



PEEL: Police efficiency, legitimacy and leadership

An inspection of British Transport Police
6 – 17 February 2017

November 2017

© HMICFRS 2017

ISBN: 978-1-78655-594-6

www.justiceinspectors.gov.uk/hmicfrs

Contents

Introduction	3
Overview – Efficiency	5
Overview – Legitimacy.....	7
Overview – Leadership	9
Efficiency – How efficient is the force at keeping people safe and reducing crime?	10
How well does the force understand its current and likely future demand?	10
How well does the force use its resources to manage current demand?.....	13
How well is the force planning for demand in the future?	22
Legitimacy – How legitimate is the force at keeping people safe and reducing crime?	30
To what extent does the force treat all of the people it serves with fairness and respect?	31
How well does the force ensure that its workforce behaves ethically and lawfully?	36
To what extent does the force treat its workforce with fairness and respect?	45
Leadership.....	52
How well does the force understand leadership?	52
How well does the force develop leadership?.....	53
How well does the force display leadership?	55
Annex A – Inspecting forces on efficiency, legitimacy and leadership.....	57

Introduction

As part of its annual inspections of all police forces in England and Wales, Her Majesty's Inspectorate of Constabulary (HMICFRS)¹ assesses police effectiveness, efficiency and legitimacy (PEEL). HMICFRS and Her Majesty's Inspectorate of Constabulary in Scotland (HMICS) are independent inspectorates which have a legal responsibility, under section 63 of the Railways and Transport Safety Act 2003, to inspect British Transport Police (BTP).

BTP is the police force responsible for policing the railways of England, Wales and Scotland. The force therefore transcends local and national borders. In October 2016, HMICFRS and HMICS were commissioned by the Under Secretary of State for Transport to inspect the efficiency, legitimacy and leadership of BTP using the methodology set out in HMICFRS's spring 2016² PEEL all-force inspection programme.

In addition, in December 2016, the Railway Policing (Scotland) Bill³ was laid before the Scottish Parliament. The bill, if enacted, would enable the transfer of Scottish operations of BTP and the British Transport Police Authority (BTPA)⁴ to Police Scotland⁵ and the Scottish Police Authority.⁶ HMICS has used this joint inspection to identify any high-level matters of importance arising from the proposed transfer. HMICS will publish its findings in a separate report later in 2017.

¹ This inspection was carried out before 17 July 2017, when HMIC also took on responsibility for fire & rescue service inspections and was renamed HM Inspectorate of Constabulary and Fire & Rescue Services. The methodology underpinning our inspection findings is unaffected by this change. References to HMICFRS in this report may relate to an event that happened before 17 July 2017 when HMICFRS was HMIC. Citations of documents which HMIC published before 17 July 2017 will still cite HMIC as the publisher.

² See HMICFRS website: www.justiceinspectorates.gov.uk/hmicfrs/peel-assessments/how-we-inspect/

³ See Railway Policing (Scotland) Bill: www.parliament.scot/Railway%20Policing%20Scotland%20Bill/SPBill02S052016.pdf

⁴ The British Transport Police Authority is the independent body responsible for ensuring an efficient and effective police force for rail operators, their staff and passengers. Its duties and functions are similar to those of the Scottish Police Authority or a police and crime commissioner in England and Wales. See: <http://btpa.police.uk>

⁵ The Police Service of Scotland ('Police Scotland') was established under the Police and Fire Reform (Scotland) Act 2012 as a single, national police service. It came into being on 1 April 2013.

⁶ The Scottish Police Authority was established under the Police and Fire Reform (Scotland) Act 2012 to maintain policing, promote policing principles and continuous improvement of policing, and to hold the chief constable of Police Scotland to account for the policing of Scotland.

In addition to its national responsibility, BTP differs from most police forces in several ways. First, it falls under the remit of the Secretary of State for Transport and not the Home Secretary (for forces in England and Wales) or the Cabinet Secretary for Justice (in Scotland).⁷ Secondly, the force is funded almost entirely by the rail transport industry through police service agreements with the BTPA. The nature and challenges of working on the rail network mean that the force also provides some services that are, generally, outside the remit of local forces, such as dealing with fatalities on the rail network. Finally, the force does not have a resident population but rather provides a service to passengers, rail staff and others who work on or live near the railway.

This report sets out our findings for BTP in three sections:

- how efficient the force is in managing its resources;
- how legitimate the force is in treating its workforce and the public; and
- how well the force understands, develops and displays leadership.

Direct comparisons with Home Office forces across all elements of PEEL are difficult and liable to be misleading. As a result, HMICFRS and HMICS have decided to provide a narrative report that does not contain headline judgments.

⁷ See section 20 of the Railways and Transport Safety Act 2003.

Overview – Efficiency

BTP's understanding of the current demand for its services is incomplete and, in some areas, weak. Although the force collates a wide range of management information about the number and nature of public calls received, it has a limited knowledge of less obvious demand, such as crimes relating to modern slavery or child sexual exploitation. The force has only a limited understanding of what crime and incident⁸ demand for its services will look like in the future.

We found that the force has a clear process for prioritising its activities and setting out its levels of service for the public, which is informed by the expectations of the public and other interested parties. These priorities are very well understood by officers and staff at all levels of the force. However, while we recognise that the force has plans to reorganise its resources, at the time of our inspection they were not deployed in a way that meets the demand that the force faces.

We found that BTP has a poor approach to assessing its plans through its business cases, and it does not have a detailed understanding of the benefits that may arise as a result of those plans. Furthermore, the force cannot demonstrate that it has an established process in place for managing projects and the benefits arising from them, or for reviewing projects after they have been implemented.

The force's planning for future demand needs to be improved. We found gaps in the information contained within the force's planned efficiency savings, many of which are at the initial scoping stage or include significant assumptions. This, together with the absence of an agreed medium-term financial plan for the period to 2021, means that we cannot be confident that the force is making credible financial and organisational plans for the future.

The force has identified that its information technology (IT) needs urgent and significant improvement. We agree. A clear, realistic and costed IT plan needs to be put in place quickly to address this. Moreover, the force needs to make sure it has very strong systems in place to control and monitor that plan and track progress.

BTP does not yet have adequate plans to reduce costs, or to make improvements to its services as a result of efficiencies in the future. At the time of our inspection, we found little evidence that the force's planning had taken account of predicted levels of future demand, workforce capabilities or longer term plans for ICT or estates. This means that the force cannot yet prioritise areas for investment in the future.

⁸ Reports of events received by the police that require police attention are referred to as incidents. Not all incidents reported to the police are crimes; for example, reports of suspicious behaviour, civil disputes, or missing children.

In addition to participating in this PEEL inspection of BTP, HMICS has carried out additional inspection activity to examine the strategic issues arising from the transfer of BTP's Scottish operations to Police Scotland. Its findings are scheduled to be published in a separate report later in 2017.⁹

During the course of this inspection, it was clear that senior BTP leaders want to improve the way resources are managed. They have also begun implementing some of the changes that are required in order to do that. However, the force should, as a matter of priority, address the following areas for improvement:

- British Transport Police should ensure its plan to implement new shift patterns is supported with sufficient planning resources. During 2017 the force should review how well the objectives have been met and what further action may be required.
- British Transport Police should ensure its understanding of the current and future demand for its services, including hidden crime, is developed through in-depth research and analysis into specific types of crime, incidents and locations.
- British Transport Police should ensure, during 2017/18, that it meets its own high-level commitment to understand the costs of its activities, which will help inform its future decisions.
- British Transport Police should put in place better systems and processes to ensure that the potential benefits of projects, change programmes and collaborative work are fully understood.
- British Transport Police should put in place a comprehensive, costed and timetabled IT plan that takes account of the impact of change programmes.
- British Transport Police, with the British Transport Police Authority, should develop its strategy for managing its reserves as part of its medium-term financial strategy. The force should determine an appropriate level of cash reserved for contingencies, its requirements for working capital and therefore how much of its reserves can be used for capital investment or other purposes.

⁹ See www.hmics.org/

Overview – Legitimacy

In this section, we saw far more encouraging evidence of good practice. BTP deserves praise for working hard to ensure it treats all of the people it serves with fairness and respect. The force understands the importance of this, and seeks feedback from the communities it serves in a range of ways, including carrying out surveys, text messaging, a mobile phone application and social media. The difficulties of doing this should not be underestimated, given the different groups the force serves and the transient nature of the largest of these, the travelling public. The force analyses the feedback it receives which gives it a good understanding of the issues that have a negative impact on the way the force is perceived.

New recruits and special constables receive good training based on the force's values, ethics and professionalism. The workforce is aware of the Code of Ethics and the force's values. The force has also worked hard to clear its vetting backlog, and all vetting is now up to date. It clarifies and reinforces acceptable behaviour, and officers and staff are confident about reporting concerns to their supervisor.

However, there is more the force could do to ensure that its workforce behaves ethically and lawfully. Its vetting policy is overdue for review and is not in line with current national guidance. The force does not have a formal assessment of the risks of corruption or a comprehensive plan for controlling those risks. The force does not actively seek intelligence about potential corruption. In addition, although the problem of abuse of authority for sexual gain is a priority for the force due to the high-profile nature of this kind of corruption, the force's approach is still in the very early stages of development.

BTP treats its workforce with fairness and respect. It uses a range of methods to identify and understand what affects perceptions of fair and respectful treatment among its workforce. The force takes good care of all its employees and it has invested significantly in improvements in this area. Officers and staff feel that there is a genuine commitment to their wellbeing, and are clear about how to get support if they need it. Supervisors receive good training, and told us that they are clear about their responsibilities in relation to the welfare of their staff. The force has reviewed and replaced its performance appraisal process; early indications are that this is an improvement.

Areas for improvement

- British Transport Police should evaluate its methods for seeking feedback and challenges from all the people it serves, and ensure that it takes action in relation to the feedback it receives.
- British Transport Police should ensure it complies with all aspects of the current national guidelines for vetting.
- British Transport Police should produce a long term plan to assess the risk of corruption within the force and set out a policy for controlling the identified risks. The assessment and policy should be updated annually.
- British Transport Police should develop the capability and capacity required to gather intelligence on potential corruption, including the abuse of authority for sexual gain.
- British Transport Police should improve the way it clarifies and reinforces standards of behaviour to its workforce, with particular regard to the abuse of authority for sexual gain.
- British Transport Police should establish procedures to identify all future allegations of abuse of authority for sexual gain as allegations of serious corruption, and make appropriate referrals to the Independent Police Complaints Commission.

Overview – Leadership

BTP aims to have leaders who are: “Trusted to lead, selfless and inspiring, building great teams to make things happen”. Its senior leadership team emphasises regularly the types of behaviour that the force expects of staff, which are part of a widely-known and accepted programme known as VITAL.¹⁰

The force uses a good range of techniques to develop leadership capability among its staff, including coaching and mentoring for those members of staff identified as having the potential to lead at the highest level. The force accepts that it does not understand fully which leadership skills are lacking among its staff and has introduced a new personal development review process to address this.

The force recognises the importance of a diverse workforce. It has developed programmes to encourage people in its leadership team who have a diverse range of protected characteristics (such as age, gender or sexual orientation). However, we found little evidence to suggest that the force is considering how diversity in other areas such as experience, existing skills or management style could enrich its leadership teams.

¹⁰ The programme details those behaviours that the force requires of all its officers and staff. VITAL stands for: value-adding, innovative, teamwork, active, leaders. These behaviours are designed to reflect the approach and characteristics required in transport policing, including treating people with fairness and respect.

Efficiency – How efficient is the force at keeping people safe and reducing crime?

As with all public services, it is vital that the police service operates in a way that makes the most of all its available resources. Police forces need to make sure they understand the current demand for their services. This is to make sure that they use all the resources available to them to fight all types of crime and to protect communities. Also, forces need to be looking to the future to understand how that demand may change and to plan where they need to invest extra resources or change the ways they operate so that the public can continue to receive the policing it expects and deserves.

Uniquely, BTP is funded almost entirely by the rail transport industry through police service agreements with the BTPA. The police authority uses a charging model,¹¹ informed by policing data, to determine each operator's contributions, based on covering the full annual costs of policing (including those of the police authority) and reflecting each operator's police service agreement.

As part of the government's objectives to reduce public spending, the Department for Transport has been given the task of identifying savings of 37 percent. The government's 2015 spending review set an expectation for BTP and the BTPA to reduce spending by at least eight percent by 2020, without affecting operational capability. In addition, the BTPA required the force to identify resources to invest in new capabilities such as the emergency services mobile communications programme.¹²

How well does the force understand its current and likely future demand?

