



**BRITISH TRANSPORT  
POLICE FEDERATION**

## **BRITISH TRANSPORT POLICE FEDERATION REVIEW**



## **Introduction**

In 2021 the British Transport Police Federation celebrated their 100<sup>th</sup> Anniversary. To mark the occasion the annual conference voted to initiate a review of their federation with the aim of improving services for the members.

The review was asked to examine a number of key strategic areas as listed but had a free remit to look at any aspect of the Federation.

*Efficiency*

*Equality and diversity*

*Productivity*

*Resourcing*

*Accountability*

*Trust and legitimacy*

## **Background**

The British Transport Police (BTP) is the police force with responsibility for the safety and investigation of crime on the railways and stations across England, Scotland & Wales. There are just over 3,000 officers policing 2,500 stations and over 25,000 miles of track. Over 190,000 people are employed on the railways. More than 1.3 billion rail journeys and 1.8 billion underground journeys are undertaken each year.

## **Funding**

Unlike the 43 forces of England & Wales and Police Scotland, the BTP are not a Home Office force. They are funded by the rail operating companies and the Department of Transport.

## **Pay and Conditions**

Pay for BTP officers is linked to the pay of Home Office officers and they are governed by most of the same Police Regulations including Conduct and

Performance but there are a few exceptions. The BTP officers' employment status is that they are warranted crown servants, but they can be made redundant. They also have a completely different pension scheme to Home Office forces.

In addition, since certain laws are different in Scotland, the BTP is the only force that has to police under two different legal systems.

### ***Federation***

The British Transport Police Federation represent the rank & file officers up to and including the rank of Chief Inspector. They also represent the BTP Special Constabulary.

### ***Constitution***

In line with the force, the BTP Federation has 7 geographical areas. Each area elect representatives and they form the area committee. Each Area Committee elects one of their number to act as Chair and one to act as Secretary.

The Chair and Secretary of each Area form the management board.

All 39 federation representatives (who are delegates to conference) elect three full-time federation officers who fulfil the roles of Chair, Secretary and Treasurer. They work from the federation offices in Dulwich, London. The three full-time officers with their deputies (also elected by delegates to conference but not full-time) act as the federation executive. Once appointed the full-time office holders cease to be members of their area committee and management board and are replaced by new representatives.

### ***Role of the Executive***

The executive is responsible for the day-to-day running of the Federation. Their main responsibilities include the provision of legal advice for members; training for representatives; communication with members and arranging annual conference. In addition, it falls to the executive to be the main interface with BTP management and the rail authority.

## ***Statistical Information***

*Figures as of 21<sup>st</sup> December 2021*

*Total number of officers 3,158*

*Male 2,472 (78.28%)*

*Female 686 (21.72%)*

*White 2,745 (86.9%)*

*Not stated 82 (2.6%)*

*Ethnic Minority 331 (10.7%)*



## ***History***

In recent history there has been a political sea-change towards the police and policing by both politicians and the media. There has been a number of high-profile enquiries into historical policing which rightly or wrongly has impacted on serving officers. Successive governments have imposed changes to the way police pay and conditions are negotiated with the demise of the Police

Negotiating Board (PNB) and the implementation of the “independent” Police Remuneration Review Body (PRRB) reducing the ability of the federation to influence pay and conditions for their members. Government austerity measures “freezing” and “capping” police pay in the last ten years has led to police pay being cut in real terms by over 18%. There is little doubt that this has had a demoralising effect on police officers and the inability of the federation to influence government has diminished them in the eyes of some of their members.

***It is of no surprise that this review has discovered that officers feel that their work is unappreciated and undervalued.***

### ***Normington Review***

It is in this historical light, that police officers saw their Federation as weak and unable to influence government for the benefit of their members and in 2014, under pressure from government, the PFEW commissioned the Normington Review into the Police Federation.

Whilst the Normington report was about the Police Federation of England and Wales, it is important that this BTP Federation Review learns the lessons of Normington, but endeavours not to make the same mistakes. Appendix A seeks to look at where Normington went wrong.

### ***Unique and Challenging Role***

Being a rank-and-file police officer is a unique and challenging role. The physical and mental demands are greater than ever. Officers are rightly subject to public scrutiny and accountability, but very little recognition is given to the number of malicious, vexatious and trivial complaints that have a demoralising effect on officers. The Conduct and Performance Regulations are complex and often wrongly and inflexibly applied.

### ***Complaints***

Policing is, by its very nature, confrontational. Many people resent being told what to do and what they cannot do. Complaints are part of policing. Officers

deserve the support of their Federation to ensure fairness and protection from malicious or frivolous complaints.

### ***Sickness and Welfare***

Officers who are sick, often as a result of duty, deserve support. Officers who police 24/7 for 365 days a year deserve time off and family time. Officers need protection from poorly trained or misguided management who wrongly interpret or disregard regulations leading to constant disruption to shifts and cancelled rest days.

### ***Public Benefit***

A federation that supports its members is providing a public benefit, by sustaining the morale and wellbeing of its members making them better motivated and supporting them to be fit and able to work.

### ***Public Consent***

The nature of British policing is such that it relies on public consent. Members of the public may take them for granted; complain about them when they fail to get the required level of service; and occasionally despair when standards of behaviour fall below what is expected, but when they are in distress or in danger, they turn to the police. They do so with the confidence that, if necessary, officers will put themselves at risk to help and protect them. Citizens expect the police to operate “with consent” and to seek support and assent for their operation. This is a unique relationship with the public which is not replicated everywhere in the world. It is based on public trust and confidence and extends beyond normal working hours; police officers are expected never to be off duty in protecting the public.



## The Role of the Federation



### ***Welfare and Safety***

It follows that police officers need an organisation which takes care of their basic welfare and safety that can provide them and their families with the necessary support when they need it most.

Members must have a collective voice so that they are listened to when raising concerns

### ***Conduct and Performance***

By the nature of policing, officers have to make difficult and split-second judgments that others get the luxury of picking over with the benefit of hindsight. It is little wonder that police officers get complained about more than most, often unjustly, although sadly sometimes not. Police officers need and greatly value an organisation that can represent them in matters of

conduct and performance. Investigations can sadly be protracted and require additional legal advice and representation. This absolutely necessary protection comes at a cost.

### ***Pay and Conditions***

It is vital that if rank-and-file officers are to be denied normal trade union rights, that they must have a body which can represent them powerfully and effectively regarding Police pay and conditions. This is not just about being guaranteed a hearing. It is an essential part of the covenant that the views of rank-and-file officers are listened to and respected.

### ***Federation Subscriptions***

It is desirable for membership of the Federation to be universal given the widespread risks that individual officers face. That is why membership of the Federation is automatic upon enrolment with a subscription to the voluntary legal fund which they can choose to opt out of. This is the most practicable arrangement currently and one which we support.

### ***Recommendation 1***

***That membership of the Federation is automatic upon enrolment with a voluntary subscription to the legal fund.***

***This recommendation supports the key strategy of Resourcing***

### ***Managing Expectations***

Individual police officers can only improve their pay by either working overtime or gaining promotion. Rates of pay are determined outside of any individual officer's influence. The current practice is that the BTP pay scales are in line with those of Home Office forces.

Many officers expect their Federation to achieve significant pay rises, despite or in the face of successive government policies that seek to cap or reduce public spending.



The PFEW currently have no right of negotiation on pay. Instead, they make an evidenced submission along with other interested parties to the independent PRRB who are appointed by government

### ***Police Remuneration Review Body (PRRB)***

The PRRB's full terms of reference and report can be found online

[Police Remuneration Review Body 7th Report England and Wales 2021  
\(publishing.service.gov.uk\)](https://publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/92522/prrb-7th-report-2021.pdf)

In reaching their recommendation, the PRRB must have regard to:

- ***the particular frontline role and nature of the office of constable in British policing;***
- ***the prohibition on police officers being members of a trade union or withdrawing their labour;***
- ***the need to recruit, retain and motivate suitably able and qualified officers;***
- ***the funds available to the Home Office, as set out in the Government's departmental expenditure limits, and the representations of police and crime commissioners and the Northern Ireland Policing Board in respect of local funding issues;***
- ***the Government's wider public sector pay policy;***
- ***the Government's policies for improving public services;***
- ***the work of the College of Policing;***
- ***the work of police and crime commissioners;***
- ***relevant legal obligations on the police service in England and Wales and Northern Ireland, including anti-discrimination legislation regarding age, gender, race, sexual orientation, religion and belief, and disability;***
- ***the operating environments of different forces, including consideration of the specific challenges of policing in rural or large metropolitan areas and in***

***Northern Ireland, as well as any specific national roles which forces may have;***

- ***any relevant legislative changes to employment law which do not automatically apply to police officers;***
- ***that the remuneration of the remit group relates coherently to that of chief officer ranks***

Given that remit and the interests of other parties, it is extremely unlikely that officers will get the pay award they seek or deserve.

