



Report to: British Transport Police Authority Audit & Risk Assurance Committee

Agenda item: Completed by Command Support Group

Date: 18 September 2014

Subject: HMIC Inspection Status Update

Sponsor: Deputy Chief Constable

For: Information

1. PURPOSE OF PAPER

- 1.1 To provide the British Transport Police Authority (BTPA) Audit & Risk Assurance Committee with an update in relation to Her Majesty's Inspectorate of Constabulary (HMIC) activity.

2. BTP INSPECTION STATUS UPDATE

2.1 Stop and Search

- 2.1.1 A number of recommendations in relation to activities associated with intelligence will now be progressed as part of a gold group (Operation Jupiter). Operations are liaising with the Director of Intelligence in relation to Divisional Intelligence Bureaus reviewing local data and how this can be developed.
- 2.1.2 FHQ Operations are re-launching the stop and search community consultation group meeting. There is a new terms of reference and this group will be the catalyst for improving public confidence in BTP stop and search activity. A significant number of stop and search professionals have been identified as members.
- 2.1.3 BTP are currently liaising with the College of Policing in relation to the Best Use of Stop and Search Scheme. This is a voluntary scheme however all Forces including BTP will be committed to the scheme. FHQ Operations are currently mapping out actions to be taken and the implications for BTP in relation to joining up to scheme. Elements of the Scheme have already been considered as part of progress being made against the stop



and search improvement plan, however this will now be built upon in line with the scheme requirements/ principles.

2.1.4 Details in relation to progress against the Improvement Plan can be found at Appendix A. The improvement plan attached was reviewed at ICB in August 2014. It should be noted that HMIC will undertake a re-visit of stop and search during 2014/15.

2.2 Inspection of Police Custody Suites

2.2.1 BTP was inspected during week commencing 17 March 2014. Due to the unique nature of BTP's custody facilities the Force was provided with advance notice of the inspection to aid the process. Inspections of custody suites are usually unannounced.

2.2.2 The draft report for factual accuracy checking has been reviewed by BTP. Following receipt of the draft report an initial improvement plan has been developed and will be monitored at ICB and actions progressed through the Custody Steering Group. The developed improvement plan will be submitted to Audit & Risk Assurance Committee in December 2014.

2.2.3 A draft copy of the report can be found at Appendix B. It should be noted that feedback has not yet been received in relation to points raised by BTP following the review of the report; however the proposed publication date of the report is during week beginning 29 September 2014. Once the report has been published BTP will need to submit the Forces developed improvement plan to HMI Prisons no later than three months after publication.

2.3 Police Integrity & Corruption

2.3.1 This inspection took place during week commencing 18 August 2014, with reality testing taking place within PSD Intelligence & Counter Corruption Unit which included the following:

- A dip sample of a small number of PSD files to determine timelines, supervision, and appropriate actions i.e. referral to IPCC. Sample size –



5 case files where an officer has resigned, and 10 gross misconduct and/or criminal investigation case files

- Review of gifts and hospitality, business interest, and notifiable associations register

2.3.2 Additional to the above reality testing also took place at several police post locations (Manchester Piccadilly, Leeds, and Kings Cross). HMIC has previously conducted two reviews of BTP in the last few years around this area which was used to underpin this inspection (1) Police Integrity Review – undertaken in August 2011 with findings published in the HMIC national report '*Without Fear or Favour*' (2) Police Integrity Review Re-visit – undertaken in July 2012 with findings published in the HMIC national report '*Revisiting Police Relationships*'.

2.3.3 The purpose of this inspection was to determine whether BTP's workforce acts with integrity. The under-pinning questions were as follows:

1. What progress has the Force made on managing professional and personal relationships with integrity and transparency, since the publication of 'Revisiting Police Relationships' report?
2. a) What progress has the Force made in communicating and embedding ethical behaviour to all staff, including the new Code of Ethics?
b) How well does the Force proactively look for, and effectively challenge and investigate misconduct and unprofessional behaviour?
3. How well does the Force prevent, identify, and investigate corruption.

