## Agenda Item 9 Appendix A BTPA initial response to HMIC recommendations 'Without Fear or Favour'

| HMIC recommendation | Current BTPA position | Proposed BTPA actions |
|---|---|---|
| 1. Forces and Authorities institute robust systems to ensure risks arising from relationships, information disclosure, gratuities, hospitality, contracting and secondary employment are identified, monitored and managed. | **Relationships**: Contact with the media is declared and logged by the Executive.<br><br>**Information disclosure**: BTPA information management policies are in place including advice on protection of information and government marking standards. A BTPA Fraud and Corruption policy is in place which was informed by a risk assessment relating to information disclosure.<br><br>**Gratuities & hospitality**: Gifts and hospitality registers are maintained for BTPA and reported to the Audit Committee on a quarterly basis. This does not always include estimated value of the gratuity/hospitality.<br><br>BTP gifts and hospitality register is reviewed by the Chief Executive on a quarterly basis. Key issues arising are reported back to the Audit Committee on a quarterly basis.<br><br>**Contracting and secondary employment**: Standard templates are in place for BTPA employees which include a clause prohibiting secondary employment without prior approval by the Authority. This does not currently include an agreed list of any prohibited employment.<br><br>A register of member interests (including other employment) is maintained and updated monthly by the Authority and reported annual as part of the annual accounts.<br><br>The Authority has no regular oversight of BTP's arrangements to capture and risk assess secondary employment. | ***[All of these risk areas and current arrangements to be reviewed again once guidance and national standards have been issued by the Home Office in partnership with ACPO and APA]***<br><br>**Relationships:** Draft guidance from ACPO on media relations has been produced and an initial review completed by BTPA –develop guidance for staff and members on the basis of the finalised ACPO/APA media guidance when available. This is likely to include;<br><br>* Use of social media<br>* Declaring relationships with the media<br><br>**Information disclosure:**<br>* None immediately - review existing policies in light of issued national standards<br><br>**Gratuities & hospitality:**<br>* No BTPA policy in place beyond governance code – develop a separate document and ensure BTPA policy is consistent with BTP approach and forthcoming national standards<br><br>**Contracting and secondary employment:**<br>* Develop internal guidance on acceptable/unacceptable secondary employment to be consistent with BTP's where relevant<br><br>Seek assurance that BTP has completed similar reviews as part of its delivery plan. |

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| 2. There should be clear boundaries and thresholds in relation to these matters. Such limits should be consistent and service wide. | See above | See above – nothing further until publication of the national guidance develop new/refresh current policies to cover the key relevant issues identified in the HMIC report.<br><br>Seek assurance that BTP has developed similar appropriate limits as part of its delivery plan. |
| 3. Training courses should include appropriate input in relation to integrity and anti-corruption. In particular, given the importance of leadership to securing high standards of integrity the Strategic Command Course and the High Potential Development Scheme should encompass these issues. | Integrity and counter-fraud/corruption training for Authority Members and the Executive has not taken place. Some Members and Executive staff may already have training as part of their current and other roles.<br><br>No recent oversight of the level of training provided to senior officers beyond the application of the current content of the Strategic Command course. | Members should reflect on the need for refresher counter fraud/corruption training to capture any recent amendments to legislation such as the Bribery Act.<br><br>The Executive to assess whether all BTPA staff require a basic level of fraud/corruption awareness training and a refresh on the associated BTPA policy. Also to identify any additional training needs for senior Executive staff.<br><br>Seek assurance from BTP that appropriate training is in place – delivery of training is a proposed thematic for review by the Performance Review Group in 2012/13 and an update on this element can be included there for report back to the full Authority in due course. *[*This is one of the delivery plan strands reported to the BTPA Professional Standards Committee 16.05.12]* |
| 4. Chief Officer teams should review their corporate governance and oversight to ensure that those arrangements are fulfilling their function in helping promote the values of their force in the delivery of its objectives, and that they are, through their actions and behaviours, promoting the values of the organisation and making sure good corporate governance is seen as a core part of everyday business. | *An initial presentation on this work was shared with the BTPA Professional Standards Committee (on 16.05.12) it might be useful for this Audit Committee to also receive that information to identify when it might see the relevant products of that delivery plan. | To seek evidence and assurance from the BTP Chief Officer team that key risks and actions arising from this review have been captured and continue to be progressed 9 this will likely be via both the BTPA Professional Standards Committee and Audit Committee |

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| 5. HMIC expects the service to have detailed proposals in the above areas ready for consultation with all relevant parties by April 2012 | N/A awaiting proposals for review | Awaiting proposals (first draft of media relations guidance received via BTP and reviewed by the Authority Executive) for review and assessment in due course |
| 6. An assessment relating to these matters should be conducted by HMIC in October 2012 to inform PCCs and PCPs. | N/A awaiting proposals for assessment – BTP/A very likely to be included as the findings will be informative to BTP and BTPA. | Ensure BTP and BTPA are involved to an appropriate degree in any forthcoming assessment by HMIC. BTP has attempted to make initial contact with the inspection team and BTPA will do the same via its HMIC liaison team once the inspection criteria are announced |