### ***Role of Government***

The independent PRRB recommendation is not binding on government and in recent years the Home Office have twice made a pay award lower than was recommended. It is ironic that parliament has always accepted the findings of its own independent pay review body and increased MP's pay accordingly.

Against this background, the Police Federation have to manage the expectations of their membership. The unpalatable truth is that the various national Police Federations are virtually powerless to achieve the pay rises desired or needed in the current climate, which leads to the membership view that they are a "toothless tiger". It must be particularly galling for British Transport police officers to see the power of the rail unions, whose members they work closely alongside.

***With the inability to influence pay as much they would like, it is vitally important that the work of the Federation is to provide the best possible support to their members in areas such as misconduct, equality and welfare.***

## The Review Panel

The Review panel were asked to present their report and recommendations in time for votes to be taken regarding implementation to be taken at Annual Conference in September 2022.

### *The Panel*



#### ***Chair - Peter Smyth***

Peter served 36 years as a police officer in the Metropolitan Police and was a federation representative for 20 years representing officers for conduct, performance and welfare. Whilst in the Metropolitan Federation, he had a number of strategic roles serving as the Metropolitan Branch Board Chairman for over 5 years during which he was the Communication and Media lead. He has a wealth of experience in policing and federation matters. Since retirement he has been the Chief Executive of the Metropolitan & City Police Orphans Fund, a charity assisting the families of police officers who die in service.

#### ***Secretary - Deborah Gibbs***

Debbie served 31 years as a Detective Sergeant and Federation representative in front line policing looking after officers in all aspects of federation work. She was a federation trainer in misconduct and equality. She was elected to the Executive as part of the Sergeants Branch Board. Since retirement she works for the Met Federation staff advising officers on police regulations, entitlements and allowances and member services. She also administers and moderates the MPF website

## Panel Members

### ***Angela Gallagher***

Angela is a senior HR professional and Head of HR for Sage Accounting. She has over 30 years' experience in Human Resources at a strategic level

### ***Graham Gilbert***

Graham served for 42 years, 31 years as an Inspector in the City of London before retiring in 2022. He served as General Secretary of the CoLP Federation for a number of years and is experienced in running a branch board office as well as representing members.

### ***Janet Hills MBE***

Janet retired as a Detective Sergeant from the Metropolitan Police Service in August 2021, after serving 30 years. She was the first female Chair of the MetBPA and the only woman to have held the role in the Association's 28-year history. She was also the National President from October 2015 - 17. Janet received her MBE in the 2021 New Year's Honours list for her services to policing and the community. Janet continues to advocate strongly on behalf of under-represented officers, staff and her community.

### ***Kersten Peters***

Kersten is a serving uniform Constable and a member of the Metropolitan Federation Executive. Her policing experience includes front line, TSG, Firearms and aviation policing. As a federation representative she has looked after many officers. She is the strategic lead on Federation training, Post Incident Procedure and the managing editor of The London Beat, the online magazine for Met officers.

### ***Peter Stevenson***

Peter is a recently retired Constable and federation representative who served as a Federation Branch Board Secretary. He is very knowledgeable in all matters relating to Conduct and Performance. Since retirement he has been employed as the C and P lead for Kent Police Federation.

## Methodology

- Whilst accepting the limitations, it was decided that the best way to reach the maximum number of members was by way of a survey.
- Members were encouraged to complete the survey by the chance to win a randomly drawn prize.
- The panel opted to have two surveys - one for the membership and one for the elected federation representatives.
- Both surveys were conducted independently through SurveyMonkey.
- The survey included a balance of data and open questions to elicit the most complete response.
- The survey for officers was sent to all serving BTP officers who are subscribing members of the Federation (2,717).
- It was completed by 1,015 officers (37.35%) of the membership. (Normington surveyed PFEW members and based their recommendations on the returns which were under 10% of the membership)
- The survey for federation representatives was sent to all reps. 25 completed the survey (64%.)
- In addition to the survey, every BTP officer was invited to contact the Review panel if they wished to add further to their response.
- The survey was advertised on the BTP Federation website
- Members of the Review panel also met with officers from different regions of the BTP in a series of in person meetings.
- The panel also met with the BTP Federation executive
- The panel met with the non-police staff who work for the federation at Dulwich.
- The panel met with the solicitors who work for the federation in both criminal and civil cases.
- The panel were given access to federation documents and accounts at Dulwich
- The panel requested data from the force and the federation as appropriate and required
- Both surveys are attached at Appendix B and C

## The Review

The panel have examined all aspects of the British Transport Police Federation. Consideration has been given to those key strategic areas that were considered to be vital for any organisation if it is to achieve best practice for its members.

## Federation Constitution and Structure



The British Transport Police have a very different geographic territory than most other forces. Their federation constitution, quite rightly, reflects this. Splitting the representation into the same geographic areas as the force is the logical way to provide local representation. It enables a degree of local interaction with local management.

### ***Area Committee***

Local reps are elected at area level and form the area committee. Each area elects two of its members to act as Chair and Secretary and they become the area representatives to management board.

### ***Management Board***

The Review has no criticism of Management Board, but experience tells us that there is the potential for a disconnect between local representatives, who do not attend management board, and the Executive. Local representatives only get one opportunity, at conference, to meet and debate issues with reps from outside their area.



This could be addressed by inviting at least one local rep to attend Management Board as an observer. This may help them to understand the decision-making process and to ensure they are better prepared if they have any future progression to Management Board.

It is appreciated that there cannot be unlimited access to Management Board, nor would it always be logistically possible, but the Review recommends that over a 5-year election period, every representative is invited to attend one meeting as a non-voting observer.

### ***Executive***

All 39 federation representatives (who are delegates to conference) elect three of their number to serve as the principal officers of the Executive. That currently comprises the Chair, the Secretary and the Treasurer. Their Deputies are also elected by the delegates to conference and form part of the Executive although they remain part of Management Board. Only the principle Executive officers are backfilled on Management Board. This seems the most practical way to deal with this.

### ***Tenure***

The Review considered whether there should be fixed terms for Executive roles. Indefinite tenure can produce complacency and a loss of contact with front line policing. However, this must be balanced against the need to retain experience and corporate memory. In the long-term interest of both the federation and the members, the Review did not consider that there was a need to introduce tenure periods.

All federation reps, management board and executive officers can stand for re-election every 5 years. Any elected member can stand against an incumbent Chair or Secretary of the Area committee who wishes to stay in post. Any elected member of the management board can stand for any executive post.

This is, in itself, a robust mechanism to remove any officer who is not performing.

The BTP Federation have discipline rules within their constitution that enable them to deal with serious complaints about any federation officer, member of management board and the executive. These rules enable them to suspend, investigate, sanction or remove from post any representative against whom any allegation is proved.

It is good practice for any organisation to review and update their constitution periodically.

***Recommendation 2***

***Every representative is given the opportunity to attend one Management Board as a non-voting observer between elections.***

***This supports the key strategies of Accountability and Trust and Legitimacy***

## Trust and Legitimacy



The survey revealed that in general the membership had good levels of trust in the federation, although this naturally reduced at the higher level.

***It was good to note that 86.96% of members had trust in their local federation reps***

### ***Potential Disconnect***

In the survey, some members perceived a disconnect between the membership and the Executive.

*“There should be a greater connection with its members.....the executive should go out on patrol with officers to experience and see the difficulties members are facing. This would be valued...”*

In order to maintain and improve contact with local officers, the Review believes it is essential that the Executive are visible to the membership. That visibility and connect could be improved if every year at least one member of the Executive was to visit each regional area. Any such visit should be advertised in advance and should incorporate an opportunity for local officer to meet and speak with the Executive officer regarding current issues.

