



---

**Report to:** People & Standards Committee  
**Agenda item:** 10  
**Date:** 16 May 2013  
**Subject:** Police Integrity  
**Sponsor:** Det Supt Lawson  
**For:** Information

---

**1. PURPOSE OF PAPER**

1.1 To inform members of the continued efforts following the HMIC inspections 'Without Fear or Favour' in 2011 and 'Revisiting Police Relationships' in 2012.

**2. BACKGROUND**

2.1 In 2011 the Home Secretary asked HMIC to look at 'instances of undue influence, inappropriate contractual arrangements and other abuses of power in police relationships with the media and other parties.'

2.2 In August 2011, the HMIC conducted a Police Integrity Review with the findings published in the HMIC national report 'Without Fear or Favour' dated December 2011.

2.3 The main aims of the Police Integrity Review involved assessing the following:

- **Governance and Control** - the strengths and weaknesses of existing Governance arrangements and control measures in place to ensure integrity and their appropriateness for the future
- **Relationship with the media and other parties** - appropriate and inappropriate relationships and other abuses of power in police relationships with the media
- **Disclosure of Information** - establishing the existence of guidance or policy around information disclosure and then the extent and potential impact of inappropriate disclosure of police information to the media and other parties



- 
- **Inappropriate contractual arrangements** - potential for undue influence, inappropriate contractual arrangements and other abuses of power in relation to procurement, contracting, recruitment and vetting
  - **Gratuities and Hospitality** - The scale and appropriateness of gratuities and hospitality offered to and accepted by police officers and staff
  - **Business Interests** - additional employment and other conflicts of interests
  - **Proactive approaches** – proactive capability of the Police in the investigation and prevention of corruption and appropriate enforcement in relation to integrity issues
  - **Perceptions of integrity** – perceptions of the public, the police and others regarding behaviour that reflects integrity and that which does not.

2.4 The report 'Without Fear or Favour,' found no evidence of endemic corruption in the police service. However to address certain issues the HMIC made six national recommendations and 23 sub recommendations and a commitment to revisit forces in 2012 to track progress.

### 3. BTP WORKSTREAMS

3.1 A BTP Improvement Plan (attached at Appendix A) was devised and is owned by Det Supt Lawson under the DCC's Portfolio. Activity and monitoring was undertaken regarding processes and procedures that were required to be examined or improved in light of the recommendations from the HMIC report.

3.2 The areas requiring action are:

- Relationships with the Media
- Information Disclosure
- Gratuities and Hospitality
- Procurement and Contractual Relationships
- Secondary Business Interests and Conflicts of Interest
- Professional Standards and Proactivity
- Governance and Oversight

---

3.3 To deliver the Improvement Plan a Delivery Plan (attached at Appendix B) was compiled, which contained 39 activities. These were identified numerically and cross referenced to the recommendations in the Improvement Plan. The Delivery Plan was developed by PSD in conjunction with other departments and progress against the plan is managed by PSD.

3.4 As part of the Force's review of governance, BTP established an Integrity & Compliance Board (ICB) in 2012. The objective of ICB is to ensure a culture of compliance is embedded across the Force, to provide direction and monitor progress in relation to audit, inspection, risk and control matters, and to undertake reviews drawn from analysis of reports submitted to the board.

#### **4. REVISITING POLICE RELATIONSHIPS**

4.1 On 19 December 2012, the HMIC presented a progress report to BTP. The report noted the establishment of the Integrity and Compliance Board, that the Force had completed a review of all its policies and prioritised those that related to integrity issues, and progress made against the recommendations in the original report.

4.2 Following the Revisiting Police Relationships inspection 12 national recommendations were presented which have been incorporated into BTP's Delivery Plan.

#### **5. OUTSTANDING ACTIONS**

5.1 There are five actions outstanding from the Without Fear or Favour recommendations:

- Four relate to work within the Media Department (PSD Ref Number: 21,22,23 and 24).
- One relates to the audit function within PSD and is reliant on Vigilance Pro being fully functional (No. 42)

5.2 There are 6 actions outstanding from the Revisiting Police Relationships recommendations:

- Gratuities and Hospitality – needs to be recorded on Centurion
- Business Interests within PDRs



- 
- Scope knowledge of Integrity Issues within PDR Process
  - Review Job Description of PSD Organisational Learning Officer - role and title changed and submitted to RAP on 7 May 2013
  - Link in with Creativity and Innovation to raise integrity questions in their annual plans
  - Leadership Academy - standardised training packages for Chief Insp to Supt.

## **6. RECOMMENDATIONS ON MOVING FORWARD**

- 6.1 The foreword of the PSD Plan for 2013/2014 (Draft) refers to the Force Integrity Plan. At a tactical/delivery level it will be incorporated as a standing agenda item within the monthly PSD Performance Committee.
- 6.2 Matters arising/outstanding will then be reported to the Integrity & Compliance Board by Det Supt Lawson.

# 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
-----	----------------	----------	--------------	-----------------	----------------

**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