2.3.4 Initial feedback provided to BTP indicated that the Force has strong leadership in relation to integrity and corruption with a number of governance and corporate initiatives highlighted as positive messages i.e. Integrity & Compliance Board, BTPA People & Standards Committee, Op Vale and the introduction of the Annual Self Declaration. HMIC discussed a number of areas for improvement; of significant importance the following was highlighted:

- Communication and publication of lessons learned should be reinstated



- HMIC was unable to establish whether any random drug testing is undertaken which should be considered by BTP due to the Force's operating environment.
- Recording of complaints and service recovery – process is good, not bureaucratic, but does not comply with the IPCC Code of Guidance related to 'there and then'. BTP interprets 'there and then' as 48 hours.
- Timeliness around misconduct issues not being completed in 120 days.

2.3.5 A detailed Force feedback report will be received by the BTP in due course for factual accuracy checking.

2.4 Crime Data Integrity

2.4.1 This inspection took place in two phases. The first phase, during week commencing 26 August 2014 which was an audit of BTP's data including reality testing of BTP's Outer London Control Rooms/Crime Recording Centre, CMU, and one police post location. The second phase was the inspection fieldwork during week commencing 1 September 2014 including reality testing at BTP's Inner London Control Room, CMU, and two police post location.

2.4.2 The data audit focused on all notifiable crime groups, excluding fraud for the period of six months from January to June 2014. Additionally HMIC also looked at out of court disposals (cautions, PNDs, Cannabis Warnings) with 20 records being selected and files scrutinised, PNC records checked and crime records audited. 30 No crimes were also looked at in relation to sexual offences including rape (NB. only 14 reviewed); robbery; violence and theft from person. Full details of the data audit results can be found at Appendix C.

2.4.3 The inspection considered three key areas as follows:

1. Leadership and Governance – arrangements at a senior level to ensure there is confidence in recorded crime figures and all aspects of the Home Office Counting Rules (HOOCR)



2. Systems and Processes – systems and processes in place to ensure that; crime is correctly recorded in accordance with HOCR and National Crime Recording Standards (NCRS); standards of out of court disposal are maintained; and no-crime decisions are correct
3. People and Skills – does the force have staff whose conduct and skills ensure accurate crime recording.

2.4.4 Initial feedback provided to BTP indicated that there was no evidence during the inspection that shows officers or staff lack integrity or are unethical in the way in which they go about recording crime. Of significant importance the following areas for improvement was highlighted:

- Crime audit report/findings – consideration should be given to identifying clear actions from reports to with identified actions owners to ensure progress/implementation can be monitored and the relevant individuals held to account
- Out of court disposals – BTP should ensure that disposal options are appropriate for individual offence/circumstances. All relevant actions and updates should be recorded correctly
- Systems – exchange information between NSPIS and Crime. The IT Integrated System Project should ensure that appropriate linkage between functionality and data.
- Improvements to contact management processes

2.4.5 A detailed Force feedback report will be received by the BTP in due course for factual accuracy checking.

3. MISCELLANEOUS REPORTS PUBLISHED BY HMIC

3.1 Audit & Compliance monitor all national reports published by HMIC. Where BTP have not been involved in the relevant area of inspection these reports are disseminated to appropriate departments internally in order to ascertain BTP's current position, risk implications, and impact. Action Plans are put in place locally with recommendations reviewed and monitored at Force level via ICB and/or submitted to BTPA Audit & Risk



Assurance Committee for informational purposes. It should be noted that since the last Committee meeting there have been two relevant policing reports published by HMIC that require action by BTP as noted in the below table.

4. RECOMMENDATION

- 4.1 Members to note the update provided in this paper.

Summary of Reports -The below table summaries the reports published by HMIC since the last Audit & Risk Assurance Committee.

