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**Report to:** Performance Review Group  
**Agenda item:** 4  
**Date:** 17 October 2012  
**Subject:** HMIC Inspection Report  
**Sponsor:** Deputy Chief Constable  
**For:** Information

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## 1. PURPOSE OF PAPER

1.1 To provide the British Transport Police Authority (BTPA) Performance Review Group (PRG) with an update in relation to Her Majesty's Inspectorate of Constabulary's (HMIC) Anti-Social Behaviour (ASB) inspection and Police Integrity 'Without Fear or Favour' revisit.

## 2. INSPECTION STATUS REPORT

### 2.1 Anti-Social Behaviour (ASB)

2.1.1 The inspection took place in April 2012 and featured a number of elements to the inspection including pre-inspection documentation; interviews with key staff; sampling / listening to call at the Force Control Room Birmingham; victim survey together with announced / unannounced reality testing.

2.1.2 BTP received the draft detailed feedback report from HMIC for a factual accuracy check on 16 June 2012. The final report was received in August 2012 and is attached as Appendix A. However, from the draft report, BTP developed the improvement plan, which is attached as Appendix B. This will be monitored through the Integrity and Compliance Board.

2.1.3 As previously reported, HMIC highlighted the following positive activities that BTP undertakes in relation to ASB:

- Call takers were found to be polite, empathetic and victim focused.
- There were a number of good examples in relation to effective partnerships that address local ASB issues.

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- Neighbourhood Policing Teams (NPT) staff are knowledgeable about their Area, passionate about what they do and committed to providing a high quality service to their communities.
  - Abstraction target rate for NPT officers of no less than 80% is being achieved.
  - National intelligence model is being used consistently to manage ASB performance with good evidence of analysis of relevant ASB data and that it consistently features in tasking and briefing.
  - Good examples of problem solving plans being used; displaying a clear approach with other agencies and passenger focus groups.

2.1.4 The main issue relates to the identification of repeat and vulnerable callers and HMIC highlighted the following:

- There is no consistent questioning at the first point of contact to identify repeat and vulnerable callers and the routine and systematic identification of these individuals.
- There is no risk assessment framework for ASB within BTP which means the level of risk is currently unknown.
- Where ASB cases are closed on NSPIS there is confusion between the categories of personal, environmental and nuisance.

2.1.5 It should be noted, as detailed in the improvement plan at Appendix B, that BTP had already identified the issues in relation to repeat and vulnerable callers. Training has been provided for staff within the First Contact Centre and Force Control Rooms London and Birmingham; and a proforma has been added to the NSPIS Command and Control system, whereby call handlers ask questions to ascertain whether a person is a repeat or vulnerable victim. Refresher / follow-up training for supervisors is planned for 17 and 18 October 2012.

2.1.6 It is expected that HMIC will re-visit BTP in relation to ASB, although this is yet to be confirmed.



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2.2 HMIC Re-visit – Without Fear of Favour

2.2.1 HMIC undertook a re-inspection of BTP in relation to the Police Integrity Review on 5 July 2012. The original inspection took place in August 2011 with the findings published in the HMIC national report 'Without Fear or Favour' in December 2011.

2.2.2 The re-inspection mirrored the full inspection, but focused on assessing the progress being made against the main recommendations and 23 sub recommendations from the national report. A copy of this improvement plan can be found at Appendix C. The improvement plan has been updated since the revisit and is monitored on a quarterly basis by the Integrity and Compliance Board. The PSD internal workstream plan supporting the improvement plan is the thematic for October for the Board.

2.2.3 The format of the re-inspection was a documentation request for both BTP and BTPA, an integrity questionnaire, interviews with key staff and two reality check focus groups.

2.2.4 BTP received brief written feedback, which is attached at Appendix D. This highlighted the progress made since 2011, including the establishment of the Integrity and Compliance Board to progress integrity issues; the review of policies and revised position guidance in relation to gifts and hospitality, media and secondary employment; and the organisation-wide threat assessment and the development of a Strategic Risk Assessment and Control Strategy by PSD.

2.2.5 HMIC is preparing a national report of the findings from all forces which is due for publication in October 2012. The findings from this national report will be amalgamated into the current improvement plan once it is published for monitoring.

**3. RECOMMENDATION**

3.1 That members note the update provided in this paper.

## ANTI SOCIAL BEHAVIOUR IMPROVEMENT PLAN

**HMIC Anti Social Behaviour**
**SCT Portfolio Owner: ACC Territorial Policing & Crime**
**Improvement Plan Owner: Ch Supt Territorial Policing**

Ref	Area for Improvement	Due Date	Action Owner	Progress Update	Date of Update
<b>AREAS FOR IMPROVEMENT FROM DETAILED REPORT</b>					
	<b>BTP does not consistently ask questions of callers at the first point of contact to identify repeat and vulnerable callers – those most at risk of harm from ASB. This means some of these victims may not be getting the extra support they need.</b>	30-Jun-12	Contacts Manager	In June 2012, BTP added a proforma to NSPIS C&C, whereby call handlers ask questions to ascertain whether the person is a repeat or vulnerable victim. Additionally the Force Crime Registrar has undertaken training in ASB for staff within the FCC, FCRB and FCRL between April and July 2012. Refresher / additional training is planned for supervisors on 17 and 18 October 2012. For the period August 2011 to January 2012, 81 vulnerable / repeat victims were identified compared with 686 for the period February to July 2012. This is an indication of the progress being made as a result of the training. Separately BTP undertook National Decision Making training from January to March 2012 which support staff to take the appropriate action once a repeat or vulnerable victim has been identified.	13-Sep-12
	<b>Risk assessments are not being completed for ASB incidents. BTP are in the process of utilising a scored risk matrix to assist with prioritising tasking at TCGs, which could be used for risk assessing ASB.</b>	31-Dec-12	T/Chief Inspector Territorial Policing	BTP has undertaken a scoping exercise with six Home Office forces who use similar models/best practice, including Cumbria and West Midlands and obtained copies of their risk assessments. The T/Chief Inspector, Territorial Policing is updating BTP's strategy to incorporate risk assessments. The new strategy will focus on ASB policy, toolkits, risk assessments and training package with a 'Manual of Standards' being produced for dissemination throughout BTP and will form the focus of the daily Territorial Policing teleconference.	12-Sep-12
	<b>Repeat victims and vulnerable victims are not routinely and systematically being identified at the point of contact. Questions are not being asked of the caller. This has been recognised by BTP who have just completed training in control rooms. The NSPIS command and control system does not automatically identify callers previously assessed as repeat or vulnerable (although this could be done to a limited extent manually). Although the call taker is asked to consider vulnerability, there is generally no questioning of the caller to determine this.</b>	31-Oct-12	Contacts Manager	In June 2012, BTP added a proforma to NSPIS C&C, whereby call handlers ask questions to ascertain whether the person is a repeat or vulnerable victim. Additionally the Force Crime Registrar has undertaken training in ASB for staff within the FCC, FCRB and FCRL between April and July 2012. Refresher / additional training is planned for supervisors on 17 and 18 October 2012. For the period August 2011 to January 2012, 81 vulnerable / repeat victims were identified compared with 686 for the period February to July 2012. This is an indication of the progress being made as a result of the training. Separately BTP undertook National Decision Making training from January to March 2012 which support staff to take the appropriate action once a repeat or vulnerable victim has been identified.	22-Aug-12
	<b>Repeat and vulnerable victims are not considered within the existing performance framework. They are not routinely "tagged" on NSPIS and so are not easily identified.</b>	31-Mar-13	Contacts Manager	Territorial Policing and Crime have introduced a KPI for 2012/13 to achieve a 30% rise in the identification of vulnerable and repeat victims in comparison with 2011/12. The routine tagging will be incorporated in the next upgrade of NSPIS C&C. BTP is reviewing its performance framework to identify meaningful KPIs with the overall objective of reducing repeat and vulnerable victims.	12-Sep-12
	<b>Of the 100 ASB incidents reviewed, 42 involved crime. Of those only 31 were recorded as crimes.</b>	31-Dec-12	Force Crime Registrar	BTP has a robust recording of crime system in place. BTP records non-recordable as well as notifiable offences, for example byelaws, littering, etc as well recordable offences. The failure identified by HMIC for data prior to April 2012, did not only consist of all notifiable offences; only 8 were notifiable for which crimes were raised. Through the audits undertaken by the Force Crime Registrar and his team, if an offence is identified that has not been recorded, it is automatically recorded and the Area Crime Management Unit Managers are advised. The remainder of offences that are non-notifiable were identified by HMIC because BTP links ASB with non-notifiable offence codes. BTP records non-notifiable offences when they are detected, but not those that are undetected. Since April 2012 when the training was provided, the number of non-notifiable offences recorded has increased by 6%; however BTP is still under-recording, but further training is taking place in October 2012 for supervisors in relation to this. Additional guidance has been produced by the Force Crime Registrar in relation to the Recording and Detection of non-notifiable offence sin England & Wales, which has been distributed to allows officers to use their discretion in relation to this.	12-Sep-12
	<b>There is no risk assessment framework for ASB within BTP and this means that at present the level of risk is currently unknown. Having a risk assessment would improve the level of service given to those ASB incidents that have been highlighted as posing more risk.</b>	31-Dec-12	T/Chief Inspector Territorial Policing	BTP has been in contact with Cumbria and West Midlands and obtained copies of their risk assessments. The T/Chief Inspector, Territorial Policing is updating BTP's strategy to incorporate risk assessments. The First Contact Centre will be responsible for identifying whether a repeat / vulnerable victim is low, medium, high risk; this information will be passed to the attending officers.	22-Aug-12

