



BRITISH
TRANSPORT
POLICE

Agenda Item 5

REPORT TO: BTPA Performance Review Group (PRG)
DATE: 14 January 2011
SUBJECT: Equality, Diversity and Human Rights Action Plan Update:
19 BME Recommendations
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1. PURPOSE OF PAPER

1.1 To update BTPA PRG members in relation to the strategic Equality, Diversity and Human Rights (EDHR) Action Plan. This quarter will focus on the people and culture theme, in particular the 19 BME recommendations and gives an overview on the following:

- background to the recommendations;
- update on the recommendations and related activities;
- an overview of additional complementary research and suggested additional recommendations.

2. BACKGROUND TO BME RECOMMENDATIONS

2.1 In early 2009, the Force Diversity Action Group (FDAG) asked BTP employee support groups to undertake activities which might help the organisation to better understand the perceived barriers and obstacles faced by specific employee groups. The support groups were also asked to provide solutions which might help to overcome these barriers. In response to this request, SAME (Support Association for Minority Ethnic staff) and the Diversity Unit organised a number of consultation mechanisms with BTP BME employees. The mechanisms undertaken were designed with the aim of:

- facilitating free and open dialogue with BME employees about their experiences and perceptions of working within BTP;
- gaining and understanding of the barriers and obstacles faced by BME employees in relation to their career within BTP;



- gaining an insight into BME employees perceptions and experience of the grievance procedure;
 - providing practical solutions and recommendations that would assist BTP in securing a positive working environment for BME employees.
- 2.2 The consultation mechanisms used included focus groups held as part of a one day conference in March 2009 and a supplementary questionnaire that was distributed during June 2009. All BME employees were invited to attend the one day event where delegates took part in facilitated workshops which were designed to explore the barriers and obstacles they face as a BTP employees and provide suggested solutions for over coming these.
- 2.3 The results from the workshops highlighted some key findings for BTP and it was felt that these areas would benefit from further investigation to ensure that the most appropriate solutions were identified. To assist in the gathering of this supplementary information, a questionnaire was designed by Quality of Service, Diversity and SAME and emailed to all BME employees. It primarily looked at issues relating to career progression, bullying and harassment.
- 2.4 Both the findings from the focus groups and questionnaire were used to draft a set of recommendations for BTP. During November and December 2009, DCC Crowther hosted a number of discussion sessions with BME employees. These discussion sessions were used to feedback the results from the research and explore the suitability of the proposed recommendations. Following the sessions the 19 BME Recommendations were formally agreed and these have been integrated into and monitored through the EDHR action plans.
- 2.5 In October 2010, DCC Crowther requested a formal update on the progress of these recommendations. He planned to use this update to write to all BME employees and inform them of both BTPs progress and any future plans. A full update was collated (Appendix A) and the DCC will be writing to BME employees in early 2011.



3. BME RECOMMENDATIONS: KEY UPDATES

3.1 The 19 recommendations have been structured to create seven themes of activity. These seven themes are as follows:

- Communicating a Message of Commitment;
- Career Development and Progression;
- HR Standard Operating Procedures (SOPs);
- Recognising Contributions of Police Staff and PCSOs;
- BTP Behavioural Standards;
- Support Services;
- Additional Research.

3.2 In response to the recommendations and the activities contained within the seven themes, the following key work streams have been completed:

- Continued publication of the Chief Constable's commitment to equality, diversity and human rights. This has primarily been communicated through the use of the intranet, newsletters and meetings. A new EDHR action planning, monitoring and governance process has been developed through the FDAG to ensure this commitment is delivered on both a strategic (FHQ) and tactical (Area) level.
- A number of activities have been undertaken to improve progression and development of BME employees, these include the piloting of a BME Step-Up programme, the publication of a 'How To' guide for managers around Positive Action and general developmental opportunities being more widely advertised.
- An internal HR SOP audit schedule has been agreed and implemented. Amongst the first SOPs to be audited was the Exit SOP, which has been revised and will be sent out for consultation in January 2011.
- A media campaign was implemented which aimed to raise the profile of the roles Staff and PCSOs play in the delivery of the BTP policing plan objectives. This campaign saw a range of media being utilised including the Line and Area newsletters.



