

# Audit of arrangements to safeguard and promote the welfare of children Section 11 of the Children Act 2004.

#### Self-assessment tool

This self evaluation tool is designed to help identify actions to improve safeguarding within British Transport Police (BTP) and evaluate compliance with the specific and general duties in respect of safeguarding, as defined in Section 11 of the Children Act 2004.

Lead Safeguarding Manager (Name / Role):	Detective Chief Superintendent Peter Fulton
Person responsible for completing the self-assessment:	T/DCI Shani Plumb
Position:	Detective Chief Inspector, Public Protection & Vulnerability Command (PP&V)
Date completed:	July 2025

#### What is Section 11?

Safeguarding children is everyone's responsibility. Section 11 (s11) of the Children Act 2004 places duties on a range of organisations (including British Transport Police) and individuals to ensure their functions, and any services that they contract out to others, are discharged having regard to the need to safeguard and promote the welfare of children.

#### **RAG Status**

The RAG status offers an indication of achievements against the minimum standards under the Section 11 statutory obligations towards safeguarding and promoting the welfare of children.

RED	BTP's strategic and operational arrangements are not in place, not operational and therefore BTP is not meeting the minimum standards in an area and needs urgent plans for action
AMBER	BTP's strategic and operational arrangements are partly in place and therefore BTP is meeting its obligations in part
GREEN	BTP's strategic and operational arrangements are in place and BTP is meeting the standards of its statutory obligations under Section 11

#### 1. SENIOR MANAGEMENT COMMITMENT TO THE IMPORTANCE OF SAFEGUARDING AND PROMOTING THE WELFARE OF CHILDREN

Standard	Assurance Required	Owner	Evidence	RAG	Area for Improvement Identified
1.1 There is a named person responsible for leading safeguarding at Chief Officer level and a sponsor within BTPA.	There is a clearly defined management structure in place for delivery of the vulnerability strategy.	Head of Crime & Public Protection	Within BTP, safeguarding and vulnerability issues sit within a dedicated portfolio held by Assistant Chief Constable (ACC) Public Contact and Specialist Investigation and Criminal Justice. The Head of Crime & Public Protection (C& PPV), a Detective Chief Superintendent, reports directly into the ACC and is responsible for oversight of Public Protection within the Force including safeguarding. The Public Protection portfolio falls under the one command namely Public Protection & Vulnerability (PP&V) headed by a Detective Superintendent reporting to the Head of C&PPV.  The British Transport Police Authority (BTPA) monitors progress against Force safeguarding commitments through the Performance Review Committee. There is a clear focus on safeguarding and vulnerability. The BTP Chief Officer Group (COG) also utilise Force Performance meetings to scrutinise the progress of the teams within Public Protection through the Key Performance Indicators (KPIs) of the department in addition to the daily review at the Force Daily Management Meeting (DMM).	GREEN	

Version 1.1 Final Ashley Cooper OFFICIAL Page 2 of 36



aware of who the designated lead P	Head of Crime & Public Protection	The Head of C&PPV or their nominated deputy, regularly presents to new police officers (probationers) to help embed the safeguarding and vulnerability related training. The PP&V Command is involved in delivering vulnerability inputs with real life scenarios to all first- and second-line manager training programs. These were updated for Newly promoted Inspectors in 2024.  There is a dedicated PP&V Detective Superintendent and 2x Detective Chief Inspectors who oversee all aspects of service delivery. The PP&V departmental internal intranet pages are subject of regular review to reflect changing aspects of public protection.  Vulnerability Training Program  During Autumn 2022, BTP delivered a 3-hour training package to every operational officer across BTP. This covered a wide range of practical aspects of managing vulnerability including identifying those individuals and depts with major responsibilities within PP&V.  The department are in the process of developing a new Hydra for officers to attend which Mental Health awareness being discussed within both officer safety and medical first aid training.	GREEN	
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4.0.0	The sub-clotters	lland of	Threat Dielegard Heart is governed at 11 1 2012 DTD 201	ODEEN -	
1.3 Senior	The whole force	Head of	Threat, Risk and Harm is now embedded within BTP with	GREEN	
leaders ensure	shares a	Crime &	vulnerability at the forefront of all operational activity and strategy.		
that safeguarding	commitment to	Public	The Ottota via Value and ilite Oracus has been exceeded and		
children is core	the continuous	Protection	The Strategic Vulnerability Group has been created and		
business within	improvement of		established to further improve how the rail industry responds to		
BTP's strategic	services to		and deals with vulnerable people, whilst working together with BTP		
operating plans, structures and	vulnerable		to ensure that there is a joint effort to reduce risk of locations and		
	people.		individuals. This forum consists of senior BTP, Department for		
practices.	Dlannad		Transport (DfT) and rail industry leaders to tackle identified		
	Planned		vulnerability issues collectively.		
	provision considers the		Carutiny Danala ware reviewed and recet in 2024 and centinued		
	needs of		Scrutiny Panels were reviewed and reset in 2024 and continued		
	vulnerable		throughout 2025. It remains very challenging to capture 'the voice		
			of the child' although through a strong mix of panel members, we've tried to ensure that there is a diverse mix of individuals.		
	people,				
	particularly the risk of harm.		Further work is ongoing to understand how the voice of a child can		
	TISK OF HAITH.		be better captured either through the Criminal Justice route or through the collaboration between Railway Children and BTP.		
	Capacity and		through the collaboration between Kallway Children and BTP.		
	resource		The text 61016 gives people a single discrete reporting mechanism		
	planning		for BTP for reporting crime and incidents.		
	processes are in		To bit to reporting crime and incidents.		
	place, based on				
	a clear force		On a day-to-day basis, there is a dual approach to ensure that		
	prioritisation		vulnerability, where identified, is dealt with appropriately. The Divisional and Crime Commands host their own DMM which has a		
	process.				
	process.		special focus on Vulnerability. These then feed into the Force's DMM which provides additional governance and scrutiny with		
	Α		priority cases being escalated for quick time actions.		
	communication		אוווים מטונים טפוווא פטטמומנפט וטו עטוטג נווווים מטונטווס.		
	strategy				
	operates at all				
	levels within the				
	force and				
	highlights that				
	protecting the				
	vulnerable is the				



force priority.