Ref	Area for Improvement	Due Date	Action Owner	Progress Update	Date of Update
	<b>Where ASB cases are closed on NSPIS, there is confusion between the categories of personal, environmental and nuisance. Out of 100 incidents reviewed by HMIC, 28 were incorrectly classified.</b>	31-Dec-12	T/Chief Inspector Territorial Policing / Force Crime Registrar	BTP has a robust recording of crime system in place, as it records both non-recordable offences, for example byelaws, littering, etc as well recordable offences. At the time of the inspection BTP had only just introduced the ASB categories of personal, environmental and nuisance. The Force Crime Registrar has undertaken training in ASB for staff within the FCC, FCRB and FCRL between April and July 2012. Refresher / additional training is planned for supervisors on 17 and 18 October 2012. BTP employed a Crime Auditor in April 2012 to support the work of the First Contact Centre (FCC) in Birmingham in relation to classification of ASB cases.	11-Sep-12
	<b>ASB incidents that relate to local priorities are not identified at the point of report within the control room.</b>	31-Dec-12	Contacts Manager	The Force Crime Registrar has undertaken training with FCC and Force Control Rooms Birmingham and London. BTP has included definitions of Environmental, Personal and Nuisance in the ASB Strategy. Refresher / additional training is planned for supervisors in October 2012. The First Contact Centre (FCC) and the Force Control Rooms (FCR) cover significant geographical areas in England, Wales and Scotland. It should be noted that ASB is a core priority for all of BTP, therefore a suitable graded response is allocated as appropriate. At this time, whilst it would not be practical for FCC / FCR staff to have a list of geographical priorities, this would be flagged on Area.	12-Sep-12
<b>Does the force understand its ASB issues and have leadership, governance, policy, and compliance checking to support this work?</b>					
	<b>Overall leadership and drive about ASB is displayed at differing levels. BTP staff do take ASB seriously and clearly understand the impact on 'station communities', rail staff and the travelling public. Contact centre and control room staff need to be made more aware of the importance of their role in identifying risk, vulnerability and harm when dealing with ASB. The release of the ASB strategy and recent training should see improvements in this area and BTP have employed a full time Quality Assurance Officer to check progress within control rooms and contact management.</b>	31-Oct-12	Chief Superintendent Territorial Policing	In June 2012, BTP added a proforma to NSPIS C&C, whereby call handlers ask questions to ascertain whether the person is a repeat or vulnerable victim. Additionally the Force Crime Registrar has undertaken training in ASB for staff within the FCC, FCRB and FCRL between April and July 2012. Refresher / additional training is planned for supervisors on 17 and 18 October 2012. Separately BTP undertook National Decision Making training from January to March 2012 which support staff to take the appropriate action once a repeat or vulnerable victim has been identified.	22-Aug-12
1.1.1	BTP have a Chief Officer lead who drives ASB performance. <b>Although this is recognised at superintending ranks and above lower ranks have less awareness of the ACPO lead.</b> The BTP intranet website has had recent coverage of the newly released ASB strategy and this has assisted in raising staff awareness.	31-Oct-12	T/Chief Inspector Territorial Policing	Although BTP does include who the Chief Officer lead is within its training package (Assistant Chief Constable Territorial Policing & Crime), it will be updating the ASB strategy and undertaking a Communications strategy across BTP. Learning and Development has agreed to incorporate the following into new recruit, PC refresher and leadership courses from Autumn 2012: ASB training will now include the following: use of National Decision Making, vulnerable and repeat victims, use of assessments, ACPO details and enforcement options. The ACC Territorial Policing and Crime is working on a communications plan to raise the whole ASB agenda even more throughout BTP.	11-Sep-12
1.1.4	The force has recently delivered an ASB strategy which sets out and defines what ASB is including personal, environmental and nuisance. This covers a range of recordable and non recordable crime. <b>The strategy highlights the need to focus on repeat and vulnerable victims but does not give definitions. Staff were unclear as to what the definitions were, although they knew of the strategy and were able to refer to it.</b>	31-Oct-12	T/Chief Inspector Territorial Policing	The T/Chief Inspector, Territorial Policing is working with Leicestershire Constabulary in relation to definitions of vulnerable and repeat victims. This will be included in the revised ASB strategy that is being produced by the end of October 2012.	22-Aug-12
1.1.5	<b>There is no graded response for ASB. Call handling staff and supervisors decide on response using their judgement.</b> All staff have received training in the National Decision Making Model and it is expected that they will make informed decisions, taking into account all information presented, on how best to respond to the call. Where no police attendance occurs the call taker explains the reasons to the caller. <b>Staff are not fully aware of the importance of ASB within control rooms or contact management, however the ASB strategy is assisting in increasing knowledge and awareness.</b>	31-Oct-12	Contacts Manager / T/Chief Inspector Territorial Policing	In June 2012, BTP added a proforma to NSPIS C&C, whereby call handlers ask questions to ascertain whether the person is a repeat or vulnerable victim. Additionally the Force Crime Registrar has undertaken training in ASB for staff within the FCC, FCRB and FCRL between April and July 2012. Refresher / additional training is planned for supervisors on 17 and 18 October 2012. Separately BTP undertook National Decision Making training from January to March 2012 which support staff to take the appropriate action once a repeat or vulnerable victim has been identified. The types of calls relating to ASB could include person swearing, drunkenness, loitering, graffiti and youths skateboarding.	22-Aug-12
1.1.6	Although <b>there is no designated "marketing strategy"</b> for ASB, BTP uses the media and other forms of marketing to both gather information and to feedback to the public. This includes local PACT meetings, newsletters, posters, TV, newspaper, social networks and You Tube.	31-Oct-12	T/Chief Inspector Territorial Policing	BTP is currently updating the ASB strategy and once this is completed in October 2012 there will be a communications strategy to support this. The ACC Territorial Policing and Crime is working on a communications plan to raise the whole ASB agenda even more throughout BTP.	22-Aug-12

