

[26 September 2023] Agenda Pack / Full Authority

MEETING
26 September 2023 09:00 BST

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20 September 2023

WEBSITE

Agenda

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4 Actions	Chair		25
5 Policing the Railways in Wales [Verbal]	Chief Superintendent Andy Morgan	09:15	-
6 Strategic Risk Register Q1 2023/24	Chief Executive	09:45	29
7 Policing Plan Performance Q1 2023/24	Deputy Chief Constable		55
8 Chief Constable's Report Q1 2023/24	Deputy Chief Constable	10:00	59
9 Chief Executive's Report Q1 2023/24	Chief Executive	10:15	67
10 [TO FOLLOW] An Estate Fit for the Future - London Regional Hub Update	Head of Strategy, Planning and Engagement	10:30	-
11 [WITHDRAWN] TfL/TOCs Final Outturn vs Budget	Chief Financial Officer	10:35	-
12 Committee Minutes		10:45	-
12.1 [Background Pack] Audit and Risk Assurance / 5 July 2023	Kenna Kintrea		-
12.2 [Background Pack] Appointments, Remuneration and Appraisal / 4 August 2023	Ron Barclay-Smith		-
12.3 [Background Pack] Strategy and Planning / 5 September 2023	Andy Cooper		-
12.4 [Background Pack] People and Culture / 6 September 2023	Nick Hawkins		-
12.5 [Background Pack] Performance and Delivery / 7 September 2023	Craig Mackey		-
12.6 [Background Pack] Audit and Risk Assurance / 8 September 2023	Kenna Kintrea		-
12.7 [Background Pack] Scottish Railways Policing / 14 September 2023	Ron Barclay-Smith		-
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Minutes

Full Authority

Wednesday 28 June 2023 at 11.00am in Meeting Room G1/2, British Transport Police Force Headquarters, 25 Camden Road, London, NW1 and via Microsoft Teams

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Present:

Ron Barclay-Smith (Chair)
 Andy Cooper (Deputy Chair)
 Fiona Brunskill
 Willie Gallagher
 Nick Hawkins
 Lord Jackson of Peterborough
 Kenna Kintrea
 Bev Shears

Apologies:

Emir Feisal
 Craig Mackey

In attendance:

British Transport Police Authority Executive
 Hugh Ind (Chief Executive)
 Rubeela Qayyum (Chief Financial Officer and Deputy Chief Executive)
 Stephanie Calvert (Head of Governance and Compliance)
 Kate Carr (Project Director)
 Sam Elvy (Head of Strategy, Planning and Engagement)
 Madhvi Raichura (Finance Business Partner – Charging)
 Lucy Yasin (Head of Governance and Compliance)
 Alistair MacLellan (Board Secretary / Minutes)

British Transport Police

Lucy D’Orsi (Chief Constable)
 Mike Furness (Chief of Staff)
 Alistair Sutherland (Deputy Chief Constable)
 Sean O’Callaghan (Assistant Chief Constable)
 Charlie Doyle (Assistant Chief Constable)
 Allan Gregory (Assistant Chief Constable)
 Steff Sharp (Director of Corporate Development)
 Harriet Andrews (Deputy Director – Financial Control)
 Clare Conie (Deputy Director of People and Culture)
 Richard Dronfield (Deputy Director – Decision Support)
 Karen Wiesenekker (Strategic Head of Diversity and Inclusion)

External

Oliver Mulvey (Department for Transport)

Apologies

Agenda Item 1

1. Apologies were received from Emir Feisal and Craig Mackey.

Declarations of Interest

Agenda Item 2

2. There were no declarations of interest.

Minutes

Agenda Item 3

3. **RESOLVED**, that the minutes of the meeting held on 29 March 2023 be approved.

Matters Arising

4. Item 6 (Business Planning / British Transport Police Budget and Medium-Term Financial Plan 2024/2028). The Chief Constable noted that there was a tension between the papers presented by the BTPA Executive and the Force with regards to unfunded pressures which would require further review.
5. Item 8 (Oversight of Inclusion and Diversity). Those present discussed the recent Equality, Diversity and Inclusion workshop held in May 2023 and the following points were made.
 - a. A Member noted that he took issue with the inclusion of critical race theory during the workshop. In his view it was a contested and divisive theory that risked detracting from first-person lived experiences. He accepted that he was making a value judgement in this regard.
 - b. The Member continued, noting that his main concern regarding the workshop was its cost of £29,000. Had the BTPA been demonstrably failing in meeting its statutory duties under the Equalities Act 2010 he would see the need to convene the workshop using an external provider, but this was not the case. He felt that the workshop could have been delivered in-house at lower cost.
 - c. The Member concluded by noting that, notwithstanding the above point, procurement of the final provider could have been done differently. Lastly, he would have welcomed the opportunity for the design and delivery of the workshop to be influenced by the People and Culture Committee.
 - d. The Head of Governance and Compliance confirmed that of several potential suppliers for the workshop, only one supplier had submitted a tender.

- e. A Member commented that, in her view, the workshop was the right approach to take, and it had been designed and delivered in such a way that officers and staff had been able to relay their lived experiences in an environment of safety.
- f. A further Member added that, sometimes, it was best to bring in outside providers to challenge existing thinking. It was important to recognise – as demonstrated by the Baroness Casey Report – that UK policing had systemic issues with regards to equalities and diversity. It was important therefore to acknowledge that getting to grips with those issues would be a challenge and therefore she did not agree with the points made by her colleague regarding cost, design and delivery of the workshop.
- g. An Assistant Chief Constable commented that, in his view, the value of the workshop was in the fact that UK policing had had 30 years in which to delivery improvements in equalities, diversity and inclusion using in-house means and it had not achieved the desired outcomes. He personally has shifted his own thinking as a result of the workshop and therefore, at a time when wider UK policing was challenging its corporate thinking, he felt as a chief officer that the workshop had been right and proper.
- h. The Chair welcomed all comments and noted that the Full Authority would be returning to the topic of equality, diversity and inclusion later in the year.

Actions

Agenda Item 4

- 6. **RESOLVED**, that the report summarising actions arising from previous meetings be noted, and actions 1/2023, 2/2023 and 3/2023 be closed.

Strategic Risk Register Q4 2022/23

Agenda Item 5

- 7. Members considered the Strategic Risk Register Q4 2022/23 and the following points were made.
 - a. The Chief Executive noted that the Full Authority would be exploring its strategic risks in detail at a risk workshop on 11 July 2023.
 - b. A Member commented that a cover note detailing committee scrutiny of risk should be a consistent feature of this item (Action 4/2023).
- 8. **RESOLVED**, that the Strategic Risk Register Q4 202/23 be noted.

Policing Plan Performance Q4 2022/23

Agenda Item 6

9. Members considered a summary of Policing Plan Performance Q4 2022/23 and the following points were made.
 - a. The Deputy Chief Constable noted the key points within summary, including the 31% increase in crimes recorded on year, the increase in robbery and violent crime, the reduction in disruption, and the continued focus on sexual offences.
 - b. In response to a question regarding the increase in crimes involving sexual harassment, the Deputy Chief Constable replied this was due to the Force tending to capture more crimes of this type in its reporting compared to other forces. The Force was reviewing its solved rate for these offences.
 - c. In response to a question, an Assistant Chief Constable acknowledged that the Force's recording of serious sexual assaults was the highest in the UK and he was conscious of the Force's corporate decision to encourage reporting in this area.
 - d. In response to a question regarding the decrease in crisis interventions and missing persons reports, both the Deputy Chief Constable and an Assistant Chief Constable noted that, as demand on the network increased, the Force's ability to respond to these types of reports was impacted. That said, the suicide rate (as the unfortunate successive stage of a crisis intervention) was stable.
 - e. The Chief Constable noted any conversation regarding sexual offences needed to be regarded in terms of the confidence of women in policing, which had – prior to the murder of Sarah Everard – been taken for granted. The judicial outcome rate for sexual offences was so low that this negatively impacted on victim confidence. Overall, there was an imbalance in the overall justice system against the victim e.g. a rape victim was obliged to recount their ordeal several times in pursuit of a judicial outcome, whereas a rape suspect was only obliged to provide a pre-prepared statement.
 - f. The Chief Constable praised the Assistant Chief Constable's team for their work to gain the trust of victims of sexual offences, and concluded by noting that a key plank of the approach to combatting sexual offences was ensuring bystanders had the awareness and confidence to intervene in support of persons at risk of becoming victims.
 - g. In response to a comment from a Member regarding theft of passenger property, the Deputy Chief Constable noted that ensuing consistent messaging across Train Operating Companies (TOCs) was a challenge,

alongside access to reliable CCTV coverage that would assist in investigations.

- h. A Member welcomed the improvement in disruption hand-back times and noted the central importance placed on disruption by both industry and passengers, as demonstrated by recent survey data presented to the Stakeholder Engagement Working Group and the Scottish Railways Policing Committee. It was important therefore that disruption was visibly referenced in Force reporting and the BTPA Annual Report.
- i. An Assistant Chief Constable welcomed the downturn in anti-social behaviour but added that the Force remained conscious of the risk of under-reporting in that area.
- j. In response to a question, the Deputy Chief Constable confirmed that assaults against officers were on an upward trend and agreed to ensure this data was included in future reporting (Action 5/2023).

10. **RESOLVED**, that the summary of Policing Plan Performance Q4 2022/23 be noted.

Inclusion and Diversity

Agenda Item 7

External Scrutiny Update

Agenda Item 7.1

11. Members considered an External Scrutiny Update and the following points were made.
- a. The Project Director introduced the update, noting work to implement central coordination of external scrutiny, streamlining the external scrutiny landscape and BTPA taking responsibility for the support of the Strategic Independent Advisory Group (SIAG).
 - b. A Member welcomed the update and encouraged the Executive and the Force to reflect on how external scrutiny could be informed by data as well as anecdotal lived experience, to ensure an accurate understanding of the totality of issue(s) was arrived at.
 - c. In response to a query, the Strategic Head of Diversity and Inclusion noted that the Force was communicating with existing external scrutiny members to ensure their continued engagement with the Force's external scrutiny framework. Moreover, recruitment activity was taking place to improve diversity of external members.
 - d. A further Member welcomed the update, noting that in his experience external scrutiny groups to date risked not including a diverse range of

persons and perspectives, and operating to a defined structure. He encouraged the Force and Executive to develop a time-bound plan on where BTP/A hoped to be in three-six months in terms of external engagement – the number of persons engaged, number of meetings (Action 6/2023).