There is a strong culture of continuous improvement.

There are internal and external communication plans which make the force's vulnerability policy transparent and open.

Leadership practices and styles are supportive and effective. Information sharing protocols are continually being reviewed to ensure briefing to partners are proportionate and necessary.

A briefing slide of vulnerable children who come to notice may be sent to police posts, including the Station Commander/Officer in Charge (OIC). They are then responsible for further work/tasking to their local officers. A further sanitised briefing can also be produced if required and disseminated to rail staff where we believe someone may be at risk of harm to maximise our 'eyes and ears' on the ground, however this is an operational decision by front line officers to manage the information

In 2024 we launched the geospatial briefing initiative that provides a real time link to the location of an officer to relevant briefing material for both crime and safeguarding. This means that officers will automatically receive updated briefings direct to their smartphones about vulnerable people who have been previously encountered at their location. We are also exploring was to improve information sharing with partners.

We are currently looking to trial a new app which allows us to share data with train operating companies in a secure manner. A date for this has not yet been set.



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1.4 Senior managers encourage and promote the voice of the child in decision making processes.	Head of Crime & Public Protection	Due to BTPs unique national jurisdiction, it is always challenging to ensure the voice of the child is captured in decision making processes. That said, partner agencies, once notified of circumstances that have led BTP to intervene with a child, will always allow the child to have a voice in decision making processes. Decisions on what should happen to children that BTP comes across are always made following consultation with relevant Children's Social Services.	GREEN	
		In addition to the above, BTP have been working in collaboration with The Railway Children since 2017 to provide an outreach service for vulnerable children. Railway Children project workers engage with children mostly aged 10 to 17, referred from BTP with the objective of improving their safety and wellbeing. The project works collaboratively with other agencies to identify the best means of support and activities to divert vulnerable children away from potential risk. BTP Vulnerability management meet regularly with Railway Children to ensure that the best possible service is being provided. BTP fully engage with the NPCC Children and Young Persons thematic group and national policing work in terms of improving engagement, communications and feedback from CYP's.		



managers understand the need to promote effective interagency	Community engagement and partnership arrangements are clear elements of the force's strategy.	Head of Crime & Public Protection  PP&V Command  Divisional Commanders (B, C & D)	Senior managers within PP&V attend meetings across England, Wales and Scotland as they fully understand the need to promote effective interagency working to safeguard children. This ranges from National Policing Chiefs Council (NPCC) groups to Local Safeguarding Children's Partnerships (LSCPs). Through these forums, BTP engage with community partnerships to ensure that BTP's local needs and threats are discussed much more widely as part of a community response. BTP prioritises areas based on challenges and high-risk areas, as it is challenging to attend all localized multi agency arrangements for every local authority area in England, Wales and Scotland.  BTP may upon request have representation at other local arrangements such as Multi Agency Problem Solving groups at locations identified as having high rates of vulnerability-related incidents. Much of this is supported by Divisional senior managers and colleagues who ensure that the voice of BTP is represented to discuss localised challenges.  The Vulnerability Unit continue to collaborate and work with embedded psychiatric medical professionals from the NHS. They continue to signpost C&YPs to relevant support agencies and put in place plans for individuals who are deemed to be of risk on the railway.	GREEN	LSCPs are encouraged to ensure that they are sufficiently confident that the various teams they govern are sharing information with BTP.
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HaRT BTP has a Harm Reduction Team (HaRT) that seeks to work with repeat, high frequency presenters on the rail network. This is funded by the rail industry through Enhanced Policing Services Agreements (EPSAs). Officers engage with subjects who may present a risk to themselves by the sheer volume of presentations. HaRT officers encourage their 'service users' to take ownership of both the issue and the solution by guiding them through their own personalized plan to recovery and/or diversion away from the railway infrastructure and seeking to put in place the longer terms support that they need for a sustained recovery.	
BTP are the National Police Chiefs Council lead Force for Suicide Prevention and are active members of the government's National Suicide Prevention Strategy Group and contribute best practice to the Cross-Government Suicide Prevention Work Plan. Similarly, BTP attends the DfT's Suicide Prevention Awareness Group to bring together agencies from across the transport sector to work together in reducing transport-related suicides. This group comprises of members from a range of agencies including Network Rail, Highways England, British Transport Police, Transport for London, RNLI and the Maritime and Coastguard Agency. BTP's work around SPMH is often cited as best practice. Network Rail, BTP and the Samaritans continue to work closely together in addressing suicide on the railway network.	