Ref	Area for Improvement	Due Date	Action Owner	Progress Update	Date of Update
1.1.7	Abstraction is closely monitored with regular dip sampling to ensure the target of 80% is being met. ASB training does occur for new officers as part of basic training but also as part of NPT training. <b>The training focuses upon the NPT officer role and how to problem solve, although not all officers had received this.</b> There are many avenues for problem solving advice including Crime Reduction Advisors, TOC advisors and IAGs, who can assist in problem solving advice. <b>There is a tool box on the intranet however this was not widely used or known about.</b>	31-Oct-12	T/Chief Inspector Territorial Policing	A Sergeant within Territorial Policing has been tasked with producing more effective toolkits for BTP, including a community engagement toolkit. This will then be incorporated within the revised BTP ASB Strategy, which will be disseminated via the communications strategy.	22-Aug-12
<b>Does the force have ASB embedded in its performance management regime?</b>					
<b>Overall BTP have a robust performance management regime in measuring ASB, this is based on the number of incidents recorded and the number of formal case management plans carried out. They are moving to more local based targets and these will include a mixture of 'quantitative' and 'qualitative' targets. BTP are not measuring against risk or repeat and vulnerable ASB.</b>					
1.2.1	There is an ASB delivery plan to monitor the six themes of the ASB strategy and each area reports progress against the themes. <b>However under the ASB Strategy theme "focus on vulnerable and repeat victims" it is documented that when a report is received a graded response will follow taking into account the risk. HMIC could not find any mention in the delivery plan regarding graded response or risk assessing. The strategy does not give definitions of repeat and vulnerable victims.</b>	31-Oct-12	T/Chief Inspector Territorial Policing	BTP has been in contact with Cumbria and West Midlands and obtained copies of their risk assessments. The T/Chief Inspector, Territorial Policing is updating BTP's strategy to incorporate risk assessments. The new strategy will focus on ASB policy, toolkits, risk assessments and training packages with a 'Manual of Standards' being produced for dissemination throughout BTP. This will be delivered through training, the Communications strategy and also through monitoring on Area / BTP teleconferences.	22-Aug-12
1.2.3	At the highest level the force manages performance through the monthly force management team meeting, chaired by the DCC. ASB, along with other areas, gets discussed and challenged during part one of this meeting. <b>This does not include measuring performance on repeat victimisation and vulnerability.</b>	31-Mar-13	Ch Supt Territorial Policing / Head of Performance and Analysis	Territorial Policing and Crime have introduced a KPI for 2012/13 to achieve a 30% rise in the identification of vulnerable and repeat victims in comparison with 2011/12. Additionally Territorial Policing is working with Performance and Analysis to identify 'hot spots' in relation to ASB. BTP is reviewing its performance framework to identify meaningful KPIs with the overall objective of reducing repeat and vulnerable victims.	12-Sep-12
1.2.4	Areas have fortnightly meetings to discuss and challenge areas of performance that includes ASB. Each area sets its own targets for ASB and is then held to account by the force management team. <b>When performance starts to dip the ACC in charge of Territorial Policing ensures Area Commanders have effective plans to deliver improvement. However, in the absence of readily available performance information this does not include performance in relation to repeat and vulnerable victims.</b>	31-Mar-13	Chief Superintendent Territorial Policing	Territorial Policing and Crime have introduced a KPI for 2012/13 to achieve a 30% rise in the identification of vulnerable and repeat victims in comparison with 2011/12. It is monitored through Service Excellence Board and at Area Management Team meetings.	12-Sep-12
1.2.5	NPTs and Train Operating Company (TOC) staff have received awards recognising their work on ASB. However there was <b>general feeling that ASB achievements are not recognised as much as other areas of policing and no examples of recognition could be given.</b>	31-Oct-12	T/Chief Inspector Territorial Policing	The T/Chief Inspector, Territorial Policing is formulating a proposal for the Chief Superintendent and ACC Territorial Policing, to hold a national awards ceremony for the best ASB initiatives. Categories would include most effective Problem Solving Plans, best joint working, most cost effective reduction in ASB and recognition of SPCs for tackling ASB.	22-Aug-12
<b>Does the force manage ASB problems through NIM processes?</b>					
1.3.2	The force intelligence bureaux complete analytical products relating to ASB locally and force wide. They utilise BTP data and third party data from other agencies and organisations. <b>BTP analysts use data on repeat locations and repeat victims to identify hotspots, but this does not include an assessment of the risk posed to victims. An assessment is completed when tasking out resources at the TCGs by the chair, but ASB is not always prioritised by risk level.</b> HMIC note that there is a recently compiled risk assessment for tasking and once this is rolled out this should assist.	31-Mar-13	Head of Performance and Analysis	Territorial Policing is working with Performance and Analysis to identify 'hot spots' in relation to ASB. The analysis will focus on: vulnerable and repeat victims, ASB in relation to nuisance, environment and personal which will in turn identify the 'hot spot' locations. Once identified, these will be passed to NPTs through tasking, with the location being re-evaluated to see if there has been a reduction.	12-Sep-12
<b>At the point of contact, does the force effectively identify and record incidents of ASB, repeat and vulnerable complainants?</b>					
<b>Overall BTP are not consistently and systematically identifying repeat and vulnerable ASB victims at the point of report. However the force does have other processes within crime recording and intelligence which will identify repeat victims at a later stage. It is noted that training has been completed and improvements should be seen. Tags on the computer system, to identify repeat or vulnerable victims, are not used.</b>					
In June 2012, BTP added a proforma to NSPIS C&C, whereby call handlers ask questions to ascertain whether the person is a repeat or vulnerable victim. Additionally the Force Crime Registrar has undertaken training in ASB for staff within the FCC, FCRB and FCRL between April and July 2012. Refresher / additional training is planned for supervisors on 17 and 18 October 2012. Separately BTP undertook National Decision Making training from January to March 2012 which support staff to take the appropriate action once a repeat or vulnerable victim has been identified. The routine tagging will be incorporated in the next upgrade of NSPIS C&C.					