- e. A Member noted that the update did not go into detail on the implementation risks of the new external scrutiny model, and these could be better communicated and understood.
- f. An Assistant Chief Constable commented that, to date, his main concern on external scrutiny had been the fact the Force was not been robustly held accountable in areas such as stop and search. So, for him, a key outcome of refreshed external scrutiny was a growth in the level of challenge provided to the Force.
- g. In response to a question, the Assistant Chief Constable and the Strategic Head of Diversity and Inclusion confirmed that existing groups and panels had access to e.g. body-worn video footage and elements of case files. A Member commented that this type of access could act as a bridge between data and anecdotal lived experience, and drive key conversations.
- h. A Member noted BTPA Committee terms of references should be updated where relevant to take into account BTPA's new responsibility for the Strategic Independent Advisory Group (Action 7/2023).
- i. A Member noted external scrutiny should be included in the Members' Handbook, given up to seven new Members were due to join the Authority (Action 8/2023)
- j. The Chair requested a meeting with the chair of the Strategic Independent Advisory Group (Action 9/2023).

12. RESOLVED, that Members,

- a. Note the progress made by the Force in streamlining external scrutiny, and the Chief Officer Group-endorsed proposal at annex A.
- b. Approve the move of Strategic Independent Advisory Group ownership from the Force to the Authority and note the opportunities that presented to improve public scrutiny and accountability.
- c. Delegate the receipt of feedback from external scrutiny via the BTPA Executive to the relevant Committee depending on the subject, and terms of reference be amended where necessary.

Annual Report and Accounts 2022/23

Agenda Item 8

13. Members considered the Annual Report and Accounts and the following points were made.

- a. The Chief Financial Officer introduced the annual report and accounts and noted,
 - i. The auditors had commented on the strength of the accounts, which was a testament to the Deputy Director – Financial Control and her team.
 - ii. The auditors had not completed their audit – BTPA Executive staff and Force counterparts were meeting with them that day for an update.
 - iii. Audit and Risk Assurance Committee had reviewed the annual report and accounts at its meeting on 22 June 2023. The Committee had made some comments regarding more reference to risk controls and had been updated on adjustments made to the accounts between P13 and P14.
- b. The Deputy Director – Financial Control added some commentary and noted,
 - i. One adjustment made at P14 was regarding IFRS16, where the Force had identified an issue with the way in which FHQ Camden lease had been scoped. This had prompted a reassessment of all leases and IFRS16 scoping decisions to ensure the Force’s approach was consistent and simple. Following that work, the Force had made an adjustment circa January 2023 and alerted auditors, who had confirmed they were content with the Force’s approach. There was some reference to previous years, but not material enough to justify past-year accounts. Auditors had similarly confirmed they were content with this approach.
 - ii. Another adjustment made at P14 were regards to liabilities relating to Oval Four and Stockwell Six. Auditors were content with this adjustment.
- c. The Chief Financial Officer continued, noting that,
 - i. Members had received a briefing on the annual report and accounts on 26 June 2023.

- ii. Since that time, the Force had identified a further adjustment of c.£467k which fell below the auditor's materiality threshold, but above their trivial threshold. This adjustment related to a liability carried since 2016 relating to the officer pension scheme deficit payment recovery plan. This had in fact been paid off in full in 2016, but nevertheless the party remained on the Force's balance sheet as a creditor. Confirmation had been received that the monies had been paid in full, it was necessary to remove the perceived liability from the accounts.
 - d. The Deputy Director – Financial Control confirmed, in response to a comment from the Chief Financial Officer, that the Force would be conducting a walkthrough of its pensions accounts and documenting lessons learned and any recommendations for improvement in controls. This workstream would be reported to Force-level Audit, Risk, Inspection and Compliance Board (ARIC) and on to BTPA Audit and Risk Assurance Committee (Action 10/2023).
 - e. In response to a question, the Deputy Director – Financial Control noted she was not able to comment on reasons for auditors not identifying the need for the pensions adjustment sooner, but opined it was perhaps due to their testing focusing on the quantum of the various schemes rather on relatively minor – by comparison – liabilities such as the one identified.
 - f. In terms of the reasons for the Force not identifying the required adjustment sooner, the assumption had been made that the figure was a long-term liability. Once this had been called into question, it had been escalated to the Deputy Director and resolved as expediently as possible.
14. Members noted that the external audit of the accounts was ongoing, and the following points were made.
- a. A Member noted that Government Internal Audit Agency (GIAA) reports throughout the year had been of high standard. In contrast, in their view the external audit provided by KPMG on behalf of National Audit Office (NAO) did not appear to be meeting expected timescales.
 - b. A Member developed this point, noting that BTPA Executive and BTP Force put in a lot of effort to produce the accounts to time, and so it was disappointing to hear that a planned 26 June meeting had been postponed by the auditor until after the Full Authority meeting at which Members were considering the report. In their view, this called into question the level of professionalism being applied to the audit.
 - c. The Chair of the Audit Committee noted that their Committee had made similar points. It was important to note the level of staff turnover across BTPA Executive, BTP Force, National Audit Office and KPMG which made it

remarkable that such a strong report and accounts had been prepared. Nevertheless, some form of formal communication regarding timeliness of the audit would be suitable.

- d. The Chief Constable added her endorsement and queried whether the auditor was delivering as per the terms of their contract.
 - e. The Chief Executive noted that timeliness of audit was not a new issue, and indeed the NAO model of contracting out external audit was not, in the case of BTPA, working well.
 - f. The Chair noted that Members were clearly not content with the performance of the auditor and added that he would welcome advice on how to communicate this view to the NAO constructively (Action 11/2023).
15. Members made some final comments on the annual report and accounts and noted,
- a. Officers should ensure there was evidence for the reference to staff welcoming the new ways of working adopted by the Force referenced in the Performance Report.
 - b. Reference could be made to the fact that the Internal Audit Annual Opinion 22/23 was an incremental improvement on *Moderate* compared to 21/22, as noted at Audit Committee on 22 June 2023.
16. **RESOLVED**, that Members, subject to the comments made,
- a. Approve the BTPA Annual Report and Accounts 2022/23 in principle.
 - b. Delegate authority to the Audit and Risk Assurance Committee to conduct a final review and approval of any insubstantial changes to the Annual Report and Accounts prior to their submission to Parliament.

The BTP (Conduct) (Amendment) Regulations 2023

Agenda Item 9

17. Members considered a report regarding the BTP (Conduct) (Amendment) Regulations 2023 and the following points were made.
- a. The Head of Governance and Compliance introduced the report and noted that the proposal before Members was one of several items within the professionalism workstream undertaken by the Authority and the Force. That said, the Authority was awaiting the outcome of a Home Office review prior to proceeding with wider professionalism proposals.

- b. The Chief Constable welcomed the proposal, but expressed disappointment that the Authority was not being more ambitious in proceeding with wider professionalism reform as, in her view, there was clear appetite from partners including the Department for Transport for the Force to be trailblazers in this space.
 - c. In response to a question, the Chief Executive noted that the Home Office review referred to would potentially report prior to the Summer recess.
 - d. Those present noted the risk, highlighted by the Chief Constable, of an individual dismissed by e.g. Civil Nuclear Police or Ministry of Defence Police for a sexual offence that did not meet the Crown Prosecution Service threshold for prosecution would not make it on the barred list and therefore ineligibility for employment with the Force.
 - e. The Chief Constable noted that there was appetite within Department for Transport to proceed with the inclusion of police staff members on misconduct panels and was keen herself to understand the position of BTPA Members on the various professionalism reform proposals.
 - f. In response to a comment, the Chief Constable noted that the BTP Federation and the Superintendents' Association were both supportive of professionalism reform, as evidenced by their reactions to the recent Aftab case.
 - g. The Chief Constable concluded her remarks by noting the BTPA could be more ambitious in bringing forward proposals for reform more quickly without reference to the outcome of the forthcoming Home Office review.
 - h. Members requested that a report summarising the suite of proposed professionalism reform initiatives be provided for them to review outside of the meeting (Action 12/2023).
18. **RESOLVED**, that Members approve the regulatory amendments enabling BTP to adopt Accelerated Misconduct Hearings procedures for former officers.

Board Effectiveness Evaluation: Update on progress and 2023/24 Proposals Agenda Item 10

19. Members considered an update report regarding the Board Effectiveness Evaluation that included proposals from 2023/24 and the following points were made.
- a. The Head of Governance and Compliance introduced the report, referencing recent work to enhance working relationships between BTPA and the Force, and the delivery of a Deloitte report on governance delivered in September 2022.

- b. The Head of Governance and Compliance concluded by noting that there was now an opportunity to build on recent board effectiveness work and review the potential for greater alignment between Force governance and BTPA governance processes.
- c. The Director of Corporate Development added her support to the recommendations.
- d. The Chair concluded the item by noting the impending arrival of up to seven new Members of the Full Authority which would require careful management to ensure effective board dynamics.

20. RESOLVED, that Members,

- a. Note progress on the board effectiveness evaluation action plan.
- b. Agree the principles of a joint board effectiveness evaluation 2024 set out at paragraph 5 of the report, and request that a joint board effectiveness evaluation framework be drafted collaboratively between BTPA and BTP and reported back to the Full Authority (Action 13/2023).

BTPA Code of Governance Refresh 2023

Agenda Item 11

21. Members considered a report regarding the BTPA Code of Governance Refresh 2023 and the following points were made.

- a. Members were content to approve the Committee terms of reference amendments proposed at Appendix 1, noting the suggestion made at Item 7.1 (External Scrutiny Update) that the Strategic Independent Advisory Group (SIAG) should be referenced where relevant in the BTPAs governance structure.
- b. Members were content to make clear within the Code that reference to a Force Director of Finance and Commercial Services should, where that role was vacant, grant the Chief Constable to ability to put forward a nominee to act in that capacity.
- c. Members were content to include reference to a Code of Ethics within the Code as per Home Office guidance.
- d. Members were content to approve the proposed approach to the Full Authority's working groups described at paragraph 6.

22. Members went on to consider the proposed new Annexes 4, 6 and 7 set out at Appendix 2 and the following points were made.