1.6 There is	Head of Crime	BTP Vulnerability Units maintain a database of all Safeguarding & GREEN	
outine audit and	and	Vulnerability Reports (SVRs) completed on NICHE. The documents are	
valuation of	Public	dip-sampled for timeliness and quality of referral decisions.	
vork undertaken	Protection	The least two stalles Be formance in Fratery (KDIs) and	
vithin BTP to		The departmental Key Performance Indicators (KPIs) are	
safeguard and promote the		challenging and ensure robust scrutiny can take place. These KPIs are formally adopted and embedded into BTP & BTPA performance	
velfare of		and focus on measuring and reviewing the number of vulnerability	
children including		concern reports into the Vulnerability Units	
action plans to		concentration and valid administration of the	
improve		BTP continue to work to improve the feedback loop for referrals with	
standards.		demand limiting the ability to follow up and the force is dependent on	
		other partner agencies for this information.	
		The DDOV Common and managed as another any the MDIs into the Famor's	
		The PP&V Command report monthly on the KPIs into the Force's Performance Delivery Board (PDB) where performance is assessed	
		and remedial actions to improve on performance is identified.	
		and remedial actions to improve on performance is identified.	
		BTP operates two 24/7 Controls Rooms under the command of a	
		Force Incident Manager (FIM) and a Senior Duty Officer (SDO).	
		There is also a network of operational Duty Officers (Inspector rank)	
		in every Division overseeing incident management. In the event of	
		an urgent child safeguarding incident, the Duty Officer will have	
		immediate command and control of the incident. In addition to these	
		arrangements a senior on-call rota is in place including detective and	
		forensic officers. There is a further tier of scrutiny at the Force's Daily Management Meeting which is a 7 day per week process.	
		management meeting which is a r day per week process.	
		Critical incidents relating to a child or young person are reviewed and	
		structured debriefs undertaken by our Lessons Exploitation Centre.	
		Reports are then produced to identify any lessons learned and	
		remedial action required with specific owners being assigned and held	
		to account.	



Vulnerability Unit managers in London and Birmingham have undertaken a series of training inputs to Control Rooms at these locations. This has helped to develop understanding by control room staff of the role of the Vulnerability Units and enabled them to better understand the issue of vulnerability more widely within the force.	1		
The Head of C&PPV and DCI PP&V also deliver regular inputs to new recruits joining the organisation to help embed the safeguarding and vulnerability related training.  There is a daily Crime DMM which is utilised to review and quality assure responses by both First Responder and Investigators. This meeting is always attended by a representative at Inspector level from Public Protection and Vulnerability.  Where standards haven't been met, there are immediate actions issued to provide a level of service recovery. This daily meeting is well established following the centralisation of the Crime command.		Vulnerability Unit managers in London and Birmingham have undertaken a series of training inputs to Control Rooms at these locations. This has helped to develop understanding by control room staff of the role of the Vulnerability Units and enabled them to better understand the issue of vulnerability more widely within the force.  The Head of C&PPV and DCI PP&V also deliver regular inputs to new recruits joining the organisation to help embed the safeguarding and vulnerability related training.  There is a daily Crime DMM which is utilised to review and quality assure responses by both First Responder and Investigators. This meeting is always attended by a representative at Inspector level from Public Protection and Vulnerability.  Where standards haven't been met, there are immediate actions issued to provide a level of service recovery. This daily meeting is well	

## 2. CLEAR STATEMENT OF BTP'S RESPONSIBILITY TOWARDS CHILDREN IS AVAILABLE FOR ALL STAFF

Standard	Assurance Required	Owner	Evidence	RAG	Area for Improvement Identified
2.1 There exists a child safeguarding policy accessible to all staff, which provides clear guidance on what actions to take if there are concerns about a child's safety or welfare, and is consistent with Working Together to Safeguard Children 2018.	There is a clear and documented policy for responding to the needs of children which is supported by a published strategy.	Head of Crime & Public Protection	BTP Child Protection Guidance was significantly updated in 2024. It's also been split to ensure the differences in legislation between England & Wales and Scotland are clear for First Responders operating in these areas. This is accessible to all staff via the force intranet system and seeks to provide practical guidance to officers and staff dealing with Child Protection concerns. There is also a BTP Overarching Safeguarding Strategy which outlines BTP's holistic approach to all aspects of safeguarding and BTP's key principles in addressing this.	GREEN	

Version 1.1 Final Ashley Cooper OFFICIAL Page 11 of 36



2.2 The policy highlights the importance of the voice of the child and listening to children when they are expressing concerns about their own or another child's welfare.	Head of Crime & Public Protection	The Child Protection Guidance explicitly highlights the listening to and taking all reports seriously at first receipt. This is reinforced by the force THRIVE+ call assessment process that seeks to identify areas of vulnerability at time of first report to enable appropriate response levels and attendance to be set. It is recognised, however, that the application of the policy requires reality testing to gauge its effectiveness and adherence by officers and staff.  The vulnerability training delivered by the College of Policing and the Safeguarding on Transport Champions training delivered by Railway Children both go a long way to highlighting the importance of listening to the voice of the child.  Where there are lessons to be learnt, the Lessons Exploitation Centre (LXC) cascade information throughout the organisation. The organisation also ensures that learning from Serious Case Reviews, IOPC and thematic reviews from the VKPP are cascaded across the organisation to improve the way it responds to children.	GREEN	
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2.3 The policy is reviewed every three years or whenever there is a change in legislation or guidance.		Head of Crime & Public Protection	BTP Child Protection Guidance is available to all staff via the Force intranet site. This is accessible either through the Policy Portal on the system or via a link on the dedicated safeguarding page on the intranet.  Further to the online guidance, PP&V have produced a Child and Young Person's First Responder's Guide which is available to all front line staff via the intranet to support them further in dealing with children and young people.	GREEN	
2.4 Staff know where to seek advice on matters of safeguarding and information sharing.	Everyone in the force understands their role in risk management.  Referrals and communications processes are understood by all.  All information captured is shared and accessible by partners.	Info Sec	BTP Information Sharing Policy is managed by a dedicated team within BTP. The information security team based in Cardiff are regularly included in discussions regarding disclosure or proposed disclosure of information, and as part of any consultative process for the purposes of drafting DPIAs and Information-sharing agreements.  PP&V have a dedicated specific Point of Contact within the information security team.  The National Vulnerability Unit with staff based in; London, Birmingham, Leeds and Glasgow are the da facto place for officers to go for advice on sharing of information and generally speaking the information is shared via well-established processes via the SVR submission and onward dissemination by the Vulnerability Units.  Information is stored on NICHE and disseminated to relevant agencies and partners, it may also be briefed out and generally uploads to PND.	GREEN	



2.5 Children are	Pr
kept safe when	ea
they come into	int
contact with	pro
BTP's services.	dri
	۵th

Prevention, early intervention and problem solving drive the force ethos of service delivery.