Report Title	Summary	BTP Position	Report recommendations to be progressed by BTP
Police custody in Islington – generally positive but more staff needed	This report is one of a series on police custody inspections carried out jointly by HMIC and HMI Prisons. The inspection looks at strategy, treatment and conditions, individual rights and health care. Note: where good practice is found on an inspection it is collated in a good practice document published by HMIC. This document is regularly updated.	Custody Directorate has been made aware of HMIC’s Police Custody: good practice examples which they review accordingly.	No
Her Majesty’s Revenue and Customs – recovery of proceeds of crime revisit	Between September and December 2013, HMIC undertook a revisit to assess how well HMRC had implemented 15 recommendations from their 2011 report into its performance in addressing the recovery of the proceeds of crime from tax evasion and benefit fraud.	Not relevant to BTP	No
Strategic Policing Requirement: An inspection of how police forces in England and Wales deal with threats to public order	This is one of three reports about how forces comply with the Strategic Policing Requirement (published by the Home Office in July 2012). It examines how well the police service has met the requirements of the Strategic Policing Requirement in relation to the threat to public order. This report includes relevant information from HMIC’s inspection of the arrangements that police forces have in place to meet the Strategic Policing Requirement, and additional specific information on how police forces deal with threats to public order.	The Strategic Policing Requirement: ‘An inspection of the arrangements that police forces have in place to meet the Strategic Policing Requirement’ was published by HMIC in April 2014 and was reviewed by relevant areas of the business. Further to the publication of this report published in June 2014 no further/additional actions have been identified.	No
Strategic Policing Requirement: An inspection of how police	This is one of three reports about how forces comply with the Strategic Policing Requirement (published by the Home Office in	The Strategic Policing Requirement: ‘An inspection of the arrangements that police forces have in place to meet the Strategic Policing	No



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forces in England and Wales deal with threats of a large-scale cyber incident (including criminal attack)	July 2012), being published by HMIC this year. It examines how well the police service has met the requirements of the Strategic Policing Requirement in relation to the threat of a large-scale cyber incident (including criminal attack). This report includes relevant information from HMIC's inspection of the arrangements that police forces have in place to meet the Strategic Policing Requirement, and additional specific information on how police forces deal with the threat of a large-scale cyber incident.	Requirement' was published by HMIC in April 2014 and reviewed by relevant areas of the business. Further to the publication of this report published in June 2014 no further/additional actions have been identified.	
Policing in Austerity: Meeting the Challenge	This report contains the findings of the fourth Year of HMIC's rolling annual programme of 'Valuing the Police' (VtP) inspections. This report is the last report in programme. HMIC is now moving towards new all-force annual inspections, called PEEL (police efficiency, effectiveness and legitimacy) assessments.	<p>BTP was not involved in this series of inspections however HMC undertook an inspection of BTP on VtP in June 2013 which was part of the third series of the programme. To date HMIC has published three other major reports as part of this annual programme: 'Adapting to Austerity', Policing in Austerity 'One Year On', and Policing in Austerity – 'Rising to The Challenge'.</p> <p>The recently published report found that Home Office Forces in England & Wales have plans to save over £2.5 billion over the last four years. 35 out of 45 Forces were assessed as having a good response and five were judged to be 'outstanding' (1) Avon & Somerset (2) Norfolk (3) Lancashire (4) Staffordshire (5) West Midlands. Only three Forces 'require improvements' (1) Bedfordshire (2) Gwent (3) Nottinghamshire. There are four recommendations contained within the report, but these relate to specific forces.</p>	No
Police custody in	This report is one of a series on police custody	Custody Directorate has been made aware of	No



Report Title	Summary	BTP Position	Report recommendations to be progressed by BTP
Northumbria – further improvements needed	inspections carried out jointly by HMIC and HMI Prisons. The inspection looks at strategy, treatment and conditions, individual rights and health care. Note: where good practice is found on an inspection it is collated in a good practice document published by HMIC. This document is regularly updated.	HMIC's Police Custody: good practice examples which they review accordingly.	
Crime Data Integrity - several individual force reports	These inspections were carried out between February and August 2014. The force reports follow on from the interim report (Crime recording: A matter of fact – An interim report of the inspection of crime data integrity in police forces in England and Wales) which was published in May 2014. They include specific recommendations for each force on how to improve the accuracy of, and therefore public confidence in, the way the police records crime. A second batch of force-specific reports will be published in Autumn 2014.	Reports reviewed by Strategic Development Department, Audit & Compliance. As noted above BTP is being inspected as part of this inspection however the Force will not be included in the national report.	No – individual Force feedback report awaited.
Norfolk – national child protection inspection	This report is the first of a series of inspection reports into child protection. The inspection examined child protection in Norfolk Constabulary in April 2014. It is the first in a rolling programme of inspections of all police forces in England and Wales.	Circulated to the Head of Crime	No – but a separate review of safeguarding is being undertaken by the Head of Crime.