- a. The Chief Financial Officer noted that the new annexes were the result of the Deloitte Report 2022 and had been developed following the Deloitte workshop in November 2022, and further consultation with Deputy Directors within the Force.
- b. The overarching aim of the new annexes was to reduce what was seen in previous annexes as overly burdensome and prescriptive processes and, given the current improved working relationship between the Authority and Force, introduce simpler ways of working.
- c. The Chief Financial Officer noted that any stipulations within the Department for Transport's annual delegation letter to the Authority would take precedence over the content of Annex 7.
- d. The Chief Financial Officer noted that, in response to Member feedback, Annex 7 could be clearer that final approval applied to each stage of a business case, rather than to approval of a Full Business Case.
- e. In response to comments from the Chief Financial Officer and the Deputy Director – Decision Support, Members were content to change, in Annex 7, the Chief Constable's delegated powers to approve ex-gratia payments to up to £50. This would support the timely payment of unpleasant duties payments to officers of which c. 2000 payments had been made in 2022/23 at a total cost of c. £100,000.
- f. Members noted that the unpleasant duties ex-gratia payment had been variously referred to as either an allowance or bonus when previously reported to the People Committee. They encouraged the Force and Executive to liaise to determine how the payment should be defined in future reporting (Action 14/2023).
- g. The Chief Financial Officer noted, with regards to Annex 7 – Procurement Authority, that the proposed threshold for the Chief Constable of up to £500,000 was the lower of two thresholds in the former Annex 7 that had now been rationalised. While the Director of Corporate Development supported the premise of rationalisation, noting that revision of the annexes was intended to streamline governance, the proposed lower threshold risked introducing bureaucracy. She would support retaining the procurement authority of the Chief Constable at up to £1m for the acceptance of lowest tender and signing of contracts after competitive tender for revenue and capital contracts. The change was therefore not approved.
- h. A Member observed that it was curious, in his view, that the Annexes made no reference to authority to recruit, given this posed a potential financial risk. He acknowledged that recruitment was tightly controlled within the

Force under the aegis of the Strategic Workforce Plan, but nevertheless encouraged the Force and Executive to review whether, in any further revision, that there should be reference to recruitment within the Code (Action 15/2023).

23. **RESOLVED**, that Members,

- a. Approve the amended terms of reference for Performance and Delivery Committee.
- b. Approve the amended terms of reference for the People and Culture Committee
- c. Approve the amended terms of reference for the Audit and Risk Assurance Committee.
- d. Approve the amendment of the Code of Governance to enable the Chief Constable to nominate a person to act in lieu of the Director of Finance and Commercial Services at such times when that post was vacant.
- e. Approve the inclusion of a reference to a Code of Ethics as per Home Office guidance on the Policing Protocol.
- f. Approve the proposed approach to BTPA Working Groups specifically,
 - i. Note the Pension Working Group's terms of reference had been reviewed and approved in March 2023
 - ii. Note the Stakeholder Engagement Working Group would complete its first annual business cycle in September 2023, following which the Group would be reviewed.
 - iii. Discontinue the Strategy Working Group pending its reactivation with a refreshed terms of reference to oversee the development of the next Strategic Plan
 - iv. Discontinue the Innovation and Transformation Working Group.
- g. Approve the replacement of Annex 4 (Financial Management) (June 2022) with Annex 4 (Financial Management) (June 2023) in appendix 2 with some minor terminology clarifications.
- h. Approve the replacement of Annex 6 (Accounting Officer SLAs) (June 2023) with Annex 6 (Principles for Engagement) (June 2023) in appendix 2 with some minor paragraph reference amendments
- i. Approve the replacement of Annex 7 (Scheme of Financial Delegations) (June 2022) with Annex 7 (Scheme of Financial Delegations) (June 2023) in appendix 2, including,

- v. Clarifying that the capital projects final approval applied to each stage of a business case, rather than to approval of a Full Business Case.
- vi. Amending the threshold for the Chief Constable's approval for ex-gratia consolatory payments to individuals in respect of incidents that do not involve financial loss from 'N/A' to 'up to £50' and,
- vii. Noting that the proposed change under Annex 7 / BTP Procurement Authority was not approved.

Capital Projects Delegation Limits

Agenda Item 12

24. Members considered a report regarding Capital Projects Delegation Limits and the following points were made.

- a. A Member noted she was not against the proposed increase in thresholds in principle but did not feel the evidence provided within the paper for doing so was as compelling as it could be.
- b. Those present agreed that the large degree of variance in delegation thresholds when compared with peer forces made it difficult to provide a definitive argument in favour of increasing the current capital projects delegation thresholds. Members acknowledged that a key test for a delegated authority was whether it permitted an officer or staff member to perform their day-to-day duties without the need to continue referring to the Full Authority.
- c. The Chief Executive noted that the proposal before Members reflected the fact that the delegated thresholds had not been reviewed and adjusted for quite some time, with the proposal reflecting both inflation but also improved ways of working identified both by Deloitte and Government Internal Audit Agency. He was confident too that the proposed thresholds were written objectively with future Chief Constables and future Chief Executives in mind.
- d. The Director of Corporate Development noted that the thresholds, if adopted, still did not address the potential bottleneck in reporting whereby capital project proposals were submitted to regular, predictable meetings within the Force and Authority, apart from when they required the scrutiny of the Chief Executive. This had the potential to introduce uncertainty and delay.
- e. The Chief Executive acknowledged that competing perspectives on effective governance should be examined objectively with a view to improving ways of working (Action 16/2023).

- f. A Member noted that the new capital project thresholds should be reviewed after a year, and an evaluation report made back to the Full Authority (Action 17/2023).

25. **RESOLVED**, that Members,

- a. Approve the capital projects delegation limits in Annex 7 of the BTPA Code of Governance to,
 - i. Up to £500,000 for the Chief Constable
 - ii. Up to £1m for the Chief Executive
 - iii. Over £1m for the Full Authority, and
- b. The BTPA Code of Governance (June 2023) be amended accordingly.

The meeting was adjourned from 1.00pm – 1.18pm.

Merging of Electricity Contracts

Agenda Item 13

- 26. Members considered a report regarding a proposal to merge the Force's electricity contracts and the following points were made.
 - a. The Chief Financial Officer noted the recommendation within the report were designed to align the Force with central government framework and was largely administrative – it was nevertheless before Members due to the amount involved.
 - b. In response to a question, the Deputy Director – Decision Support noted the contract was government-mandated, and that the Force would benefit from reduced energy prices in due course.
- 27. **RESOLVED**, that Members approve the merger of the two Force electricity contracts into one single contract at an estimated three-year cost of £7.6m.

Contract Award: Student Officer Accommodation

Agenda Item 14

- 28. Members considered a report regarding a contract award for student officer accommodation and the following points were made.
 - a. The Chief Financial Officer introduced the report, noting that a more detailed financial analysis conducted by the Force could be made available on request.

- b. The Chief Financial Officer concluded by highlighting the potential offered the contract for a more flexible UK-wide approach to Force training post-2026
- c. The Chief Constable noted her support for the contract, noting that from a Values and leadership perspective it was important for the Force to offer improved accommodation compared to the present offer, particularly given that the proposed new accommodation was located in a vibrant, diverse area of London.
- d. A Member welcomed the report, noting that she had often received poor feedback on the present accommodation when engaging with officers across the Force. She also welcomed the flexibility the contract offered for a more flexible UK-wide approach to Force training post-2026.
- e. In response to a question, the Deputy Director of People and Culture noted that the new accommodation offered, as the Chief Constable had noted, a stronger sense of place and vibrancy, improved security, study spaces, and access to an on-site gym. She added that, where there was capacity, officers from across the Force would be encouraged to use the accommodation when in London as part of their duties.
- f. In response to a question, the Deputy Director of People and Culture noted that assurance would be provided in the first instance by on-site staff, reporting into central Force function that would also be able to monitor occupancy rates. Members were asked to note that there was some risk of over-occupancy depending on course numbers.
- g. In response to a comment from the Chief Executive regarding the training experience available at Spring House, and the length of time to deliver training reform, the Chief Constable acknowledged that change was taking time, but demonstrable progress was being made in response to e.g. different expectations on travel for training post-COVID through the provision of training pods. The Force was keen to deliver training reform once, to deliver it well.
- h. The Chief Executive encouraged the Force to continue to be mindful of the opportunity to make use of the c£600,000 unspent annual Apprenticeship Levy.

29. RESOLVED, that Members approve,

- a. A total spend of £3,106,419 including VAT for the three-year contract and associated cost for Helix House
- b. That BTPA enter into a contract with London Nest for the accommodation.

Chief Executive's Report Q4 2022/23
Agenda Item 15

30. Members considered the Chief Executive's report for Q4 2022/23 and the following points were made.

- a. The Chief Executive introduced the report and highlighted,
 - i. 2023/24 financial pressures, greater clarity on which would be available once the Q1 23/24 forecast was circulated.
 - ii. Recent HMICFRS reports, one of which into Serious and Organised Crime had been published.
 - iii. Turnover in senior leadership with the BTPA Executive Team.
 - iv. The fact that, the Integrated Security and Policing pilots (ISPPs) notwithstanding, absence of progress on a national integrated approach meant that the corresponding BTPA Goals was graded Red.
- b. The Deputy Chief Constable and an Assistant Chief Constable noted they were more optimistic than the Chief Executive regarding integrated policing and security but acknowledged that getting a handle on strategic collaboration, overseen by a guiding mind, was a challenge. This was acknowledged by the Great British Rail Transition Team.
- c. A Member also highlighted the importance of the impending Pay Award 2023 and the following points were made.
 - i. The Chief Constable noted that the Medium-Term Financial Plan (MTFP) had budgeted for 4% and there was an increasing likelihood that the pay settlement would be 7%. It was important for Members to consider that officers and staff could compare their pay award with those on offer in the rail sector, which were often more generous. She emphasised that the Force had not budgeted for any pay award over 4%.
 - ii. The Chief Constable continued, noting that of £9.5m unfunded cost pressures, £4.4m were overprogramming by the Force with the remainder being unfunded pressures that the Force had expected to be able to meet from Reserves and for which there was no budget cover. This was a challenge for the Force and Authority over the coming months. Members were asked to note that the current MTFP only catered for 3% and 2% pay in succeeding years.
 - iii. In response to a comment from the Chair on the possibility of a one-off payment to officers and staff in common with an approach in the NHS, the Chief Constable noted that this was an additional potential pressure, and that the Force did not recognise any

expectation to manage budget pressures beyond its £4m overprogramming.

- iv. The Director of Corporate Development emphasised that the Force needed clarity from the Authority on unfunded pressures in order for decisions to be made. The longer the current situation continued in-year, the more difficult the unfunded pressures would be to manage effectively.
- v. A Department for Transport representative was invited to address the meeting and concurred with the points made regarding the need for robust financial controls and the likelihood of difficult decisions.

31. **RESOLVED**, that the report be noted.