- Undertaking a review of the Grievance SOP, updating accordingly and drafting relevant 'How To' guides for managers, including a guide around allegations of bullying and harassment.
- Activities undertaken to increase the awareness of the support services in BTP and how they can assist employees. This has included holding Wellbeing Days, the promotion of support groups in newsletters and through posters and a poster campaign advertising confidential reporting.
- Supporting additional research (e.g. NAMP, BME Leavers Project) and using the findings to update the existing or draft new recommendations.

3.3 As indicated earlier, a full update on all 19 recommendations is provided at Appendix A.

4. COMPLEMENTARY RESEARCH AND ADDITIONAL RECOMMENDATIONS

4.1 Whilst BTP recognises that the work around the 19 recommendations will improve the BTP working environment, it will not be necessarily be enough to eradicate all of the issues or barriers faced by its employees. With this in mind, BTP is keen to remain mindful of additional research and commission other research where appropriate, using the results to update or extend the activities and work streams being undertaken. Recently BTP has looked at three specific areas of research, mapping them across the existing BME recommendations and identifying how these activities can be adapted or what new work streams BTP may wish to consider starting. These areas of research and any recommendations are outlined below.

Female Research

4.2 BTP's WSF (Women's Support Forum) commissioned two pieces of research as part of their 2010 International Women's Day Conference; a questionnaire of all members prior to the conference by the Diversity Practice and a workshop at the conference looking at careers after children. The results of the two pieces of research, including the recommendations, were fed into the Engagement and Diversity team. Engagement and Diversity mapped these recommendations across the existing work streams developed from the 19 BME Recommendations, identifying where activities had already been



undertaken, could be revised or needed to be considered for implementation. As a result of this exercise there are items that BTP are considering adding to the existing recommendations. These include the following recommendations:

- Undertake activities to enhance the use of flexible working in BTP, including:
 - A review of the SOP taking into account the findings of the female research and best practice from across the police service;
 - Design and implement a media campaign which aims to increase awareness of the plethora of flexible working options and highlight the benefits of flexible working in the delivery of operational policing and the achievement of policing plan targets.
- Undertake a review of the Maternity and Family Friendly SOP in order to:
 - Address the findings of the female research and take into account best practice from across the police service;
 - Enhance the information available to managers in relation to the management of pregnant employees, with particular reference to their return to work.

4.3 DCC Crowther will be writing to all female employees in early 2011 to thank them for their contribution to the research and inform them of progress and future planned activities.

National Association Muslim Police (NAMP) Research

4.4 Recommendation 11 of the BME recommendations was for BTP to support the research being undertaken by NAMP around BME leavers. BTP joined this research project and received the report relating to BTP BME leavers in December 2010. Engagement and Diversity cross referenced the findings and recommendations with the existing BME recommendations. It was identified that work has been completed or is being undertaken on all the six recommendations. These activities include reviewing the structure of police staff pay, undertaking a review of the Exit SOP and reviewing the staff and officer promotion processes.

4.5 Dialogue will continue with NAMP on this area of work in order to ensure they are kept up to date on progress around the recommendations and are consulted on the suitability of current and future work streams.



Metropolitan Police Authority (MPA) Race and Faith Inquiry

- 4.6 In July 2010, the MPA published its Race and Faith Inquiry report, which included a number of recommendations for the Metropolitan Police Service (MPS) to consider implementing to improve equality in the organisation. SAME met with Engagement and Diversity to discuss the report and they highlighted the recommendations that they felt could be best adopted by BTP. Engagement and Diversity assessed these recommendations and the possible impact upon BTP. It was found that activities had been completed or were being undertaken around a number of the recommendations, including a review of the Higher Grade Duty SOP, plans to move towards the NPIA Police Promotions Framework, changes in the procedure used to manage grievances and employment tribunals.
- 4.7 Engagement and Diversity will continue to work with SAME on embracing relevant recommendations from this and other internal and external research.