***Recommendation 3***

***That annually at least one member of the Executive should undertake a planned visit to each of the seven areas of the BTP to make themselves available to talk with local officers and keep in touch with current working practices and any problems that are emerging.***

***This supports the key strategies of Accountability and Trust and Legitimacy***

## Communication



Good communication is vital between any organisation and its membership. This is particularly true for police officers and their federation because of the nature of policing and the high level of accountability that police officers are held to. In our experience many officers, particularly those young in service, have little knowledge of what the federation do and how it works. Many officers' first contact with the federation is when they find themselves in need of support and advice.

If the federation are to achieve the same high level of accountability as their members, it is necessary that those holding the organisation to account have sufficient knowledge to make an informed opinion.

If trust and legitimacy are to be achieved, open and transparent information about federation work must be shared.

The BTP Federation use a variety of methods to communicate with their members:

### ***Circulars***

These are sent from time to time to all officers via their force email accounts. Circulars cover items of news considered to be of benefit to all officers.

### ***Newsletters***

A newsletter is sent to every officer each month. It incorporates a summary of all the news items that have gone on the website during the previous month.

### ***Chairman's Blog***

The current Chair introduced a monthly blog. This is a news item. It includes current issues of importance to the members that the Executive has been raising with the force at a strategic level; what meetings have taken place; and the results of negotiation with management.

### ***Facebook***

The British Transport Police Federation Facebook account has over 2,500 followers. It has a feed of news updates and acts as a driver to push members towards the website.

[British Transport Police Federation | Facebook](#)

### ***Twitter***

Twitter is used in a similar way to Facebook.

The Facebook and Twitter feeds are managed by GemmaPettmanPR on behalf of the Federation Chair

[@BTPolFed](#)



## **Website**

The BTP Federation has its own website.

[British Transport Police Federation \(btpolfed.org.uk\)](http://btpolfed.org.uk)

*“I think sometimes there could be better updates as to ongoing negotiations as a lot of hard work is not publicised.”*

In the survey, many officers and representatives suggested content that they would like to see on the website. They wanted news updates; FAQs; police regulations; contact details for federation reps; member services and federation forms. These were all frequently mentioned.

A closer inspection of the website reveals that all of the suggested “new” content is already on the site, much of it in the members section where a login is required.

BTP Federation Circular 14-2022 which was sent to all members re-issued the website log in and password details. At the end of the day, the content is there and has been signposted, but individual members need to take personal responsibility to find the information. It is difficult to see how the Executive could do more to promote the website.

The website is informative and current. At the time of starting the Review the federation had just launched a version of the website referred to as the “App”. In fact, this is not an app but a bookmarked version of the website suitable for handheld devices. The existing methods of communication listed seem to work very well.

### ***Recommendation 4***

***That the BTP Federation continue to utilise all methods of communication with their members***

***This recommendation supports the key strategies of Accountability and Trust and Legitimacy***

We do however have some concerns about the interactivity between the federation database, the membership and the website. This will be dealt with under the section of this report dealing with the database.

### **Website Costs**

The website is hosted by Webmaster (Northern Ireland) and the cost is £500 per month. The hosts use HTML rather than newer technology such as WordPress and consequently neither the executive officers nor the PR consultant can upload content directly onto the website. Instead, they produce their own content but have to send it to Webmaster to translate into HTML so it can be uploaded. This is a poor use of the available technology and an unnecessary cost.

The panel have not seen the contract with Webmaster, but the executive understanding is that part of the monthly fee (£100) is for managing the Facebook account. In actuality, the Facebook account is managed directly by Gemma Pettman PR. It is not clear why the fee of £100 continues to be paid.

The majority of modern organisations have the ability to manage their own website content. Any savings could be used to re-design and modernise the website with new technology. It is not the job of the Review panel to advise where the BTP Federation take their business but believe that there is a potential for long term savings.

### **Recommendation 5**

***A review of the website contract should be undertaken to see if the current arrangement is still suitable.***

***This recommendation supports the key strategies of Resourcing and Efficiency***

*“...advertise what we all do to support and help members”*

### **Good News**

Many of the officers surveyed, particularly federation representatives, were keen to highlight the good work being done by the federation on a daily basis, such as when negotiation leads to improved conditions, better safety and

welfare support. The one area where the BTP Federation could improve their communication is to advertise their good work. There are clearly difficulties with confidentiality and suitability in some circumstances, but some good news would be a welcome method of engendering a higher level of trust with the membership.

***Recommendation 6***

***The executive, management board and area committees should look at how they could advertise good federation work***

***This recommendation supports the key strategy of Trust and Legitimacy***

## Conference



The British Transport Police Federation hold an annual conference. This is attended by all representatives. The conference is held at different venues each year to fully reflect the geographical spread of BTP.

At conference, the annual report and accounts are presented and any motions to change policy are voted on. This is the “normal business” or AGM part of the Conference.

There is also the opportunity to hear from the Chief Constable and to ask questions of the Chief and the Railway Authority. Past conferences have included guest speakers.

### ***Conference Expenditure***

Conference is one of the biggest items of expenditure in the annual accounts. It should be noted that the federation do offset some costs with commercial sponsorship where possible, particularly around the awards dinner.

It was clear from interviews that representatives were keen to retain conference in its present form. It was also clear that some members regard conference as an expensive luxury. However, it is equally true that many members are not aware of the purpose of conference nor its benefits to them.

*“I think there should be more different opportunities to meet and build relationships throughout the federation”*

### **Benefit**

Representatives reported that conference was the only opportunity for them to meet together in person with reps from other areas. Given the vast geographical area that is covered by BTP policing, that is hardly surprising. Conference provides the opportunity to share ideas and experiences that should lead to “best practice”. Representatives from every area can ask direct questions of the Chief Constable on behalf of their members and this can only be of benefit to their members.

### **Business**

There must be a mechanism to deal with the requirements of presenting the annual report and accounts. Motions must be debated and voted on and conference is the easiest and most practical way to deal with this. Many organisations have struggled with conducting business online during the pandemic and report that they are returning to holding AGMs in person.

### **Speakers**

Guest speakers can be valuable but going forward there should be a change of emphasis from merely interesting to informative. In 2021, conference was given a presentation on Post Incident Procedures (PIP) by Colin Reynolds of Reynolds Dawson. This was both interesting and instructive. Many reps commented on how useful the presentation had been.

*“I feel refresher training wouldn’t go amiss. It’s been a while since my misconduct training”*

Conference time could legitimately be used for training on new legislation or policy. Many reps receive no further training after their initial basic and misconduct course and could benefit from regular updates and refreshers.



Guest speakers should be considered who can support that principle. Utilising conference in this way might save time and money if it avoids officers having to travel at other times. It would also reduce distractions from the force which is a public benefit.

### ***Excellence Awards***



There is also an annual “awards” dinner. These awards are known as the Excellence Awards and the recipients are nominated from across the BTP. They highlight examples of policing where the nominees have shown a high level of commitment and achievement. Each winner is invited to the dinner and during the ceremony is invited onto the stage to receive their award. These awards are very popular with both federation representatives and the membership.

From speaking to officers and colleagues concerned that there is little doubt that recognition and being valued by their peers for their excellent work is both important and beneficial. There is a perception that the policy is one of presenting one award to each area. Whilst this not the absolute rule, it does seem to end up with one award for each area. If excellence is to be rewarded,



it should be given to the six best examples of excellence not based on geography. Whilst it is accepted that this could lead to one area being awarded multiple times and some areas missing out, it should even out over a number of years. Such a policy would also encourage each area to only put forward the genuine cases of excellence.

***Recommendation 7***

***That conference continues to be held each year at different geographical locations.***

***This recommendation supports the key strategy of Trust and Legitimacy***

***Recommendation 8***

***That conference is scheduled for two days***

***This recommendation supports the key strategies of Productivity and Resourcing***

***Recommendation 9***

***That consideration is given to selecting guest speakers at conference who will be instructive and/or meet a training need.***

***This recommendation supports the key strategies of Productivity and Efficiency***

***Recommendation 10***

***That the awards dinner continues in its current form, but the awards are presented to the 7 most deserving cases rather than any geographical consideration.***

***This recommendation supports the key strategy of Trust and Legitimacy***

## Finance



### ***Accounts***

Annual audited accounts are published and are available to all members on the members pages of the website. The accounts are prepared by professional auditors and are clear and easily read.

### ***Income***

The main source of income for the BTP Federation is the members' subscriptions. BTP Federation subscriptions are currently £240.50 per annum per officer. The PFEW subscriptions are £282.96 per annum. The BTP Federation subscription rate compares favourably with that of the PFEW.

