

POLICE INTEGRITY & CORRUPTION IMPROVEMENT PLAN (National Recommendations)

National Recommendations

SCT Portfolio Owner: Deputy Chief Constable

Improvement Plan Owner: Head of Professional Standards Department

Ref	Area for Improvement	Action Owner	Proposed Due Date	Initial Response	Updates	Latest Update	Date of Update	Complete Yes/No	RAG Status
1	The Home Office, when considering the responses to its consultation "Improving Police Integrity", should work with the College of Policing and the relevant national policing leads to establish whether the regulatory and legislative framework allows forces to understand clearly the distinction between those activities that should be treated as misconduct and those that should be treated as police corruption.	N/A	N/A	Update 11 March 2015 - This action is to be progressed by the Home Office, however it should be noted that BTP and the BTPA have submitted a joint response to this consultation. This was tabled by Len Jackson at the BTPA People and Standards Committee.	N/A		11-Mar-15	N/A	COMPLETE
2	Within three months of the Home Office announcing its proposals in response to its consultation "Improving Police Integrity", the relevant national policing leads should issue clear guidance to police forces and the National Crime Agency on: (a) the regulations that should be used by professional standards departments to deal with any issue of police misconduct; and (b) the legislation that should be used by anti-corruption units to deal with any cases of corruption.	N/A	30-Apr-15	Update 11 March 2015 - This action to be progressed by the Home Office and the relevant national policing leads.	N/A		11-Mar-15	N/A	COMPLETE
3	With immediate effect, all forces should ensure that the initial assessment of all public complaints is conducted by a chief inspector or police staff equivalent in accordance with: (a) Police (Complaints and Misconduct) Regulations 2012, Regulations 30 and 33 – in respect of public complaints, and (b) Police (Conduct) Regulations 2012, Regulation 3(5) – in respect of internal misconduct reports.	Head of PSD	30-Apr-15	Update 11 March 2015 - Whilst BTP has not yet formally adopted the Police (Complaints and Misconduct) Regulations 2012, PSD is complying with this requirement. All public complaints and internal allegations of misconduct are formally assessed by the DCI (Reactive).	No further action required.		11-Mar-15	Yes	COMPLETE
4	By 31 August 2015, chief constables should review the number of officers and staff with protected characteristics who have formal allegations made against them, to ensure that force processes are operating without bias or discrimination.	Head of PSD	31-Aug-15	Update 11 March 2015 - This will be referred to the Professional Standards and Ethics Reference Group for discussion. The inaugural meeting will take place in May 2015.	Update 24 April 2015 - action to be reviewed following the first Professional Standards and Ethics Reference Group which is due to take place on the 7 May 2015. Update 18 June 2015 - in support of the Professional Standards and Ethics Reference Group, compliant and conduct cases have been broken down by characteristics such as age, gender, ethnic appearance to identify any trends, this will continue to be a consideration at these meetings. Information on other characteristics is currently unavailable from Centurion data. Update 24 August 2015 - Due to the sensitivities of additional characteristics data this is not held on Centurion or currently accessible to PSD staff. Assessment of data will be considered in conjunction with key colleagues from Capability & Resources in due course	22/2/2016: Consideration of simplified access to data still being considered by PSD staff and key colleagues from Capability & Resources.	22-Feb-16	No	AMBER
5	By 31 August 2015, the Home Office should ensure that all forces record reported misconduct in a consistent manner.	Head of PSD	31-Aug-15	Update 11 March 2015 - No action required for BTP. It should be noted that all PSD cases are recorded on Centurion. This system is used nationally by different Home Office Forces. The version of the system used by BTP is compatible with the regulations BTP work to.	N/A		11-Mar-15	N/A	COMPLETE