APPENDIX A: AN OVERVIEW OF PROGRESS ON THE 19 BME RECOMMENDATIONS

Recommendation		Notes - Review of actions
No	Summary	
1.	A message of commitment to equality and diversity from the new Chief Constable to be re-enforced through Diversity Action Group (DAG), Force Management Team (FMT) and Annual Supervisor Seminars.	<p>This theme has featured in a broad range of strategy and planning documents; informs policy development; is verified by our work to meet the Equality Standard (for the Police Service); reviewed by monitoring progress against the Equality, Diversity and Human Rights Action (EDHR) Plan. A statement of our commitment is included upfront in all new/revised HR Standard Operating Procedures (SOPs).</p> <p>In terms of decision making bodies, it is explicit in the terms of reference of DAGs; and the discussion at SCT and FMT reflects this priority. In terms of communications, equality and diversity features in 'The Line', the intranet front page and screen shots. There is always more to be done but there is ample evidence that equality and diversity 'means something' to BTP.</p>
2.	Scheduled plans of internal audits to be undertaken covering HR Standard Operating Procedures. Audit findings to be published and recommendations for compliance to be dealt with by Areas/Departments.	A schedule for the internal audit of HR SOPs has been developed and agreed (see Appendix A for the schedule for the remainder of this financial year). The first audit (of the leavers SOP - HR1:1 Exit Questionnaire and Interview) generated a range of data. This informed radical revisions to SOP. This is now complete and being prepared for consultation. See recommendation 12 below.
3.	To communicate the feedback from the Conference and the progress of the Action Plan throughout BTP.	Outcomes from the Autumn 2009 discussion sessions were circulated to BME employees; the recommendations have been incorporated into the EDHR action plan; a number of them featured in the 2009 supervisors' seminars; and they are reviewed periodically at the HR Forum. We hope that Area DAGs will look in more detail at the recommendations and how they might be further disseminated and developed.



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No	Summary	
4.	<p>a) Re-enforcement of 'Positive Action' messages during initiatives and continuous re-enforcement of the message that diversity adds value to the business.</p> <p>b) Creation of a Positive Action 'How to ...' guide as part of HR Express.</p> <p>c) Awareness for HR Business Partners through the HR Forum and all Areas through Area Diversity Action Groups.</p>	<p>The 'Achieving Policing Plan Targets' Group has led on this at executive level. Significant initiatives are now supported by an Equality Impact Assessment (EIA); undertaking this forces policy makers to give due weight to the business case for diversity.</p> <p>The positive action '<i>How to ...</i>' guide has been published and is available via the intranet. The Engagement & Diversity Team and the Learning & Development Department are also looking to explore what additional activities can be developed to enhance our current positive action initiatives.</p> <p>There are also practical and visible examples which include elements of positive action, such as 'Step up'.</p>
5.	<p>A review of the procedure for advertising vacancies to be undertaken covering: consistency for the length of time posts are advertised; a re-vamp of the Vacancy Intranet Site; and clearer guidance as to eligibility and greater use of positive wording in adverts.</p>	<p>Intranet: HR Policy and Learning and Development (L&D) have been working with Media and Marketing on the redesign of the HR and L&D intranet pages. The aim of this work is to improve these intranet pages making them easier to navigate and have a greater emphasis on employee services. This work includes a focus on the vacancy pages; ensuring that they are easily accessible and available to all employees. HR Policy and Media and Marketing are currently re-establishing the timeframes around this project following the re-allocation of the work stream in Media and Marketing.</p> <p>Standard Operating Procedures (SOPs): Work has been undertaken in relation to HR SOPs and the advertising and management of vacancies. This includes direction, for examples, around the use of positive wording in advertisements, clearer eligibility criteria and the drafting of job descriptions / person specifications.</p>
6.	<p>BTP implements a communication strategy covering development and progression opportunities that contains</p>	<p>Intranet: HR Policy and L&D have been working with Media and Marketing on the redesign of the HR and L&D intranet pages. For more information on this see point</p>