Incidents are fully investigated so that the full history is understood and that risk management is effective. Trained practitioners support investigations by ensuring kev decisions are informed by people with specific. relevant skills.

Head of Crime & Public Protection Children can come into contact with BTP services in different ways including as:

- Victims
- Witnesses
- Suspects
- Missing persons
- Other concern for welfare incidents, generally a call for help.

BTP's primary role is to where necessary, put in place immediate safeguarding measures and thereafter refer to the relevant professional and Home Office Force in relation to all child protection measures. That said, BTP plays an active role in initiating and attending case conferences and strategy meetings with statutory partners to ensure that concerns in relation to safety of children are addressed as quickly as possible. This is more prominent where BTP are the lead Force in the investigation, such as County Lines where children are being coerced, exploited and trafficked to commit crime.

The County Lines TaskForce, funded by a separate Home Office grant, has embedded social care specialists within it who operate alongside the officers, they provide direct advice and guidance also attend and support strategy meetings and other interventions

Child and Young People processes cover interactions with children in all these circumstances and the requirements for information collection and dissemination in all cases is made clear to staff. Additionally, the THRIVE+ risk assessment tool seeks to identify vulnerability at first point of contact with BTP to ensure that an appropriate level of response is provided including police protection measures.

BTP's First Contact Centre (FCC) utilise a THRIVE+ risk assessment tool to aid identification of vulnerability at point of contact. Daily reports are returned to FCC supervisors to review where an assessment hasn't been undertaken and ensure risk and vulnerability hasn't been missed.

**GREEN** 



2.6 BTP has a clear Prevent strategy and underpinning
guidance
detailing its roles
and
responsibilities
specifically in
relation to
children in line
with the
requirements
within Section 26
of the Counter-
Terrorism and
Security Act 2015.
2010.

That the BTP demonstrates a due regard to the need to prevent people being drawn into terrorism.

Taking a risk based approach:

- Ensure that Prevent is embedded into all aspects of policing

Equip frontline officers and staff with an understanding of Prevent. what radicalisation means and why people may be vulnerable to being drawn into terrorism as a consequence of it

Specialist Operations In line with the Prevent strand of the government's CONTEST strategy, and the Counter Terrorism and Security Act 2015 which made the force a specified body, the BTP work in partnership in order to prevent people being drawn into terrorism.

BTP recognises that, in demonstrating 'due regard to the need to prevent people from being drawn into terrorism in the exercise of their functions'; there is a need for Counter Terrorism and Prevent to be embedded in all aspects of policing.

BTP is represented at Regional Prevent Co-ordinator forums chaired by the national co-ordinator. This provides BTP with visibility to key national agendas and ensures that we have sight of developing best practice.

Prevent is now considered to consist of three constituent business areas – Identify, Safeguard and Manage Risk. BTP recognises its role is weighted towards Identify (and referral on to other units) and Manage Risk (regarding potential insiders). That said, the Vulnerability Units review SVRs submitted and where there is an indication of radicalisation, signpost accordingly.

Other things in place are:

- Safeguarding forms include boxes to indicate vulnerability to radicalisation.
- A network of local Prevent Engagement Officers is still in place to promulgate key messages amongst their peers.

Within Special Branch, processes continue to be developed to identify record and process reports which indicate vulnerability to radicalisation (for onward progression through Channel / safeguarding processes).

**GREEN** 

The recommendations from the HMICFRS inspection are completed.



Ψ.					
- Provide					
frontline officers	,				
and staff with an	,				
awareness of	,				
what measures	,				
are available to	,				
prevent people	,				
being drawn	,				
into terrorism	,				
and how to	,				
challenge	,				
extremist	,				
ideology that	,				
can be	,				
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it	,				
- Support	,				
stakeholders	,				
that choose to	,				
adopt principles	,				
of Prevent	,				
-Maintain	,				
appropriate	,				
records to	,				
demonstrate	,				
compliance	,				
Maintain	,				
effective	,				
dialogue with	i e				
the national	,				
Prevent	,				
network,	,				
coordinated by					
Counter	,				
Terrorism	,				
Police HQ	,				
(CTPHQ).					



2.7 BTP has a clear policy and strategy for addressing child safeguarding concerns in relation to CSE, County Lines, Trafficking and Slavery, and other forms of organised abuse.	Head of Crime & Public Protection FIB	For CSE please refer to Standard 2.1.  Since the implementation of the new Intelligence structure in April 2019, there has been a significant improvement in the alignment between Force priorities and the control strategy by establishing thematic desks e.g. Missing & Exploited Persons (including County Lines) and Serious Violence. Therefore the information provided by Intelligence has had greater alignment to force priorities under a Threat Risk and Harm (TRH) model, particularly for vulnerability and TRH priority crimes, and BTP's control strategy.  BTP has been successful in securing funding from the Home Office to tackle County Lines and is working closely with Metropolitan Police, Merseyside Police and West Midlands Police. Through this funding, a County Lines Taskforce has been established which is led by a Detective Superintendent and has additional support from a Child Exploitation Consultant. The Taskforce is able to cover the big exporting regions and has been very successful in disrupting County Lines activity whilst safeguarding vulnerable children and young people who are being exploited and trafficked across the country to commit crime.  BTP has been working tirelessly to ensure that applicable cases are referred into the National Referral Mechanism (NRM) and more recently into Rescue and Response (London based children and young people). There has been a notable increase into these two services.  Relevance of information provided by Intelligence continues to be tailored to the target audiences by geographical location through briefings aimed at sector command level.  BTP has developed and implemented a comprehensive strategy to address the threat, risk, harm and vulnerability presented by County	GREEN	