6	By 31 August 2015, all forces should have systems in place to publish the outcomes of all misconduct cases including those involving criminal and corrupt behaviour.	Head of PSD	31-Aug-15	Update 11 March 2015 - Progress has already been made in this area. A phased approach will be adopted starting with Level 2 cases then Level 1. A draft synopsis of the two proven findings arising from the Misconduct Hearings which have taken place in 2015 has been prepared for review before publication. Discussions have taken place with Media and Marketing and an Internal Communications Plan is being developed and will be rolled out in due course.	Update 24 April 2015 - initial publications to be released following the the first Professional Standards and Ethics Reference Group which is due to take place on the 7 May 2015. Update 18 June 2015 - There has been one proven finding following a Misconduct Hearing for the performance year 2014/15. A draft synopsis of the findings has been prepared and forwarded to Media & Marketing to input and publication. Update 24 August 2015 - All proven findings since the start of the performance year have been published internally along with 'professionalism' messages. Proven findings will be published internally on a quarterly basis at a minimum.		24-Aug-15	Yes	COMPLETE
7	By 31 August 2015, all forces should have in place a confidential means of reporting wrongdoing, in which officers and staff have confidence.	Head of PSD	31-Aug-15	Update 11 March 2015 - PSD has a Confidential Anonymous Reporting System (CARS) which is utilised to quite some degree. All CARS reports receive scrutiny and are reviewed by the Head of PSD and the DCC. The PSD Employee Conduct and Standards of Behaviour Policy documents a number of different ways wrongdoing can be reported.	Update 24 April 2015 - Following recent receipt of BTPs individual force feedback report this process will be reviewed to determine whether any improvements are required. Update 17 February 2016 - Force awareness around CARS is sufficient and proof is in both how the system is used effectively and/or abused. Both the negative and positive are used to measure usage accordingly.		17-Feb-16	Yes	COMPLETE
8	By 31 August 2015, the College of Policing and the relevant national policing lead should issue guidance to all forces about the support that forces should provide to those officers and staff who report wrongdoing.	Head of PSD	31-Aug-15	Update 11 March 2015 - Action to be progressed by the College of Policing. BTP will link in with the College of Policing contact for PSD who attends the South Eastern Regional Practitioners Group (SERPG) which BTP are also members of.	N/A		11-Mar-15	N/A	COMPLETE
9	By 31 August 2015, all forces should ensure that their policies on the acceptance of gifts and hospitality comply with the national guidelines. By the same date, all officers and staff should be reminded of the policies.	Head of PSD	31-Aug-15	Update 11 March 2015 - The BTP Gifts and Hospitality policy is currently under review. The Force has adopted a transparent approach to this. The latest register will be published on the external BTP website. The Gifts and Hospitality register is regularly reviewed at Integrity & Compliance Board. In addition Gifts & Hospitality will also be a standing agenda item for the Professional Standards & Ethics Reference Group.	Update 24 April 2015 - Improvements are continuing to be made to this process. The PSD Compliance and Organisational Learning Manager is aware of the comments made by the HMIC within BTP's individual feedback. Update 18 June 2015 - The policy has been reconsidered and is currently in the final stages of review. Once complete and ratified, appropriate communications will be circulated. Media & Marketing have been briefed accordingly. Update 9 Oct 2015 - the final amendments of the policy are being progressed but currently awaits the arrival of a new compliance and organisational learning manager to take it forward. Update 7 December 2015 - Gifts & Hospitality policy has been amended and re-published with new declaration form and guidance. Comms will be going out in regards to these amendments in the first professionalism newsletter.		07-Dec-15	Yes	COMPLETE
10	By 31 August 2015, all forces should comply with national vetting policies.	Head of PSD	31-Aug-15	Update 11 March 2015 - The vetting unit within PSD conducts vetting checks in line with national vetting policy. The vetting resources verses demand is currently being reviewed due to increasing workloads caused by transformation, recruitment and technology projects.	Update 24 August 2015 - due to continuous demand for a high volume of vetting checks, the vetting unit continues to be closely scrutinised. FTC staff have been retained pending a permanent solution which is currently being considered. Update 6 November 2015 - a permanent solution still hasn't been agreed but will be looked at through financial planning for next year, Update 7 December 2015 - the vetting department is working with recruitment to ensure that they are prepared for any recruitment drives and so can prioritise workloads to reflect this.	22/2/2016: Significant work has been done to reinforce and tie in with vetting processes to prevent extended backlogs in responding to vetting requests. On-going monitoring.	22-Feb-16	No	GREEN