Ref	Area for Improvement	Due Date	Action Owner	Progress Update	Date of Update
2.1.1	<b>Repeat victims are not routinely and systematically being identified at the time of report. Of 100 calls listened to by HMIC, only 10 showed evidence of repeat victimisation being discussed with the caller. All of those 10 involved the caller offering this information rather than being questioned about it.</b> Training has been introduced and improvements have been seen. This is being monitored by BTP. <b>IT systems do not currently assist in the identification of repeat victims although this is being planned for latest version of the NSPIS system. Tags are not being used and at present manual searching has to be completed on names.</b>	31-Oct-12	Contacts Manager / Force Crime Registrar	In June 2012, BTP added a proforma to NSPIS C&C, whereby call handlers ask questions to ascertain whether the person is a repeat or vulnerable victim. Additionally the Force Crime Registrar has undertaken training in ASB for staff within the FCC, FCRB and FCRL between April and July 2012. Refresher / additional training is planned for supervisors on 17 and 18 October 2012. Separately BTP undertook National Decision Making training from January to March 2012 which support staff to take the appropriate action once a repeat or vulnerable victim has been identified. The routine tagging will be incorporated in the next upgrade of NSPIS C&C.	12-Sep-12
2.1.2	<b>Vulnerable victims are not routinely and systematically being identified at the time of reporting. Of 100 calls listened to by HMIC, only 10 showed evidence of vulnerable victims being discussed with the caller. Call handlers are not consistently asking questions to assess vulnerability. The computer system does not display if the victim has previously been classed as vulnerable.</b> Training has been put in place and improvements have been seen. This is being monitored by BTP.	31-Oct-12	Contacts Manager / Force Crime Registrar	In June 2012, BTP added a proforma to NSPIS C&C, whereby call handlers ask questions to ascertain whether the person is a repeat or vulnerable victim. Additionally the Force Crime Registrar has undertaken training in ASB for staff within the FCC, FCRB and FCRL between April and July 2012. Refresher / additional training is planned for supervisors on 17 and 18 October 2012. Separately BTP undertook National Decision Making training from January to March 2012 which support staff to take the appropriate action once a repeat or vulnerable victim has been identified. The routine tagging will be incorporated in the next upgrade of NSPIS C&C.	12-Sep-12
2.1.3	<b>There is no system to identify if an incident relates to local NPT priorities such as on-going operations or Problem Solving Plans (PSPs).</b> Call handlers are not briefed about local priorities.	31-Oct-12	Contacts Manager / T/Chief Inspector Territorial Policing	The Force Crime Registrar has undertaken training with FCC and Force Control Rooms Birmingham and London. BTP has included definitions of Environmental, Personal and Nuisance in the ASB Strategy. Refresher / additional training is planned for supervisors in October 2012. The First Contact Centre (FCC) and the Force Control Rooms (FCR) cover significant geographical areas in England, Wales and Scotland. It should be noted that ASB is a core priority for all of BTP, therefore a suitable graded response is allocated as appropriate. At this time, whilst it would not be practical for FCC / FCR staff to have a list of geographical priorities, this would be flagged on Area.	22-Aug-12
2.1.4	<b>Although supervisors are expected to dip sample calls this is not happening on a regular basis.</b> BTP have just recruited a quality assurance officer whose role will be checking call handling. Victim surveys are completed centrally and a call-back system has been introduced. <b>Of the 100 incident records reviewed HMIC found evidence of supervisory guidance recorded on only three and evidence of a quality check recorded on only one.</b>	31-Oct-12	Contacts Manager	BTP undertook National Decision Making training from January to March 2012, which has seen an increase in the number of identified repeat and vulnerable victims. In June 2012, BTP added a proforma to NSPIS C&C, whereby call handlers ask questions to ascertain whether the person is a repeat or vulnerable victim. Additionally the Force Crime Registrar has undertaken training in ASB for staff within the FCC, FCRB and FCRL between April and July 2012 to make staff more aware of the importance of their role in relation to ASB. Refresher / additional training specifically aimed at supervisors and their role is planned for October 2012.	22-Aug-12
2.1.5	<b>The three codes, personal, environmental and nuisance, have only just been introduced and their use in opening (and closing) incidents is not well understood by operators and call handlers.</b>	31-Oct-12	Contacts Manager / Force Crime Registrar	The Force Crime Registrar has undertaken training in ASB for staff within the FCC, FCRB and FCRL between April and July 2012 to make staff more aware of the importance of their role in relation to ASB. Refresher / additional training is planned for supervisors on 17 and 18 October 2012.	22-Aug-12
<b>Does the force respond to reports of ASB in accordance with force policy and adopt a short-term problem-solving approach, with partner agencies where appropriate?</b>					
<b>Overall BTP records a higher number of incidents onto their crime recording systems than Home Office Forces. These all fall under a prioritised 'points system' which ensures compliance and investigation. However processes are not in place for dealing with ASB incidents in a structured manner, from time of report.</b>		31-Oct-12	Chief Superintendent Territorial Policing	BTP has formalised the process in relation to ASB incidents through National Decision Making training in January to March 2012, the additional of a proforma to NSPIS C&C, whereby call handlers ask questions to ascertain whether the person is a repeat or vulnerable victim and training, via the Force Crime Registrar for staff within the FCC, FCRB and FCRL between April and July 2012 to make staff more aware of the importance of their role in relation to ASB. Refresher / additional training specifically aimed at supervisors and their role is planned for October 2012.	22-Aug-12
2.2.1	<b>Call handling staff do not receive training regarding ASB. They were aware of the new personal, environmental, and nuisance codes but were not always clear of the meaning.</b>	31-Oct-12	Contacts Manager / Force Crime Registrar	BTP undertook National Decision Making training from January to March 2012. Additionally the Force Crime Registrar has undertaken training in ASB for staff within the FCC, FCRB and FCRL between April and July 2012 to make staff more aware of the importance of their role in relation to ASB. Refresher / additional training is planned for supervisors on 17 and 18 October 2012.	22-Aug-12
2.2.2	<b>Call handling staff do not systematically pass information about the history of repeat victimisation or vulnerability to attending staff.</b>	31-Dec-12	Contacts Manager	There is a process in place whereby officers attending an incident are informed of all the information available on an NSPIS C&C log, including whether it is a repeat or vulnerable victim. The Real Time Intelligence officer are now checking background history and vulnerabilities of the caller / victim.	12-Sep-12