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	<p>the following elements:</p> <p>a) A dedicated section of the BTP Intranet for development and progression that is easy to access.</p> <p>b) Advertising all opportunities and initiatives through the BTP employee Support Groups for circulation to members.</p>	<p>five..</p> <p>Advertising: A number of media are used throughout BTP to advertise activities and ensure that awareness of opportunities and initiatives is spread as widely as possible throughout BTP. Examples of the media that is regularly used includes:</p> <ul style="list-style-type: none"> ▪ Support Groups: they have been used to advertise/promote/ support initiatives such as 'Step up', 'Springboard' and the 'High Potential Development Scheme'. ▪ HR News and Notices: have been used to promote learning and development opportunities ▪ Area Newsletters: have been used to supplement the above activities and widen the promotion of development and progression opportunities.
7.	A media campaign should be launched designed to promote the roles of Police Staff and PCSOs in BTP. To include articles and information in The Line and Area Newsletters.	This communication campaign has led to focused coverage in 'The Line' (e.g. Feb 2010 – PCSO role; March 2010 – Police Staff roles; May/June – Police Staff role). This should help increase the visibility of the valuable roles Police Staff play in effective policing.
8.	The Police Staff Recruitment and Selection SOP to be expanded to cover the promotion procedure.	<p>Work on the expansion of the Police Staff Recruitment and Selection SOP has been on hold until the results of the Engaging Police Staff (EPS) project were fully established and implemented. EPS has resulted in much more clarity being provided for Police Staff through the new terms and conditions and the supporting SOPs/operating rules.</p> <p>Now the results of EPS have been implemented work can commence on the expansion of the recruitment and selection SOP. The expansion will be undertaken with consideration being given to the various police staff contracts and it will be ensured that the revised SOP complements all police staff terms and conditions. It is</p>



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		anticipated that work will be completed on this by autumn 2011.
9.	Research to be undertaken to consider (a) BTP leadership skills and (b) evaluation of the Talent Management Scheme.	<p>Developing effective leaders is critical to BTP's future success and the BTP 2010/2011 Learning and Development Strategy reflects this with the focus it has around leadership and talent development. A copy of the Strategy can be found at Appendix C</p> <p>Much work has been undertaken by the L&D Team during 2010/2011 in these areas, this work includes:</p> <p>a) – Leadership Skills</p> <ul style="list-style-type: none"> • The development of the BTP Leadership Team which consists of 3 x Leadership Trainers, 1 x Talent Development Officer (TDO) and 1 x Leadership and Force Examinations Officer. <ul style="list-style-type: none"> • Leadership Trainers are responsible for the design and delivery of all BTP Leadership training; • The TDO post looks after coaching and mentoring, including the Step Up programme; • The Leadership and Force Examinations Officer looks after all the admin for the team and also manages the OSPRE Police Promotion process and Scottish Police Promotion process. • Fit for Future training: the design and delivery of a mandatory leadership training programme for all Sergeants, Inspectors and Police Staff equivalent that have managerial responsibilities. The training programme is sponsored by DCC Crowther. The aim of the programme is to develop appropriate and effective leadership in the work place and to motivate participants to want to



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		<p>become effective role model leaders within BTP. A copy of the programme outline can be found at Appendix D</p> <p>b) – Talent Management</p> <ul style="list-style-type: none"> • Evaluation of the Talent Management programme: The pilot Talent Management Programme came to a natural end and an evaluation was undertaken of this. BTP decided that talent management would be brought in house and would fall under the Leadership Team within the new L&D structure. • Talent Management within BTP is managed through the use of the High Potential Development Scheme, the introduction of an in house 360 feedback on line tool (which will be live in Jan 2011), use of Myers Briggs Type Indicator, identification of talent through OSPRE results, NIE results etc. There is still some work to be done around this area and this will be outlined in the Leadership Strategy for 2011/2012 which is being presented to Force Learning & Development Board in Jan 2011 for sign off. • The pilot BME Step up Programme took place in 2009/2010 and as a result work was undertaken to bring the programme in house and develop a team of BTP Step-Up coaches so it could be rolled out across BTP. A further programme was delivered in Scotland in Oct/Dec 2010. There are currently two Step-Up programmes planned for delivery in 2010/11 (Nov / Dec 10 (Scotland) and Feb / Mar 2011 (London)). In addition a further Step Up Coaching programme has also been run (Oct – Dec 2010 Scotland and London) • Springboard continues to be delivered as part of the BTP talent management programme and 2 programmes have been completed in 2010 (London and Scotland).