Chief Constable's Report Q4 2022/23 [BTP Annual Report 2022/23]

Agenda Item 16

32. Members considered the Chief Constable's report for Q4 2022/23 and the following points were made.

- a. The Chief Constable noted that the report was designed to meet her statutory duty under section 56 the Railways and Transport Safety Act 2003 to provide the Authority with an annual report on the policing of the railways for that year.
- b. The Chief Constable summarised the contents of the report and emphasised some specific points,
 - i. The Force would welcome the opportunity to make a submission to the Authority's new Cost Allocation Model consultation when appropriate. The Force would not want to see a model that disincentivised industry partners to invest in crime prevention.
 - ii. It was important for Members to be mindful that Gross headcount was how the Force was structured. Therefore, when officers and staff provided feedback to Members that they did not have the people resources, they were referring to Gross rather than Net headcount.
- c. In response to a question, the Chief Constable replied that outstanding reviews of Police National Database alerts for officers and staff would be completed by November 2023 at the latest.
- d. The Chief Constable concluded by noting her concern over the challenging timelines for the London Estate business case, the unfunded pressures, and

the pay award 2023 discussed earlier on the agenda. That said, she was proud of the work delivered by the Force in 2022/23 including that on equalities, diversity and inclusion and on people policies.

33. **RESOLVED**, that the Chief Constable's Report Q4 2022/23 [BTP Annual Report 2022/23] be noted.

Committee Minutes

Agenda Item 17

Performance and Delivery Committee / 10 May 2023

Agenda Item 17.1

34. **RESOLVED**, that the draft minutes of the Performance and Delivery Committee meeting held on 10 May 2023 be noted. The Project Director highlighted the Committee's consideration of the annual report on custody, and Force legitimacy with regards to stop and search and disproportionality.

Strategy and Planning Committee / 22 May 2023

Agenda Item 17.2

35. **RESOLVED**, that the draft minutes of the Strategy and Planning Committee meeting held on 22 May 2023 be noted. The Committee Chair noted the quality of the Strategic Plan monitoring report, and the fact the Committee considered issues including the Crime Prevention Strategy, Unfunded Pressures and the new Cost Allocation Model.

Scottish Railways Policing Committee / 1 June 2023

Agenda Item 17.3

36. **RESOLVED**, that the draft minutes of the Scottish Railways Policing Committee meeting held on 1 June 2023 be noted. The Chair noted the high level of external attendance at the Committee, the continuing close joint working between D Division and Police Scotland, and the forthcoming new Chief Constable of Police Scotland.

People and Culture Committee / 7 June 2023

Agenda Item 17.4

37. **RESOLVED**, that the draft minutes of the People and Culture Committee meeting held on 7 June 2023 be noted. The Committee Chair noted the Committee's consideration of issues including the Pay Award 2023, Police Education Qualifications Framework (PEQF), and points raised at a recent BTPA and BTP Federation Conference.
38. The Chief Constable noted she had an observation regarding the draft minutes, to be raised in non-public session.

Appointments, Remuneration and Appraisal / 21 June 2023

Agenda Item 17.5

39. **RESOLVED**, that the draft minutes of the Appointments, Remuneration and Appraisal meeting held on 21 June 2023 be noted. The Chair noted that it was long-standing policy for the Authority to follow the direction provided by His Majesty's Government on police pay, which was in turn influenced by the recommendation of the Police Remuneration Review Body.

Audit and Risk Assurance / 22 June 2023

Agenda Item 17.6

40. **RESOLVED**, that the draft minutes of the Audit and Risk Assurance Committee meeting held on 22 June be noted. The Committee Chair highlighted the conclusion of the GIAA internal audit programme and the welcome grading of Substantial for the Force's *Fixing the Fundamentals* IT programme. Less welcome was the *Limited* rating for the Force's handling of travel expenses. Lastly, the GIAA Annual Report and Opinion had graded the Force as Moderate, with some suggestion this was a welcome incremental improvement on 2021/22.

Full Authority Workplan 2023/24

Agenda Item 18

41. **RESOLVED**, that the Full Authority Workplan 2023/24 be noted. Members agreed that the proposed item on Enhanced Police Service Agreements (EPSAs) could be removed.

RESOLVED, that the public be excluded from the meeting for the following items of business in line with the BTPA Code of Governance (June 2023) Annex 5 Paragraph 22.

Non-Public Minutes

Agenda Item 19

42. **RESOLVED**, that the non-public minutes of the meeting held on 29 March be approved.

New Charging Methodology – Progress Update

Agenda Item 20

43. Members considered a progress update regarding the new Charging Methodology¹.

¹ Please refer to the Non-Public Minutes of the 28 June 2023 meeting for the full minute text of this item.

Any Other Business

Agenda Item 21

44. There was one item of non-public business².

Meeting Evaluation

Agenda Item 22

45. Fiona Brunskill provided a meeting evaluation and the following points were made.

- a. There had been a good level of debate during the meeting, in an environment where differing views could be expressed.
- b. Given the relevance of their content to wider items on the agenda, consideration should be given to moving the Chief Executive's Report / Chief Constable's Report to the beginning of the meeting.

Farewells

46. The Chair noted that this was Rubeela Qayyum's last Full Authority meeting prior to her maternity cover contract concluding in September 2023. He noted that Rubeela had carried out her duties with skill and good humour and thanked her for the key elements of work she had delivered with such effectiveness during the year.

47. The Chair went on to note that this was the final meeting for Stephanie Calvert and Lucy Yasin, who were shortly leaving the Authority Executive to take up a job share position of Head of Corporate Governance with an NHS Trust. Both had worked for the Force and Authority for a long period of time and had carried out their duties with a high degree of skill and commitment. The Chair noted he would miss their counsel and wished them well in their new role.

The meeting ended at 2.55pm.

² Ditto

FULL AUTHORITY ACTIONS FROM PREVIOUS MEETING(S)

No	Date	Action	Owner	Outcome
4/2023	28 June 2023	A Member commented that a cover note detailing committee scrutiny of risk should be a consistent feature of the Full Authority's strategic risk item.	Board Secretary	Closed BTPA Cover Report has been provided for Strategic Risk Register on the September 2023 agenda.
5/2023	28 June 2023	In response to a question, the Deputy Chief Constable confirmed that assaults against officers were on an upward trend and agreed to ensure this data was included in future reporting on Policing Plan Performance to the Full Authority.	Board Secretary	Closed Policing Plan slide includes a chart on the number of YTD Police Assaults vs previous years, albeit Members may wish to cross reference this data with that provided to the People and Culture Committee.
6/2023	28 June 2023	A Member encouraged the Force and Executive to develop a time-bound plan on where BTP/A hoped to be in three-six months in terms of external scrutiny – the number of persons engaged, number of meetings etc.	Project Director / Strategic Head of Diversity and Inclusion	In Progress Verbal update to be provided at September 2023 meeting.
7/2023	28 June 2023	A Member noted BTPA Committee terms of references should be updated where relevant to take into account BTPA's new responsibility for the Strategic Independent Advisory Group	Board Secretary	Closed Action has been incorporated into Code of Governance Refresh 2024.
8/2023	28 June 2023	A Member noted external scrutiny should be included in the Members' Handbook, given up to seven new Members were due to join the Authority	Board Secretary	Closed Action will be factored into ongoing refresh of Members' Handbook

9/2023	28 June 2023	The Chair requested a meeting with the chair of the Strategic Independent Advisory Group	Project Director / Member Engagement Manager	Closed Meeting took place on 31 July 2023.
10/2023	28 June 2023	The Deputy Director – Financial Control confirmed, in response to a comment from the Chief Financial Officer, that the Force would be conducting a walkthrough of its pensions accounts and documenting lessons learned and any recommendations for improvement in controls. This workstream would be reported to Force-level Audit, Risk, Inspection and Compliance Board (ARIC) and on to BTPA Audit and Risk Assurance Committee	Board Secretary	Closed Referred to Audit and Risk Committee workplan. An update will be provided to that Committee in November 2023 and it is anticipated the action will be closed at that Committee's March 2024 meeting.
11/2023	28 June 2023	The Chair noted that Members were clearly not content with the performance of the auditor and added that he would welcome advice on how to communicate this view to the NAO constructively	Chief Executive / Chief Financial Officer	In Progress Verbal update to be provided at September 2023 meeting.
12/2023	28 June 2023	Members requested that a report summarising the suite of proposed professionalism reform initiatives be provided for them to review outside of the meeting	Chief Executive	Closed Member Briefing Note provided as Serial B177 on <i>Board Intelligence</i> on 17 July 2023
13/2023	28 June 2023	Agree the principles of a joint board effectiveness evaluation 2024 set out at paragraph 5 of the report, and request that a joint board effectiveness evaluation framework be drafted collaboratively between BTPA and BTP and reported back to the Full Authority	Head of Governance and People / Director of Corporate Development	Closed Added to Full Authority Workplan (December 2023). Meeting between Steff Sharp and Susan Kohler to take place during September 2023 to scope

				out viability of joint exercise.
14/2023	28 June 2023	Members noted that the unpleasant duties ex-gratia payment had been variously referred to as either an allowance or bonus when previously reported to the People Committee. They encouraged the Force and Executive to liaise to determine how the payment should be defined in future reporting	Chief Financial Officer / Director of Corporate Development	Closed Action referred to People and Culture Committee – to be factored into future reporting.
15/2023	28 June 2023	A Member acknowledged that recruitment was tightly controlled within the Force under the aegis of the Strategic Workforce Plan, but nevertheless encouraged the Force and Executive to review whether, in any further revision, that there should be reference to recruitment within the Code	Chief Financial Officer	Closed Factored into Code of Governance Refresh 2024, unless Members direct an in-year Code revision is made.
16/2023	28 June 2023	The Chief Executive was heard regarding capital projects, noting that in his view it was Force internal governance that was often the cause of delay in progressing projects. But he acknowledged that competing perspectives should be examined objectively with a view to improving ways of working	Chief Executive	Closed Factored into Board Effectiveness Evaluation 2023/24 activity.
17/2023	28 June 2023	A Member noted that the new capital project thresholds should be reviewed after a year, and an evaluation report made back to the Full Authority	Board Secretary	Closed Added to Full Authority Workplan (June 2024)
18/2023	28 June 2023	The Deputy Chief Constable requested a briefing on the proposed new Cost Allocation Model for Force Chief Officer Group	Chief Financial Officer / Finance Business Partner – Charging	Closed Briefing meeting took place during September 2023.