Version 1.1 Final Ashley Cooper OFFICIAL Page 17 of 36



Lines drugs supply, and responding to child safeguarding concerns are central to this work. BTP's County Lines Strategy is aligned to Home Office led, cross-government approaches for the Serious Violence Strategy and Ending Gang Violence and Exploitation (EGVE) programme, and aims to help break the pervasive business model of County Lines: BTP recognises that we are uniquely placed to assist by making it far harder to use child runners, identify those children being exploited, and to work with partners to ensure the controllers of these criminal networks are brought to justice.

BTP has staged development processes in place for the identification and attribution of County Lines activity reported within Intelligence and Safeguarding channels. BTP has a bespoke Risk Assessment Tool and a dedicated County Lines Coordination Desk within our Force Intelligence Bureau which provides a response to County Lines and a basis for engagement with the National Crime Agency (NCA), Regional Organised Crime Units (ROCUs) and other partners to tackle the threat, risk and harm posed by County Lines gangs. BTP Intelligence Development Officer's (IDO's) operate cross border liaising with Homes Office Forces and Police Scotland to identify County Lines style operations and disrupt activity.

BTP continues to improve the way it uses data to understand people and locations that are high risk and may be involved in County Lines and exploitation.

MSOIC (Modern Slavery and Organised Immigration Crime)

BTP has a small but dedicated team who oversee all potential NRM submissions prior to onward transmission, they also oversee all daily potential MDS matters although do not have oversight of any resulting investigations.

## 3. SAFER RECRUITMENT & ALLEGATION MANAGEMENT

Standard	Assurance Required	Owner	Evidence	RAG	Area for Improvement Identified
3.1 Robust recruitment and vetting procedures for all roles including volunteers are in place to prevent unsuitable persons coming into contact with children.	Individuals must provide details on employment history which is subject to relevant checks where appropriate.  All staff undergo a vetting check at the appropriate level for their role.	HR TP PSD	All police officers, PCSOs and police staff are vetted in line with the national 'Vetting Code of Practice'. Applicants for <b>all</b> roles are required to answer detailed questions about their criminal record (down to the level of any involvement with the police) both at application and conditional offer stage in their vetting forms. They are also required to provide employment references.  Without exception, the recruitment team will not give a formal offer of employment to any candidates who do not satisfy our vetting standards and satisfactory references.  All BTP volunteers, who include IAGs, regular volunteers, chaplaincy and Cadet leaders, are vetted to PSV level 2. In addition to that <u>all</u> Cadet leaders, which include BTP officers as well as Volunteers, are currently Disclosure and Barring Service (DBS) checked. The Citizens in Policing (CiP) team are also subject to DBS checks as they deal with young people via both the cadet programme and work experience programme.  Staff from Railway Children all receive vetting for BTP in order to allow access to police premises however they are subject of their own internal processes for the purposes of engaging with children and young people.  The Railway Pastors are BTP vetted checked. Precautions are made to ensure only suitable people are brought into the organisation	GREEN	



3.2 Safeguarding responsibilities are identified in the relevant job descriptions.	HR	Police Cadet leaders consist of police officers, PCSOs, Police Staff and police Support Volunteers. There is an application and interview process. As volunteers do not have job descriptions as such, they have a set of safeguarding behaviours within the policy and a VPC Code of Conduct which they must follow.	GREEN	
		In addition to the initial safeguarding training, BTP Cadet leaders get a mandatory annual CPD 1 day conference which covers and reinforces their role, responsibilities, updates, processes to follow, including instances of disclosure. The team are also linked in with Local Authorities who run courses for their teachers and safeguarding & youth services to upskill our cadet leaders, ie Mental Health First Aid Courses.		
		There is a continuous review of Job Descriptions in general which will ascertain whether safeguarding responsibilities can be covered off within the roles and responsibilities section. There is an expectation that anyone working for BTP in any capacity behaves and displays behaviour in line with the Standards of Professional Behaviour and the Code of Ethics.		



3.3 Staff responsible for recruitment are appropriately trained, e.g. at least one of the panel members should have undertaken Safer Recruitment training.	ł	HR	It's generally accepted that there isn't a requirement to train panel members in Safer Recruitment. This is because once HR advisors are trained, they should be able to pick up any issues at point of application. Due to the robust vetting processes in place, and as explained in 3.1, no one is subjected to a formal job offer until vetting is completed, and the organisation is satisfied that there is no risk attached to employment.  Generally, panel members receive training to assist them in managing the interview process in a fair and transparent process.	GREEN	
3.4 Staff within BTP understand their role and responsibilities and the role of other professional/ partner organisations.	(	Head of Crime & Public Protection	BTP offers courses / training to Detectives, Senior Investigating Officers (SIOs) and there is SCAIDP light training.  Guidance documents have also been created which are found on the PP&V intranet site. These documents guide First Responders through complex issues and explain their role as First Responders along with what is expected of them in terms of safeguarding and how to share those concerns with the Vulnerability Unit.  More work is required to ensure that investigators are, as a matter of course, always thinking and linking in with Children's Social Care to risk assess whilst we've got the child or young person who may be at risk of violence or further exploitation.	GREEN	