11	By 31 August 2015, in order to identify potential corruption, all forces should have systems in place to assess annually: - whether information on approved business interests remains up to date, and is appropriate; - where business interests have not been approved, that this decision has been complied with; - whether information in respect of notifiable associations remains up to date and is appropriate; and - registers concerning procurement of services.	Head of PSD / Procurement Manager	31-Aug-15	Update 11 March 2015 - The business interests register is regularly reviewed and monitored. The register is also reviewed at Integrity & Compliance Board twice a year. Any refused applications will be considered at the PSD Tasking Meetings. The Notifiable Associations register is also regularly monitored.	Update 21 August 2015 - discussions are taking place between PSD and Procurement in relation to the procurement of services element. Awaiting update from Procurement . Update 7 December 2015 - PSD Intel Unit (PSDIU) is working with procurement to gain access to their procurement systems to ensure that they are able to check registers concerning procurement of services when investigations are taking place. At the same time, the procurement team have created a new declaration form for all contract owners to notify them if they have any interest in the recommended supplier for goods/services. If, and when there are concerns, they will redirect this to PSDIU for investigation.	22/2/2016: PSD Intel Unit (PSDIU) continue to work with the Procurement Team, to simplify access to the procurement system, to ensure that they are able to check registers concerning procurement of services when investigations are taking place. The Procurement Team created a new declaration form for all contract owners to notify them if they have any interest in the recommended supplier for goods/services. These forms continued to be monitored.	22-Feb-16	No	GREEN
12	By 31 August 2015, all forces should ensure they have the necessary capability and capacity to develop and assess corruption-related intelligence in accordance with the authorised professional practice.	Head of PSD	31-Aug-15	Update 11 March 2015 - BTP has an intelligence and counter corruption unit. Corruption related intelligence is managed in line with the authorised professional practice. PSD is currently conducting a review of how covert policing operations in relation to corruption are developed following a recent case.	Update 24 August 2015 - The review has been completed. Ouputs from the review where applicable are monitored by the DCI Proactive with oversight from the Head of PSD and the DCC.	CLOSED	24-Aug-15	Yes	COMPLETE
13	By 31 August 2015, all chief constables should satisfy themselves that they have processes in place to ensure that investigations into misconduct by officers and staff resulting in "no further action" are fair and free of any form of discrimination.	Head of PSD	31-Aug-15	Update 11 March 2015 - The Professional Standards and Ethics Reference Group will review investigation outcomes and live cases to satisfy itself of proportionality and fairness. The inaugural meeting will take place in May 2015.	Update 24 April 2015 - action to be reviewed following the first Professional Standards and Ethics Reference Group which is due to take place on the 7 May 2015. Update 18 June 2015 - BTP now have a mechanism in place to test this. A further Professional Standards and Ethics Reference Group will take place on 26 August 2015 Update 9 Oct 2015 - the professional standards and ethics reference group took place on the 26 August 2015 and further meetings have been scheduled to continue monitoring this.	CLOSED	09-Oct-15	Yes	COMPLETE
14	By 31 August 2015, all forces should ensure that there is sufficient analytical capability to analyse threats, risks, harms and trends in respect of misconduct, criminality and corruption in support of professional standards departments and anti-corruption units.	Head of PSD	31-Aug-15	Update 11 March 2015 - The Analysis and Performance Unit is responsible for the analytical function for the Force. PSD has a dedicated analyst. There are processes in place where by any concerns and requests to develop any analytical products would be raised with the Head of Analysis and Performance.	Update 18 June 2015 - Analysis and Performance has been PSD with analytical support in respect of the Professional Standards and Ethics Reference Group which looks at these types of trends. The product submitted to the reference group will be developed over time.	CLOSED	18-Jun-15	Yes	COMPLETE