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10.	A review to be undertaken of the BTP promotion process.	<p>Promotion Exams: BTP Learning and Development Department (L&D) are currently in discussion with the National Police Improvement Agency (NPIA) in relation to the implementation of the National Police Promotion Framework (NPPF) in BTP. The NPPF involves a four step promotion qualification process that replaces the existing process of the two OSPRE exams. Step 1 of NPPF looks at suitability for promotion and includes management recommendation and a mock legal exam (OSPRE Part 1), Step 2 is the Part 1 legal exam, Step 3 involves the identification and selection of suitable temporary promotion and Step 4 is a 12 month work based assessment. An overview of the process can be found at Appendix B.</p> <p>Promotion SOP: A review has been scheduled for this SOP in the autumn of 2011.</p>
11.	BTP to support the research project being undertaken by the National Association of Muslim Police (NAMPA) involving BTP, Metropolitan Police and Cambridgeshire and embrace the recommendations arising.	<p>BTP supported this research which is now completed.</p> <p>A copy of the report, including recommendations, was received in Dec 2010. Engagement and Diversity are currently mapping the recommendations across existing and planned activities, identifying where work streams address the recommendations, where work streams can be modified to better address the recommendations and where new activities/plans are needed. Results of this mapping activity will be completed by January 2011.</p>
12.	BTP to review the Exit Interview procedure in line with the Home Office procedure and best practice principles.	<p>As referred to in recommendation 2, work on a new Exit SOP is well advanced. The new procedure incorporates good practice, fits with Home Office guidance (though in a simplified form), provides for post employment follow up, and the completion of core documents (like the questionnaire) on line.</p> <p>The draft SOP will be circulated for consultation in January 2011 and the consultation group will include the staff associations and support groups. Once agreed the new SOP will be implemented using a paper based completion of documents, such as the</p>



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		<p>questionnaire. It is anticipated that this will be launched in Spring 2011.</p> <p>As mentioned above the plan is to move a number of the exit procedures to an online process; however this requires a number of changes/upgrades to be made to ORIGIN. HR Policy are working with the ORIGIN Support Team to schedule in the changes needed.</p>
13.	To re-communicate the Behavioural Standards throughout BTP and publish examples of inappropriate behaviour in General Orders and 'Lessons Learned' document.	<p>Misconduct and Public Complaints: General Orders (GOs) are used by BTP re-enforce messages around the BTP behavioural standards. Information around misconduct cases is published in GOs, including details of the allegations made, the result of any disciplinary panel and sanctions given. The publication of such information allows BTP to demonstrate to its employees that inappropriate behaviour will not be tolerated and is tackled firmly and fairly. In addition to this the Professional Standards Department (PSD) also publishes Lessons Learned information on their intranet pages. This section of the intranet highlights lessons learned from previous enquiries and investigations enabling officers and police staff to reflect on problems that have occurred during previous investigations and prevent them reoccurring.</p> <p>Employment Tribunals and Grievances: Engagement and Diversity, Legal Services and specific HR Departments are currently looking at ways to enhance the lessons learned process in relation to employment tribunals and grievances. It is anticipated that a refined process will be in place by February 2011.</p>
14.	To design and implement an awareness programme for 2010/11 planning year in relation to the informal resolution and mediation process within the Grievance Resolution Procedure.	<p>The Grievance SOP has been reviewed and revised accordingly. The aim of the new SOP is for it to be as straightforward as possible and include a specific emphasis on informal resolution and mediation. (See also Recommendation 15 below.) The revised SOP will be sent out for consultation in January 2011, with staff associations and support groups forming part of the consultation group. It is anticipated that the new SOP will be published no later than the spring of 2011.</p>