Ref	Area for Improvement	Due Date	Action Owner	Progress Update	Date of Update
2.2.3	<b>It is unclear if all ASB incidents reported to BTP are being recorded onto the crime recording systems. HMIC spoke to managers from crime recording and contact management and they believed that there may be gaps in ASB recording, for example they were unsure what the process would be if a complainant contacted BTP by letter. There was evidence of ASB incidents reported directly to patrolling staff being placed onto the force intelligence system rather than being recorded as an incident.</b> However, intelligence records included follow up enquiries and results clearly displaying action.	31-Mar-13	T/Chief Inspector Territorial Policing	As not all ASB incidents are crimes, it would depend on the type of incident referred to via emails / letters / twitter feeds as to whether it would be added to NSPIS C&C. If an incident is not crimed, a 5x5x5 would be submitted via the Force Intelligence System, which would be considered at the Tactical Analysis meeting and Area tasking. For incidents where there is no crime, BTP are endeavouring to put interventions in place that will ensure that quality of life issues are addressed appropriately. This will include addressing issues by the implementation of problem solving plans and high visibility patrols.	12-Sep-12
2.2.4	<b>ASB offenders and locations are included in briefings to officers and staff. However repeat victims do not often feature in these briefings.</b> CID and response officers both have access to crime mapping which displays hot spots and there was evidence of this being used regularly. Where appropriate, ASB features on the daily briefing on the intranet and this, again, is regularly reviewed by CID and response officers. Analysts, on occasions, will go out and brief officers on particular issues. All Problem Solving Plans have clear ownership. NPTs have a clear view of ASB issues in their areas and displayed good knowledge of issues and trends.	31-Mar-13	Chief Superintendent Territorial Policing	Territorial Policing is working with Performance and Analysis to identify 'hot spots' in relation to ASB. The analysis will focus on: vulnerable and repeat victims, ASB in relation to nuisance, environment and personal which will in turn identify the 'hot spot' locations. Once identified, these will be passed to NPTs through tasking, with the location being re-evaluated to see if there has been a reduction.	12-Sep-12
2.2.6	<b>A tool kit of potential tactical options to tackle ASB is available on the intranet but it is not widely known about or used</b>	31-Oct-12	T/Chief Inspector Territorial Policing	A Sergeant within Territorial Policing has been tasked with producing more effective toolkits for BTP, including a community engagement toolkit. This will then be incorporated within the revised BTP ASB Strategy, which will be disseminated via the communications strategy.	22-Aug-12
2.2.7	Short term ASB that is recorded onto the crime system is monitored and both recordable and non recordable incidents are subject to a computerised „points system in which all ASB incidents are scored and prioritised. This ensures the monitoring of follow up care, updates and investigation. <b>ASB issues placed onto the intelligence system are not supervised. Although incident records on NSPIS displayed a low number of supervised entries (out of 100 entries reviewed only 3 showed supervisory oversight), the majority of these incidents were entered on the crime recording system which ensures strict supervision.</b>	31-Oct-12	Contacts Manager / Force Crime Registrar	In June 2012, BTP added a proforma to NSPIS C&C, whereby call handlers ask questions to ascertain whether the person is a repeat or vulnerable victim. Additionally the Force Crime Registrar has undertaken training in ASB for staff within the FCC, FCRB and FCRL between April and July 2012 to make staff more aware of the importance of their role in relation to ASB. Refresher / additional training specifically aimed at supervisors and their role is planned for 17 and 18 October 2012.	22-Aug-12
<b>Does the force effectively put in place long term problem solving solutions, with partners where appropriate?</b>					
2.3.5	<b>BTP do not complete any risk assessments for ASB. Problem Solving Plans do not have risk assessments completed as part of the overall plan</b>	31-Dec-12	T/Chief Inspector Territorial Policing	BTP has undertaken a scoping exercise with six Home Office forces who use similar models/best practice, including Cumbria and West Midlands and obtained copies of their risk assessments. The T/Chief Inspector, Territorial Policing is updating BTP's strategy to incorporate risk assessments. The new strategy will focus on ASB policy, toolkits, risk assessments and training package with a 'Manual of Standards' being produced for dissemination throughout BTP and will form the focus of the daily Territorial Policing teleconference.	12-Sep-12
<b>Are complainants of ASB contacted in line with their needs to update them on police action taken and to check on their view of progress of the reported incident?</b>					
<b>Overall victim care and updates were apparent for those incidents placed onto the crime recording system. The majority of reported ASB incidents appear to be recorded onto this system as BTP record a far higher number of byelaw incidents. However ASB incidents that do not fall into the crime record category, do not have a structured follow up contact process.</b>					
2.5.1	Where incidents are placed onto the crime recording system they are subject to a computerised evaluation system. This enables the monitoring of incidents to ensure staff are investigating cases appropriately and updating victims. Supervisors are able to monitor the points system and are held to account for any incidents receiving a red or amber status Victim care units also update victims. <b>However ASB incidents that are not recorded on the crime recording system are not subject of structured monitoring, for instance those ASB incidents placed onto the intelligence system.</b> HMIC reviewed intelligence reports and found that details of the action taken and results were recorded. The review of calls and incidents revealed a high level of customer focus by call handlers (98 out of 100 displayed good customer care and focus).	31-Dec-12	Chief Superintendent Territorial Policing	BTP records a high level of non-recordable and recordable crimes (which would not be recorded by Home Office Forces) and are subject to supervisory overview and follow up via Crime Management Units and Area tasking. If an incident is not crimed, the information is placed on the Force Intelligence System.	12-Sep-12
2.5.3	Victim care units and crime management centres update victims and the points system ensures follow up contact is carried out and recorded on the crime system. <b>However those incidents which are not recorded on the crime recording system do not have a process to ensure follow up contact is conducted.</b>	31-Dec-12	Chief Superintendent Territorial Policing	BTP records a high level of non-recordable and recordable crimes (which would not be recorded by Home Office Forces) and are subject to supervisory overview and follow up via Crime Management Units and Area tasking. If an incident is not crimed, the information is placed on the Force Intelligence System.	12-Sep-12



# NATIONAL RECOMMENDATIONS

HMIC Without Fear or Favour

SCT Portfolio Owner: Deputy Chief Constable

Improvement Plan Owner: D/Supt Alistair Lawson

Ref	Recommendation	Due Date	Action Owner	Progress Update	Date of Update
<b>RECOMMENDATIONS FROM NATIONAL REPORT</b>					
1	<p><b>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.</b></p> <p>(They should ideally do so on the basis of national standards and expectations – there are no geographical variables when it comes to integrity and there should not be local differences in standards. This work on national standards should be encouraged by the Home Office and promoted by leaders in the Service locally).</p>	31-Aug-12	Head of PSD / Head of SDD	<p>BTP has existing policies concerning:-</p> <ul style="list-style-type: none"> <li>- Reporting of Inappropriate and Compromising Associations</li> <li>- Force Information Security</li> <li>- Gifts and Hospitalities</li> <li>- Counter Corruption and Fraud</li> <li>- Business Interest and Secondary Employment</li> <li>- Procurement</li> </ul> <p>BTP has reviewed these policies taking account of the recently published ACPO guidance to reduce risks identified in the report, which will ensure clear boundaries and thresholds. Separately BTP is currently undertaking a systematic review of all policies and SOPs. In the interim position statements and employee guidance has been issued throughout BTP in relation to Gifts &amp; Hospitality and Social Media: Personal Use by Officers and Staff.</p> <p>In addition to this BTP is undertaking a review of all intelligence gathering tools focussing on improvement of open and closed sources. Two reports have been submitted, in June and July 2012, in relation to electronic business monitoring systems - Current Software and Potential Solutions. Systems testing is being undertaken to assess the fitness for purpose of current software in relation to PSD requirements with the outcome scheduled for 31 October 2012.</p> <p>BTP has introduced an Integrity and Compliance Board, which meets monthly and is chaired by the Dep identified.</p>	06-Sep-12
2	<p><b>There should be clear boundaries and thresholds in relation to these matters. Such limits should be consistent and Service wide.</b></p> <p>(This in effect means identifying a clear message for staff on these issues as to what is acceptable, what is unacceptable and what areas of vulnerability to avoid. ACPO should lead this work in partnership with staff associations and those involved in police governance).</p>		Head of PSD / Head of Media & Marketing	<p>BTP has existing policies concerning:-</p> <ul style="list-style-type: none"> <li>- Reporting of Inappropriate and Compromising Associations</li> <li>- Force Information Security</li> <li>- Gifts and Hospitalities</li> <li>- Counter Corruption and Fraud</li> <li>- Business Interest and Secondary Employment</li> <li>- Procurement</li> </ul> <p>BTP has reviewed these policies taking account of the recently published ACPO guidance to reduce risks identified in the report, which will ensure clear boundaries and thresholds. Separately BTP is currently undertaking a systematic revision and review of all policies and SOPs, which will be completed by 31 December 2012. Interim position and employee guidance was issued throughout BTP in relation to Gifts &amp; Hospitality and Social Media: Personal Use by Officers and Staff in July 2012.</p> <p>In addition BTP has developed a Statement of Mission and Values, which is an overarching set of values which will provide clear guidance on what is considered acceptable within the Force. The six values, which cover the areas of Integrity &amp; Respect; Commonsense; Trust &amp; Confidence; Determination; Professional and Pride have been agreed by the Strategic Command Team. They will now be embedded in all strands of BTP, including the 2012-15 Strategic Plan, PDR's, training inputs by PSD and operational briefings to ensure they are shared, understood and subscribed to by all employees.</p>	06-Sep-12