A good understanding of the demand for police services is a vital part of ensuring that forces have the right resources in the right place to provide the right level of policing now and in the future. This means not just an understanding of reported incidents, but also seeking out demand that is less likely to be reported, such as modern slavery or child sexual exploitation. Forces also need to understand how much effort to put into work that prevents crime and anti-social behaviour from occurring in the first place. It is important that forces continually review how they

¹¹ *The introduction of the new charging model: a review*, BTPA, April 2010. Available at:<http://btpa.police.uk/livesite/wp-content/uploads/2012/07/1270553190NewChargingModel.pdf>

¹² The emergency services mobile communications programme will replace services provided by Airwave with a new national mobile communications service. See: www.gov.uk/government/publications/the-emergency-services-mobile-communications-programme

operate, to ensure that they are not wasting resources by operating inefficiently or responding to unnecessary demands.

Forces must also understand how demand is changing, and how they need to change; they must plan for the future and continue to respond effectively. As well as assessing likely future threats and risks from crime, this also means understanding and assessing the potential impact of wider societal and environmental changes on the demands they will face.

How well does the force understand the current demand for its services?

While many of the services which BTP provides are the same as those provided by local forces, the environment within which BTP operates means that some of its demands and services are different.

Incidents and crimes occurring in and around railway stations will ordinarily require generic policing skills. However, incidents occurring on trains (crossing geographic borders) and on and around the track can require a different response, particularly with the commercial pressures that arise from disruption to services.

We found that BTP has some understanding of the current demand for its services, but this could be improved. Every day, the force makes operational decisions based on the number and nature of public calls received, and reports from police officers about incidents and investigations. The force's intelligence units collate and assess this information and provide their analysis to officers and staff throughout the force. However, there is a small but persistent backlog of intelligence reports awaiting assessment, which means that intelligence assessments (and therefore resourcing decisions) do not take account of all the information available.

While BTP has a clear understanding of the number of calls it receives and the number of incidents and crimes reported, it has a more limited knowledge of less-obvious demand. The force has undertaken awareness-raising campaigns to increase reporting of some crimes, but it needs to make better use of intelligence assessments and put plans in place to tackle less-obvious demand. These assessments normally take the form of in-depth research and analysis (often referred to as a problem profile) in relation to a particular type of crime, or a particular location. While we recognise that the force had completed such profiles for other types of crime, at the time of the inspection, the force had undertaken only very limited activity in relation to less-obvious demand.

Daily management meetings take place in operational units around the force each morning to understand risk and operational challenges, and to deploy resources accordingly. We observed some of these meetings during our inspection and spoke to operational staff. Resources were routinely deployed to known crime hotspots, but we consider that officers and staff could take more account of the vulnerability of individuals within the community they serve.

How well does the force understand potential future demand for its services?

Demands for police services are continually evolving. Forces need to anticipate and understand likely future changes so that their plans keep pace with the public's needs and expectations. Potential future demand includes new and emerging types of crime, such as cyber-crime, modern-day slavery and human trafficking. It also includes changes to the communities that forces serve and developments in technology and environmental events, such as flooding.

BTP has access to a range of information about likely future demand. For example, Network Rail and the train operating companies regularly provide information and data on passenger numbers and footfall through premises, including the predicted use of main railway stations. Recently, the force has introduced what it calls 'a futures board', which will bring a more structured approach to understanding future demand and preparing the force to meet it.

However, there is limited evidence that the force has a clear understanding of potential future demand for its services. The force needs to make better use of predictive analysis to anticipate longer-term changes in crime types and trends in preventative and enforcement activity. The force's limited understanding of less-obvious demand, including hidden crimes such as child sexual exploitation and human trafficking, also limits its ability to assess the full range of potential future demand.

Summary of findings

BTP's understanding of the current demand for its services could be better. The force makes operational decisions based on a wide range of management information about the number and nature of public calls received and reports from police officers on their current incidents and investigations. However, it has a limited knowledge of less obvious demand, such as crimes that the public do not report to the police frequently.

The force has recently introduced a futures board, which will help provide a more structured approach to understanding future demand and preparing the force to meet it. Nonetheless, the force does not yet have a clear enough understanding of the demands it is likely to face in the future.

Area for improvement

- British Transport Police should ensure its understanding of the current and future demand for its services, including hidden crime, is developed through in-depth research and analysis into specific types of crime, incidents and locations.

How well does the force use its resources to manage current demand?

Police forces need to operate in a way that makes the best use of all available resources so that demand is met and public expectations are satisfied. They also need to demonstrate that they have become more efficient. We considered the extent to which BTP has the right people with the right skills in the right place to protect the public and to fight crime.

At the time of our inspection, the force was addressing significant financial weaknesses that it identified following an internal review in 2015, but had not completed remedial actions. The finance department is monitoring and improving levels of service in its basic financial systems. This will have been a long and uncomfortable task for the department, but it now needs to complete its restructure and quickly move to establish itself as a credible, professional and fit-for-purpose function with the BTPA, the force executive board and external stakeholders.

During the inspection, we were told by senior officers that while the need for effective oversight, challenge and accountability was valued, the existing oversight structure was both time-consuming and expensive. The force's chief constable is designated as a second accounting officer to support the police authority's chief executive in carrying out this role. An extensive code of corporate governance was in place to define their respective responsibilities and external consultants had been commissioned to review governance structures.

How well does the force's current allocation of resources match demand, organisational and financial requirements?

Police forces need to consider many factors when deciding how to allocate their resources, including all elements of demand, local risks and priorities, and their national responsibilities. We considered how well BTP assesses these factors when making decisions about the level of service to provide and how to use its resources to best effect.

The force uses a largely incremental approach to budgeting, adjusting the previous year's figures for identified pressures and savings. We were told that the 2016/17 budget had been prepared by considering strategic and operational assumptions, operational priorities and deploying available resources accordingly. The force advised us that subordinate budgets were costed, reviewed, challenged and consolidated, then reviewed, adjusted and finally endorsed by the BTPA. A coherent and lengthy challenge to this process took place, which was supported by all parties.

At the time of the inspection the force was expecting its income and expenditure to be broadly in line with its budget for the current financial year. However, this projection reflected management measures put in place earlier in the year to address an anticipated budget shortfall in 2016/17. These measures included restricting

police staff recruitment and delaying the entry of new police officers into the force in the 2017/18 financial year. Without these measures, the force would have projected an over-spend in 2016/17.

Managing demands for police services

In March 2015, BTP introduced a demand resource and deployment (DRD) programme to examine how well its frontline resources were distributed to meet demand, how well they were spread geographically and their availability during the day. The programme considered the demands on the force's resources, and identified that frontline uniformed officers and staff were not well distributed geographically, and did not have the right shift patterns to meet demand. As a result, the force was making significant overtime payments and was regularly cancelling officers' rest days to meet predictable demands and regular events. The force estimated that this cost approximately £4–5m a year.

At the time of our inspection, the force was still operating with the old resource distribution and shift patterns. The DRD programme was in the final stages of developing an implementation plan, after designing new shift patterns in consultation with staff. Implementation will begin in April 2017 and the force expects to realise the full benefits in 2018. The force needs to improve the implementation of this programme and the functions that are critical to resource management (such as the duty and events planning team) need to be in place at the time of implementation, with enough people and other resources. In addition, BTP should seek advice from other police forces and law enforcement agencies, many of which have already been through similar changes.

As part of prioritising its activities and setting service levels, BTP takes account of the needs and expectations of the public and other interested parties. The force, often in conjunction with other parties, has a well-established process for taking the views of a significant sample of its community, which are then used to inform the force's priority-setting and future activity.

BTP has a clear process for prioritising its activities and setting service levels. The force's priorities are determined in consultation with a range of interested parties, including commercial organisations, passengers and staff who use trains and people who use facilities within train stations such as shops and restaurants. We found that the force's priorities are very well understood by officers and staff at all levels.

Crime recorded by BTP has reduced by about 25 percent over the last ten years, while the total number of incidents¹³ reported to the force has broadly remained stable over that time. The force has sufficient resources to respond to all reported

¹³ Reports of events received by the police that require police attention are referred to as incidents. Not all incidents reported to the police are crimes, for example, reports of suspicious behaviour, civil disputes, or missing persons.

crimes and incidents and is able to prioritise those that need to be dealt with more urgently. The force has identified several crime hotspots and deploys resources to those areas. The force can also mobilise significant resources to respond to train crashes and other critical incidents, either working independently or in collaboration with the relevant local police force.

However, the distribution of resources across the force is not yet balanced to meet demand. For example, the shift patterns that are currently in place (although these are soon to change) are not aligned with peaks in demand. As result, the force is spending a significant amount of money on overtime payments, in order to make officers available outside their scheduled shifts.

The DRD programme has started to improve the force's understanding of the resources required to meet the demands for services. The resourcing model initially developed for the programme assumed crimes or incidents all take broadly the same amount of time and require the same resources. However, the force has recognised flaws in this approach and since August 2016 has developed and used a more sophisticated process which involves the consideration of particular offence types and allows for increased officer time in responding and investigation. The force hopes that this will improve the accuracy of the model as they continue to develop it and enable the full separation of specific costs for commercial operators, particularly those paying for enhanced police service agreements.¹⁴

While the force does understand the costs of some activities (such as football-related policing and other significant public order events), it does not have a full picture of the cost of all its policing work. For instance, neither the force's recent crime review¹⁵ nor its DRD programme included work to understand the costs of investigations. The force's chief officers have made a commitment to undertake activity-based costing¹⁶ in 2017/18, but without a clear understanding of costs, the force is not well positioned to make informed decisions about priorities, and cannot be confident that it offers value for money in all of the services it provides.

¹⁴ Enhanced police service agreements are requests for additional policing services that are not provided for under the police service agreement. This additional service is agreed between the BTPA and the customer and is charged at full cost in accordance with the specific customer agreement.

¹⁵ In March 2015 BTP commenced a review of how it approached crime investigation. The crime review established that there was a need to standardise procedures across all geographic areas. The force is set to introduce the new operating investigative model between April and November 2017.

¹⁶ Activity-based costing identifies activities in an organisation and assigns a cost to each activity based on the resources the activity uses or consumes.

Increasing efficiency

Although BTP is looking to identify opportunities where it can be more efficient, we found no evidence of force-wide systems and processes to continuously improve the way the force operates. However, the force has recently created a benefits and efficiency board to manage a range of projects intended to make the force more efficient and to save money. Many of these projects are in their early stages, but the board provides the opportunity, mechanism and governance arrangements to establish an organisation-wide culture of continuous improvement.

Efficiency projects are underway in almost every area of the force. Many are dependent on other projects, particularly IT, and the scale and complexity of running all of these projects at the same time brings considerable risk. We are concerned that some teams critical to the success of these projects may not have the skills or resilience to implement the efficiency projects, alongside providing 'business as usual' services. The force needs to reassure itself that it has enough people with the necessary skills and experience to not only control and implement each project successfully, but also to manage the level of change across the organisation as a whole.

BTP has a significant number of projects and programmes of work that are either underway or in the early planning stages. The force told us that governance delays in getting the necessary approval from the police authority had resulted in costly project delays. The force should seek to agree with the police authority a timely process and format for the approval of business cases, bearing in mind the need for further approvals by government bodies

How well does the force improve the productivity of its workforce?

Finding ways to make police officers and staff more efficient when they are out in their communities and reducing time spent in the office helps ensure that officers remain visible, on the beat and engaged in activities to reduce and fight crime.

We assessed how well BTP understands the skills its staff need now, and the skills they will need in the future in order to be as productive and efficient as possible. Where there are gaps in either capacity or capability, we assessed whether the force is taking appropriate steps to address them.

Understanding current workforce capabilities and gaps

BTP has, to some degree, not been subject to the same level of efficiency savings that has been required of Home Office forces in recent years. However, the force, through the BTPA, is required by the Department for Transport to make efficiency savings of at least eight percent by 2020, without affecting its operational capability. To achieve these efficiencies, BTP needs to do more to understand the capabilities of its workforce and plan effectively to address current and future gaps.