<p>19/2023 (Non-Public)</p>	<p>28 June 2023</p>	<p>The Chair directed that an issue regarding [REDACTED] be considered by the Chief Constable / Chief Executive outside of the meeting and an update provided to Members when appropriate</p>	<p>Chief Executive / Chief Constable</p>	<p>In Progress Verbal update to be provided under matters arising from the Non-Public Minutes at the September 2023 meeting.</p>
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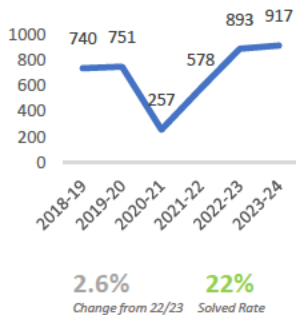
WEBSITE

BTP Forcible Policing Plan Objectives – Q1

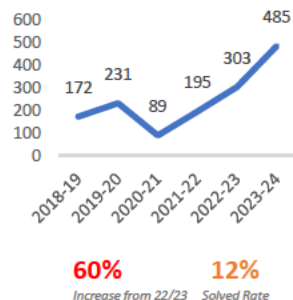
Ensure passengers and staff can work and travel free from the threat of violence

Tackle violence against women, and girls, sexual harassment and hate crime

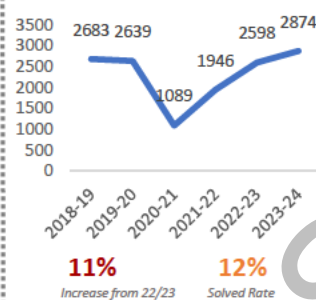
YTD Serious Violence



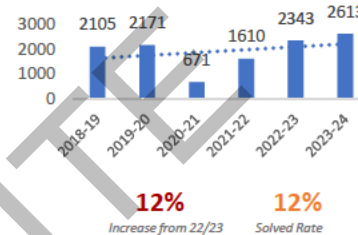
YTD Robbery



YTD Public Order

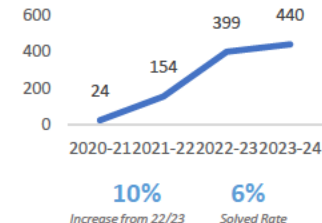


YTD VIAWG



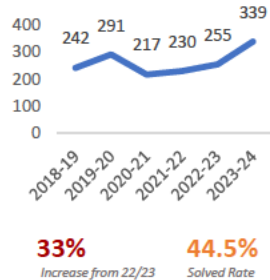
VIAWG offences have seen an increase compared to last year, mainly connected to the overall rise in public order; harass/alarm/distress offences.

YTD USB

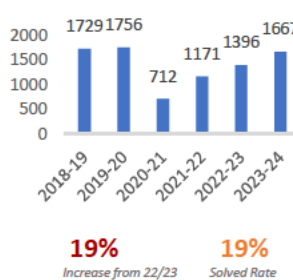


Unwanted sexual behaviour continues to rise with solved rate remaining low, due to limited investigative opportunities from the nature of offending.

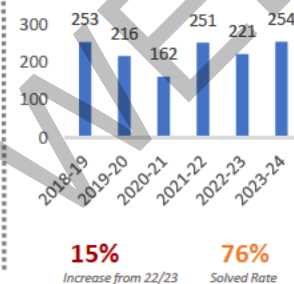
YTD Weapon Enabled



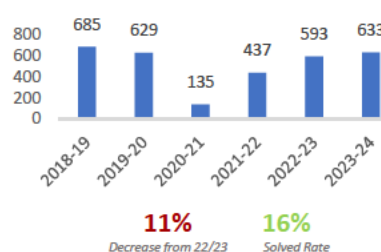
April Staff Assaults



YTD Police Assaults

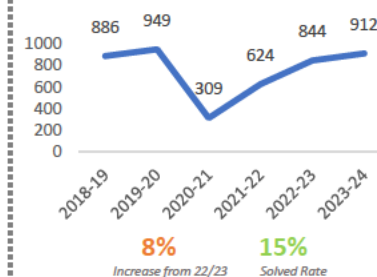


YTD Sexual Offences



Sexual Offences are up compared to last year but still in line with 2019-20 volumes. However we know this is still not the true level of crime, approx. 12-15% below offending levels.

YTD Hate Crime

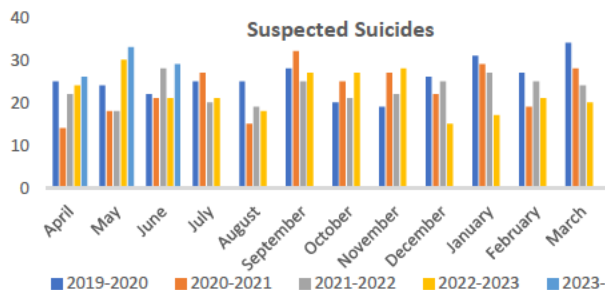


Hate crime offences have seen an increase but remain within expected levels similar to 2019-20.

Crimes that cause harm (serious violence, robbery) are seeing continued increases from last year, often reaching highest recorded levels in the last 5 years. Solved rates across the areas are still below previous years, with the only exception serious violence.

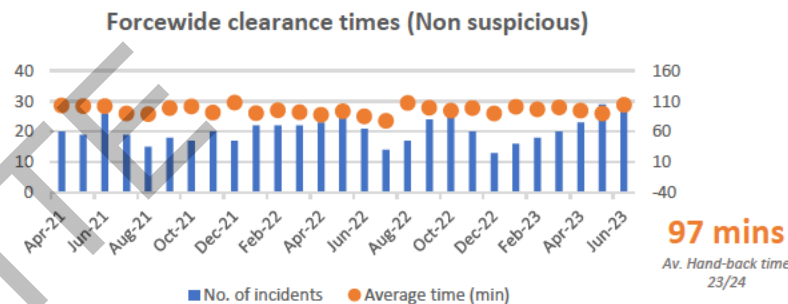
BTP Forcwide Policing Plan Objectives – Q1

Protect, support and safeguard vulnerable people and those at risk of exploitation and harm

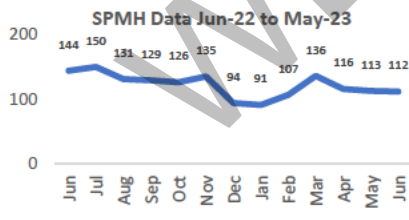
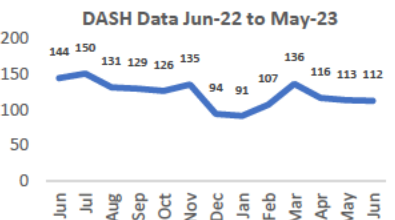
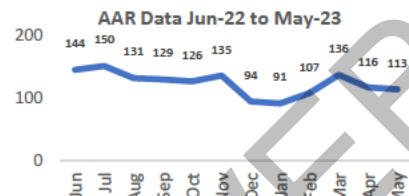
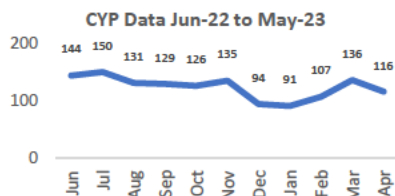


June saw a slightly higher level of suicides compared to previous years, continuing the trend seen in recent months.

Reduce disruption on the network through collaboration

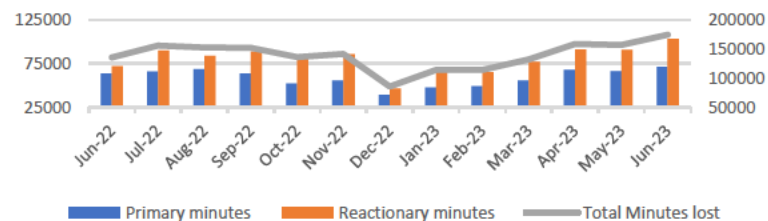


Average handback time is 97 minutes YTD just above the 90 minute benchmark. For June 2023 this was recorded at 104 minutes with 30 incidents.



Children Young Persons (CYPs) continue to have the highest data submissions in comparison to other areas of Vulnerability, having seen a steady increase since December. As per previous years we can expect submission levels to increase throughout the summer.

Disruption - Primary & Reactionary June 2022 – June 2023

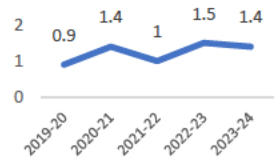


June reactionary and primary minutes are much higher when compared to the same period in 2022. While the incident count has decreased from 2,907 to 2,698 (-7%), delay minutes have continued to increase meaning av. minutes per incident are rising.

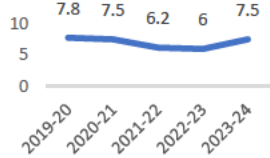
BTP Forcwide Policing Plan Objectives – Q1

Ensure passengers and staff can work and travel free from the threat of violence

Disproportionality: Asian



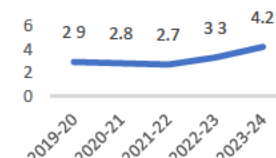
Disproportionality: Black



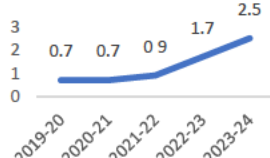
These figures relate to: Times more likely to be searched compared to White individuals.

The progress made in reducing self-defined 'not stated' directly affected disproportionality. Although this may result in a growing rate for all ethnic minority groups this is because fewer searches are excluded resulting in more accurate figures.

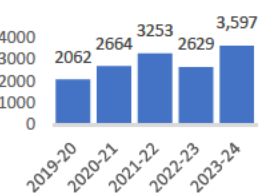
Disproportionality: Mixed



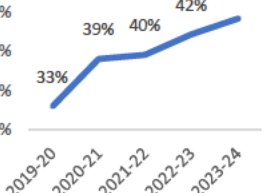
Disproportionality: Other



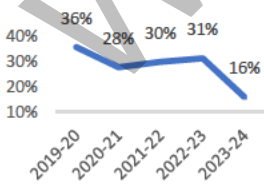
No. of Stop & Searches



Find Rate



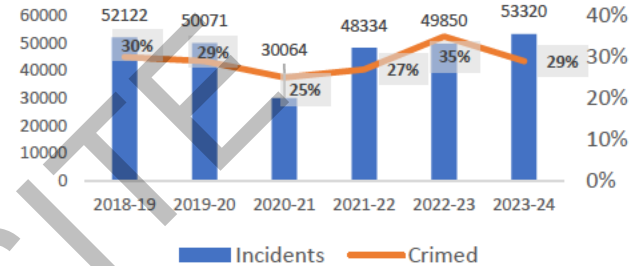
SDE 'Not Stated' %



The number of stop & searches still remains high YTD due to continued Op Invert activity. Find rate is seeing an increase, currently peaking at 44% YTD with Self defined "not stated" category continually reducing due to good working practices.