Ref	Recommendation	Due Date	Action Owner	Progress Update	Date of Update
3	<p><b>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 (a theme which runs through this review), the Strategic Command Course (in January 2012) and the High Potential Development Scheme should encompass these issues.</b></p> <p>(Chief Constables should review how much effort is being put into briefing their staff on the standards as to what is acceptable, unacceptable and on the areas of potential vulnerability).</p>		Head of PSD / Head of HR	<p>BTP has developed a Statement of Mission and Values, which is an overarching set of values which will provide clear guidance on what is considered acceptable within the Force. The six values, which cover the areas of Integrity &amp; Respect; Commonsense; Trust &amp; Confidence; Determination; Professional and Pride have been agreed by the Strategic Command Team. They will now be embedded in all strands of BTP, including the 2012-15 Strategic Plan, PDR's, training inputs by PSD and operational briefings to ensure they are shared, understood and subscribed to by all employees.</p> <p>Since September 2004, PSD have been providing inputs to all new Police Recruits, Special Police Constables and PCSO's. Inputs have also been provided to CLDP courses, Federation Representatives, Support Groups, PSD Area Champions, Supervisors and CID. In total there have been 2,280 attendees recorded at these training courses. The input has been reviewed and improved over time with overarching themes of Reactive Investigations &amp; Processes and Intelligence &amp; Counter Corruption. Details / examples of the training courses provided by Learning &amp; Development are available if required by HMIC.</p> <p>As of April 2012, a policy decision was made that all PSD inputs will be carried out by a member of the PSD SMT, supported by specialist personnel where appropriate.</p> <p>In June 2012 a revised standard presentation was created which has the following broad themes:</p> <ul style="list-style-type: none"> <li>- Embedding Standards of Professional Behaviour</li> <li>- PSD Organisational Structure</li> <li>- PSD Processes and Procedures</li> <li>- PSD Intelligence Development</li> <li>- Counter Corruption</li> </ul>	28-Jun-12
4	<p><b>Chief officer teams should review their corporate governance and oversight arrangements 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.</b></p>		SCT	<p>BTP has developed a Statement of Mission and Values, which is an overarching set of values which will provide clear guidance on what is considered acceptable within the Force. The six values, which cover the areas of Integrity &amp; Respect; Commonsense; Trust &amp; Confidence; Determination; Professional and Pride have been agreed by the Strategic Command Team. They will now be embedded in all strands of BTP, including the 2012-15 Strategic Plan, PDR's, training inputs by PSD and operational briefings to ensure they are shared, understood and subscribed to by all employees.</p> <p>In addition to this the Integrity and Compliance Board will improve governance and oversight on issues that are identified in the report. At the Police Authority level, there is oversight through the Professional Standards Board and Audit Committee.</p>	27-Jun-12
5	<p><b>HMIC expects the Service to have detailed proposals in the above areas ready for consultation with all relevant parties by April 2012.</b></p>			N/A	
6	<p><b>An assessment relating to these matters should be conducted by HMIC by October 2012 to inform incoming Police and Crime Commissioners and Police and Crime Panels.</b></p>			N/A	

# NATIONAL RECOMMENDATIONS

**HMIC Without Fear or Favour**
**SCT Portfolio Owner: Deputy Chief Constable**
**Improvement Plan Owner: D/Supt Alistair Lawson**

Ref	Recommendation	Due Date	Action Owner	Progress Update	Date of Update
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**SUB RECOMMENDATIONS FROM NATIONAL REPORT**
**Relationships with the Media**

1	<b>Forces should explore options for identifying and monitoring emerging and inappropriate relationships with, and leaks to, the media</b> (Page 29)	31-Aug-12	Head of PSD	<p>This is monitored by PSD as reflected in the BTP policy on Reporting Inappropriate and Compromising Associations. As well as maintaining and monitoring the recorded inappropriate associations, PSD identify and monitor relationships using intelligence gathering tools such as Confidential Anonymous Reporting (CARS), Email Gateways tools and Internet monitoring. PSD has reviewed all intelligence gathering tools including Electronic Business Monitoring and submitted a report with proposals.</p> <p>PSD is raising awareness of CARS through meetings with Area Commanders and inputs at Area Management Team meetings where presentations are being delivered on usage and confidence building.</p> <p>Two reports have been submitted, in June and July 2012, in relation to electronic business monitoring systems - Current Software and Potential Solutions. Systems testing is being undertaken to assess the fitness for purpose of current software in relation to PSD requirements with the outcome scheduled for 31 October 2012.</p> <p>The number of staff within the Counter Corruption Unit (CCU) and Intelligence Unit has been reviewed and two Intelligence Development Officers will commence employment during September 2012. Additionally, officers have been supplied on a secondment basis both internally and from other forces to the CCU.</p> <p>Media and Marketing log the vast majority of calls which come through the press office. There is also media monitoring which is in place which should pick up any mention of BTP.</p>	06-Sep-12
2	<b>HMIC suggests all forces' notifiable association policies include reference to persons who 'undertake paid or unpaid work for the media'</b> . (Page 30)	31-Aug-12	Head of SDD / Head of PSD	<p>The current Reporting Inappropriate and Compromising Relationships SOP mentions the reporting of associations with persons working in the Media Industry. However all policies are currently under review and will in future consider reference within Business Interests and Secondary Employment and/or Media Contact SOPs or guidance.</p> <p>The revised Business Interest and Secondary Employment has been circulated throughout BTP with effect from 19 August 2012. PSD is now responsible for this policy. As part of this PSD has configured Centurion to act as a case management system for all applications. New applications are currently being recorded and previous authorised applications will be back record converted providing a database in relation to Business Interest and Secondary Employment.</p>	06-Sep-12
3	<b>It is HMIC's view that forces and authorities should record all interactions between police employees and media representatives. The time and date of the meeting, brief details of purpose, content and persons involved should be recorded. An appropriate mechanism should be in place to audit these records.</b> (Page 31)		Head of Media and Marketing	<p>This is under review as the force does not want a Media contact database held centrally as it will prove cumbersome and discourage the openness encouraged. However, guidance has been given that all officers need to make a note in their electronic diary when they meet a journalist identifying why and what was discussed. This will provide a searchable audit capability as required.</p>	26-Jun-12