3.5 BTP has clear, reviewed and updated written policy and procedure regarding complaints and allegations.	PSD	Complaints against police and police employees from members of the public are highly regulated and dealt with in line with the by the Police Reform Act 2002, and relevant Independent Office for Police Conduct (IOPC) Statutory Guidance.	GREEN	
3.6 BTP has a designated person trained to handle complaints and allegations of a safeguarding nature made against people who work with children.	PSD	While there is no identified individual, a complaint or allegation would be assessed by the professionalism manager and once assessed, appropriate allocation would be discussed. Within PSD there are PIP 2 officers who have worked within the safeguarding arena and have a detailed understanding. If the investigation was complex or required specialist skills, PSD would speak to crime department within BTP or the appropriate home office force where relevant. In addition, where a complaint relates to a specific field, an investigator will engage with the relevant subject matter expert for advice and assistance. These cases would also be also subjected to increased supervision.  Continual Professional Development (CPD) events have included an input from a vulnerable complainant to develop investigators in their understanding of safeguarding issues.  Further to the above PP&V are now linked in at DCI level to ensure that appropriate support and guidance is in place to ensure investigations are robust whilst ensuring safeguarding measures in place are sound.	GREEN	

Version 1.1 Final Ashley Cooper OFFICIAL Page 22 of 36



3.7 BTP has	PSD	The organisation has a variety of options available for staff	GREEN	
processes and		members to overtly or confidentially report wrongdoing or perceived		
procedures in		wrongdoing. These are advertised widely and regularly used		
place to support		(indicating staff confidence in them).		
and enable				
'whistle blowing'		The Confidential Anonymous Reporting System (CARS) is for Staff		
on both		to report misconduct issues or general integrity concerns to the		
individuals and		PSD Intel Unit anonymously. It allows a two way communication		
partner		between an informant and the PSD Intel Unit without compromising		
organisations		the informant's identity. Alternatively, staff can submit to the secure		
where there are		PSD Niche server - which is only viewable by the PSD Intelligence		
concerns that		Unit.		
people are failing				
to protect				
children from				
harm, which				
reflect the basic				
principles of Sir				
Robert Francis's				
'Freedom to				
Speak Up'				
review.				



3.8 BTP has a process in place for dealing with unacceptable behaviour of staff.	PSD	Members of staff are subject to the relevant regulatory framework with regard to complaints made my members of the public (Police Reform Act 2002 and relevant IOPC Statutory Guidance). With regards to internal conduct matters staff must conduct themselves in a manner compatible with the values of BTP and the 'Standards of Professional behaviour' And the Code of Ethics.	GREEN	
		A Police Staff Policy and Procedure standard operating procedure exists which signposts formal investigations to be undertaken by PSD in line with the British Transport Police (Conduct) Regulations 2015 and procedures are considered in line with the ACAS code of practice on Disciplinary and Grievance Procedures.		



# 4. TRAINING

Standard				RAG	Area for Improvement Identified
4.1 A strategy for the provision of safeguarding training is in place and is supported by appropriate funding based upon a training needs assessment.	Long-term plans for workforce development are in place.  There is up to date identification and recording of relevant skill sets of officers and staff to ensure capability in force vulnerability services.	L&D	All officer's training skills are recorded on the Training Administration System (TAS), including completion of safeguarding training and other relevant safeguarding skillsets such as enhanced interview skills, SIO, SOIT, etc.  There is a lack of dedicated resource within Learning and Development to support the embedding of vulnerability training within BTP. This makes it difficult for BTP to provide consistent, up to date messaging about vulnerability to front line staff.  BTP recently (Autumn 2022) completed the roll out of a 3 hour vulnerability training package (VTP) to all officers with the force however this was effectively a one-off whereas continuous rolling programmes of training are required to ensure that new staff are captured.  The Vulnerability Units have completed an updated 2hour training package for delivery to all newly promoted sergeants commencing Autumn 2023.  Training requirements for staff are aligned to their Professional Development Review to ensure transparency and that progress is maintained.		No dedicated trainer is appointed anywhere within BTP. Subject matter experts (SMEs) are relied on to provide the detailed narrative for probationer training and that of supervisors. This is being reviewed with L&D.



4.2 Safeguarding is included in induction training for all staff.	L&D	Transferees receive safeguarding training as part of the 'Business as Usual' training programme.  Newly promoted Sergeants and Inspectors also receive a	GREEN	Although graded green, BTP needs to re-visit the issue of
		safeguarding input which is delivered by the Leadership Academy and staff from PP&V which is tailored to the role of a supervisor.		vulnerability training due to lack of
		(See 4.1 re new Sergeants course)		dedicated resource within
		All new Special Constables also receive a one day Safeguarding input during their initial training phase. There is also a one day Mental Health and Suicide Prevention input.		PP&V leading to ad hoc and inconsistent delivery of some
		In addition, several L & D staff have completed safeguarding training to raise awareness and ensure the force operates a safe learning environment and a programme will be rolled out later in the year to upskill trainers		courses.