The last year for which audited accounts are available is 2020. It is quite clear that the COVID 19 pandemic had a considerable effect on federation expenditure with the cancellation of many meetings and conference. As 2020 is not a typical year we have also relied upon the figures from the 2019 accounts, to assess financial activity.

None of our panel are trained auditors or accountants. Nevertheless, several of the panel have held the role of Treasurer and/or Trustee and the accounts show an organisation that is financially well run. The expenditure shown seems entirely commensurate with the organisation's aims and responsibilities.

### ***Reserves***

Reserves have been increased. This is entirely appropriate in our view. The federation has a duty to plan for any contingency, including financing legal action on behalf of its members. It is vital that the Federation is equipped to meet any contingency action.

### ***Honoraria and Additional Responsibility Allowance***

The British Transport Police Federation is unique in that they pay some form of honoraria to every representative. In other forces, only the executive receives an additional allowance. The amounts involved are small, starting at £200 per annum. This represents a token gesture to acknowledge the additional work and time that representatives incur looking after their members. As previously outlined, our survey of representatives clearly showed that most reps represent colleagues whilst off duty.

Whether it is called honoraria or additional responsibility allowance, it can be an emotive subject. In the panel's experience, a small minority of members can appear not to support the premise that representatives should be rewarded above their normal rank salary although it was not raised in the BTP survey. However, it should be acknowledged that not only do representatives work in their own time but that the impact of federation work can also reduce their opportunities to work overtime and can reduce opportunities for career progression.

The Review found that that such payments are justifiable. It is extremely unlikely that anyone would be attracted to federation work for such a small sum. However, it is a right and proper acknowledgement to the officer for volunteering for the role of federation representative.

As representatives continue their federation path and the strategic workload and demand increase, there are opportunities to receive a higher level of honoraria.

The Area Chairman and Secretaries receive £500 per annum. Again, this sum is not large equivalent to about 4 additional day's pay for a top rate Constable and is commensurate with the demand on the office holder's time and the level of extra responsibility they have.

The Federation Executive (Chair, Secretary and Treasurer receive an additional responsibility allowance. They have considerable responsibilities and are almost permanently "on call." It was clear from speaking to officers and reps that they frequently call members of the Executive for advice and to access legal services. The Executive are also responsible for federation policy and planning. They are the primary interaction with the force at a strategic level. The Review found that these payments to be completely commensurate with the additional responsibility.

### ***Transparency***

Honoraria and Additional Responsibility Payments are clearly shown in the annual accounts for all members to see. The Review finds that all these payments are commensurate with the added levels of responsibility and extra work and makes no recommendation for change.

## Member Services

The BTP Federation offer a range of products known as “Member Services” as well as discounted offers with various companies.



### ***Group Insurance***

The Group Insurance policy is offered through George Burrows and includes:

- £130,000 Life Assurance
- Personal Accident cover
- £10,000 Critical Illness Cover
- Sickness benefits
- GP Care on Demand
- Care First Counselling Service
- Legal expenses insurance
- Worldwide Family Travel insurance
- RAC Motor Breakdown Assistance
- Mobile Phone/Gadget Insurance

### ***Cost***

The cost of the group insurance is £25.59 (lunar monthly i.e., every four weeks) for serving officers and £27.72 (calendar monthly) for Special Constables.

This is very much in line with other federation branch boards and appears competitive.

### ***Administrative Charge***

Some federations add an admin or commission charge to their member services to generate extra income which is normally spent on welfare projects. The BTP Federation do make a very small charge for their products which is transferred into federation accounts.



### ***Welfare Fund***

The BTP Federation have a Welfare Fund, administered by the Treasurer. This fund has no regular source of income apart from the occasional donation or legacy. The Federation have

recently transferred a considerable sum from federation accounts into the Welfare Fund. As far as we can establish there is no support from the BTP or ATOC.

Officers in need can apply to the Fund for grants and loans to help with welfare issues. During the Review, some concerns were expressed that there had been occasions when loans from the welfare fund were not repaid. The Review has established with the Treasurer that the current practice is to pursue all outstanding loan repayments.

The audited accounts for the Welfare Fund are included in the BTP Federation annual accounts.

### ***Police Treatment Centres and St George's Police Children Trust***

The BTP Federation recommend that their members contribute to these charities at a deduction from pay of £7.20 every 4 weeks. Around 60% of the police family do so. The PTCs are in Harrogate, North Yorkshire and Auchterarder, Perthshire.

### ***Lottery***

There is also a small Federation lottery administered at Dulwich. Currently around 25% of members pay into the lottery.

The Review found that the annual audited accounts are published and are available to all members on the website. The accounts are clear and professionally audited. The Review have made only one recommendation to current practice.

### ***Recommendation 11***

***In order to give the Welfare Fund some future stability, the Review recommends that 25% of the commission earned on member services each financial year is paid into the Welfare Fund and only subject to variation by Management Board***

***This recommendation supports the key strategies of Resourcing and Accountability***



## Database



The BTP Federation maintain a database of the membership. This includes the names and contact details of all subscribing members.

### **Shortcomings**

Many of the representatives interviewed reported shortcomings in the current database.

The issues raised included

- *The inability for reps to access the database, meaning that the only way they can verify if an officer is a subscribing member is to phone the office at Dulwich and ask for a check. This facility is only available in office hours and there are only two support staff at Dulwich, so there can be delays.*
- *The database does not record the area on which the member works. Officers are often posted to new units on selection and promotion. The database is not updated with such moves. This means that the reps for a particular area are unable to establish which officers are currently posted to their area. This also causes problems at election time trying to establish who is entitled to vote in a particular election.*
- *The contact details for members includes their BTP email address rather than their personal email address. This causes a twofold problem. It restricts what can be circulated to members because of the force firewall. It is also good practice for members and reps to use personal email addresses so that the force cannot access any private communications.*

- *The ability of the Executive to use the database to send out emails and texts directly to the members.*

The Review panel understand that in June 2022, the BTP Federation are due to receive a presentation offering them a new database with added features. When deciding whether to accept any proposed new database, it is hoped that a solution to these issues will be considered.

*Subject to the BTP acquiring a new database:*

#### ***Recommendation 12***

*All representatives are given “read only” access to the database*

***This recommendation supports the key strategies of Efficiency and Productivity***

#### ***Recommendation 13***

*That personal email addresses are added/updated to the database for existing and new members*

***This recommendation supports the key strategies of Efficiency and Trust and Legitimacy***

#### ***Recommendation 14***

*That federation HQ staff liaise with the force to ensure the database is up to date regarding the members’ rank and current posting.*

***This recommendation supports the key strategy of Efficiency***

## Staffing



### **Headquarters**

The current situation is that Federation HQ is in Dulwich, SE London in rented accommodation.

### **Travel**

For a force as geographically spread as the British Transport Police, any HQ is going to require reps to travel considerable distances, at a cost. Some reps may need overnight accommodation and London is one of the most expensive places to stay.

### **Rent**

It should be noted that the building currently occupied by the BTP Federation is owned by the Metropolitan Police Trading Service and the rent paid is far lower than normal commercial rents for London.

### **Overnight accommodation**

In the past, any member of the Executive living outside London was allowed to stay in a hotel for an overnight stay in London. An understandable but very expensive option. The current Chair and General Secretary have instead

decided that any overnight stay in London can be accommodated in the office. They have equipped the offices with sufficient furniture to enable them to stay at HQ at no cost. This is a commendable initiative and saving to members' money.

### ***London***

At a rough estimate, 60% of British Transport Police officers are posted in London and the Home Counties. The force HQ is in London. Professional Standards main office is in London. Central HR for the force is in London. The Railway Authority is based in London.

The Review have looked at the current arrangements. It is an inescapable fact that despite the force being UK wide, London is the logical place to maintain the Federation HQ. Any relocation would involve multiple trips for the Executive to London, with the inherent time, travel and accommodation costs. Any move would almost certainly involve expensive redundancy cost for existing support staff.

Whilst the Review Panel can sympathise with the frustration of some members that everything is in London, most of the factors involved are beyond the control of the Federation. Any move would involve considerable cost. The Review could see no logical reason to change the existing arrangement.

### ***Full-time Federation Representation***

#### ***Existing arrangements***

The current position is that there are 3 full-time federation representatives - the Chair, the General Secretary and the Treasurer. These three roles have deputies, but the deputy positions are not full-time. The deputies are from across the UK and not always readily available to cover Executive roles at short notice.