Ref	Recommendation	Due Date	Action Owner	Progress Update	Date of Update
4	<b>In light of such benchmarking, consideration should be given to the development of a national media policy to include appropriate levels of interaction, social interaction and relationships, alongside practical guidance. The policy should be supported by a structured programme of media training and awareness and link into the broader legal and ethical framework and the Service's standards and values.</b> (Page 32)	31-May-12	Head of Media and Marketing	<p>BTP is currently working with the ACPO Communication Advisory Group in developing new national media policy which will be adopted by PSD. BTP will implement the national policy when it is developed and this will be communicated throughout the force.</p> <p>BTP conducts in house media training and will incorporate the need to raise awareness of the ethical and legal position of the force. In practice, all officers are already encouraged to engage with the media with the support of media and marketing. The boundaries, expectations and limitations of any relationship are already covered and would be in line with the HMIC position; the record keeping is new and this will now be built in. Media and marketing actively support officers and it is extremely rare for any contact not to be reported to the department and advice and guidance sought by the officer concerned. Senior officers do not meet with journalists without the press office being aware and usually present.</p>	26-Jun-12
<b>Information Disclosure</b>					
5	<b>Forces should consider how best to prevent, monitor, investigate and take action against officers and staff in relation to information disclosure, which should include reference to all other areas of this review and inappropriate associations.</b> (Page 36)	31-Aug-12	Head of PSD	<p>Currently PSD identify and monitor potential information disclosure using intelligence gathering tools such as Confidential Anonymous Reporting, Email Gateways tools and Internet monitoring. PSD has reviewed all intelligence gathering tools including Electronic Business Monitoring. Two reports have been submitted, in June and July 2012, in relation to electronic business monitoring systems - Current Software and Potential Solutions. Systems testing is being undertaken to assess the fitness for purpose of current software in relation to PSD requirements with the outcome scheduled for 31 October 2012.</p> <p>Additionally PSD will increase training and publicity on anonymous reporting techniques with the promotion of reporting of such information disclosure.</p> <p>The number of staff within the Counter Corruption Unit (CCU) and Intelligence Unit has been reviewed and two Intelligence Development Officers will commence employment during September 2012. Additionally, officers have been supplied on a secondment basis both internally and from other forces to the CCU.</p>	06-Sep-12
6	<b>HMIC suggests that all forces need to have a policy in place if they are to be able to effectively protect their reputation through staff use of social networking.</b> (Page 37)	31-Aug-12	Head of PSD	<p>PSD issued guidance on off duty Social Media Usage initially on April 2012, which was forwarded to HMIC as part of the documentation request on 18 June 2012. There has also been an PSD position statement on Social Media Usage circulated around the force on 22 June 2012.</p> <p>The use of Social Media for disseminating BTP information is currently being discussed as part of the new Social Media project, which meets on a monthly basis. Any planned use of Social Media by BTP therefore may have additional guidance or policies.</p> <p>The objectives of the Social Media Project are (1) to maximise the use of digital and social media across operational and organisational functions, and embrace the opportunities it presents; (2) to proactively look across activities for opportunities to use emerging communications, and challenge the way BTP currently deliver services; (3) to actively encourage staff to use social media, building skills and knowledge of how and when to use it, within a framework that places parameters, but trusts staff.</p> <p>Meetings of the Digital and Social Media Project have been being held, the most recent being 5 September 2012. The project works in a cross functional way developing BTP's digital and social media strategy and testing the impact of the strategy on day to day operations through a series of pilots running in a number of Areas, including First Contact Centre, Media &amp; Marketing, Force Intelligence and CCTV. The pilots started in June 2012 and will continue until February / March 2013.</p>	06-Sep-12

Ref	Recommendation	Due Date	Action Owner	Progress Update	Date of Update
7	<b>Forces and authorities need to have a consistent approach to preventing, investigating and responding to information disclosure issues, whether such disclosure is to the press and broadcast media, via social networking or to other third parties.</b> (Page 39)	31-Aug-12	Head of PSD	<p>Currently PSD identify and monitor potential information disclosure using intelligence gathering tools such as Confidential Anonymous Reporting, Email Gateways tools and Internet monitoring. However, PSD will be reviewing all intelligence gathering tools including Electronic Business Monitoring.</p> <p>Additionally PSD will increase training and publicity on confidential anonymous reporting techniques with the promotion of reporting of such information disclosure Guidance is also being developed as part of Values and Standards working group.</p> <p>PSD is raising awareness of CARS through meetings with Area Commanders and inputs at Area Management Team Meetings where presentations are being delivered on usage and confidence building.</p> <p>Two reports have been submitted, in June and July 2012, in relation to electronic business monitoring systems - Current Software and Potential Solutions. Systems testing is being undertaken to assess the fitness for purpose of current software in relation to PSD requirements with the outcome scheduled for 31 October 2012.</p>	06-Sep-12
8	<b>and to ensuring that all police officers and staff understand the boundaries within</b>	31-Aug-12	Head of PSD	<p>Currently PSD identify and monitor use of Social Networking sites using intelligence gathering tools such as Confidential Anonymous Reporting, Email Gateways tools and Internet monitoring. However, PSD will be reviewing all intelligence gathering tools including Electronic Business Monitoring and will submit a report with proposals by 31 August 2012.</p> <p>Additionally PSD issued guidance on off duty Social Media Usage initially on April 2012, which was forwarded to HMIC as part of the documentation request on 18 June 2012. There has also been an PSD position statement on Social Media Usage circulated around the force on 22 June 2012.</p> <p>The use of Social Media for disseminating BTP information is currently being discussed as part of the new Digital and Social Media project, which meets on a monthly basis. Any planned use of Social Media by BTP therefore may have additional guidance or policies.</p> <p>The objectives of the Social Media Project are (1) to maximise the use of digital and social media across operational and organisational functions, and embrace the opportunities it presents; (2) to proactively look across activities for opportunities to use emerging communications, and challenge the way BTP currently deliver services; (3) to actively encourage staff to use social media, building skills and knowledge of how and when to use it, within a framework that places parameters, but trusts staff.</p> <p>Meetings of the Digital and Social Media Project have been being held, the most recent being 5 September 2012. The project works in a cross functional way developing BTP's digital and social media strategy and testing the impact of the strategy on day to day operations through a series of pilots running in a number of Areas, including First Contact Centre, Media &amp; Marketing, Force Intelligence and CCTV. The pilots started in June 2012 and will continue until February / March 2013.</p>	06-Sep-12
<b>Gratuities and Hospitality</b>					
9	<b>HMIC suggests that this function sits most appropriately within PSDs.</b> (Page 42)	Complete	Head of PSD	This function already sits under the Professional Standards Department at BTP.	22-Jun-12
10	<b>HMIC suggests that the Service needs to adopt a national standard which clearly defines the boundaries of acceptability around gifts and hospitality. This should include recording practices which illustrate both what is accepted and what is declined so that the full nature of the relationship is transparent.</b> (Page 42)	29-Jun-12	Head of PSD	Following receipt of the ACPO Guidance, the Head of PSD has reviewed BTP's position in relation to Gifts and Hospitality. A position statement was reissued to all officers and staff on 26 June 2012 reiterating BTP's position in relation to the acceptance of gifts and hospitality. On 18 July 2012 the Intranet page was updated with the new guidance and the redundant SOP removed to minimise confusion during the change over period. Ensuring the Guidance is compatible with enforcement is rated 'high' on the project that is currently reviewing and revising all BTP SOPs, which will be completed by 31 December 2012.	05-Sep-12
11	<b>HMIC believes that this simple checklist would allow staff to make an informed spontaneous decision when they are offered hospitality or a gift.</b> (Page 43)	31-Aug-12	Head of PSD	<p>This was reviewed by the Head of PSD in line with BTP's approach to Gifts and Hospitality and a position statement was reissued to all officers and staff on 26 June 2012 with clear guidance on what is acceptable using the GIFT mnemonic Checklist as recommended by the HMIC.</p> <p>The Intranet page has been updated with a table to be completed with the required information for submission to supervisors for authorisation prior to a gift or hospitality being accepted.</p>	05-Sep-12