Tackle those crimes and incidents that most impact on the confidence of those who work and travel

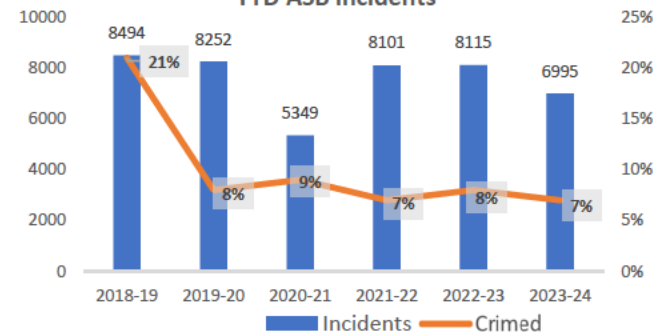
YTD Forcwide Incidents



7% Increase from 22/23

Forcwide incidents have seen a gradual increase since Covid – surpassing volumes recorded during the same period in previous years. However this hasn't been seen in crimed incidents, which have decreased.

YTD ASB incidents



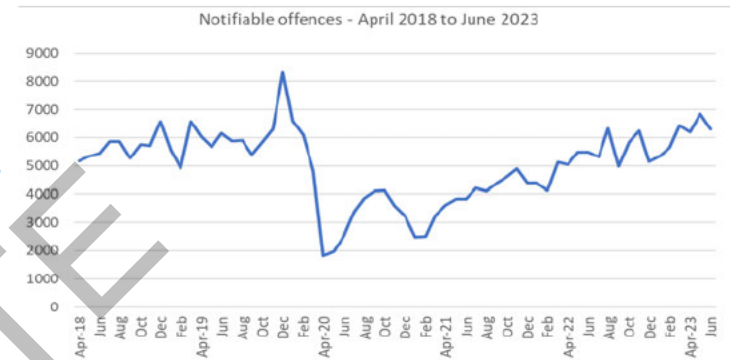
-11% Decrease from 22/23

Excluding year 2020-21, this is the lowest number of ASB incidents in the last 5 years –with a similar proportion (7%) resulting in crimes recorded.

BTP Forcwide Policing Plan Update

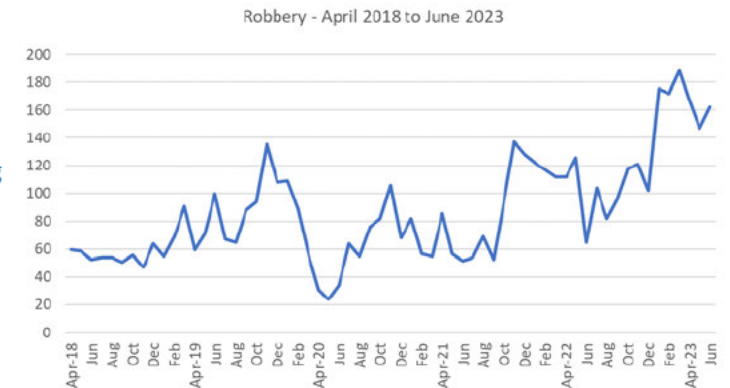
Overall notifiable offences

- At the end of quarter 1, there was a 21% year to date increase in the number of crimes recorded by BTP compared to the same period last year. This was also 21% more than the same period in 2018/19 and 8% more than 2019/20. The largest driver of this increase was theft of passenger property (+2,056 / 61%). There was a 6% increase in the number of crimes solved. However, the increase in recorded crimes meant that the solved rate reduced from 14% to 12%.
- The Policing Plan update to the quarter 1 Performance and Delivery Committee (PDC) noted the cost of living increase and inflation. It was reported that there has been an increase in acquisitive crime such as Robbery, Theft of Personal Property & Shoplifting, which was forecast to continue throughout the remainder of the policing year. It was also reported that financial stresses may also cause an increase in the ability for OCGs to coerce or blackmail vulnerable persons into county lines activity. The Committee noted the Force's efforts to work with the rail industry with regard to crime prevention messaging for the public to be aware of the risk of acquisitive crime.



Robbery

- Robbery continued to be a challenge in B Division in quarter 1. Forcwide, there was a 60% increase in robbery offences during this period compared to the same months last year. While there has been an increase in the number of detections (+33%), the 12% solved rate was a reduction compared to 14% for the same period last year. At PDC it was reported that this was being responded to via a Silver Group within the B Division area, and that the Force was working with key partners, which allowed a combination of preventative measures to be put in place, strategies and swift tactical response to emerging trends. It was also noted at PDC that weapon-enabled crime was a worry due to the crossover with robbery offences.



Next quarter challenge – establishment/resources

- The Policing Plan update to the Q1 PDC meeting reported that overall for the Force there was a 10% vacancy gap across all employee types; 6% for Police Officers, 32% for PCSO's and 13% Police Staff. This was causing general issues with a lack of resources & resilience for work but also additional pressure on those individuals working in understaffed teams and roles across the Force.

SECURITY CLASSIFICATION - OFFICIAL

HANDLING INSTRUCTIONS - No restriction on circulation

DISCLOSABLE (FOI / PUBLICATION SCHEME) - Yes



Report to: British Transport Police Authority

Date: 26/09/2023

Subject: Chief Constable's Report

For: Noting

1. PURPOSE OF PAPER

- 1.1 This report brings to the attention of Members of the Police Authority, items that I consider the Committee will wish to note. Unfortunately, I have had to send apologies to this meeting as my Investiture as Commander of the Royal Victorian Order is taking place at Windsor Castle on the same day.
- 1.2 BTP often deal with tragic occurrences on the railway, although perhaps none more so than the death of Sergeant Graham Saville. Graham, a Nottinghamshire Police response officer, sustained fatal injuries when he was hit by a train as he attempted to save a distressed man in Balderton on 24 August 2023. My deepest condolences go out to his loved ones at this devastating time. I would also like to thank all of the officers and staff who attended the scene for their exceptional work in very difficult circumstances, and our wellbeing team for the support they provided.

2. FINANCIAL UPDATE

- 2.1 This is a significant focus at the moment, so I felt it was important to spend time reflecting the challenges we face. As the Performance & Delivery Committee recently heard, the ongoing management of our budget in 2023-24 is challenging. This is primarily because we entered the year with £9.5m unbudgeted pressures. Part of this (£5.1m) was agreed by BTPA outside of the core budget, with the intention that reserves would be used as the funding route. By 2023, it was clear that this route was not automatically accessible to BTP/A. BTPA have since secured DfT budget cover for £2.1m for the costs of the Coronation bank holiday, Exercise and Testing and the National Enabling Programme.

This leaves priority unbudgeted pressures such as Fixing the Fundamentals, Wellbeing and Professional Standards unsupported, along with an element of BTP overprogramming ahead of the financial year. It is of great disappointment to myself and my Chief Officer Group that these areas were not considered necessary to give budget cover for. In addition, we face new in-year pressures such as the increasing costs of misconduct hearings, insurance, and non-pay inflation as well as an emerging income pressure reflecting vacancies in EPSAs and Grant-funded areas where we have had to divert resources to BAU to meet demand (£3.6m).

- 2.2 Early on in the financial year, it was clear the lack of budget cover would create a significant problem. Whilst in previous years we have held similar levels of unbudgeted pressures, we have had a clear gap between resourcing levels and budgeted establishment. This 'pay' underspend materialised to 'buy out' in-year pressures, taking us far closer to the budget than earlier indications. This year is different. We have a pay budget almost identical to our current and planned workforce numbers. Our recruitment and vetting processes are far slicker, allowing us to recruit people quicker. This means, unlike previous years, there is no significant pay underspend to offset unbudgeted pressures. We are also better at retaining people than ever before. Leaver rates this year have been below forecasts for the fifth period in a row; contrary to the national policing trend. However, our vacancies are not where we'd want them to be, in terms of performance and income recovery – disproportionately hitting TfL and EPSAs. Finally, overtime spend continues to increase to bridge the gap between our workforce strength and the demands of frontline policing. This is an unprecedented set of circumstances for us to manage.
- 2.3 As you would expect, I met the Chair and Chief Executive in June to discuss our concerns and sought an early position on firm assumptions and / or corrective action, as the longer we held a known pressure of this significance without a secure funding route, the harder it would be to resolve and accurately forecast. The Force's position was primarily to work with DfT to seek budgetary cover for the overspend and secondly to seek BTPA's support that our intended overspend be charged out to the industry, deemed as the cost of policing the railways in 2023-24. Failing either course, the proposal was to manage – through controlling recruitment – an element of the overspend. A wholesale recruitment freeze in June would have saved only £5.9m, to give an indication of the limited scope of our in-year choices. Our June note to the Chief Executive concluded "BTPA must be clear that with every day that passes before this instruction is either clarified or given formally, the viability of a recruitment freeze as an option reduces."

- 2.4 Following these discussions, the direction was to await the Q1 forecast and PRRB settlement. It was possible that with a pay settlement below the budgeted 4%, an element of the in-year overspend would be 'bought out'. This did not materialise and PRRB awarded 7%, equating to an additional £5m in-year impact. Whilst other Forces adopted enhanced settlements (£1,000 per officer), BTP made no such request. Whilst the BTPA commitment to funding the in-year impact of PRRB relieved an additional pressure, the forecast overspend continued to sit at around £10m. This was despite a range of realism measures, delays, and decommissions in the first quarter of the financial year. I would remind Members that 71% of our core budget is pay, 2% County Lines, 1% BTPA, 17% non-pay, which is fixed in the medium term (leases, contracts etc), 3% overtime and 6% variable non-pay (petrol, heating, cleaning, travel, accommodation, electricity, training, occupational health services etc.). Following the Q1 forecast, I met with the Chief Officer Group where we agreed a further in-year budget reduction of £0.8m and reinforced existing controls around overtime and non-essential travel and hotels.
- 2.5 The direction at Performance & Delivery Committee in September was to reduce our in-year forecast by £5m. Such a significant shift mid-year is frustrating because our lack of budgetary cover has been well understood for some time. Even with the most extreme measures such as a recruitment freeze, it is highly unlikely to be delivered. We have now stopped most work without associated budget cover (Fixing the Fundamentals, Wellbeing and Professional Standards) and will focus more on workforce planning movements to reduce the contributing income under-recovery. However, this has not made a meaningful impact on our forecast – it has simply stopped it growing. We put forward these proposals last year to the Authority as activity categories over and above our budget, making clear that we would not be prepared to impact our core operational delivery to secure their investment. This was on the basis that reserves funding was agreed. Now, we have followed that same premise to safeguard BTP from more operationally impactful measures such as stopping or slowing recruitment.
- 2.6 However, if we are instructed to make a material difference to the forecast overspend, stopping recruitment is the only viable option remaining. If we stopped now, based on our turnover and the intakes where conditional offers have not already been sent to candidates, we could reduce headcount by **274**, by April 2024. It would save us only £2.8m against our forecast overspend. Slowing recruitment would save even less. Both of these measures would cause significant operational, reputational, and political risk. The operational impact would mainly be felt next year, when the pipeline of officers completing their training and being posted to Division dries up for a sustained period of time. It could mean we are not able to deliver our Strategy and Policing Plan with so many fewer staff. It would also make a number of police posts on the network untenable

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requiring a rationalisation of operating locations and a detrimental impact on performance. Five stations would be assessed and considered for closure from April 2024, dependent on the level of vacancies. Critical police staff functions could quickly become unviable, depending on where turnover occurs. To recover the workforce strength, we have today would take 27 months. It would put us at odds with every Home Office Force and Central Government's commitment to policing, placing BTP as an outlier in the policing family.