Figure 1: Planned changes in full-time equivalent workforce from 31 March 2010 to 31 March 2020 for British Transport Police compared with territorial forces in England and Wales

	March 2010	Change from 2010 to 2016		March 2016	Change from 2016 to 2020		March 2020
		BTP	England and Wales		BTP	England and Wales	
Officers	2,677	11%	-13%	2,968	-5%	-2%	2,813
Staff	1,297	22%	-21%	1,584	-20%	-5%	1,270
PCSOs	335	7%	-34%	358	-5%	-6%	341
Workforce total	4,309	14%	-17%	4,910	-10%	-3%	4,424

Source: Home Office police workforce statistics and 2016 HMICFRS data collection

The force uses an IT system called Origin to record the skills of its officers and staff and the training they have undertaken. This enables the force's control room to identify and deploy the right people with the right skills to incidents and crimes. To make this process as efficient as possible, the realignment of resources through the DRD programme should include the geographic review and realignment of skills, to ensure that the right people, with the right skills, are available in the right places.

Various departments across the force conduct their own annual analyses of training needs, but there is currently no overall workforce plan. The force is, however, in the early stages of developing a plan that would enable it to understand its resource and skills requirements for the next few years. A force-wide skills audit is currently being carried out to inform the development of this plan.

Tackling workforce gaps

Within its projects and programmes, BTP does not routinely consider workforce requirements across the force as a whole. The DRD programme, which is in the process of redistributing resources around the force, has taken account of only a limited number of policing skills when considering how it moves resources to meet demand. This needs further work.

One supervisor we spoke with stated that 18 probationers were being assigned to his area, but there were insufficient numbers of suitably trained officers available to work with the probationers.

The force plans to assess the skills of its detectives and their locations across the country, but only after staffing moves and changes have taken place as part of the crime review. The crime review also appears to have been considered in isolation, rather than alongside all the other policing activities, such as activity to prevent crime or reassuring the public.

The review recommends an increase in the number of detectives to undertake investigations of types of crime (such as bicycle thefts) that, under College of Policing guidelines, do not require the level of training that that detectives undertake at considerable expense.

The force has not compared the workloads of its detectives with those in other police forces when determining the number of detectives required. The force has also accepted a crime review recommendation to replace police staff investigators with more expensive police officers, which is incongruous considering that other forces are replacing police officer investigators with police staff.

BTP has undertaken an extensive leadership development programme for sergeants and inspectors, which is almost complete. It intends to implement this for police staff equivalents once police officer training is completed. The force is yet to evaluate the benefits of this training.

When it carries out recruitment campaigns for police officers and staff, the force does not do enough to consider future skills requirements, such as IT skills. For instance, the force recently advertised for 300 police officers; but by focusing on generic skills it might have missed an opportunity to enable its workforce to meet future challenges.

In undertaking the DRD programme and the crime review, the force has identified the average workload of officers and teams across the force. The force could have made better use of this information, particularly by comparing workloads (internally and externally) to understand variations in productivity and to assist with planning and modelling the workforce for the future.

At the time of our inspection, the force told us that in April 2017 it expected to begin work on a project (known as a target operating model) to determine how the force will operate in the future. It is vital that, in undertaking this work, the force fully understands the demands it faces and the current skills and work rate of staff across all force areas to accurately assess and meet future requirements.

How well does the force work with others to improve how it manages demand for its services?

We assessed how well BTP has explored all opportunities to work in collaboration with others to increase efficiency and provide better, more resilient services. The different contexts in England, Wales and Scotland mean that BTP encounters some specific operational difficulties when seeking to collaborate with other organisations across borders. As a result, the majority of its arrangements for collaborative working are focused on specific transport hubs.

Nonetheless, the force has several collaborative arrangements in place outside specific transport hubs, including:

- work with the London Transport Community Safety Partnership to tackle hate crime;
- shared patrols with Transport for the West Midlands and West Midlands Police to tackle areas that may be vulnerable to crime and anti-social behaviour;
- a suicide prevention working group that brings together health agencies, charities and the police to address triggers for suicide and develop effective intervention methods; and
- arrangements with Network Rail and train operating companies to provide joint emergency intervention units and incident response teams for incidents that are likely to disrupt the rail network.

The force has a wide range of agreements in place that set out how it will work with other organisations, particularly in relation to sharing information and the level of service that will be provided.

The force has some good arrangements in place with local police forces about the operational response to problems such as football-related public disorder and determining which force takes the lead at critical incidents or those involving firearms. For example, BTP led the investigation into the tram crash at Croydon in November 2016 with support from the Metropolitan Police Service, whereas the Metropolitan Police Service led the investigation into an attempted murder at Leytonstone tube station, with BTP support.

Collaboration benefits

Although we found some evidence that BTP's collaboration and joint-working arrangements lead to better outcomes, we found little evidence that collaborative working is reducing police costs.

As an example, the force and other agencies it works with (such as mental health charities) encounter over 2,000 people on the railway network each year who are at risk of attempting suicide. Through collaborative agreements with health services and the rail industry, suicide prevention plans are put in place. In 2015/16, BTP received £736,000 from Network Rail, London Underground and the NHS, which has been assessed as contributing to 1,269 life-saving interventions. As well as saving lives, such interventions can reduce disruption to the rail network.

The force plans to do more collaborative procurement. One project was starting to examine opportunities to reduce the costs of back office functions such as payroll, procurement, accounting and human resources activity.

HMICFRS recognises that the force faces challenges in relation to collaboration that are not present for Home Office forces. As we have said, the force has to overcome the difficulties of working in England, Wales and Scotland. In addition, as a non departmental public body,¹⁷ the force is unable to recover any VAT charged on services that it purchases in the course of fulfilling its statutory obligations under police service agreements.

But, notwithstanding those difficulties, we still consider that the force needs to do more to develop collaborative arrangements to reduce operating costs and improve value for money, as well as – crucially – improving service to the public.

In particular, there may be scope for greater efficiency through more collaboration with other police forces. Whether or not the force decides to continue providing services itself, decision-making should be informed by examining all the options available. The force, and the police authority, need to do this as part of a sustainable, affordable financial plan for the medium term.

How well does the force understand how any changes made to improve efficiency have affected its ability to manage demand?

As resources reduce and demands on police services become ever more complex, it is increasingly important that forces understand fully the benefits that are realised from any investment and the impact of any new ways of working. This understanding enables them to learn from what works and to take swift action to mitigate any negative results.

¹⁷ A non-departmental public body (NDPB) is a body which has a role in the processes of national government, but is not a government department or part of one. See: www.gov.uk/guidance/public-bodies-reform

BTP has limited understanding of the benefits arising from changes that it has made to improve efficiency. But the force cannot demonstrate that it has a process in place for assessing, reviewing or managing the benefits of its projects and programmes. The force recognised this was an area for further development and advised us that it intended to undertake benefits assessments of some of its current programmes.

The force's approach to the preparation of business cases, including the assessment of costs and benefits, is also poor. We found examples of business cases being prepared by individuals other than the person responsible for the project. This is far from ideal. Robust business cases, which must include detailed and accurate assessments of costs, are needed if the force is fully to understand the value of its investments.

This is an area that requires improvement. The force and the BTPA need to develop effective mechanisms to review all change programmes and projects, preferably through independent assessment. This needs to be done when business cases are submitted, throughout the life of the project and after the project has been completed. This will not only help the force understand the benefits of each project, but also to learn wider lessons.

Summary of findings

BTP is not good enough at assessing and managing the benefits of projects and programmes. It also needs to improve the way it uses resources to manage demand.

On a positive note, the force is clear about how it prioritises its activities and sets service levels. These priorities are very well understood by officers and staff at all levels of the force. The force also plans to rearrange its resources to meet demand better. However, the force's resources are not yet distributed across the country to meet demand efficiently.

Areas for improvement

- British Transport Police should ensure its implementation plan for new shift patterns is supported with sufficient planning resources. During 2017 the force should review how well the objectives have been met and what further action may be required.
- British Transport Police should ensure, during 2017/18, that it meets its own long-term commitment to understand the costs of its activities, which will help inform its future decisions.
- British Transport Police should put in place better systems and processes to ensure that the potential benefits of projects, change programmes and collaborative work are fully understood.

How well is the force planning for demand in the future?

We examined how well BTP uses its understanding of current and future demand to develop more efficient. Our assessment examined the extent to which plans are credible and achievable while being creative and ambitious. This included how far the force aims to improve efficiency through its workforce plans, collaboration plans, financial plans, ICT plans and approaches to risk. The proposed transfer of operations to Police Scotland will affect BTP's planning for demand. We begin this section by providing some context and our initial findings in relation to this proposed transfer.

Planning for the transfer of force operations to Police Scotland

On 27 November 2014, the Smith Commission¹⁸ set out recommendations for further devolution of powers to the Scottish Parliament, as agreed by Scotland's five main political parties. Among its recommendations, the Smith Commission stated that "The functions of the British Transport Police in Scotland will be a devolved matter".¹⁹ The UK Parliament passed the Scotland Act 2016, which gave effect to the Commission's recommendations, including devolving responsibility for the policing of railways and railway property in Scotland to the Scottish Parliament.

On 8 December 2016, the Railway Policing (Scotland) Bill was published. It is currently being considered by the Scottish Parliament. The Bill will enable the transfer of the functions of BTP and the BTPA in Scotland to Police Scotland and the Scottish Police Authority (SPA). The intended transfer date is 1 April 2019.

Clearly, the Bill will significantly affect BTP, which will need to implement the structural, commercial and operational policing changes necessary to successfully transfer railway policing to Scotland. While it is envisaged that BTP's operations in Scotland (known as D Division, and comprised of 284 officers, special officers and police staff) will transfer to Police Scotland, the transfer will also affect those functions based in England and Wales which support operations in Scotland (for example, command and control, or corporate functions such as human resources).

As the decision to transfer the British Transport Police's functions in Scotland was entirely a political decision, no detailed and authoritative business case which articulates the benefits, disadvantages or costs of the transfer to Police Scotland was developed. However, the Scottish Government, when introducing the Bill to the Scottish Parliament, referred to three high-level benefits in the Policy Memorandum:

¹⁸ Following the independence referendum in September 2014, the Prime Minister appointed Lord Smith of Kelvin to chair a commission (the Smith Commission) on further powers for the Scottish Parliament.

¹⁹ *Report of the Smith Commission for further devolution of powers to the Scottish Parliament*, Smith Commission, 2014, paragraph 67. Available from:

<http://webarchive.nationalarchives.gov.uk/20151202171017/https://www.smith-commission.scot/>

- "ensuring that railway policing in Scotland is accountable, through the Chief Constable [of Police Scotland] and the SPA, to the people of Scotland;
- enhancing railway policing in Scotland through direct access to the specialist resources of Police Scotland; and
- 'future-proofing' the infrastructure policing model in Scotland against changes that may arise from the review of infrastructure policing in England and Wales."²⁰

No benefits to BTP as an organisation, or the future operation of railway policing in England and Wales, have been articulated. The Bill's Financial Memorandum does not fully explore the costs of providing the transfer of railway policing, nor any extra costs that may arise either for in Scotland or in England and Wales.²¹

In preparation for the devolution of railway policing, a Joint Programme Board, co-chaired by the Department for Transport and the Scottish Government, was set up in January 2016. Although both the BTPA and the SPA were included in the initial membership of this board, BTP and Police Scotland were not invited to join until January 2017.

For the purpose of our joint PEEL inspection, we considered the extent to which BTP was preparing for the transfer of its Scottish operations. Our inspection took place some time after the transfer of Scottish operations to BTP had been proposed, but only a shortly after the publication of the Railway Policing (Scotland) Bill. As BTP had only recently been invited to join the Joint Programme Board, we only found evidence of very recent and limited planning and preparation for transfer.

In corporate areas such as ICT, some basic consideration has been given to a strategic plan which allows for the disaggregation of the computer network in Scotland. Similar approaches have been taken to other initiatives such as a force-wide plan to provide body-worn video cameras, which includes options to exclude or extend to Scotland. In contrast, the estate strategy does not yet show any evidence of consideration being given to the consequences of the potential transfer of property leases in Scotland to Police Scotland and the SPA.

BTP and Police Scotland have until 2019 (when the transfer will be completed) to plan, prepare and provide a seamless cross-border railway policing service. At the same time, BTP must continue to maintain the high level of customer satisfaction with its own service, meet the needs of railway operators, and plan for the future provision of its service in England and Wales. These activities will make significant demands of both BTP and the BTPA.

²⁰ *Railway Policing (Scotland) Bill: Policy Memorandum*, Scottish Parliament, 2016.

²¹ *Railway Policing (Scotland) Bill: Financial Memorandum*, Scottish Parliament, 2016.