There are 39 federation representatives who perform their federation role as well as their BTP policing role. Federation duty is fitted around their day-to-day policing duty. Consequently, many representatives continue to work in their federation role whilst off duty.

It is fair to assume that when a fed rep is abstracted from their policing role to fulfil a federation duty, there must be some impact on local resilience. Short-notice abstractions from duty can be problematic for line managers

In the interest of efficiency, the force and the federation need to work together to decide whether or not to continue with the existing arrangement of ad hoc abstractions.

### ***Example***

If in an average week there are 400 hours of federation work carried out by the existing reps in duty time, then 10 full-time reps working 40 hours each would mean no short-notice abstractions from duty.

It is accepted that this is a very simplified way of looking at the issue. There are no accurate statistics on how many duty hours are spent on federation work. It is accepted that keeping records on the workloads of reps would be unnecessarily difficult and time consuming.

So, it is impossible to accurately gauge whether there is a benefit to having more full-time reps. Some forces resist increasing the number of full-time federation roles as on the surface it can appear that every officer performing a full-time federation is an officer not serving the public.

### ***Reducing the workload of Line Managers***

Again, this oversimplifies the work of the federation. Federation reps play a vital role in reducing the work of line managers, particularly in negotiating and mediating at an early stage of many issues from simple police regulations, shift rosters and grievances. In the survey, 42.72% of officers had spoken to a federation rep about shift patterns and rosters, 30.29% about overtime and expenses and 24.27% about police regulations

### ***Welfare and Sickness***

Federation reps fulfil a supporting role in welfare and sickness. In our survey, 28.93% of officers had consulted a federation rep for advice about sickness and attendance and 16.5% about a welfare issue. 53.06% had looked to the federation for sickness support.

### ***Conduct and Performance***

It is very often the case that the local federation representative is more knowledgeable in conduct and performance regulations than line managers. There are federation reps of every rank and this knowledge can support other line managers to deal with conduct and performance appropriately and efficiently. This is a benefit to the force and therefore public interest.

The contribution of the local federation to efficiency at work and therefore added improvement in service delivery cannot be underestimated.

Whilst some forces resist having more full-time local officers, some Chief Officers have recognised that it can bring about a positive impact for the force.

This Review makes no recommendations regarding full-time reps outside of the Executive. However, the Federation and the Chief Officer need to have an honest conversation about what is best for the members and the British Transport Police.

### ***Staffing at HQ***

There are currently two support staff at Dulwich. One member of staff works almost totally with the in-house lawyer on civil and equality legal casework. The other member of staff maintains the database and liaises with BTP Payroll concerning deductions from members pay. Neither has the time or training to support the Executive in a PA type role.

### ***The Executive***

The current Executive officers have no secretarial support. They have to prepare and type agendas and minutes for meetings. They conduct their own research. They organise their own diaries and make their own travel and accommodation plans. This is very surprising and not in line with the federation arrangements for a force of a similar size, such as Kent, but with a considerably smaller geographical workforce. Kent is looking to increase full-time federation officials at their Fed HQ and have admin support as do most other federations.



### ***Admin Support***

The Review recommends the employment of a personal assistant, at least on a part-time basis, to free the full time Executive to concentrate on strategy, representation and liaison with the force.

### ***Treasurer Role***

The current role of Treasurer includes Office Manager and the running of the Welfare Fund. He also provides resilience to cover absences for the Chair and General Secretary.

### ***Bookkeeper***

The Review believes that a bookkeeper employed for one day a week should be sufficient to keep financial records and file invoices. Financial decisions must stay with the Executive. The Treasurer should re-title Treasurer/Assistant General Secretary. The role should retain responsibility for the Welfare Fund.

### ***Deputies***

The deputies' role is to attend Executive and Management meetings and to deputise for office holders when needed.

### ***Federation Leads***

The Review Panel looked at the structure and staffing of other federation HQs in forces of similar size to the BTP.

Conduct and Performance, Equality and Diversity and Welfare are three areas of work that could benefit from the appointment of a representative lead.

Equality and Diversity and Conduct and Performance are both of high importance to members, management, the reputation of the force and public opinion. They also carry high reputational risk.

## **SPOC**

A single point of contact on both these matters is vital in a modern federation and a busy force.

They can provide strategic liaison with the Chief Officer, Professional Standards and Human Resources on policy and direction which will ultimately benefit not only the members but the force as well.

## **Long Term Structure**

The Review accepts that the structure of the British Transport Federation Executive is outside of their own control. Full-time posts are at the behest of the Chief Constable. Nevertheless, to improve the efficiency of the Federation for its members and for the British Transport Police force, the Review does make a recommendation for change. This may not be immediately achievable but should be the long-term aim.

## **Recommendation 15**

**The Review recommends a structure for the British Transport Police Federation HQ as follows:**

**Chair: Full-time role mainly based at Dulwich**

**Deputy Chair: Part-time no change**

**General Secretary: Full time role at Dulwich**

**Assistant General Secretary/Treasurer/ Welfare Lead: Full-time role at Dulwich**

**Equality & Diversity Strategic Lead: Full-time role**

**Conduct and Performance Strategic Lead: Full-time Role**

**This recommendation supports the key strategies of Efficiency, Equality and diversity, Productivity, Resourcing, Accountability, Trust and Legitimacy**

This would mean an increase of two full-time federation officers. There would be no change to the Deputies who should remain not a full-time role

***Recommendation 16***

***The Review also recommends the employment of:***

***A part-time bookkeeper***

***A full-time or part-time Personal Assistant/Secretary***

***This recommendation supports the key strategies of Resourcing, Efficiency and Productivity***

## Equality and Diversity



**Equality is about treating everyone with dignity and respect.**

It is about ensuring every individual has an equal opportunity to make the best of their lives and talents. Everyone should have equality of opportunity and not be treated differently or discriminated against because of their characteristics.

**Diversity is about inclusion.**

Diversity celebrates and values how different we ALL are. Diversity is about recognising, valuing and taking account of people's backgrounds, knowledge, experience and skills and utilising them to create a productive, efficient, healthy and effective workforce.

Intersectionality is a framework for understanding how aspects of a person's identity combine to create different types of discrimination. Intersectionality identifies multiple factors of advantage and disadvantage.

***“Diversity is being invited to the party; inclusion is about being asked to dance.” Verna Myers***

### ***The Role of the Federation in Equality***

It is more important than ever that a staff association, like the federation, is able to represent its members in matters of Diversity and Equality. In fact, to support modern policing, it is vital.

The federation must support colleagues to be treated fairly and equally.

They must work with the force, unions and other staff associations to create equal opportunities and to develop good working relationships and environments for all.

They must foster improving understanding through negotiation, support, and advice in an impartial, honest and non-judgemental way.

### ***Equality Training***

It is surprising to discover that the British Transport Police Federation currently offer no training to representatives to enable them to deal with Equality and Diversity.

This is unacceptable.

Whilst the force does provide some training for officers in this area, the training needed for representatives must, by its very nature, be different. It is the role of the federation to be able to support the officer from their individual perspective. As such the federation rep must be able to represent the officer's best interests which is very often not the same as the best interest of the force.

The survey highlighted that some officers want their federation and line managers to be *“empathetic and knowledgeable”* with a *“better understanding”* and *“awareness”* of diversity and equality issues.

It is essential that federation reps receive targeted training. The PFEW already offer their representatives Equality training.

In the short term, in order to get as many reps trained as quickly as possible, a quick fix may be to approach the PFEW to ask them to share their course. This could save considerable time and expense. Going forward the ultimate aim must be for the BTP Federation to offer their own equality training.

### ***Number of Federation Representatives***

76% of the membership and 65% of federation reps thought that the BTP Federation were representative of their members and 52% of the members and 43% of federation reps thought that the federation should have specialist representation.

In common with most Home Office forces, the number of female officers in the British Transport Police is increasing. Likewise, the number of officers from BAME backgrounds is also increasing. The Federation needs to reflect its membership in order to give confidence to all officers that they will all be supported.



### ***BAME***

At the recent elections the number of representatives from a BAME background increased by 200%. Whilst the numbers are still low, this increase is commendable and represents 7.96% of all representatives. The percentage of BAME officers in the force is 10.7%

### ***Female***

The number of female representatives did not increase. Female officers currently make up 10.25% of the representatives. The percentage of female officers in the force is 21.72%



*“More female fed reps”*

### **Proactive**

The increase in representatives with a BAME background was in no small part due to the current Chair running a campaign to proactively recruit officers with ethnically diverse heritage and encouraging them to put themselves forward for election. This initiative must be applauded. Similar initiatives should be considered for female officers and officers with other protected characteristics.