- 2.7 At the Performance and Delivery Committee it was suggested that any decisions made to mitigate financial pressures against the budget agreed in December 2022 would be made at the Accounting Officer level and should not require the intervention of the Full Authority. I do not agree with this. If there is disagreement between myself and the Chief Executive and taking into account the significant operational and reputational risks associated with the in-year funding direction proposed at the Committee, then I consider that this should be a Police Authority decision.
- 2.8 Defraying the cost of policing the railway is entirely within the gift of the Police Authority.

3. A FORCE ON THE MOVE (AFOTM)

- 3.1 Our transformation portfolio continues to deliver quantifiable benefits and efficiencies to reinvest where they will be most impactful on our objectives and to the benefit of the whole rail sector. In line with positive recent GIAA feedback that 'effective tools have been developed to support the identification and classification of benefits arising from projects', we are exploiting a new Benefits Management Strategy (BMS) to monitor and report on cash savings and wider benefits. The BMS is being updated to reflect the new Government Efficiency Framework. The programme is subject to ongoing workshops, run by a newly appointed Benefits Realisation Lead, and is now a key component in the DCC-led SRO reviews.
- 3.2 Key benefits so far this year include AFOTM rebalancing savings of £14.1m over the life of the financial plan from our Layers and Spans and CT reviews. The relocation of staff from Portland St to Manchester Peninsula has also delivered a benefit of £234k from the start of this financial year. Recent AFOTM business case approvals have included the Niche Intelligence Portal which involves future productivity savings. We continue to track total YTD Project Cost Savings Benefits through the deployment of Drones to disruption events which currently amounts to approximately £5.5m. Savings of circa £60k have been recorded for 2023-24 in our rolling Every Penny Counts (EPC) tracker (on top of the £730k rolled over as recurring savings from the baseline of 2022-23 when the EPC initiative started).

- 3.3 Members have been briefed on our Strategic Centre project that will deliver an integrated planning cycle for the Force, address strategic disconnects, duplication, and governance issues. It will put forward a sustainable business case and design for a BTP Strategic Hub. The new Capacity Planning Tool (CPT) will provide evidence-based choices - both for reinvestment and also rebalancing options.

4. TICKET OFFICE CLOSURES CONSULTATION

- 4.1 The high-profile Ticket Office Closure consultation opened on 5 July 2023 and was initially scheduled to run for three weeks, covering 974 ticket offices. BTP was informed formally on 4 July 2023. Subsequently the original deadline of 26 July 2023 was extended by DfT following complaints that this was insufficient time, and that some TOCs had not followed the process correctly.
- 4.2 BTP responded to the Ticket Office closures consultation on 1 September 2023 and has had Freedom of Information requests for its response to the consultation. Our letters to both passenger bodies are disclosable.
- 4.3 More than 680,000 responses were eventually received by the two passenger bodies, London Travel Watch (LTW) and Transport Focus (TF) following well-publicised campaigns by both the rail unions and the Daily Mirror which largely focussed on a lack of risk assessments around vulnerable people using the network. BTP worked proactively with DfT, LTW, TF and RDG to develop a system of policing and security risk assessments which will be completed by the operators and dip sampled by DfT with involvement from BTP.
- 4.4 We are looking forward to continuing to work with the passenger bodies, DfT and RDG as the consultation enters its next phase (currently 5 weeks for review but likely to extend due to the volume of responses received). I am grateful to Mike Furness, Johnny Shilton and Dom Ioannou for their fast time work on this and support to DfT.

5. Rt Hon MARK HARPER MP VISIT

- 5.1 The Secretary of State for Transport, Mark Harper MP, visited one of our operations at Ealing Broadway station on 5 August 2023 and spent over four hours with our frontline teams. He has been particularly keen to observe our operations first-hand, with a particular interest in the plain-clothes work our officers undertake to prevent violence against women and girls on the network.
- 5.2 This was a joint operation with the Metropolitan Police, which gave him a valuable insight into our specialist policing role as Guardians of the Railway. In total there were 64 stop searches, five arrests, 23 positive searches and nine stop accounts.

- 5.3 The visit went well, with Mr Harper emailed afterwards to say it had been extremely useful to see first-hand how difficult policing is. This was another example of the strong relationship developed between BTP and the DfT.

6. OPERATION ALERT

- 6.1 Visibility means higher trust and confidence levels. Renewing Op Alert during the peak times is vital to this across Network Policing. This quarter, there were 9469 Op Alert patrols, with 250 arrests, 412 stop and searches completed, and 29 weapons recovered.
- 6.2 In Scotland, on-train patrols and Op Alert have proved to be an effective tool since April 2023. There have been a number of on-train patrols from Glasgow Queen Street and Glasgow Central to locations such as Partick, Paisley, Dalmarnock, Glasgow Subway and other stations on these lines. Local managers have highlighted improved confidence in BTP over the last quarter.

7. MENTAL HEALTH CRISIS TO CARE

- 7.1 Right Care, Right Person (RCRP) is an operational model developed by Humberside Police that changes the way the emergency services respond to calls involving concerns about mental health. This model was launched by the NPCC and the College of Policing, and their ambition is that all forces will implement it.
- 7.2 I published a [Blog](#) in July that set out my position in this area. In summary, BTP will not implement RCRP in its entirety, as the nature of our operating environment is such that early intervention with those in crisis is important, not only to safeguard that person but crucially to minimise any potential disruption to the railway. We have jurisdictional overlap with 44 other forces and must engage with 54 mental health trusts and 11 ambulance trusts. We do not take calls to service in the same way as other forces and there are no emergency departments or places of safety on railway jurisdiction.
- 7.3 Helping those in crisis is at the forefront of who we are and what we do, and our own project is underway at BTP - "Mental Health Crisis to Care". This project will deliver a complete review of the way in which we respond to mental health incidents, ensuring our response is sustainable and effective, whilst recognising our unique environment and the needs of our many different locations.

8. INCLUSION AND DIVERSITY (I&D)

- 8.1 The I&D Team have continued to support colleagues via Positive Action Ambassadors, I&D Champions, a suite of toolkits and support for neurodiversity, and wide-ranging education and learning options for managers and colleagues. A recent project launched by the I&D Team is the Positive Action Support Group (170 members) which offers those

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from under-represented groups opportunities for development, support, coaching and learning.

- 8.2 We recognised that progress with the Police Race Action Plan needed further action, so we refreshed the ownership of key deliverables and included external scrutiny and support where appropriate to ensure we effectively tackle the issues around anti-racism, disproportionality, and the impact of policing on Black people.
- 8.3 The Detective Constable Accelerated Entry Scheme attracted 250 applicants across 3 campaigns with 120 female applicants (48%), which is approximately 4 times greater than representation seen within standard recruitment. Additionally, 58 applicants were from ethnic minority backgrounds putting representation at 23%, which is higher than the usual 14% average. Many of the female candidates were also from Ethnic Minorities, which demonstrates the scheme's broad intersectional reach.

9. PROMOTIONS PROCESS

- 9.1 Feedback from the APS (2021) and from Employee Support Associations indicated that there was a lack of trust in the officer promotions process as well as a perception of bias and nepotism. Our ambition is to be an organisation which is well led, well equipped, well cared for and where our people have trust in the fairness of the promotion process.
- 9.2 In 2023 we launched the first new process, Constable to Sergeant. As a new process there were lessons learned but the response was mostly complementary of the new process and the 2023 All People Survey recorded an 8% increase in confidence based on the one process completed so far. Out of the 106 officers that passed 24% were female and 13% were ethnic minority.
- 9.3 We are now continuing to roll out the process for subsequent ranks simultaneously – Sergeant to Inspector, Inspector to Chief Inspector, Chief Inspector to Superintendent. On the 12 September 2023, the application window closed with a total of 130 applications. There will be 30 days of boards being held over September and October in Glasgow, London and Birmingham.

10. ESTATES UPDATE

- 10.1 The Force presented a comprehensive update on the proposed position of our new, single-site London Regional Hub on 5 September 2023. The site at 200 BPR (Buckingham Place Road) drives forward the transformation of the BTP London Estate which is aligned to our Strategic Plan. It will provide the required presence and response alongside a modern, efficient accommodation.

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- 10.2 The 200 BPR, London Divisional Hub Proposal will align with the Levelling Up agenda and Places for Growth objectives, providing a new 'home' within a single site for our workforce to be proud of.
- 10.3 On 15 September 2023, Kenna Kintrea and Andy Cooper attended a workshop with the Estates & Finance leads, to support the development of the full business case. The next steps for the project, which is following a very tight time scale, are to obtain sign off from relevant internal Boards, including gaining final approval to proceed from BTPA via correspondence. This will allow a series of actions to be progressed to ensure occupation of 200 BPR in November 2024.

11. INFORMATION TECHNOLOGY UPDATE

- 11.1 Regrettably, Amy Wilson (Head of Digital Workplace) and Craig Ellis (Deputy Chief Information Officer) from the Technology SLT have secured new opportunities outside of BTP. Having both joined in the summer of 2020, Amy and Craig have played a huge part in the turnaround within the Technology Department. They will naturally be a big loss to the Department. I will be working closely with Caroline on the next steps and the recruitment process.
- 11.2 The Technology Department launched the Fixing the Fundamentals structure in January 2023. The establishment is now in excess of 87% for the first time since the consultation back in 2022.
- 11.3 The Skills Framework for the Information Age (SFIA) review also commenced in January. This will see all job descriptions reflect the true scope of each role, with the inclusion of up-to-date technologies, skills, and competencies.
- 11.4 The Data Centre Relocation project is well underway and will increase technical resilience, whilst being a critical enabler of the safe relocation from FHQ. End of life technology is being replaced and the migration plan is underway. This will provide stronger business continuity and improved disaster recovery with the reduction of any down time.

12. RECOMMENDATIONS

- 12.1 That the content of this report is noted by Members.