These activities will make significant demands of both BTP and the BTPA. Both organisations have begun to cost their activity to support the transfer and should seek clarification from the Joint Programme Board as to who should bear those costs. Rail operators which fund railway policing, including those who only operate in England and Wales, have already expressed concern that they may be expected to bear the costs of the transfer.

While all parties involved in the transfer believe it can be successfully achieved, most acknowledge that there are significant challenges, complexities and risks that must first be identified and then resolved. Successful implementation of the transfer will therefore require all the parties involved to work together effectively to resolve critical issues such as:

- the terms and conditions of transferring officers and staff;
- pension arrangements of transferring officers and staff;
- the identification of assets and liabilities to be transferred;
- the renegotiation and renewal of funding through Police Service Agreements,²² and
- operational policing integration and cross-border co-operation.

These should not be underestimated. It will be essential for BTP and the BTPA to communicate effectively with employees who will be affected by the transfer. Officers and staff we spoke with during our inspection expressed some concern about the transfer, uncertainty about whether it would go ahead, and how it would affect them. Some communication with BTP's workforce has taken place. Nonetheless, BTP and the BTPA, with the support of the Joint Programme Board, would benefit from developing and implementing a communications and engagement plan for the duration of the transfer. This plan should include provision of updates on the status of negotiations regarding these critical issues.

How well does the force identify and prioritise areas to invest in for the future?

It is important that forces have good plans in place which take account of future demands for their services as well as the likely future funding available to them. They need to invest wisely in order to ensure that they have the right capabilities to meet future demand. HMICFRS examined BTP's financial plans and workforce plans to assess how well prepared it is to meet future changes in demand and local priorities. We looked in particular at future ICT capabilities, in addition to changes to the communities that the force serves.

²² To be known in Scotland as Railway Policing Agreements.

Matching resources to demand, organisational priorities and financial requirements

BTP provided us with a medium-term financial plan from October 2015 to October 2017. BTP was not able to provide us with its plan for 2017 and beyond, although work on this was underway. We have not seen a finalised document that sets out projections of income, expenditure, capital investments or efficiency savings that support the achievement of the force's objectives to 2021.

The force does not use priority-based budgeting²³ to determine the allocation of resources. Instead, the force follows an incremental approach, adjusting the previous year's figures to take account of identified pressures and savings. At the time of inspection (just before the start of the financial year), the budget for 2017/18 showed an £8m funding gap between expenditure and projected income. This was because some large capital investments, primarily for technology projects, were included relatively late in the process. The force recognised that it was unlikely to manage these costs within the existing 2017/18 budget, and was considering a range of potential actions to mitigate this. Clearly, given the size of the funding gap, the force has not been able to test its allocation of financial resources against organisational priorities. The force needs to align its investments with future service provision in a way that is affordable.

The workforce plan was also incomplete at the time of our inspection. The force does not consider adequately the future skills that its workforce may need in 2020 and beyond. Although the force has considered future demand for some but not all areas of its work, it has a limited understanding of hidden demand and likely changes to crime types and trends. This is an area that requires further work.

Investing in ICT

BTP recognises that information and communication technology (ICT) across the force is in urgent need of significant improvement. A chief officer is providing oversight of some of the immediate problems. For instance, the force has commissioned an external review of its digital strategy, the programme of projects to achieve it, and the capacity of its IT function to support it. However, we found a lack of engagement internally with individuals charged with making improvements to the force's overall ICT infrastructure. For example, the force's mobile technology project is not managed by its IT department. Critical posts in the force's IT department are vacant. This creates significant operational and financial risks because the appropriate technical expertise is not available for planning and sequencing remedial ICT projects – particularly in relation to infrastructure improvements. The scale of planned change, and the interdependencies and reliance between projects, mean that these risks are amplified.

²³ Priority-based budgeting is a technique by which organisations allocate resources in line with priorities. It enables organisations to identify opportunities to reduce costs and/or change service levels.

As an example, one of the force's efficiency projects aims to provide all frontline officers with tablets. These will enable officers to receive information and complete paperwork while on patrol, with the information made available force-wide almost instantly. The project should also catalyse many other improvements, such as more timely briefings and deployments. However, while the force intends to purchase and distribute around 2,000 of these mobile devices over the next year, the IT infrastructure to support them needs to be upgraded. The force recognises this and the need to ensure that mobile and infrastructure decisions and activities are coordinated to ensure the operational benefits are maximised.

This is an area in which the force needs to improve urgently. It needs to put in place a clear, realistic and costed IT plan. Additionally, the force needs to make sure it has very strong control mechanisms in place to monitor that plan.

How well does the force plan its investments?

We assessed the extent to which BTP's future plans are prudent and based on sound assumptions about future demands and costs, while at the same time being ambitious enough to meet public expectations, including identifying new ways of working and providing services in the future.

BTP, through the BTPA, is required by the Department for Transport to make efficiency savings of at least eight percent by 2020, without affecting operational capability. In addition, the force is required to identify resources to invest in new capabilities such as the emergency services mobile communications programme. In October 2016, the force provided the Department for Transport with a plan setting out how the force intended to make those savings.

The potential savings that the force has identified, as well as their timing and interdependencies, were under-developed. The costs of implementing some of the schemes (such as ICT or single control room) did not appear to have been included. The force needs to assess all opportunities for savings and develop a clear business case for each, including interdependencies, investment costs, a process for maximising benefits and realistic implementation plans. The force's benefit and efficiency board should then monitor the efficiency projects and programmes. The force should use the likely net benefits to inform its annual and medium-term financial plans.

Planning for the transfer to Police Scotland of Scottish operations

The Railway Policing (Scotland) Bill was published on 8 December 2016 and enables the transfer of the functions of BTP and the BTPA in Scotland to Police Scotland and the SPA. This will result in a significant change in how the force operates. A joint programme board, co-chaired by the Department for Transport and Scottish Government, was set up in January 2016 to start planning for the transfer of British Transport Police in Scotland.

The strategic issues arising from the proposed transfer of BTP operations in Scotland to Police Scotland are complex and there is evidence of only very recent increased planning and preparation for the transfer.

In some areas, such as ICT, limited consideration has been given to a strategic plan that recognises and allows for the disaggregation of the computer network in Scotland. Similar approaches have been taken to other initiatives such as body-worn video cameras, which builds in options to exclude or extend to Scottish operations. However, the estate strategy did not show any evidence of the potential implications from the transfer of property leases to Police Scotland and the SPA.

The establishment of workstreams supported by key senior individuals within BTP and the BTPA is to be welcomed and will provide the level of support required to help the joint programme board in successfully implementing the change. However, this will require a significant amount of work by the finance department in separating out assets and liabilities, income and expenditure (including overheads that relate to Scotland) as well as work on staff transfers, working and contractual arrangements. This is a task that the finance department needs to move forward.

In addition, both the force and the BTPA may benefit from reinforcing a clear message to focus staff on the proposed transfer, which is set to take effect from 1 April 2019. Not only will this reaffirm that change is going to happen, it will also support the development of contracts and plans that recognise that BTP as a force will change in the future.

To what extent does the force fund its investments sustainably?

It is vital to police forces' ability to sustain effective policing that they become more efficient and reduce costs so that they can not only balance their budgets but also invest in improving their capability in the future. Forces need to consider different ways of transforming the way they work in order to secure effective policing in the longer term. This may include plans to establish different joint working arrangements with other organisations or investing in ICT to improve operational efficiency.

Saving to invest for the future

BTP does not yet have adequate plans to make savings that can be invested in improving services or working more efficiently. At the time of our inspection, the force's financial and efficiency plans were not adequate and we found little evidence that the force's planning has been informed by future demand, workforce capabilities or strategies for ICT or estates. The force therefore cannot yet make reliable decisions about which areas to prioritise for investment.

BTP, with the BTPA, needs to complete a comprehensive forward financial plan for the period to 2021. This plan should take account of the force's work to develop a target operating model (planned to begin in April 2017) that will determine how the

force will operate in the future. The plan should also assess the impact of the transfer of operations to Police Scotland and the SPA.

For 2015/16, a deficit of £7.4m was recorded in the annual accounts, excluding an accounting adjustment for employee benefits. The previous year also had a deficit after financial problems such as the lack of proper maintenance of the historic fixed asset register and bookkeeping losses. BTP and the BTPA need to invest in their budget monitoring and forecasting capability so that they can not only balance their budgets, but also reduce costs. This is vital to their ability to sustain effective policing while they seek further savings and invest in improving their capability for the future.

While the BTPA holds a large amount of cash in its reserves, these were not taken into account in developing the force's plans to fund its capital projects and other investments. As at March 2016, the force held £62.5m in its income and expenditure reserve.²⁴ There had been few changes in the level of use of this reserve since at least April 2014. BTP, with the BTPA, should develop a strategy for its reserves, as part of its medium-term financial strategy. This should include an assessment of the appropriate level to cover contingencies and working capital requirements. It should also identify the amount that can be drawn down from the income and expenditure reserves for capital investment or other purposes.

Working together to improve future efficiency

BTP has introduced an annual process to challenge each budget holder on the extent to which they can reduce their spending. More extensive savings, which have yet to be fully quantified, are expected to come from the range of efficiency and change programmes currently being implemented across the force.

The force has recently appointed an experienced commercial director who has plans to increase collaborative procurement activity in important areas of spending, including forensics and the force's fleet of vehicles. This should provide better value for money and improve the use of procurement expertise.

The force has a constructive relationship with interested parties such as the train and freight operating companies, Network Rail and Transport for London. The operating companies felt that they were able to influence policing priorities, but that there was some scope for greater transparency about the services provided. BTP, with the BTPA, is taking steps to strengthen its model for charging the various operating companies. The force is able to secure additional financial support from these companies, based on an appropriate business case, should the need arise.

²⁴ In practice the majority of this income and expenditure reserve is not cash-backed and, as at March 2016, the cash balance was £26m.

Summary of findings

BTP needs markedly to improve its planning for future demand on its services. There are gaps in the information contained within a number of the force's plans to improve efficiency, many of which are at a very early stage of development or include significant assumptions. This, together with the absence of an agreed medium-term financial plan for the period to 2021, means that we cannot be confident that the force is making credible financial and organisational plans for the future.

The force has considered future demand for some, but not all, areas of its work, but it has not done enough to understand hidden demand, or to predict changes in crime types and trends. It needs to put in place a clear, realistic and costed IT plan to address the gaps the force has in this area. The force also needs to make sure it has much stronger systems in place to monitor the implementation of its IT plan.

There is evidence of only very recent increased activity around planning and preparation for the proposed transfer of operations to Police Scotland.

At the time of our inspection, the force's financial and efficiency plans were unsatisfactory. We found little evidence that the force's planning has been informed by future demand, workforce capabilities or strategies for ICT or estates. The force therefore cannot yet make reliable decisions about which areas to prioritise for investment.

Areas for improvement

- British Transport Police should put in place a comprehensive, costed and timetabled IT plan that takes account the impact of the change programmes.
- British Transport Police, with the British Transport Police Authority, should develop its plans for managing its cash reserves as part of its medium-term financial strategy. The force should determine an appropriate level of cash reserved for contingencies, its requirements for working capital and therefore how much of its reserves can be used for capital investment or other purposes.

Legitimacy – How legitimate is the force at keeping people safe and reducing crime?

Police legitimacy – a concept that is well established in the UK as ‘policing by consent’ – is crucial in a democratic society. The police have powers to act in ways that would be considered illegal by any other member of the public (for example, by using force or depriving people of their liberty). It is therefore vital that they use these powers fairly, and that they treat people with respect in the course of their duties.

Police legitimacy is also required for the police to be effective and efficient: as well as motivating the public to co-operate with the police and respect the law, it encourages them to become more socially responsible. The more the public supports the police by providing information or becoming more involved in policing activities (such as via Neighbourhood Watch or other voluntary activity), the greater the reduction in demand on police forces.

To achieve this support – or ‘consent’ – the public needs to believe that the police will treat them with respect and make fair decisions (while taking the time to explain those decisions), as well as being friendly and approachable.²⁵ This is often referred to as ‘procedural justice’. Police actions that are perceived to be unfair or disrespectful can have extremely negative results for police legitimacy in the eyes of the public.

Police officers and staff are more likely to treat the public with fairness and respect if they feel that they themselves are being treated fairly and respectfully, particularly by their own police force. It is therefore important that the decisions made by their force about the things that affect them are perceived to be fair.²⁶ This principle is described as ‘organisational justice’, and HMICFRS considers that, alongside the principle of procedural justice, it makes up a vital aspect of any assessment of police legitimacy.