4.3 Staff have received safeguarding training to enable them to develop the necessary skills and knowledge, and have regular opportunities to update their knowledge and understanding.	Officers and staff undertake regular relevant activity to update and refine their learning.	L&D	BTP recently (Autumn 2022) completed the roll out of a 3 hour vulnerability training package (VTP) to all officers with the force however this was effectively a one-off whereas continuous rolling programmes of training are required to ensure that new staff are captured.  Policies and associated manual of guidance documents have been reviewed and updated and First Responder guidance produced to support First Responders.	AMBER	Although there's been significant effort in improving the provision of training to improve knowledge and awareness levels, more will be done throughout 25/26 to ensure that this continues.
4.4 The force is able to evidence the safeguarding training it has provided, including the numbers trained and the type / level of training.	People are qualified and competent for their role.	L&D	As per 4.3 training was rolled out to all police officers in 2022, this was coordinated centrally via the Learning and Development Department such that a clear record of who attended and when was maintained.	AMBER	The challenge remains that there is an inadequate plan within BTP at strategic level for the continuous update of officers and staff beyond probationer training and the one off VTP course.



4.5 BTP ensures staff awareness of equality and diversity including heritage, language, religion, faith and disability may influence the identification, prevention and response to safeguarding concerns.  L&D  VTP half day safeguarding training delivered across the force discussed many aspects of vulnerability, including a general awareness about equality and diversity, especially in relation to the early identification of vulnerability and appropriate early preventative measures.  PCs and PCSOs receive a day of Diversity Training aimed to increase awareness of prejudice, discrimination, stereotyping, labelling, Allport's scale and responses to dominance. In addition an e-learning module is completed.  BTP also has 7 Employee Support Associations (ESAs) that can provide advice to officers and staff in specific areas of diversity. These ESAs are managed by the force Diversity and Inclusion manager.  The Leadership Academy delivers a management foundation course to all first line supervisors, which includes a HR module exploring the Equality Act and aspects of discrimination. The course further explores leadership and principles of fairness towards all, authenticity and trust. Part of the course includes discussions on the code of ethics and Competency Values Framework (CVF) which features impartiality.  Leadership courses for supervisors, explore diversity of personal styles using a psychometric assessment tool and discusses the development of staff including available positive action workshops. Other discussion topics include the code of ethics, CVF and unconscious bias.

Version 1.1 Final Ashley Cooper OFFICIAL Page 28 of 36



## 5. INFORMATION SHARING AND CONFIDENTIALITY

Standard	Assurance Required	Owner	Evidence	RAG	Area for Improvement Identified
5.1 Staff are aware of who to contact about sharing of information should they need additional guidance.		Info Sec	An Information Sharing Policy has been completed and guidance promoted to all internal staff using both force wide communications and the relevant pages on the Force Intranet. Good Practice, Frequently Asked Questions and Forms & Templates can be accessed via the BTP Intranet  BTP has a common law disclosure policy in place and there is a legal department which is able to advise if circumstances require it.	GREEN	
5.2 BTP has a confidentiality policy which includes procedures for obtaining and maintaining consent to share and includes the security of personal records held.		Info Sec	The policy specifies that personal data may only be shared for a lawful reason and where a relevant processing condition applies under the data protection legislation. Information must be subject to adequate controls by the receiving organisation in line with the data protection legislation and any other requirements such as Government Security Classification (GSC)	GREEN	



5.3 Staff in BTP	Info Sec	As per standard 5.1	GREEN	
are aware of good and effective practice around client confidentiality, consent and sharing		BTP also shares sanitised briefings (containing limited information) with railway staff where necessary to ensure that risk of harm to children and other vulnerable people is mitigated as much as possible. This improves the way BTP responds to the most vulnerable people and successful interventions have taken place as a direct result of this.		
information with other agencies — with or without consent and can demonstrate support of staff who have shared information in good faith.		The requirements under Common Law Police Disclosure (CLPD) have been updated and briefed out to staff via the Intranet system. This process is now a joint undertaking between VISOR, Disclosure team and Legal Services that is overseen by the D/Supt of Public Protection with a weekly review to ensure that all relevant disclosures have been properly considered. There is also a robust process for considering LADO referrals that links to the CLPD meeting.		



5.4 BTP ensures	Info Sec	PTD has a Data Protection Policy and complies with the provisions	GREEN	
there is an	IIIIO Sec	BTP has a Data Protection Policy and complies with the provisions of Approved Professional Practice on Management of Police	GREEN	
adherence to		Information issued by the College of Policing.		
ethical and legal		, , , , , ,		
sharing of				
information on children and that		Advice may be sought by staff from the force Information Governance Manager.		
there is a clear		Governance manager.		
policy for		At present the sharing of information is not covered by formal		
appropriate		Information Sharing Agreements with each separate LSCP or Social		
retention periods		Care Agency but the rationale for the sharing of all information is		
for safeguarding records.		documented and auditable, in line with Working Together information		
Toolido.		sharing guidance. BTP have a specific Information Sharing Agreement in place with Railway Children.		
		The BTP document (SVR - CYP/1) provides a rationale for a relevant		
		referral decision which is auditable. That document will be stored on		
		BTP computer systems and shared in accordance with the		
		Management of Police Information. All decisions to refer or not are		
		subject to review and quality assurance by the Vulnerability Unit.		
		The NPCC National Strategy for the Policing of Children & Young		
		People provides additional advice in relation to information sharing		
		referencing governmental guidance.		
		Working Together to Safeguard Children 2018 also provides		
		additional advice and guidance in relation to sharing of information.		