The percentage of federation reps who are female or from BAME backgrounds still does not reflect the percentage of officers in the force, so clearly more work needs to be done. The Review recognised that the role of federation rep is often one that officers do not take up until they are more senior in service and that female and BAME officers are more likely to be younger in service and that may reflect in the percentages.



One respondent in the survey wanted to see *“federation posters supporting equality and diversity.”*

Mentoring, encouragement and reassurance can all be used to encourage officers to be confident that they can become representatives and that they will receive training and support in the role.

### ***Representing Diverse Needs***

In a force of 3,000 officers with only 39 representatives, it is appreciated that it will be impossible to ensure that there will be a representative for every personal protected characteristic or from every ethnic heritage. This need has traditionally been filled by the various staff support associations which make up SAME (The Support Association for Minority and Ethnic Staff). They can offer a more tailored support.

It should be the long term aim of any federation to provide sufficient capability to support every officer with a level of professionalism that the officer can be confident that their individual needs are being met. To realise this goal, the federation should demonstrate that it has the knowledge and understanding required.



### ***Staff Support Associations***

Staff Support associations should not be seen as competition. Instead, they should be encouraged to work with the federation to pursue a common goal of ensuring every officer is given the best level of support.

This could be achieved by inclusion on an ad hoc invitation basis of a representative from a staff support association at management board meetings, particularly if there are any equality issues on the agenda. This would be as a non-voting participant but may enable the federation to have a better level of understanding and act as reassurance to the staff support associations that the federation has a genuine desire to represent every officer.

### ***Recommendation 17***

***The BTP Federation must urgently introduce training in Equality and Diversity for all representatives***

***This recommendation supports the key strategies of Equality and Diversity, Trust and Legitimacy, Productivity and Accountability***

### ***Recommendation 18***

***The BTP Federation should open discussions with staff support associations to achieve a greater level of mutual understanding***

***This recommendation supports the key strategies of Equality and Diversity and Trust and Legitimacy and Accountability***

### ***Recommendation 19***

***Staff support associations should be invited to attend Management Board on a periodic basis as non-voting guests***

***This recommendation supports the key strategies of Equality and Diversity, Trust and Legitimacy and Accountability***

### ***Recommendation 20***

***The BTP Federation must continue to encourage and support officers from gender and diverse backgrounds to put themselves forward as representatives.***

***This recommendation supports the key strategies of Equality and Diversity, Trust and Legitimacy and Accountability***

## Health and Safety



The British Transport Police Federation have a Health and Safety Sub-committee who meet regularly.

The committee is made up of one representative from each area and all are trained to Institution of Occupational Safety and Health (IOSH) standard.

Members of the Review panel met with the Health and Safety committee. They reported that having the IOSH training was absolutely essential, and that management respected their input, knowing that they had received the appropriate level of professional training.

In a force such as the BTP, with the added dynamic of working in close proximity to trains and railway lines, health and safety must continue to be a priority. It is vital that the members have confidence that their federation representatives have the knowledge and professionalism to be able to represent their health and safety interests.

### ***Recommendation 21***

***The BTP Federation must continue to ensure that at least one representative from each area is trained to IOSH standard.***

***This recommendation supports the key strategies of Resourcing, Productivity and Accountability***



## Conduct and Performance

If this Review had been commissioned before the dreadful crimes of Wayne Couzens, the section on Misconduct may well have been very different.

It is clear that all forces are exercising a very cautious approach to misconduct in the light of Couzens. The BTP appear to be no different.

### ***Police Conduct and Performance Regulations***

Prior to that, forces were adopting the provisions of the Police Conduct and Performance Regulations 2008 and 2020 where the ethos was to deal with minor breaches of the Code of Conduct at the appropriate level and in a timely manner.

### ***Federation Advice***

The survey tells us that the issue upon which most officers seek federation advice is misconduct. The Review panel's interviews with both officers and reps have revealed that misconduct is now a huge issue for both the force and the federation.

The Review recognises that a number of high-profile media stories have led to the need to improve public confidence in the police.

It is not in the interests of the officers or the Federation to have bad or corrupt officers in the force. It is absolutely right that forces should be allowed to investigate and deal with such officers robustly.

### ***Appropriate Level***

It is important to have a clear delineation between gross misconduct and minor breaches of the Code of Conduct that could adequately be dealt with by written warning, reflective practice or management action. This must take place at the initial assessment. There must be a balance between the forces desire to protect its reputation and the proper use of misconduct regulations.

***“the result of a poor PSD investigation, I was issued with management action for not taking an action which was clearly documented”***

### ***Excessively Robust Approach***

Every federation representative spoken to reported that the BTP were taking an excessively robust approach to misconduct. Seemingly minor infringements were being treated as gross misconduct.



### ***Suspensions***

For a force of just over 3,000, to have over 30 officers suspended from duty is extraordinary. It means 1% of the workforce are not available for any duty. Kent, a force of a similar size, has only 12 officers currently suspended.

If the number of suspensions is just a symptom of an over cautious approach, and a failure to consider other methods of dealing with lower-level misconduct such as reflective practice review or misconduct meetings, then this will continue to be a big problem for the force and the federation.

### ***Cost of Investigations***

The costs incurred by the force supporting gross misconduct investigations are considerable and are even greater when some of these matters progress to a hearing.

### ***Number of Gross Misconduct Investigations***

Given the current numbers of gross misconduct investigations, suspensions and hearings, a federation with just 3 full-time officers cannot be expected to service such a demand. The area reps are having to spend more and more time trying to support officers facing gross misconduct investigations. Federation reps are facing increasing abstractions from normal duty as they struggle to balance the demands on their time.

### ***Cost of Hearings***

Gross misconduct hearings take place in York. This is another drain on the time and finances of both the force and the federation. A three-day hearing for example would generate costs for travelling, accommodation and meal costs not only for the officer subject of the hearing but also witnesses and the federation representative.

### ***BTP HQ London***

The Review is aware that there is now the ability to hold some misconduct hearings in London. That will certainly reduce some of the issues concerning time and expense. It would appear that the need to hold hearings in London merely confirms that the number of hearings has increased and is not a short-term phenomenon.

### ***Impact on Resources***

It may be that the British Transport Police has been unlucky and that over the past year, there have been an increase in serious conduct allegations. However, if the current number of gross misconduct investigations end up as simple misconduct or unsubstantiated, the force will have expended considerable money and resources to no good end or public benefit. It will also have an adverse effect on Federation finances and resources, which could be better spent elsewhere for the benefit of the members.

***“An idea of the timescale in which the allegations would be investigated and finalised”***

### ***Timeliness***

95.65% of reps reported that the force did not deal with conduct and performance in a timely manner and 56.52% reported that a conduct investigation had taken longer than 12 months.

***“.....told that it was going to take almost a year to deal with”***

### ***Hidden Costs***

There is a hidden cost of these serious protracted investigations. They have a detrimental effect on the mental health of both the officers under investigation and their federation friend.



## ***100% of officers and 78.26% of reps reported experiencing stress as a result of a conduct and performance investigation***

Research has shown that officers who are suspended, feel isolated and lose confidence in the force and the conduct procedure. Officers subject to protracted investigation may feel resentful at the force for the way they have been treated and suffer a detriment to their own and their family's wellbeing. If they are not dismissed at the end of the process, they may struggle to recover and become a productive member of the force. This cannot be in the interest of the force or the public.

Officers reported that they needed access to mental health support, advice and counselling while waiting for conduct matters to be progressed.

***“I was left to stew for over 8 months on my own, without job support. Fed however were fantastic”***

### ***Impact on Reps***

Federation friends dealing with multiple officers facing misconduct are unlikely to emerge unscathed as they deal with the stresses and resentments of their colleagues.

### ***Impact on Colleagues***

When a simple breach of the Code of Conduct is dealt with at an inappropriate level, the resentment felt by the accused officer can often be mirrored by colleagues thereby generating a distrust of the whole misconduct process. This is not healthy for an efficient and productive force because it can engender a risk averse attitude. This is unsustainable for police officers who are often faced with making time critical decisions.