One of the most important areas in which internal organisational justice and external procedural justice principles come together is the way in which police forces tackle corruption. How this is done needs to be seen to be fair and legitimate in the eyes of both the police workforce and the general public.

²⁵ *It's a fair cop? Police legitimacy, public cooperation, and crime reduction*, National Policing Improvement Agency, September 2011. Available at:
http://whatworks.college.police.uk/Research/Documents/Fair_cop_Full_Report.pdf

²⁶ *Fair cop 2: Organisational justice, behaviour and ethical policing*, College of Policing, 2015. Available at:
http://whatworks.college.police.uk/Research/Documents/150317_Fair_cop%20FINAL_REPORT.pdf

To what extent does the force treat all of the people it serves with fairness and respect?

Our inspection aims to assess how far the force can demonstrate the importance it places on maintaining procedural justice; and the extent to which it is seeking feedback to enable it to prioritise and act on those areas that have the greatest negative impact on public perceptions of fair and respectful treatment (e.g. stop and search, surveillance powers or use of force). This should include how the force is approaching those groups that have the least trust and confidence in the police.

To what extent does the force understand the importance of treating the people it serves with fairness and respect?

We assessed the extent to which the importance of procedural justice was reflected in the force's vision and values, and the extent to which it was understood by the workforce.

Organisational values

BTP has a good understanding of the importance of treating the people it serves with fairness and respect. The force's organisational values are customer-focus, integrity and respect, common sense, trust and confidence, determination, professionalism and pride. The values are built on the Code of Ethics²⁷ and inform the force's VITAL behaviours (value-adding, innovative, teamwork, active, leaders). These behaviours are designed to reflect the approach and characteristics required in transport policing, including treating people with fairness and respect.

The VITAL behaviours are regularly promoted to the workforce in a number of ways, such as roadshows led by the chief constable, posters on display in force buildings and information on the force intranet. In addition, the force allocates resources to crime hotspots as part of a process known as Operation Trafalgar. Officers and staff who participate in this operation receive specific training about how to engage and interact with the public in a way that is fair and respectful.

The importance of the force treating the people it serves with fairness and respect is covered in great depth in its training for new recruits. The force uses a mix of teaching techniques to provide training on the Code of Ethics, the National Decision Model²⁸ and the VITAL behaviours. The Code of Ethics is referenced in all modules of the training for promotion training programmes.

²⁷ *Code of Ethics: A Code of Practice for the Principles and Standards of Professional Behaviour for the Policing Profession of England and Wales*, College of Policing, July 2014. Available at: www.college.police.uk/What-we-do/Ethics/Documents/Code_of_Ethics.pdf

²⁸ *Authorised Professional Practice National Decision Model*, College of Policing, December 2014. Available at: www.app.college.police.uk/app-content/national-decision-model/?s=

Following their initial training, officers in the special constabulary attend twice-yearly professional training weekends, which include content on the Code of Ethics and the VITAL behaviours.

We found widespread knowledge and understanding of the Code of Ethics and the VITAL behaviours among those we spoke with in the force. The importance of treating all of the people the force serves with fairness and respect is very well understood by the workforce. This is a very positive finding.

How well does the force seek feedback and identify those issues and areas that have the greatest impact on people's perceptions of fair and respectful treatment?

In this inspection, in line with the focus of other recent PEEL inspections, we focused on the extent to which BTP works to identify and understand the issues that have the greatest impact on people's perceptions of fair and respectful treatment. This includes how well the force seeks feedback and challenge from the people it serves.

Seeking feedback and challenge

BTP serves several different groups, including the train and freight operating companies. We spoke with a number of representatives from these companies during the inspection, who felt that the force's level of engagement with them was mostly very good. Regular opportunities for consultation were provided to these companies, to seek their views as well as provide them with feedback on progress.

The largest group that the force serves is the travelling public. To address the transient nature of this group, the force makes good use of technology to seek feedback, including about the extent to which people have been treated with fairness and respect. The force has introduced a text messaging service to encourage the travelling public to engage in a way that is quick, easy and discreet. It received over 28,000 text messages in 2016. Rail staff can also give feedback and send information to the force using an application on their smart phones. Officers and staff in the force's sub-divisions²⁹ also work with rail and station-based retail staff on a daily basis to discuss any issues or concerns that they may have. The public can give positive and negative feedback, including about fair and respectful treatment, through the force's website, where they can also find a form and information about how to make a complaint, how complaints are handled and the appeals process.

The force promotes campaigns about crime prevention and engagement opportunities using Facebook and Twitter. The force currently has 60 active Twitter accounts; training is provided to ensure that they are used properly. However, the use of Twitter is not evenly distributed across the country; this means that the force is missing an opportunity to reach a wide range of communities.

²⁹ The area covered by the force is split into three geographic regions around Britain referred to as divisions. Each division is split into local policing areas called sub-divisions.

The force has appointed a senior officer to co-ordinate its youth engagement activities so that it can seek the views of young people about issues such as stopping people in the street and searching them, trespassing on the railways, or being a victim of crime. The force works with a range of organisations, such as VOYAGE³⁰ and the Arc Theatre,³¹ to support its youth engagement activities. The force is also a member of the police public encounters board, which considers how the police can best engage with young people. The board is attended by representatives from community groups, national and local government, other police forces and police and crime commissioners.

When officers use their powers to stop someone and search them, the person who has been stopped is given a card that explains the reason for the stop and search, their rights and what to do if they want to make a complaint, for example if they feel that they have not been treated fairly and with respect. The Metropolitan Police Service and City of London Police also use this card.

Each of the force's sub-divisions works with an independent advisory group that helps seek feedback and challenge from different communities. They do this by observing police operations, giving feedback on force activities and advising how the force's actions are interpreted by members of the public. The groups also provide practical help and advice on incidents that are likely to have a particular impact within a community. The force uses its website to encourage members of the public to join a local advisory group.

Identifying and understanding the issues

The force carries out an annual rail staff survey that measures rail employees' satisfaction in a number of areas, including whether BTP treats them with fairness and respect. In 2016, the majority of respondents felt that the force would treat them with respect (85.5 percent) and would treat them fairly regardless of who they are (83.5 percent). The force analyses the results of this survey to understand what matters most to rail employees and what it can do to improve their confidence in the force. The results of this survey are published on the force's website.

The bi-annual National Rail passenger survey includes questions about personal security. The survey is carried out by Transport Focus, which analyses the results and makes them available to the force. The force uses the results to develop its

³⁰ VOYAGE (Voice of Youth and Genuine Empowerment) is a social justice charity that aims to empower marginalised black young people and provide them with the self-awareness and motivation to transform themselves and their communities.

³¹ Arc specialises in creating and performing theatre that challenges assumptions and brings about change in the way that people relate to one another at work, at school and in the community. It works with organisations that want to make a lasting difference in areas such as diversity, inclusion, education, health, criminal justice and community cohesion.

understanding of public confidence. The results of this survey are also available on Transport Focus's website.

As well as independent advisory groups, the force has a national stop and search community consultation group that is made up of members from the local stop and search groups. The national group has an overview of the force's stop and search activity both in London (where most stops and searches take place) and across the country. The force has developed a comprehensive stop and search data pack, which it publishes on its website. It uses this to encourage members of the public, including young people, to join a stop and search community group in their local area. Members of these groups are also encouraged to bring a young person to meetings to improve the force's level of engagement with young people.

In the 24 months to 31 March 2016 there were 238 public complaint cases per 1,000 officers recorded against officers in the force, which is below the England and Wales average of 544 cases per 1,000 officers. In the same period there were 71 public complaint cases per 1,000 staff (including PCSOs) recorded against staff in the force, which is also below the England and Wales average of 121 cases per 1,000 staff. The force recognises that not everyone who is unhappy about its service will use the online form, so it will accept complaints in whatever format they are received, including the text messaging service. Once the investigation into a complaint has been concluded, the force's professional standards department seeks feedback from the complainant, which is used to improve the way that complaints are handled.

The force works with independent custody visitors, who are volunteers who conduct unannounced visits to custody suites to ensure that detainees are being treated properly. The visitors prepare summary reports that set out their observations and any concerns they may have identified during a visit, and how those concerns were addressed. The force's custody managers attend monthly independent custody visitors' panel meetings to discuss the findings from these visits, assure themselves that concerns have been addressed and share learning and good practice.

How well does the force act on feedback and learning to improve the way it treats all the people it serves, and demonstrate that it is doing so?

It is important that as well as actively seeking feedback from the public, the force also responds to that feedback. We assessed the extent to which this response includes changes to the way the force operates to reduce the chance of similar incidents occurring in future, as well as resolving individual incidents or concerns, and how well the force communicates the effectiveness of its action.

Making improvements

The force's lessons exploitation centre takes the lead for ensuring that learning and good practice are made available across the organisation. The centre invites officers and staff to submit their experiences and lessons learned using the force intranet.

The centre also seeks examples of lessons learned and good practice by approaching colleagues across the force. It records examples, makes them available across the force and with other agencies, and retains them for future reference should a similar situation arise.

The feedback the force is given about the origins of negative and positive perceptions of police treatment is made available to the workforce to improve understanding. For example, the force recognises that if officers are discourteous or unethical in their approach to stop and search, their actions will make people less confident that the force is acting in the public interest.

Since 2012, the force has reduced the number of people that it stops and searches. However, in 2016 the search found an illegal object, such as drugs, knives or other weapons, 31 percent of the time, and the proportion of stops leading to an arrest increased from 9 percent in 2012 to 16 percent in 2016. This helps to demonstrate that the force is taking a more focused approach in its use of stop and search to gain public confidence.

Demonstrating effectiveness

BTP makes good use of social media (Facebook, Twitter and Instagram) to explain the actions it has taken in response to feedback or information it has received. For example, a principal theme of force's Public Consultation Survey is the link between passengers feeling safe and the visibility of rail staff or police officers at railway stations. The force ran a targeted 'You said, we did' campaign to improve public confidence in the 37 stations at which people reported the lowest level of satisfaction. This included increasing the police presence at those stations. Analysis undertaken by the force found that, following the campaign, overall confidence levels improved in approximately half of these stations.

At a sub-divisional level, the force holds regular meetings with the managers and staff of the train operating companies. These meetings include updates on the actions the force has taken in response to feedback.

The force also holds community meetings to listen to local concerns and provide updates about how they have been addressed. Officers and staff provide feedback to rail and retail staff as part of their daily conversations with these groups.

However, the force needs to do more work to understand which of its many initiatives are most effective at increasing perceptions of fair and respectful treatment.

Summary of findings

BTP works hard to ensure it treats all of the people it serves with fairness and respect. The Code of Ethics and the force's VITAL (Value-adding, Innovative, Teamwork, Active, Leaders) behaviours are very well understood across the force.

The force uses a range of techniques to seek feedback from the people it serves about their perceptions of fair and respectful treatment. The challenge of this should not be underestimated, given the different groups the force serves and the transient nature of the travelling public.

The force acts on feedback it receives from the people it serves, for example by having a police presence at stations where the lowest levels of public confidence have been recorded, to increase public satisfaction with the police. We also found examples of community engagement at sub-divisional level aimed at improving public perceptions of the force.

Area for improvement

- British Transport Police should evaluate its methods for seeking feedback and challenge from all the people it serves, and ensure that it takes action in relation to the feedback it receives.

How well does the force ensure that its workforce behaves ethically and lawfully?

This part of our inspection considers the way forces have responded to the recommendations that HMICFRS made as a result its 2015 inspection into police integrity and corruption.³² This part of the inspection also reflects research showing that prevention is better than cure: the best way to ensure that police officers and staff behave ethically is for forces to develop an ethical culture, identify potential risks and to intervene early.³³ To achieve this, forces need to clarify and continue to reinforce and exemplify acceptable and unacceptable standards of behaviour, including the Code of Ethics.³⁴

³² *Integrity matters*, HMIC, January 2015. Available from:

www.justiceinspectorates.gov.uk/hmicfrs/publications/integrity-matters/

³³ *Promoting ethical behaviour and preventing wrongdoing in organisations*, College of Policing, 2015. Available at:

http://whatworks.college.police.uk/Research/Documents/150317_Integrity_REA_FINAL_REPORT.pdf

³⁴ *Promoting ethical behaviour and preventing wrongdoing in organisations*, College of Policing, 2015. Available at:

http://whatworks.college.police.uk/Research/Documents/150317_Integrity_REA_FINAL_REPORT.pdf

and *The role of leadership in promoting ethical police behaviour*, College of Policing, 2015. Available at:

http://whatworks.college.police.uk/Research/Documents/150317_Ethical_leadership_FINAL_REPORT.pdf

and *Literature review – Police integrity and corruption*, HMIC, January 2015. Available at:

www.justiceinspectorates.gov.uk/hmicfrs/our-work/police-integrity-and-corruption/

How well does the force develop and maintain an ethical culture?