Report to: Full Authority
Date: 26 September 2023
Subject: Chief Executive's Report
Author: Hugh Ind, CEO
For: Information

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BTPA Goals

1. We want to be a well-run Arm's Length Body, trusted by all our stakeholders.
2. We want to promote & enable a modernised and inclusive culture in the BTP.
3. We want to provide effective, supportive and challenging police oversight for today and tomorrow across the full range of BTP activity.
4. We want to develop our vision for security and lead the conversation with industry and DfT to improve outcomes for industry and passengers.
5. We want to drive transformation and ensure BTP is respected for their specialism by the rail industry and for their innovation across policing.
6. We want continuously to deliver efficiencies and keep improving productivity.

Purpose of paper

To update and inform Members of current issues and activity relevant to the British Transport Police Authority.

To complement the associated report of the Chief Constable provided at the Full Authority's 26 September 2023 meeting.

1. 'We want to be a well-run Arm's Length Body, trusted by all our stakeholders'.

1.1 Correspondence between Secretary of State and Chair

It is worth drawing Members's attention again to correspondence between the Chair and the Secretary of State since my last update. The Secretary of State wrote to the Chair on 15 August (BI E019) setting out his expectations of BTPA over the next year. The Chair's reply of 11 September is at BI 023.

1.2 2023/24 In year financial pressures

My last two updates have tracked the crystallisation of in year pressures on BTP's budget. The Pay Award added a further £4m pressure. Performance Committee took a more detailed report this month and noted the need for BTP to reduce their forecast overspend by £5m for the year.

1.3 Cost Allocation Model Reform

Our 6-week consultation with the rail industry on the reform of our Cost Allocation Model starts on 25 September. To achieve agreement and implement the new Model for the 2024/25 charges looks very challenging but still achievable.

1.4 Pension Valuations and Training

We are yet to receive a considered response from The Pensions Regulator on the Authority's March 2023 decision to sign off the December 2021 valuation of the *officer* pension scheme.

Our next objective is to sign off the December 2022 valuation of the *staff* pension scheme before the end of March 2024.

We plan Member training on the constitution and operation of our various pension schemes before Christmas (to be open to new and existing Members).

1.5 Member Handbook

Some Members have provided feedback on the Member Handbook. We plan to update this document before the arrival of new Members this autumn. Further feedback from Members to Alistair MacLellan will be welcome.

1.6 Meeting feedback

We instituted a Member review of Committee meetings as part of our Board Effectiveness work in 2019/20. Rather than place the onus for the conduct of this review on a sole Member each time, we are looking to trigger comments from more participants at each meeting, including BTP attendees. Member support for this effort will be appreciated.

2. **'We want to promote & enable a modernised and inclusive culture in the BTP'**

2.1 New Staff Pension Scheme

The December 2022 valuation referenced at Paragraph 1.4 above is of the existing staff pension scheme which is to be closed to new members from 1 October. Staff who join BTP after that date will be offered membership of a new, more flexible, Defined Contribution pension scheme for which HMG gave approval in June. My thanks to Rubeela, Vicky and BTP colleagues for their work in setting up this scheme for commencement next week.

2.2 Dismissals Review

Members will have seen that the Home Office announced the high-level findings of its Dismissals Review at the end of August. The detail was published on 18 September. You can find it [here](#). The Chair wrote to the Secretary of State on 7 September (BI

E021) outlining our proposed response. A joint BTPA/BTP Working Group will work through the detail and we will update Members in due course.

3. 'We want to provide effective, supportive and challenging police oversight for today and tomorrow across the full range of BTP activity.'

3.1 Operational Performance

We have recently reinstated an agenda item on BTP operational performance at Full Authority meetings. This is at item 7 on today's agenda. A fuller discussion is held each quarter at the Performance and Delivery Committee. Monthly data is uploaded to Board Intelligence for all Members to see. Demand on BTP is growing across the range of policing activity at the moment.

3.2 Policing Plan 2024/25

TOCs and other industry partners have the opportunity to feed into the prioritization process for BTP across Get Britain at a series of (Teams) meetings over the next month. Member attendance is encouraged at any of these meetings. Dates are as follows:

26th September Western	5th October Scotland
3rd October B-Central	10th October B-North and South
3rd October Wales	11th October Pennine
4th October Midland	

3.3 HMICFRS

The suite of HMICFRS PEEL reports from their 2022 Inspection of BTP (including Vetting) has yet to be published. But Members have had access to the reports ([BI Serial B175 / 27 June 2023](#)) and can follow up via Committee meetings and other means. We expect these reports to be published this autumn.

New HMI Lee Freeman has taken over from Matt Parr as lead Inspector for BTP. The Chair is to meet him next month. His new team has asked to observe BTPA's Performance and Audit Committees in November as well as the Full Authority in December.

3.4 Executive Team

Rubeela Qayyum left BTPA on 15 September after providing maternity cover for Sarah Church who has now returned as CFO and Treasure of the BTP Fund.

This is Susan Kohler's first meeting of the Full Authority since her arrival this summer to replace Stephanie Calvert/Lucy Yasin.

This is Sam Elvy's last meeting of the Full Authority after 18 years with us. She has given a great deal to BTPA over the years and rail industry, BTP and BTPA colleagues alike will all miss her very much as we wish her well with what comes next. We will be advertising for a replacement for Sam shortly.

Madhvi Raichura leaves BTPA in the middle of October after 2.5 years running our Cost Allocation Model. Dean Salvador previously ran the Model and will return at the end of October for six months until such a time as we know our efforts to reform and simplify it have been successful.

Lynsey Luthra (nee Marshall) rejoins the Executive team as Risk and Assurance Manager at the end of this month, after 18 months working in the Arts sector.

Collectively, this represents a more significant rotation of Exec Team staff than I normally report to Members and, of course, the loss of Sam after her length of service stands out. Having three returners in Sarah, Lynsey and Dean will significantly mitigate any operational impact of this churn for BTPA.

4. 'We want to develop our vision for security and lead the conversation with industry and DfT to improve outcomes for industry and passengers.'

4.1 Ticket offices

After much work between BTP, DfT and other partners in the rail industry, agreement has been reached on a template for use this autumn to assess the safety implications of any contested ticket office closures. The Chief Constable's parallel update offers more detail.

5. 'We want to drive transformation and ensure BTP is respected for their specialism by the rail industry and for their innovation across policing.'

5.1 No commentary to report at September 2023 meeting.

6. 'We want continuously to deliver efficiencies and keep improving productivity'

6.1 Medium term Financial Plan

Preliminary discussions on Rubeela Qayyum's 4 August Directive on the MTFP took place at the month's Strategy and Planning Committee. An update will be provided on today's agenda.

6.2 200 Buckingham Palace Road

The Authority also has before it an summary paper on the proposed move of BTP's Central London operational teams and elements of FHQ to TFL premises in Buckingham Place Road. A final decision on the plan will be needed subsequent to a dedicated breakfast briefing on 9 October.

British Transport Police Authority – Full Authority Workplan (September 2023)

Items in italics have been added since the June 2023 meeting

~~Struck through~~ items have been moved – see footnotes.

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29 March 2023	28 June 2023	26 September 2023	5 December 2023
Standing Items			
Minutes	Minutes	Minutes	Minutes
Committee Minutes	Committee Minutes	Committee Minutes	Committee Minutes
Actions	Actions	Actions	Actions
Risk Profile	Strategic Risk Register Q4 22/23	Strategic Risk Register Q1 23/24 <i>including summary of Committee scrutiny</i>	Strategic Risk Register Q2 23/24
Policing Plan Performance	Policing Plan Performance Q4 22/23	Policing Plan Performance Q1 23/24	Policing Plan Performance Q2 23/24
Inclusion and Diversity	Inclusion and Diversity – <i>External Scrutiny Update</i>	Inclusion and Diversity ¹	Inclusion and Diversity
Chief Constable's Report	Chief Constable's Report – <i>BTP Annual Report 22/23</i>	Chief Constable's Report	Chief Constable's Report
Chief Executive's Report	Chief Executive's Report	Chief Executive's Report	Chief Executive's Report
Workplan	Workplan	Workplan	Workplan
Planned Items			
BTPA Priorities	Draft Annual Report and Accounts 2022/23	TfL/TOCs Final Outturn vs Budget	Budget and Medium-Term Financial Plan
Management Assurance Return 2022/23	Code of Governance Refresh 2023	<i>Policing the Railways in Wales</i>	Policing Plan Annual Review
Police Officer Pension Valuation 2021	Board Effectiveness Evaluation	<i>Q2 Financial Position / Medium-Term Financial Plan Update</i>	Board Effectiveness Evaluation Update ²
Business Planning – BTP Budget and MTFP 24/28	The BTP (Conduct) (Amendment) Regulations 2023	<i>London Regional Hub Update</i>	
Professionalism	Scheme of Financial Delegations – Amended Thresholds		
Contract Award – National Network Services	New Charging Methodology Progress Update		
Terms of Reference Approval – Pension Working Group	Merging of Electricity Contracts		
	Contract Award: Student Officer Accommodation		

¹ Removed from September 2023 agenda given the Full Authority will have conducted an inclusion and diversity away day on 25 September 2023.

² NB Full Authority Action 13/2023: a joint board effectiveness evaluation framework be drafted collaboratively between BTPA and BTP and reported back to the Full Authority.

March 2024	June 2024	26 September 2024	5 December 2024
Standing Items			
Minutes	Minutes	Minutes	Minutes
Committee Minutes	Committee Minutes	Committee Minutes	Committee Minutes
Actions	Actions	Actions	Actions
Risk Profile	Strategic Risk Register Q4 23/24	Strategic Risk Register Q1 24/25	Strategic Risk Register Q2 24/25
Policing Plan Performance	Policing Plan Performance Q4 23/24	Policing Plan Performance Q1 24/25	Policing Plan Performance Q2 24/25
Inclusion and Diversity	Inclusion and Diversity	Inclusion and Diversity	Inclusion and Diversity
Chief Constable's Report	Chief Constable's Report – BTP Annual Report 23/24	Chief Constable's Report	Chief Constable's Report
Chief Executive's Report	Chief Executive's Report	Chief Executive's Report	Chief Executive's Report
Workplan	Workplan	Workplan	Workplan
Planned Items			
Management Assurance Return 2023/24	Draft Annual Report and Accounts 2023/24	TfL/TOCs Final Outturn vs Budget	Budget and Medium-Term Financial Plan
	Code of Governance Refresh 2024 ³	Q2 Financial Position / Medium-Term Financial Plan Update	Policing Plan Annual Review
	Board Effectiveness Evaluation		
	Capital Projects Thresholds Review ⁴		

³ Full Authority Action 15/2023: A Member acknowledged that recruitment was tightly controlled within the Force under the aegis of the Strategic Workforce Plan, but nevertheless encouraged the Force and Executive to review whether, in any further revision, that there should be reference to recruitment within the Code.

⁴ Full Authority Action 17/2023