### ***Records***

It is vitally important that the BTP Federation keep records of the number of cases where officers are served with gross misconduct notices and the final outcome. Anecdotal evidence is unlikely to convince BTP management to review their policy whereas data evidencing for example that “In the last 6 months, 50 gross misconduct notices have been issued, 45 of which have

resulted in simple misconduct or no further action” is evidence that Professional Standards are being too robust in their approach. If a federation is going to achieve the best representation for its members, then it must be in possession of facts.

The Review Panel were mindful of recommending another increase to bureaucracy for the Executive but believe this will be a vital tool with which to challenge management, where necessary.

### ***Recommendation 22***

***The Federation introduce a system whereby reps notify the Executive of any case where an officer is served with a gross misconduct notice. These cases would be monitored by the Executive to ascertain the outcome.***

***This recommendation supports the key strategies of Accountability, Resourcing, Productivity and Efficiency***

### ***Recommendation 23***

***That the BTP Federation enter into urgent negotiation with the force to try to ensure that there is more proportionality introduced into the misconduct process.***

***This recommendation supports the key strategy of Trust and Legitimacy***

## Regulations



BTP Regulations mirror Home Office Police Regulations, although BTP officers do have some additional allowances.

The BTP Federation have worked with the force for a Compendium of Regulations to be issued and made available for all officers.

It was issued in 2021

Access to and understanding of Police Regulations is vital for officers and management.

The Review has discovered that there is no training for line managers in Police Regulations. Officers reported that only 59.46% of line managers and 31.07% of the senior leadership team understood Police Regulations. This can lead to their misinterpretation by some managers. It is therefore vitally important that federation representatives are trained and do understand them

It is also vitally important that the force and the federation agree on any “interpretation” and any agreement is formalised within the compendium. This will ensure that Regulations are applied consistently across the force and retained in the corporate memory.

***Recommendation 24***

***The BTP Federation should revisit the Compendium of Regulations with the force, agree any interpretation of regulations and formalise that in writing***

***This recommendation supports the key strategy of Efficiency and Trust and Legitimacy***

## Training



**Most Federation training is undertaken “in house” and delivered by the Executive**

### ***Basic Reps and Misconduct Training***

New representatives receive a basic “new reps” course and then a more intensive misconduct course.

***91.3% of reps had completed the basic reps course***

***65.22% of reps had completed the misconduct course***

### ***Health and Safety Training***

Health and safety training is delivered by outside agencies to IOSH standard.

***39.13% of reps had completed the H&S course***

### ***Equality and Diversity Training***

As previously detailed earlier in this report, there is no training on equality and diversity. This must be urgently addressed.

### ***Training Delivery***

One area that the Review looked at was the timing of the delivery of training. As the election period is every five years, most training occurs shortly after the elections when it is hoped that all new reps can undertake both the new reps course and the misconduct course.

***50% of reps waited less than 3 months for training***

***21.74% waited less than 6 months for training***

***8.7% waited more than 6 months***

Some representatives were concerned regarding those occasions where a new rep is elected outside of the normal election period, for example when an existing rep retires. In those instances, the new rep can wait some considerable time for training. The Review understands that a new course cannot be commissioned every time a new rep is elected. However, a new rep with no training can be unable to take their share of the workload. This can increase the workload for other reps on that area.

In an ideal world, training should be undertaken, as soon as practicable, for all newly elected reps but we recognise that this may need to wait till there are at least a reasonable number of officers to attend training. The BTP Federation could also consider sourcing courses from the PFEW on an ad hoc basis

### ***Welcome Pack***

The delay in training could be mitigated by immediately issuing new reps with a welcome pack. This could include some basic information about regulations, misconduct and equality. It should include contact details for the other representatives on their area and contact details for the Executive.

### ***Other Training***

Representatives also flagged that they would like training in mental health and the Review understands that this is something currently under consideration by the BTP Federation executive. Other areas of training included Pensions and PIP.

### **PIP**

Post Incident Procedure Training (PIP) is delivered by Firearms Police Officers Association (FPOA) in conjunction with Reynolds Dawson. The Review understands that the BTP Federation intends to train all 39 reps in PIP. That would appear to be the Gold standard.

### **Continued Professional Development**

It was good to see that federation reps were keen to continue their professional development with targeted refresher training. In the panel's experience, other federations utilise solicitors and outside agencies to provide training input. Most, if not all, will give their time for free which makes it cost neutral for the federation. This input is in the form of 30 minute to 2-hour

online presentations. These short sessions have proved to be a great way to keep interest high and improve knowledge.

This is something that the BTP Federation could explore.

***Recommendation 25***

***That all newly elected representatives are sent a welcome pack as soon as possible after confirmation of the election result.***

***This recommendation supports the key strategies of Trust and Legitimacy, Efficiency and Productivity***



## Federation Facility Time



The role of a federation representative is an important one. It can be both demanding and time consuming and in most instances is balanced with the full-time role of a serving police officer.

The British Transport Police Federation has very few full-time federation reps.

In our survey 47.83% of reps reported that misconduct was the number one issue on which members asked for help, with misconduct, performance, sickness and shift patterns and rosters the subjects they were most asked to advise on.

Representatives reported that, in general, BTP line managers were very good at allowing facility time in duty hours for representatives to carry out their federation duties.

### ***95.65% of reps were allowed facility time by their line managers***

It is good to note that the majority of managers were sympathetic to the needs of their colleagues. It is also worth noting that in many instances the involvement of the federation can actually lessen the burden on line managers.

*“The station commanders and officers expect your availability. Sometimes you have to say no, but that lets the officer and the Fed name down”*

Equally it is important to note that federation representatives understood that there would be times when the needs of the BTP and the public would supersede the needs of their federation work. Like all officers, they knew that they could be called upon at short notice to change plans.

*“I spent 6 ½ hours of fed work.....prior to a full night shift. After 2 hours sleep, I travelled to help an officer on a stage 1 meeting.”*

### ***Working in own time***

Every representative reported that, despite the availability of some facility time, they had to complete federation work in their own time.

### ***73.91% of reps reported carrying out federation work in their own time***

The amount of work being completed off duty varied. The most experienced reps, perhaps understandably as there was greater demand on their time, were those who had to work off duty the most often.

*“Try to arrange meetings in duty time, but not always able”*

It is to be commended that the majority of federation representatives seemed to accept the need for some federation work to be done whilst off duty. No overtime is claimed for this extra work and at no cost, it provides a benefit not only to the member but also to the force and the public.

*“The majority is done off duty”*

The Review noted that this “additional work” is not monitored in any way. Neither the executive at Dulwich nor the BTP themselves have any way of knowing how much work each representative is doing and how much of it is off duty.

### ***Welfare Concerns***

This does lead to some concerns about the welfare of representatives. Some cases, particularly misconduct and equality matters, can be time consuming, demanding and stressful for both the officers involved and their representatives. The impact on the mental health of reps cannot be underestimated.

*“The executive is not aware of what fed reps are dealing with unless a legal application has been made. They do not know how many cases you may be dealing with.”*

### ***Monitoring***

It is inevitable that any monitoring of representative workloads could be time consuming and lead to more bureaucracy.

However, it is vital that any organisation takes into account the welfare of its representatives. There should be some level of monitoring to address the issue. A simple proforma that could be completed by every rep quickly and simply could be introduced. The proforma could be sent out monthly by the BTP Federation Executive. The rep would estimate how many hours they spent on federation work both on and off duty. The proforma would be submitted to Dulwich and the information logged on a spreadsheet.

All the information must be kept confidentially by the executive. The information would enable the executive to assess whether any individual representative has too much demand on their time and whether workloads can be more evenly distributed.

Statistically it might also prove a useful tool should the need arise to evidence the importance of the federation to management.

### ***Full-time representatives***

Understandably, in the experience of the panel, every force seeks to minimise the number of full-time representatives. However, this ignores the real issue. What should be important is how many hours are spent on federation work across the force.

There is a flawed perception that reducing the number of full-time representatives saves money. This argument is flawed if, by having less full-time reps, there is no reduction in the number of hours carried out on federation duty. In actuality, there is an argument that it can be less disruptive if there is a model of more full-time representatives because local fed reps are abstracted from police duty less often.

The question of how many full-time representatives the BTP Federation is addressed elsewhere in this report.