One of the first things forces can do to develop an ethical culture is to use effective vetting procedures to recruit applicants who are more likely to have a high standard of ethical behaviour, and to reject those who may have demonstrated questionable standards of behaviour in the past, or whose identities cannot be confirmed.³⁵

Initial vetting

BTP vets all successful applicants to help ensure that it recruits officers, staff and volunteers who behave ethically. However, the force's vetting policy is overdue for review and is not in line with current national guidance, although the force has taken steps to address a previous vetting backlog. The force is now up to date with all vetting, including renewals and the higher-level vetting required for certain designated posts.

The force understands how the vetting process may affect the recruitment of a diverse workforce. If an applicant with a protected characteristic (such as age, gender or sexual orientation) fails the vetting process, this is discussed with them so that a decision can be made about whether to reconsider the decision. The deputy chief constable formally hears appeals against a vetting decision, considering all aspects of the case and the risks associated with changing the vetting decision.

The force complies with its obligations to provide the College of Policing with details of those officers and staff who have been dismissed from the service, so that they can be included on the disapproved register.³⁶

Clarifying and reinforcing standards of behaviour

BTP clarifies and continues to reinforce acceptable standards of behaviour in a variety of ways, including oral and written briefings, training and content on the force's intranet. The head of the professional standards department and locally-based professional standards champions regularly engage with the workforce about standards of behaviour. When someone has been disciplined as a result of misconduct, the force provides officers and staff with information about the case. The force's anti-corruption unit identifies the lessons learned from complaints, investigations and IPCC reports and makes this information with the workforce. The deputy chief constable also sends a quarterly message to reinforce the force's expectations in respect of standards of behaviour.

³⁵ *College of Policing: Authorised Professional Practice on vetting*. Available at: www.app.college.police.uk/app-content/professional-standards/vetting/

³⁶ The disapproved register contains details of those officers who have been dismissed from the service or who either resign or retire while subject to a gross misconduct investigation, where it had been determined there would have been a case to answer.

The force provides officers and staff with training on the Code of Ethics and those we spoke with had good knowledge of it. It also provides to new recruits, officers and staff seeking promotion and special constables specific training that emphasises the importance of ethical decision making.

BTP has a process for auditing the use of stop and search powers. This involves officers from the rank of sergeant to superintendent looking at a selection of stop and search forms, commenting on them and providing feedback about any areas for improvement to the officer concerned. Training is provided to officers about the reasonable grounds for stopping someone and searching them; the audit process considers the effectiveness of this training. The stop and search community consultation group also plays a role in the auditing of stop and search forms by reviewing and commenting on a sample of the forms that have been audited by the force.

BTP also has a governance board that reviews incidents that involved the use of force by officers, including whether the use of force was appropriate and proportionate under the circumstances.

The force has a process for officers and staff to register their business interests, additional occupations, notifiable associations,³⁷ gifts and hospitality they have received. Anonymised versions of these registers are published on the force's website. The force provides officers and staff with guidance on the use of social media and the workforce understands this well.

How well does the force identify, understand and manage risks to the integrity of the organisation?

Following research commissioned by the College of Policing, HMICFRS's 2014 police integrity and corruption inspection emphasised the need for forces to monitor their systems and processes to spot risks to their integrity, including – but not limited to – business interests, gifts and hospitality, and public complaints.³⁸

This year HMICFRS was particularly interested in how well forces identify and intervene with those individuals, groups or locations that may be susceptible to corruption. We also assessed how well forces are seeking and assessing intelligence about potential corruption, with a focus on those areas for improvement identified in previous HMICFRS inspections.

³⁷ Notifiable associations are relationships that, under the ACPO Vetting Policy 2012, must be notified to forces by officers and staff if they regularly associate with a suspected or known criminal, or associate with a group or engage in an activity which would have the potential to compromise the individual officer or staff member, operations, activity or reputation of the force.

³⁸ *Integrity matters*, HMIC, January 2015. Available from: www.justiceinspectorates.gov.uk/hmicfrs/publications/integrity-matters/

Identifying and understanding risks to integrity

BTP has a plan in place to control risks related to professional standards, which identifies areas of vulnerability such as education and public confidence. While the plan mentions some corruption themes, the force does not have a specific anti-corruption strategy or a strategic assessment of the risks related to corruption.

BTP's policy on the acceptance of gifts and hospitality complies with national guidelines. Officers and staff are provided with guidance on gifts, gratuities and hospitality and understand the requirement to declare them. They also understand the requirement to declare business interests, additional occupations and notifiable associations. The force professional standards department reviews annually business interests and additional occupations (including those where permission has been refused).

The force monitors its information and communications technology (ICT) system, phone and credit card usage. All desktop computers contain software that monitors their use to ensure that it complies with force policy. If required, for example as a result of information suggesting that there might be a problem, a more targeted approach can be adopted to capture an image of the computer screen and log key strokes. The software can also be used to highlight specific words that, when entered, will alert the force's anti-corruption unit. The force also monitors the use of social media. Investigators in the professional standards department's anti-corruption unit can cross-reference their intelligence with other employee information.

All members of the workforce are required to complete a vetting return in November each year. Supervisors follow up on cases of non-compliance and refer cases of ongoing non-compliance to the professional standards department for further action.

Intervening early to manage risks to integrity

BTP now has a process in place to record, resolve and investigate public complaints in accordance with statutory guidance. The force's local professional standards champions have been briefed on the new process and compliance is monitored at a weekly professional standards department management meeting. The force's records show that in 2015/16 all complaints were dealt with by the required deadline.

City of London Police's operational security officer reviewed the processes that BTP has in place to ensure that investigations into serious and organised crime are not compromised. This review identified four areas for improvement, including that the force should train its own operational security officer. An officer is now partially trained to carry out this role. BTP is continuing to work with City of London Police to improve its processes.

The deputy chief constable chairs the force's people and ethics board. This board's purpose is to identify and manage individual and organisational risks in respect of corruption, ensure that the associated risks are managed properly and provide an

escalation mechanism to the chief officer group where appropriate. This board also has an overview of disciplinary and misconduct cases. This includes ensuring that appropriate support, including that provided externally, is given to those under investigation, so that the right outcome is achieved as quickly as possible. To assist with its decision making, the board receives detailed information about professional standards cases and employment tribunals, including their resolution.

The deputy chief constable also chairs the monthly integrity and compliance assurance board. This board provides the force with guidance and assistance with managing high-level risks to the force's integrity.

Looking for, reporting and assessing intelligence on potential corruption

We do not think that the force is active enough in seeking intelligence about potential corruption. The force therefore misses the opportunity to understand the scale of new threats, such as the abuse of authority for sexual gain. As well as reducing the chance that the force will identify cases of corruption; this also makes it harder for the force to use examples of corruption in its communications with officers and staff.

The force's policy for employee conduct and standards of behaviour sets out how wrongdoing can be reported. Officers and staff know that they can use an externally-hosted system to report matters of concern in a way that is confidential and anonymous. The system is well used. Officers and staff told us that they are confident about reporting concerns to their supervisors.

The anti-corruption unit assesses, develops and deals with corruption-related intelligence in line with the requirements of the National Intelligence Model³⁹ in order to determine how information should be prioritised. However, the intelligence is not risk-assessed or coded in line with the National Crime Agency (NCA) corruption categories. This means that high-risk areas could be missed. In addition, the force contributes to the NCA's tri-annual counter corruption strategic assessment. If the NCA categories were used from the outset, the analyst who prepares the return would not need to do extra work.

The force develops intelligence through activities such as monitoring the use of its ICT systems and social media. However, we noted that the force has not conducted a drug test as a result of concerns about a member of the workforce for at least two years as no intelligence reports have been received. We consider that the force could do more in this area.

³⁹ The National Intelligence Model ("the Model") is a process used by police forces and other law enforcement bodies to provide focus to operational policing and to ensure resources are used to best effect. The Model is set out in a Code of Practice. *Code of Practice: National Intelligence Model*, Home Office, National Centre for Policing Excellence and Centrex, 2005, paragraph 3.1.1, page 6. Available at: <http://library.college.police.uk/docs/npia/NIM-Code-of-Practice.pdf>

How well is the force tackling the problem of officers and staff abusing their authority for sexual gain?

In 2012 the IPCC published *The abuse of police powers to perpetrate sexual violence*.⁴⁰ This report states that “the abuse of police powers for purposes of sexual exploitation, or even violence, is something that fundamentally betrays the trust that communities and individuals place in the police.

The *Code of Ethics*⁴¹ states that policing professionals must “not establish or pursue an improper sexual or emotional relationship with a person with whom [they] come into contact in the course of [their] work who may be vulnerable to an abuse of trust or power”.

The most recent national counter corruption assessment, in 2013, highlighted corruption for the purposes of sexual gratification as a major threat to law enforcement.⁴² HMICFRS’s 2015 report *Integrity matters*⁴³ identified police sexual misconduct as an area of great concern to the public.

We therefore considered this issue as part of this inspection. Our work was given additional emphasis in May 2016 by a request from the Home Secretary that HMICFRS inspect forces’ response to the issue of officers and staff developing inappropriate relationships with victims of domestic abuse and abusing their position of power to exploit victims.

Recognising abuse of authority for sexual gain as serious corruption

The problem of abuse of authority for sexual gain is a recent priority for BTP. The force’s approach to tackling it, including recognising it as serious corruption, is in the very early stages of development.

The force has yet to provide briefings or awareness training to the vast majority of its workforce about the abuse of authority for sexual gain. Although officers and staff

⁴⁰ *The abuse of police powers to perpetrate sexual violence*, jointly published by IPCC and ACPO (now the National Police Chiefs’ Council), September 2012. Available at: www.ipcc.gov.uk/sites/default/files/Documents/research_stats/abuse_of_police_powers_to_perpetrate_sexual_violence.PDF

⁴¹ Code of Ethics – A Code of Practice for the Principles and Standards of Professional Behaviour for the Policing Profession of England and Wales, College of Policing, London, July 2014. Available at: www.college.police.uk/What-we-do/Ethics/Documents/Code_of_Ethics.pdf

⁴² Every three years, the National Counter Corruption Advisory Group commissions a strategic assessment of the threat to law enforcement from corruption. The most recent assessment was completed in 2016 by the National Crime Agency. The assessment was based upon three years of intelligence reports on possible corruption gathered by forces in England and Wales, supplemented by information from other forces and national agencies.

⁴³ *Integrity matters*, HMIC, January 2015. Available from: www.justiceinspectorates.gov.uk/hmicfrs/publications/integrity-matters/

told us they recognise that the abuse of authority for sexual gain is wrong, they have not been made aware of the signs to look out for. This could affect their ability to recognise matters of concern that should be reported, or to understand the boundaries for their own behaviour.

Looking for and receiving intelligence on potential abuse of authority for sexual gain

The force does not actively seek intelligence on potential corruption of this nature, relying instead on usable information being reported to the professional standards department.

Potential sources of intelligence that the force does not currently exploit include victims of domestic abuse, women's refuges, sex worker support groups, websites and gyms.

Taking action to prevent abuse of authority for sexual gain

BTP has yet to develop its understanding of the scale of the problem and has only taken limited action to prevent it. Although the force recently introduced an initiative to improve matters, it needs to improve its approach to dealing with this area of serious corruption.

Rebuilding public trust

As the force's approach to abuse of authority for sexual gain is in its infancy, the force has yet to publicise the outcomes of these types of cases, though it does make routine announcements about the outcomes of all serious corruption cases. More openness about cases of abuse of authority for sexual gain would help to reassure affected groups and the general public that the force will not tolerate such behaviour.

How well does the force engage with the public and its workforce about the outcomes of misconduct and corruption cases?

HMICFRS's 2014 literature review on police integrity and corruption emphasised the importance of publishing information about misconduct, to show that police forces are taking the problem seriously, and detecting and punishing wrongdoing.⁴⁴ This also helps deter misconduct and enhances integrity within police forces themselves.