Ref	Recommendation	Due Date	Action Owner	Progress Update	Date of Update
<b>Procurement and Contractual Relationships</b>					
12	<b>HMIC suggests that PSDs and police authorities should work together with chief officers in a more co-ordinated and proactive manner to ensure effective intrusion and oversight of procurement and contractual matters. There needs to be effective monitoring at all financial levels, and this also requires scrutiny of force credit cards and procurement cards where they are used. (Page 45)</b>	31-Aug-12	Head of PSD / Head of Finance	<p>BTP is currently undertaking a review of its 'purchase to pay process' and a paper was presented to the Strategic Command Team on 19 June 2012. The paper, which was approved, recommended the use of controlled catalogues in association with Framework Agreements together with reducing the number of requisitioners and financial approvers for better quality requisitioning and reducing the number of interfaces with suppliers.</p> <p>BTP's Corporate Resources is implementing a major rationalisation of all procurement cards across the force to reduce the number to 2 per Area / Department. Engagement is being undertaken with Area Commanders and Heads of Department to provide details of key locations and individuals where procurement cards should be held. To date there has been a 36% reduction in the numbers of procurement cards. This is one of a number of measures being implemented to focus on low level expenditure across BTP as well as reviewing any related SOPs and policies in relation to procurement, e.g. retrospective orders and splitting of orders.</p> <p>The Integrity and Compliance Board monitors compliance and links established between PSD,</p>	30-Aug-12
13	<b>HMIC suggests that national good practice should be shared and implemented by all forces to ensure a consistent and risk-aware approach to the procurement of goods and services, with standardised checks and balances at different financial levels. We believe that this should include a moratorium on hospitality during tendering processes between police employees, members of police authorities and potential contractors. (Page 47)</b>	31-Aug-12	Head of Finance	<p>BTP is currently undertaking a review of its "purchase to pay process" and a paper was presented to the Strategic Command Team on 19 June 2012. The paper, which was approved, recommended the use of controlled catalogues in association with Framework Agreements together with a reduction in the number of requisitioners and financial approvers for better quality requisitioning and a reduction in the number of interfaces with suppliers.</p> <p>Procurement provides PSD with tender lists for work on an as and when basis, so that checks can be carried out with the Gifts and Hospitality register. PSD has issued an internal note so as to reduce the instances / opportunity of Gifts and Hospitality which has also been published on BTP's website under Supplier Information and Tendering.</p>	30-Aug-12
<b>Secondary Business Interests and Conflicts of Interest</b>					
14	<b>HMIC therefore suggests that the Service develops a decision making model in respect of secondary occupations that is sufficiently robust to address individual risk and organisational reputation, and compatibility with the applicant's role and responsibilities. (Page 50)</b>	31-Aug-12	Head of SDD / Head of PSD	<p>Policy is under review with reference to the ACPO guidance on Business Interest and Secondary Employment / Business Interest which will include a decision making model</p> <p>It has been agreed that the ownership of the Secondary Employment process will move from Human Resources to PSD; this took place in August 2012.</p> <p>The revised Business Interest and Secondary Employment has been circulated throughout BTP with effect from 19 August 2012. PSD is now responsible for this policy. As part of this PSD has configured Centurion to act as a case management system for all applications. New applications are currently being recorded and previous authorised applications will be back record converted providing a database in relation to Business Interest and Secondary Employment. Ensuring the Guidance is compatible with enforcement is rated 'high' on the project that is currently reviewing and revising all BTP SOPs, which will be completed by 31 December 2012.</p>	05-Sep-12
15	<b>HMIC suggests that any force or authority considering such restraint clauses should obtain specialist legal advice first as the consequences for getting this wrong (compensation, injunctive relief, public perception and so on) can be severe. (Page 51)</b>	31-Aug-12	Head of PSD	<p>After the policy review and the new Business Interest and Secondary Employment policy is drafted, consideration will then be made for any requirement in relation to legal advice.</p> <p>The revised Business Interest and Secondary Employment has been circulated throughout BTP with effect from 19 August 2012. PSD is now responsible for this policy. As part of this PSD has configured Centurion to act as a case management system for all applications. New applications are currently being recorded and previous authorised applications will be back record converted providing a database in relation to Business Interest and Secondary Employment. Ensuring the Guidance is compatible with enforcement is rated 'high' on the project that is currently reviewing and revising all BTP SOPs, which will be completed by 31 December 2012.</p>	26-Jun-12
<b>Professional Standards and Proactivity</b>					
16	<b>HMIC suggests that the ACCAG 'practice advice' is published on the 'authorised professional practice site' as soon as possible. (Page 53)</b>	N/A	Head of PSD	This is to be organised by ACCAG and requires no input from BTP.	22-Jun-12
17	<b>HMIC suggests that this is included within the Strategic Command Course and the High Potential Development Scheme. (Page 53)</b>	N/A	N/A	This is a Servicewide recommendation and is not BTP specific.	22-Jun-12

Ref	Recommendation	Due Date	Action Owner	Progress Update	Date of Update
18	<b>HMIC suggests that the corruption lead for each force should be a senior detective who has the skills and experience to lead/supervise investigations and who is in a position to inform and influence force-level decision making.</b> (Page 53)	Complete	Head of PSD	This is currently Head of PSD, who is Detective Superintendent.	22-Jun-12
19	<b>HMIC suggests that consideration be given to subsuming the valuable role currently undertaken by SOCA into the National Crime Agency (NCA).</b> (Pages 53 / 54)	N/A	Head of PSD	This will be organised by National Crime Agency and therefore requires no input from BTP.	22-Jun-12
20	<b>HMIC suggests that all forces should re-evaluate their proactive and covert capability and (where appropriate) consider the use of formal collaborative arrangements.</b> (Page 54)	31-Aug-12	Head of PSD	<p>PSD reviewed all intelligence gathering tools including Electronic Business Monitoring and submitted a report.</p> <p>PSD has already considered full collaboration with City of London Police regarding Counter Corruption however full collaboration was deemed not suitable. Therefore BTP is looking at working towards the establishment of a network of Counter Corruption Units for collaborative arrangements regarding assistance and resource sharing.</p> <p>BTP has approached the Metropolitan Police Service (MPS) and a tentative agreement has been reached for an experienced DPS covert investigator to be seconded to PSD for six months to share working knowledge and experience. Currently DPS is support BTP PSD on two covert anti-corruption investigations and a Section 23(1) RIPA agreement is being considered to further this working relationship.</p> <p>Two reports have been submitted, in June and July 2012, in relation to electronic business monitoring systems - Current Software and Potential Solutions. Systems testing is being undertaken to assess the fitness for purpose of current software in relation to PSD requirements with the outcomes scheduled for 31 October 2012.</p> <p>The number of staff within the Counter Corruption Unit (CCU) and Intelligence Unit has been reviewed and two Intelligence Development Officers will commence employment during September 2012. Additionally, officers have been supplied on a secondment basis both internally and from other forces to the CCU.</p>	05-Sep-12
21	<b>HMIC suggests that forces consider the use of specialist IT software to enhance their audit and analytical capabilities.</b> (Page 54)	31-Aug-12	Head of PSD	PSD reviewed all intelligence gathering tradecraft tools. Two reports have been submitted, in June and July 2012, in relation to electronic business monitoring systems - Current Software and Potential Solutions. Systems testing is being undertaken to assess the fitness for purpose of current software in relation to PSD requirements with the outcome scheduled for 31 October 2012.	06-Sep-12
<b>Governance and Oversight</b>					
22	<b>Integrity is likely to be stronger where there is coordination between organisational issues, policy development, training and cultural change. This should bring greater organisational coherence, reducing opportunities for inappropriate behaviours to develop.</b> (Page 58)	31-May-12	Head of Media and Marketing	BTP has developed a Statement of Mission and Values, which is an overarching set of values which will provide clear guidance on what is considered acceptable within the Force. The six values, which cover the areas of Integrity & Respect; Commonsense; Trust & Confidence; Determination; Professional and Pride have been agreed by the Strategic Command Team. They will now be embedded in all strands of BTP, including the 2012-15 Strategic Plan, PDR's, training inputs by PSD and operational briefings to ensure they are shared, understood and subscribed to by all employees.	26-Jun-12
23	<b>In the new policing landscape it will be important that the role of elected local policing bodies in respect of force integrity (including complaints, misconduct and anti-corruption) is articulated to ensure that there is effective challenge to chief officers.</b> (Page 58)	N/A	N/A	Although BTP is not directly involved in this, there are clear procedures in place in relation to complaints, misconduct and anti-corruption. This is also monitored through the Police Authority at meetings of the Professional Standards Committee and Audit Committee.	22-Jun-12