### ***Recommendation 26***

***A simple monthly proforma should be introduced to assist with monitoring the number of hours that federation work is completed on and off duty***

***This recommendation supports the key strategies of Resourcing, Productivity and Accountability***

## Provision of Legal Assistance



### ***Legal Bill***

The greatest item of expenditure for the British Transport Police Federation is the provision of legal assistance. Police officers can find themselves in need of legal advice and representation through no fault of their own but simply by being in the wrong place at the wrong time. Most officers join the Federation to ensure access to such assistance.

### ***Funding***

Officers access legal advice and representation through the Executive at Dulwich. Any criminal or gross misconduct allegations are referred to the Executive and a decision (normally made by the Chair) is made as to whether funding will be provided to pay for legal assistance.

### ***Criminal and Misconduct***

If funding is authorised, nearly all the cases are referred to Reynolds Dawson Solicitors. This is a firm of solicitors who specialise in criminal law with years of experience in police misconduct matters.

Every federation representative and officer that was spoken to during this Review, were not just very satisfied with the service provided by Reynolds Dawson, they were effusive in their praise.

### ***Civil Claims***

The BTP Federation also employ the services of an in-house lawyer to deal with civil claims and equality/employment issues. Any legal costs awarded are used to offset the cost.

Again, the representatives and officers that were interviewed were full of praise for the service provided.

It is good to know that officers are getting these excellent services and therefore we need make no recommendation for change.

There is an increasing drive to use more digital technology in legal proceedings. Personal injury cases are now almost completely dealt with electronically. The use of a legal Case Management System could provide some efficiency savings as well as reducing the amount of paper files that need to be stored. Such systems can be bought outright or purchased on a monthly basis. The monthly option includes periodic updates and an IT support package. Typical costs are around £50 per month. There may also be a training cost.

***Recommendation 27***

***The Executive should liaise with the in-house lawyer to consider whether an expenditure on a CMS would result in efficiency savings.***

***This recommendation supports the key strategies of Efficiency and Productivity***



## Mental Health



### ***Effect of Police Work on Mental Health***

One of the most shocking aspects of the Review survey was the sheer volume of responses received on the topic of mental health. When given the opportunity to comment with free text, almost every officer who completed the survey commented that their mental health was affected by police work and that they are increasingly having to deal with mental health in the community. Given that the survey was completed by 37.35% of the force, this is even more remarkable.

### ***Critical of BTP Management***

In the survey, officers were, for the most part, not critical of the force or management with the exception of the provision to support officers with their mental health.



## ***Death on the Railways***

***A British Transport police officer is around 7 times more likely to have to deal with a sudden and violent death than an officer from a Home Office force.***

That is a staggering statistic

Many of the fatalities that BTP officers have to deal with are suicides associated with mental health. If a death occurs on the railway, the circumstances can be very distressing. It is unsurprising that repeated exposure to trauma, the effect of fatalities, dealing with mental health issues and unrealistic time pressures can all have an adverse effect on an officer's health.

The current policy in the BTP is that officers who deal with fatalities or encounter trauma are referred for a process known as TRiM.

### ***TRiM***

TRiM is a BTP peer support programme. It's not a clinical intervention; it's not counselling or a form of 'treatment'. It's supposed to be about helping officers to understand their likely reactions to incidents and determining whether they would benefit from further help and support.

TRiM volunteers arrange to speak to the officer to explore how they are feeling about what they have been exposed to. The TRiM practitioner can signpost the officer to sources of help, which can include immediate referral to Occupational Health; a Psychiatric/Psychological pathway or the Employee Assistance Programme to access counselling.

TRiM is voluntary. Officers have to "opt in" to the process. The Review has been told that the vast majority of officers do not take up this option. There may be a culture or reluctance to engage because of the stigma of mental health but equally because those officers who have engaged with the process have found that there is insufficient OH capacity to provide timely counselling.

# PROTECT THE PROTECTORS



Policing has always been a stressful occupation. Trauma can be encountered simply dealing with conflict or supporting victims of crime as well as being at risk of being assaulted at work. The modern police officer is constantly under video surveillance with Body Worn Video and phone cameras held by members of the public. With this high level of public scrutiny, this can only be adding to officer stress levels.

## ***Protect the Protectors***

The BTP Federation have joined the PFEW and the Prison Officers Association in their Protect the Protectors campaign. They are campaigning for better training, access to equipment, more accurate data on police assault and improved welfare support.

Police officers can be affected by both external and internal factors in policing. Federation reps reported that the most common issues affecting stress levels for officers were **sickness (95.85%); shift patterns and rosters (91.3%); fatalities at work (86.96%); welfare (65.22%) and equality and diversity (47.83%)**.

*“.....there needs to be more focus locally on officers taking well needed time off.....AL requests being denied due to staffing”*

*“Things like rest days being cancelled”*

## ***Employer Responsibility***

It must be the responsibility of the employer, in this case the BTP, to provide a duty of care to their employees and that includes the adequate provision of

mental health support. It is not for the federation to plug the gaps left by the force's inadequate provision.

It is however the responsibility of the Federation to ensure such matters are brought to management's attention and to liaise and negotiate with management to lobby for improvements.

***Recommendation 28***

***The BTP Federation should form a review group to look at all aspects of mental health; the provision by the force to both reduce mental ill health and provide timely treatment.***

***This recommendation supports the key strategies of Trust and Legitimacy and Efficiency***

***Recommendation 29***

***That following any such review, the BTP Federation should engage with BTP management to see what can be done to improve the provision of Mental Health support***

***This recommendation supports the key strategies of Efficiency and Productivity***

## Sickness



The survey showed that **17.57% of officers who responded had been the subject of a sickness or attendance management issue.**

When asked specifically from whom they had received support, 53.06% said their federation rep, 44.90% said their line manager, 2.04% said their SLT and 22.45% had received no support.

It is clear that a large percentage of support to those off sick is being provided by the federation as well as first line managers.

### ***Support***

Officers who are long term sick need support to return to work. This is in the interests of the officer and the force. It is therefore vital that the force and federation reps continue to support officers who are off sick.

### ***Getting back to work more quickly***

Officers were asked what might have assisted them in returning to work more quickly. Unsurprisingly, some needed a more flexible approach to recuperative duty from their line managers. However, many officers wanted to be able to access medical services such as physiotherapy and counselling or to be able to have minor surgical operations more quickly to enable them to resume work.

### ***Private Healthcare***

Clearly, access to surgery is beyond the remit of the force and the federation unless there was to be some provision of private health care.

### ***Counselling***

There is limited availability for counselling through the force. It is accessed through Occupational Health. Federation reps reported that OH were understaffed, overworked and slow to deliver.

### ***Police Treatment Centres***

Both physiotherapy and counselling are available to contributing officers through the Police Treatment Centres, a charity providing treatment, support and recuperation for injured and ill police officers.

Whether it is a physical injury, or stress, depression or anxiety related, treatment is provided to help officers recover and aid their return back to work. Treatment includes support and recuperation, including intensive, police-specific, physiotherapy and rehabilitation.

This charity relies on donations from federation members across the country.

### ***Member Service***

The BTP Federation recommend that their members contribute to this charity together with the St George's Police Children Trust at a cost of £7.20 every 4 weeks. This is administered at Dulwich HQ through their member services.

### ***Effect of Officer Sickness on Reps***

It was interesting to note that of all the issues that reps deal with, aside from misconduct, representing colleagues for sickness affected the mental health of 65.22% of reps.

### ***Recommendation 30***

***The Federation must continue their work to support and signpost officers to support for their health. They must continue to lobby the force to explore any ways in which they can work together to reduce sickness levels and get officers fit to resume full duty where possible.***

***This recommendation supports the key strategies of Efficiency and Productivity***



## Conclusion

The Review Panel are grateful for the co-operation provided by officers, federation representatives, legal service providers, staff and the British Transport Police Federation Executive in conducting this review.

We would also like to thank those who completed the survey and who gave up their time to be interviewed.

The panel would like to have interviewed the Chief Officer but were unable to do so in the timeframe allowed.

We found the officers that we interviewed to be professional and dedicated to serving the public to provide the best possible police service. We were impressed with the commitment of reps to looking after their colleagues.

We found the British Transport Police Federation to be a well-run and professional organisation who have the best interests of their members at the heart of their business.

A summary of recommendations is available at Appendix D.

We hope that the recommendations of the Review assist the British Transport Police Federation to consider some positive changes to make them fit for the next 100 years and that they can continue to provide an excellent service.

***Peter Smyth***

***Independent Review Panel Chair***