As part of this inspection, we considered how well forces engage with the public, including in relation to high-profile incidents with the potential to undermine public perceptions of police integrity. We also assessed the level of awareness among the workforce of the outcomes of corruption cases.

⁴⁴ *Literature review – Police integrity and corruption*, HMIC, January 2015. Available at: www.justiceinspectorates.gov.uk/hmicfrs/our-work/police-integrity-and-corruption/

Working with the public

BTP recognises the importance of being open about allegations of wrongdoing by its officers and staff in order to maintain public confidence. To ensure accountability, the force publishes the outcome of public misconduct hearings on its website.

At the time of the inspection, the force had just held its first misconduct hearing in public. A list of upcoming misconduct hearings is available on the force's website, along with the outcomes of such hearings.

Working with the workforce

The force publishes detailed accounts of misconduct outcomes on its intranet. To reinforce messages about unacceptable behaviours and their consequences, the professional standards department ensures that the published details reflect the seriousness of the allegations that were upheld. The professional standards department pages on the force intranet are the most frequently visited by the workforce.

Summary of findings

Although we found much good working practice, BTP could further improve the extent to which it ensures that its workforce behaves ethically and lawfully. The force carries out vetting in line with its policy, but the policy is overdue for review and is not aligned with current national guidance.

The force clarifies and continues to reinforce acceptable behaviours in a variety of ways. Officers and staff can use a confidential reporting service to report matters of concern, and are confident about reporting concerns to their supervisors. The force has a strategy for controlling risks related to professional standards, but it is not well developed or specific to risks related to corruption. The areas of vulnerability identified in the force's strategy were not recognised as one of the 12 areas of corruption identified by the National Crime Agency in its national counter corruption assessment.

The problem of abuse of authority for sexual gain is a recent priority for the force. Its approach to dealing with this area of serious corruption is in the very early stages of development. Officers and staff recognise that the abuse of authority for sexual gain is wrong, but this is based on their own understanding of what the term means because they have not received briefings or awareness training.

The force has made good progress against the four recommendations made in HMICFRS's 2015 police integrity and corruption report.

Areas for improvement

- British Transport Police should ensure it complies with all aspects of the current national guidelines for vetting.
- British Transport Police should produce a strategic assessment of the risk of corruption within the force and strategy for controlling the identified risks. The assessment and strategy should be updated annually.
- British Transport Police should develop the capability and capacity required to gather intelligence on potential corruption, including the abuse of authority for sexual gain.
- British Transport Police should improve the way it clarifies and reinforces standards of behaviour to its workforce, with particular regard to the abuse of authority for sexual gain.
- British Transport Police should establish procedures to identify all future allegations of abuse of authority for sexual gain as allegations of serious corruption, and make appropriate referrals to the Independent Police Complaints Commission.

To what extent does the force treat its workforce with fairness and respect?

A workforce that feels it is treated fairly and with respect by its employers is more likely to identify with the organisation, and treat the public in a similarly fair and respectful way. Conversely, perceived unfairness within police organisations can have a detrimental effect on the attitudes and behaviours of officers and staff.⁴⁵

As there is no comparative data on how fairly officers and staff perceive forces to have treated them, we focused our assessment on how well forces identify these perceptions within their workforces and act on these findings. In particular, we looked at the extent to which organisational 'fairness' is reflected in the way individual performance is managed, and how 'organisational respect' is reflected in the way forces provide for the wellbeing of their workforces, particularly in terms of preventative and early action.

How well does the force identify and act to improve the workforce's perceptions of fair and respectful treatment?

Research suggests that forces that involving officers and staff in decision-making processes, listening to their concerns, acting on them, and being open about how and why decisions were reached, improves workforce perceptions of fair and respectful treatment.⁴⁶ We assessed how well BTP engages with its workforce to identify and understand the issues that affect them, how well the force acts on these issues and how well it demonstrates that it has done so.

Identifying and understanding the issues

BTP uses a range of methods, including an employee survey, to identify the areas that have the greatest impact on perceptions of fair and respectful treatment among its workforce. Officers and staff can make their views known during a conference call with the chief constable, on a forum on the force intranet, during visits to sub-divisions by the chief officer group and in regular meetings with local leaders.

⁴⁵ *Fair cop 2: Organisational justice, behaviour and ethical policing*, College of Policing, 2015. Available at:

http://whatworks.college.police.uk/Research/Documents/150317_Fair_cop%202_FINAL_REPORT.pdf

Organisational justice: Implications for police and emergency service leadership, Herrington C and Roberts K, AIPM Research Focus, Issue 2, 2013. Available at: www.aipm.gov.au/wp-content/uploads/2013/08/Org-Justice-Final.pdf

⁴⁶ *Fair cop 2: Organisational justice, behaviour and ethical policing*, College of Policing, 2015, page 11. Available at:

http://whatworks.college.police.uk/Research/Documents/150317_Fair_cop%202_FINAL_REPORT.pdf

The force's 2015 employee survey had a response rate of 64.5 percent of the workforce, which is higher than the average response rate for police forces in England and Wales of 41 percent. The force plans a further survey for 2017.

The force carries out exit interviews, although people leaving the force can opt out of this process. Officers and staff we spoke with felt that it would be good if the force sought more feedback from those who leave the force. It could then take this into consideration when filling posts where there has been a high level of turnover, and proactively manage new recruits' expectations. The force has started to do this. Supervisors attend recruitment campaigns to explain what working in certain posts will be like, for example the amount of travel that the geographical area of some divisions requires.

Officers and staff can also submit ideas for consideration, though there is confusion among the workforce about how to do this. Some of those we spoke with said the force does not have a suggestions scheme, while others said they think there is a scheme but they are unsure how to go about submitting ideas. Nonetheless, we identified a few examples of people feeling that they had been listened to because the suggestions they made had been implemented. These included improvements to NICHE (the force's ICT system for crime-recording) and the purchase of equipment to reduce the time taken to remove bodies from the railway track after a fatality. We consider that BTP should formalise and clarify its processes for making suggestions.

Making improvements and demonstrating effectiveness

One of the outcomes of the employee survey is that the force has introduced a culture board. The board meets quarterly and its purpose is to continue the development of an organisational culture which is consistent with the force's purpose, ambition, values and priorities.

The force provides feedback about survey results to officers and staff and has an employee survey action plan. Sub-divisional leaders seek feedback by, for example, holding focus groups at a local level to see if officer and staff satisfaction has improved, rather than waiting until the next full survey.

The force provides a lot of information to its workforce about organisational change and other work-related matters. Officers and staff acknowledge this, but they told us that they found the amount of change and the resultant communications overwhelming. They also told us that actions taken as a result of the employee survey have not been formally communicated to them.

Some officers and staff we spoke with said that they did not feel listened to and did not feel that their opinion was valued, even when the force says that it is seeking their views. Examples included the implementation of new ICT systems without sufficient training, even though concerns had been raised previously, and concerns that a new shift roster will not work in all sub-divisions due to their differing geographies. The force should consider how best to make the cultural changes

needed, to ensure that its workforce feels listened to and valued. Formalising and clarifying its suggestion scheme should help with this.

How well does the force support the wellbeing of its workforce?

Police forces need to understand the benefits of having a healthier workforce – a happy and healthy workforce is likely to be a more productive one, as a result of people taking fewer sick days and being more invested in what they do. This inspection had a particular focus on preventative activity to encourage wellbeing.

Understanding and valuing the benefits

BTP recognises that the nature of railway policing can pose physical and psychological risks to the health and wellbeing of its workforce. The force launched its wellbeing strategy in April 2016. It is committed to making excellent provision and has invested significantly in this area.

The four main elements of the force's wellbeing strategy are:

- sickness absence reporting;
- post-traumatic stress disorder;
- stress management; and
- safety and occupational health.

The value that the force places on the benefits of this work is demonstrated by the fact that the chief constable is responsible for implementing the strategy, although he has delegated oversight of its implementation to the force's health and wellbeing group. Among other things, the group has specific responsibility to:

- review sickness absence and occupational health data to identify sections of the workforce that may need more targeted wellbeing interventions;
- review the safety and occupational health intranet pages and communication strategies to ensure that they are up to date and are reaching the widest possible audience; and
- provide assurance reports to the force executive board and the BTPA that the objectives of the strategy are being achieved.

Officers and staff feel that there is an authentic commitment to wellbeing at all levels in the organisation.

Identifying and understanding the workforce's wellbeing needs

The force's employee survey includes questions about workforce wellbeing to help the force understand and address any concerns that its workforce may have. To help target activity to promote wellbeing, the force monitors and analyses management information such as sickness absence data. Members of the special constabulary have the same access to wellbeing provision as their officer colleagues, and can access additional support if their day job is affected by an injury sustained while on duty. The force maintains an insurance policy that can be used to support special constables financially if they are unable to do their day job because of an on-duty injury. The force mediates on behalf of special constables with their employer, if required.

Taking preventative and early action to improve workforce wellbeing

BTP promotes its wellbeing provision and provides a lot of easily accessible information about this on its intranet. The force has provided training for supervisors about how to recognise the signs of PTSD and other stress-related illnesses in their teams, so that they can intervene and provide support before problems escalate. Supervisors told us that they are clear about their wellbeing responsibilities. The force holds regular wellbeing events for officers and staff. It has recently appointed two senior officers to oversee wellbeing activity.

The force uses trauma risk management (TRiM). This is a process that enables non-healthcare staff to monitor and manage colleagues. As part of the force's work, officers and staff deal regularly with deaths on the railway. Cases of PTSD have been identified in ex-officers, but there is a low level of take-up of TRiM. Those we spoke with said that this is because officers and staff are not comfortable with referring themselves. The reasons they gave us included not being confident about the confidentiality of the service and feeling that use of the service will be a bad mark on their employment record. Access to TRiM is voluntary, although it is sometimes suggested by supervisors. The force is considering automatic referral for officers and staff on exposure to their second traumatic incident. This has been met with a mixed response by the workforce. The chief constable has undertaken to seek the views of officers and staff about the use of TRiM, to enable the force to understand fully their concerns.

Other wellbeing provision includes a flexible employee assistance programme, which can be accessed while on or off duty after self-referral, and an occupational health service. The force has experienced some problems with its occupational health service (because of the force's national coverage), but it is working to resolve these and improvements have been made.

The force promotes its wellbeing strategy internally on the force intranet, along with e-bulletins, roadshows and 'wellbeing days'. All officers and staff have been given a 'Caring for your wellbeing' booklet, which explains the force's approach to managing and caring for its workforce. The booklet also outlines the proactive measures that the force takes to promote staff wellbeing.

The force has adopted the 'Officer assault pledge' and follows a well-developed plan when officers have been assaulted. The force's policy for major incidents, such as the Croydon tram crash, includes a section on wellbeing. When officers and staff finish a shift following a major incident, they are immediately directed to wellbeing provision.

The force recently held its first wellbeing seminar to assess the effectiveness of its provision, hear from providers of these services and obtain feedback on officer and staff experiences of support services. The chief constable chairs the seminar, which is attended by wellbeing providers and members of the workforce, including representatives of the Police Federation and the staff union. There are also several wellbeing champions in the force. Their role is to act as a local point of contact to promote the force's wellbeing services and assist in identifying wellbeing concerns at an early stage.

Those with whom we spoke said that they know where to look for wellbeing information and that they are comfortable discussing wellbeing matters with their supervisors. Those who have used wellbeing services spoke very well of the support they received.

How fairly and effectively does the force manage the individual performance of its officers and staff?

College of Policing research suggests that opportunities for promotion and not dealing with poor performance may adversely affect workforce perceptions of fairness, which in turn may lead to negative attitudes and behaviours in the workplace.⁴⁷ We assessed how fairly and effectively BTP manages the individual performance of its officers and staff, including the extent to which the process aligns with guidance produced by the College of Policing.⁴⁸

The performance assessment process

Supervisors in BTP are required to complete an annual performance development review for the officers and staff that they are responsible for. The purpose of the

⁴⁷ *Fair cop 2: Organisational justice, behaviour and ethical policing*, College of Policing, 2015. Available at:

http://whatworks.college.police.uk/Research/Documents/150317_Fair_cop%20FINAL_REPORT.pdf

⁴⁸ College of Policing guidance on the police performance development review process is available at: www.college.police.uk/What-we-do/Support/Reviewing-performance/Pages/PDR.aspx

review is to assess each individual's performance in their current role and identify development activity that could lead to improved performance. The review should also enable line managers to help officers and staff work towards reaching their full potential, including promotion or a move into a different role at the same level.