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		<p>In addition to revised SOP a 'How to ...' guide has been published entitled <i>Stop an Issue from Becoming a Grievance - Informal Resolution</i>.</p> <p>This theme is included in CLDP Diversity and Professional Practice Modules which is available to all managers and <u>mandatory</u> for all newly promoted Sergeants. The workshop includes an input around the management of grievances and allows managers to practice managing situations with the use of forum theatre.</p>
15.	To research the current levels of grievances categorised as 'bullying and harassment' and consider the possibility of having a 'bullying and harassment' procedure separate from the Grievance Resolution Procedure.	<p>We are addressing this in two ways. Firstly, a 'How to ...' guide for managers has been prepared entitled <i>Dealing with allegations of bullying and harassment</i>. Second, there is a specific part of the re-written grievance procedure which deals with bullying, harassment and discrimination.</p> <p>Although the emphasis must be on creating a positive working environment, having a clear and accessible procedures (and firm supporting guidance) will ensure that cases which do arise can be dealt with quickly and fairly.</p>
16.	To review the existing Tenure Policy, in consideration with National policies/best practice, to determine if it is 'fit for purpose' within BTP.	<p>BTP currently has in place an interim Tenure SOP which was updated in Nov 2010 to include tenure around specific training courses and in relation to posts in PSD.</p> <p>A full review of the SOP is planned to take place at the end of 2011.</p>
17.	To devise a suitable training programme for employees based on the national behavioural standards.	<p>Although a specific training programme has not been designed, work is currently being undertaken by L&D to update the BTP Diversity Training Programmes. This work includes integrating information on the behavioural standards into both the Level 1 (Diversity Awareness) and Level 2 (Diversity and Professional Practice) packages to allow them to be reinforced through this training. It is anticipated that the revised Level 1 package will be available in January 2011 and the Level 2 in February 2011.</p>



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18.	Wider publicity of support services available i.e. Support Groups, Crimestoppers, CareFirst etc.	<p>Even a casual look will reveal that considerable effort has been made here. Examples include posters (role of support groups) and event calendars, screen shots, a series of cultural awareness events and well being days. Support groups have dedicated intranet pages and have used Area/FHQ newsletters to demonstrate and promote their work. PSD have issued targeted posters. Recent 'How to ...' guides targeted at managers have emphasised the positive role support groups can play in, for example, tackling bullying and harassment, resolving grievances etc.</p> <p>Each one of these efforts to raise awareness may seem small in itself but, taken together, they reinforce the fact that we 'mean business' when it comes to equality and diversity and are serious about achieving our diversity objectives.</p>
19.	A detailed and structured approach to be developed to ensure that the contribution of staff across the board is acknowledged and celebrated when working towards the goals of BTP.	<p>The implementation of the EPS project and the introduction of the new Police Staff (ABC) contracts has assisted in creating a more transparent and structured approach to rewarding Police Staff (including PCSOs). The project has resulted in:</p> <ul style="list-style-type: none"> • A new pay and grading scale being implemented, which has 7 spine points on each grades pay scale. • All roles and job descriptions being subject to job evaluation and were assigned to the relevant new grades. • All employees who have signed up to the new contract (more than 80%) being appointed to the relevant spine point on their new grade. • Police Staff with an initial salary above the salary scale, having salary protection for 24 months, after which they are moved to the spine point 7 of the grade for their role. • Movement along the spine points of a grade being linked to PDR ratings. A competent or above PDR rating results in a person moving up one spine



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		<p>point, this equates to a 3% pay increase and is in addition to any revalorisation of the scales themselves.</p> <ul style="list-style-type: none">• Staff who receive an exceptional PDR rating being put forward as part of a bid to the authority for a bonus payment to reflect their performance. <p>In addition to the above BTP have in place a Bonus Payment Scheme and various awards schemes. The Bonus Payment Scheme is in place for the reward of work of an outstandingly unpleasant, demanding or important nature. Bonuses of up to £500 can be applied for via the application process that can be found in HR 1:7 Expenses and Allowances SOP. Applications, including reasons for the award, are submitted by the employee's line manager to the HR Business Centre. The application is assessed by an award panel, which includes the HR Business Partner, where a decision is made relating to any award received.</p>