## 6. SAFE WORKING PRACTICES

Standard	Assurance required	Owner	Evidence	RAG	Area for Improvement Identified
6.1 Arrangements are in place to appoint a designated independent officer if a child is taken into police protection.		Head of Crime & Public Protection	British Transport Police officers have the power to take children into Police Protection under Section 46 of the Children's Act 1989 but are not empowered to act as the "designated officer". This responsibility has to be passed to an officer of at least the rank of Inspector in the relevant Home Office Police force for the area. All BTP Inspectors are aware that they have this legislative power under the Working Together Statutory Guidance; however, this should only be used in exceptional circumstances and best practice remains that the responsibility should still lie with the Home Office Force Inspector (designated independent officer) to prevent isolated and disjointed working.  BTP operates a Duty Officer (DO) system whereby an officer of at least the rank of Inspector would oversee the incident and ensure that appropriate procedures are followed and that the relevant police force is contacted to take over the responsibilities of the designated	GREEN	
			officer as soon as possible after the decision to take a child into police protection is made.  All children taken into police protection by BTP are referred into the Vulnerability Unit via a CYP/2 form created specifically for such instances, coupled with an SVR form for further information sharing purposes. The Vulnerability Unit ensures that appropriate follow up referrals have been made in addition to the initial notifications that will be made by the officer taking the child into police protection.		



6.2 Arrangements are in place to monitor compliance with child protection policies and procedures.		Head of Crime & Public Protection	Safeguarding incidents are highlighted and intrusively supervised thorough Divisional and Crime Daily Management Meetings (DMM). The DMM is the forerunner to the Chief Constable's (CC) Daily Briefing and any high risk or ongoing safeguarding issues are further managed in this forum.  Details of high risk repeat CYPs are shared with Divisions and monitored through their Divisional Tasking process.	GREEN	
6.3 Officers are aware of the process in relation to CYP/1 and CYP/2 forms for all child safeguarding concerns.	Referrals and communications processes are understood by all.	Head of Crime & Public Protection	There is an established procedure that all BTP staff complete an SVR when dealing with a relevant child or young person in a situation that gives rise to concern. These forms are submitted via the Force's Record Management System (Niche). They are then researched further, and a decision made on a case by case basis whether a referral to local child safeguarding processes is required.  CYP submissions, now via the SVR process, are managed by the Vulnerability Units with significant matters brought to the attention of senior police leaders.  BTP DASH forms highlight the need to identify children and young people involved directly or indirectly in domestic abuse incidents. There is a requirement for a CYP submission for all children related to these types of incidents, so the Force is able to ensure that as well as the safeguarding of the adult victims involved the safeguarding needs for the children and young people either directly or indirectly involved are also addressed.	GREEN	



## 7. INTER-AGENCY WORKING

Standard	Assurance Required	Owner	Evidence	RAG	Area for Improvement Identified
7.1 BTP ensures that it contributes (where appropriate) to multi agency arrangements in place to best deliver safeguarding of children.		Head of Crime & Public Protection	It is not practicable for BTP to regularly attend all local meetings due to the Force's national remit. However, BTP will contribute on a case by case basis and where strategic themes are identified. Local departments and teams are encouraged to forge links with agencies in their respective areas to ensure that local issues are identified and addressed.	GREEN	



7.2 BTP participates (where appropriate) in multi-agency meetings to share information and contribute effectively to the planning of safeguarding children.	Head of Crime & Public Protection	Due to BTP's national remit, it's not feasible for the Force to regularly attend all multi-agency meetings, as mentioned above. However, through the Public Protection and Vulnerability Command, BTP regularly engages with existing MASH units, and/or similar safeguarding organisations within HO forces, and Police Scotland referring and discussing vulnerable individuals including children.  BTP are represented on the National Police Chief's Council (NPCC) working groups for Child Abuse Investigation, Children and Child Sexual Exploitation. They are also represented on the national groups looking at County Lines, Modern Slavery and Human Trafficking, Children and Young People, Missing People, Domestic Abuse, Stalking or Harassment and Hate Crime. This ensures that they both contribute to discussions in these areas and are fully aware of updated plans and emerging threats which are then fed back into policy and procedures within BTP.  The Crime DMM, which is chaired by a senior Detective, is held every morning and reviews serious and complex cases. Where applicable, cases are linked into multi agency discussions and strategy meetings to ensure effective planning is in place to safeguard vulnerable people.	GREEN	
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7.3 BTP engages fully with Child Safeguarding Practice Review Panels (CSPRP) and Rapid Reviews and contributes as required.		Head of Crime & Public Protection	The DCI, PP&V is the Single Point of Contact (SPOC) for all Child Safeguarding Practice Review Panels and Rapid Reviews sent to the Force.  The Public Protection and Vulnerability Unit Inspectors support the Detective Chief Inspector due to the geographical challenges across England, Wales and Scotland.  The DCI ensures that all agency reports are compiled and submitted in a timely manner, which are signed off by the Head of Public Protection in the Force before dissemination, and may attend panel meetings as required.	GREEN	
7.4 LSCP overview CSPRP reports and actions plans are reported to the relevant members of the SLT.		Head of Crime & Public Protection	As per Standard 7.3, all internal Management Reviews / Reports are signed off by the Head of Crime and Public Protection who will report any significant issues highlighted to the ACC with responsibility for Safeguarding. Subsequent review results are shared with both the Head of Public Protection and the ACC lead for Safeguarding where areas of learning for BTP are highlighted and discussed.	GREEN	
7.5 Lessons identified through CSPRP that have implications for practice is effectively disseminated identified recommendations are implemented and the impact on improving outcomes evaluated.	There is a strong culture of Continuous Improvement.	Head of Crime & Public Protection	Any recommendations from CSPRP / Rapid Reviews reports are scrutinised to pick up either specific learning for BTP or general learning that can be used to inform policy and procedure. A process for highlighting and disseminating learning through the office of the Head of Public Protection is in place. Additionally, the same process would be used to proactively address any issues identified as a result of the IMR produced for the review.  Internal reviews are conducted by our LXC following reports of critical incidents or instances of best practice. This work includes structured de-briefs with officers and staff to identify both personal and organisational learning and development opportunities.	GREEN	

36