The force's performance review process used to be paper-based. The officers and staff we spoke with had a negative opinion of this system; they did not see it as serving its purpose, but rather as a 'tick box' exercise that was completed for compliance purposes. The force has taken steps to improve the process. In April 2016 the force introduced an electronic system known as 'e-Right Track' that sends alerts to users when they need to carry out an action that contributes to their annual review. For example, it sends an alert prompting supervisors to meet with each member of their staff for a quarterly review meeting. The alert also reminds the staff member to prepare for the quarterly reviews.

The new system encourages officers and staff to take responsibility for their performance and personal development. The force can also use the system and the quarterly review process to provide an overview of talent within in the force.

The results of performance assessment

Many people we spoke with were positive about the change to the performance assessment process and felt that overall the new process is an improvement on the force's old system. The improvements include setting appropriate objectives, regular one-to-one meetings with line managers and more open and honest conversations about individual performance and development. However, a few of those we spoke with said that, while they could see the benefit of the new process, the force had yet to resolve all of the problems they had experienced with the old system. In addition, 'e-Right Track' was rolled out just after two other major ICT changes had been made; sufficient training was not provided and therefore it is taking some people longer to complete the review process. This is disappointing, particularly as concerns had been raised about the level of training provided for the earlier ICT changes.

Managers and supervisors are very positive about the new process, with many recognising the opportunity to improve individual and team performance. We found some concern about the ability to have regular and meaningful meetings with their staff, given the geographical area that some sub-divisions cover and the size of some teams.

Summary of findings

BTP deserves real credit for the way it treats its workforce with fairness and respect. It uses a range of methods to identify and understand the areas that have the greatest impact on workforce perceptions, and takes action to address them, although it does not provide formal feedback on what it has done.

The force is clearly committed to supporting the wellbeing of its workforce. It has invested significantly in this area. Comprehensive guidance is available on the force intranet, and the force runs a series of campaigns. Members of the special constabulary have the same access to wellbeing provision as their officer colleagues, and can access additional support if their day job is affected by an injury sustained while on duty. Supervisors receive training and told us that they understand their wellbeing responsibilities. Officers and staff feel that there is an authentic commitment to wellbeing at all levels in the organisation.

The force has reviewed and improved its performance appraisal process for the workforce. Early indications are that this is an improvement on the earlier system.

Leadership

Police leadership is fundamental in enabling a force to be effective, efficient and legitimate.

This inspection focused on how a force understands, develops and displays leadership through its organisational development and is based on the recent 'Guiding Principles' developed by the National Police Chiefs' Council, the College of Policing and HMICFRS.

How well does the force understand leadership?

In order to function effectively, police forces need a good understanding of their leadership capabilities and expectations. How forces work closely with their workforce when setting leadership expectations is vital to ensure that police staff and officers feel enabled to lead in an ethical way.

As we discussed on page 32, BTP has a clear vision of leadership expectations (what it expects from its leaders), which are outlined in the force's VITAL (Value-adding, Innovative, Teamwork, Active, Leaders) behaviours) behaviours. The workforce felt communication of this vision and the behaviours has been good and all of the staff members we spoke with were clear about what was expected of them and their leaders.

The force undertook a comprehensive internal leadership survey in 2015, in addition to the wider employee survey. The leadership survey sought a better understanding of the levels of leadership required within the force and to improve how leadership training is provided. Senior leaders intend to use the new 'e-Right Track' personal development review (PDR) process to develop their understanding of how the force is led at all levels. At the time of our inspection, the project was in its first year and the force was focused on ensuring that all staff had received an annual review with objectives. By the end of the third year, the force anticipates that the process will provide meaningful data on leadership skills in the workforce and identify gaps. However, this means that the force currently does not have an understanding of how well it is led at all levels and does not know whether its leaders have the capacity or capability to perform the roles required of them.

BTP is in the very early stages of implementing talent and development forums. Although this is currently limited to senior leaders reviewing the performance and potential of officers who report to them, the force is also designing a process to help it review individuals' development needs. Formal and informal coaching and mentoring is available and is being used. However, this is on an individual basis with no force-wide understanding of the capability of its leaders and no way to understand or respond to gaps or problems across the organisation. At the beginning of its

change programme, the force did consider auditing skills at every level and rank, but the work was not completed. Without a skills audit, the force is very dependent on the PDR system to highlight problems, which it cannot yet do.

Area for improvement

- British Transport Police should conduct a skills audit to find out its leaders' capabilities and capacity to ensure that it can identify and fill gaps.

How well does the force develop leadership?

The way in which a force identifies and develops leadership skills is a crucial part of making sure it performs well now and in the future. Forces should identify leadership development programmes that contain a broad range of approaches, beyond formal training.

Forces' knowledge of their current leadership capability should also mean that they are aware of any gaps in the leadership skills and experience of their workforce, and they should be addressing these gaps.

BTP has demonstrated that it can respond appropriately when it identifies gaps in its leadership capability or capacity. For example, the force introduced a leadership development programme after it recognised that there was a problem with the quality of its leadership, particularly among junior managers. All sergeants and inspectors receive training through what the force refers to as its leadership academy. The force decided to provide this training to police officers before it was provided to staff because it considered that this was the area of greatest risk. The force has since developed a 'new to management' course for newly-promoted members of non-warranted staff, which began in January 2017. The force accepts that, ideally, leaders in all ranks and roles within the organisation would learn together and is aiming for a more unified approach to training.

During our inspection, we found that the force's leadership expectations are a fundamental part of all training courses along with the VITAL behaviours and the Code of Ethics. As a result, there is a general perception within the workforce that the standard of leadership has improved and junior managers and staff feel more confident as leaders. However, the force understands that more needs to be done before the improvements are clear to all staff.

The force is improving how it develops its leaders, particularly at chief inspector rank and above. It offers support for officers and staff who are applying for the Senior Police National Assessment Centre.⁴⁹ The force provides 360-degree feedback, coaching and mentoring as well as secondments through London First.⁵⁰ It also provides its workforce with access to group action learning sets, which are an approach that focuses on learning from experience and then acting on that learning.

The force collaborates with both the Metropolitan Police Service and City of London Police as part of the London Police Challenge Forum, a series of panels designed to address ethical dilemmas that are raised by employees of all three organisations. While we welcome this, we were disappointed to find that the force does not undertake any formal evaluation of any of its own leadership development initiatives. As a consequence, there is no real understanding of whether any of the measures are leading to the desired improvements.

The force has not undertaken an audit of skills gaps. This means it has little understanding of, and therefore difficulty recruiting to address, gaps in its leadership capabilities. The force has recruited a chief officer recently and, in doing so, demonstrated a willingness to seek the best candidate externally. However, this approach seems to be confined to senior appointments.

BTP does have a system to identify talented individuals across all ranks. It has a 'talent pool' process, which includes coaching, personal development plans and specific postings or attachments. As well as individuals applying for the process (which is open to both officers and staff), people can also be nominated by their local leadership team. Nominations rely on the new Right Track PDR process, which is not yet able to differentiate between potential for promotion to the next rank and potential to be a senior leader. At the time of inspection there are eight members of the talent pool, all of whom are officers and the majority of whom are superintendents. The force aims to widen this pool during 2017.

As with leadership development, the force has no formal review or assessment process to help understand whether its development programmes are working.

Area for improvement

- British Transport Police needs to develop a way to review its leadership development programme to give a greater understanding of the success or otherwise of the programme.

⁴⁹ The Senior Police National Assessment Centre is a process to identify those officers who are capable of being an effective chief officer. Superintending officers are eligible to apply. See: www.college.police.uk/What-we-do/Development/Promotion/Pages/Senior-PNAC.aspx

⁵⁰ London First is a not-for-profit business membership organisation. See: <http://londonfirst.co.uk/about/>

How well does the force display leadership?

Good leadership encourages and develops a wide range of people, embraces change and actively supports the development of new ideas. While it is important for forces to ensure that they are representative of the communities they serve, truly diverse leadership teams are built around the wider experience, background and skills of individuals.

We found limited evidence of BTP seeking new ideas and approaches from other forces or from academic research. However, the force has reviewed recently the culture board process used by Kent Police and has since developed its own similar initiative. The force also trains all staff according to College of Policing guidelines to ensure standards are maintained.

The force's leadership survey revealed that only 31 percent of those who completed the survey were in any way satisfied that 'there were opportunities to express good ideas' and only 20 percent were in any way satisfied that 'senior management expressed a desire to hear ideas from the workforce'. BTP could clearly do more to ensure that all staff feel that new ideas are welcome and ensure that there is a process which allows them to make those suggestions.

In contrast, those we interviewed felt that BTP has very sound processes for sharing good practice. The Lessons Exploitation Centre (LXC), a computer database, was highly regarded by all staff with whom we spoke. The force uses LXC to record, analyse, assess and disseminate lessons learned from across the force.

BTP has recognised the importance of a diverse workforce that reflects the communities it serves and understands that it needs to do more to create diverse leadership teams. BTP is taking steps to increase diversity in its leadership. For example, the force:

- has put in place senior management oversight of its objective to develop greater diversity within the workforce, especially at leadership level;
- recently introduced a programme to encourage diversity in its leadership. This is currently available, as a pilot, to black, Asian and minority ethnic (BAME) sergeants; and
- uses the Springboard women's development programme to encourage the development of female officers and staff.

The force and the staff associations feel that these initiatives have a positive effect on the diversity of the leadership group. The force monitors its selection and promotion processes to ensure that its aims are followed. This has led to an increase in the number of BAME officers entering the promotion process and being successful to the rank of sergeant.

Area for improvement

- British Transport Police should ensure that all of its workforce are aware that new ideas are welcome and highlight how these ideas can be submitted.

Annex A – Inspecting forces on efficiency, legitimacy and leadership

During our inspection, we collected data and documentation from the force, reviewed the force website, interviewed senior officers and held focus groups with officers and staff from all grades and ranks across England, Wales and Scotland. Also, we made unannounced visits to police stations to talk to frontline officers and staff about their work.

How does HMICFRS inspect police efficiency?

We reviewed both the financial and workforce planning carried out by BTP while examining wider questions of demand management, making best use of all resources available and investing for the future. We considered the following overall question:

- How efficient is the force at keeping people safe and reducing crime?

HMICFRS considers a police force to be efficient if it is making the best use of resources to provide policing services that meet expectations and public priorities, and if it is planning and investing wisely for the future. HMICFRS gathered evidence across three 'core questions' which reflect those areas of policing that we consider to be of particular interest and concern to the public.

We have been tracking the progress of police efficiency since 2010, initially through our programme of Valuing the Police inspections.⁵¹ In this inspection, we focused on the way in which the force understands the demand it is facing or will face, how it is currently meeting that demand and how it is planning to meet future challenges. We looked at the following core questions:

- How well does the force understand its current and likely future demand?
- How well does the force use its resources to manage current demand?
- How well is the force planning for the demand in the future?

As our efficiency inspections continue to develop over the coming years, we will look at different aspects of efficient policing. However, the principles of making the best use of resources to provide efficient services that meet demand and public expectations remain consistent across all our assessments of police efficiency, which enables us to make year-on-year assessments of progress.

⁵¹ Available from: www.justiceinspectors.gov.uk/hmicfrs/data/valuing-the-police-data/

How does HMICFRS inspect police legitimacy?

When assessing BTP's legitimacy, our inspection considered the following overall question:

- How legitimate is the force at keeping people safe and reducing crime?

HMICFRS considers a police force to be legitimate if it has the consent of the public, and if those working in the force consistently behave in a way that is fair, ethical and lawful. To assess how legitimately forces are keeping people safe and reducing crime, HMICFRS gathered evidence across three core questions, which reflect those areas of policing that we consider to be of particular interest and concern to the public.

During the course of this inspection we asked the following core questions:

1. To what extent does the force treat all the people it serves with fairness and respect?
2. To what extent does the force ensure that its workforce behaves in a way that is ethical and lawful?
3. To what extent does the force treat its workforce with fairness and respect?

How does HMICFRS inspect police leadership?

When assessing BTP's approach to leadership, our inspection considered the following overall question:

- How well led is the force?

HMICFRS gathered evidence across three core questions, which reflect those areas of policing that we consider to be of particular interest and concern to the public.

During the course of this inspection we asked the following core questions:

1. How well does the force understand leadership?
2. How well does the force develop leadership?
3. How well does the force display leadership?