



Home Office

Community Safety Accreditation Schemes

Good Practice Guidance



Foreword by Vernon Coaker MP

Minister of State for Policing, Security and Community Safety

I regard Community Safety Accreditation as a unique initiative in the field of local policing offering a vision of a partnership which is both dynamic and cost effective. The potential benefits are significant and they can help contribute to the delivery of neighbourhood policing that is both sustainable and really addresses the problems that local people face. I can think of few things in my brief that so clearly make a difference and yet the take-up of which is so patchy. I want that to change and this Good Practice Guide, based on what is already happening in England and Wales, will be key to police forces and authorities making this happen.

Communities and community engagement lie at the heart of modern day policing. Community Safety Accreditation Schemes are just one of a number of reforms this Government is encouraging the police service to take forward to ensure they are making best use of all available resources and that communities are at the heart of the fight against crime.

Community Safety Accreditation Schemes are a critical component of this reform agenda and have an important role to play in the development of locally tailored Neighbourhood Policing in particular. Accreditation recognises the role of those already involved in delivering community safety and draws them in to the extended policing family providing benefits to the police, the accredited organisation and its employees and to our communities.

Although only established relatively recently, those forces which have introduced Community Safety Accreditation Schemes within their areas are already indicating benefits in terms of crime reduction, improved community communication and cohesion, and public reassurance. The schemes contribute to police effectiveness and efficiency by releasing police officers from non-essential community safety tasks.

This guide shows that there are clearly some forces that have seized on the potential that accreditation offers and are creating innovative solutions in their local areas that are improving the quality of life of residents through partnership working. I commend these forces for their pioneering work and for their willingness to engage with the private security industry in fashioning the important role which this industry can play in the extended police family. I now urge those who have yet to take this forward to look at the clear benefits that are highlighted in this guide and to proactively seek organisations for accreditation. Just as Police Community Support Officers are central to the delivery of Neighbourhood Policing, so accredited persons have a critical role to play in neighbourhood policing teams and are a key component of the extended police family.



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1 Introduction

The authority for Chief Constables to establish and maintain Community Safety Accreditation Schemes (CSAS) was provided by Section 40 of the Police Reform Act 2002 (PRA 2002). The purposes of the schemes are to:

- contribute to community safety and security; and
- in co-operation with the police force for the area, combating crime and disorder, public nuisance and other forms of anti-social behaviour.

The schemes provide an opportunity for approved community safety and security organisations to enter into a formal agreement with Chief Officers that allows their employees to become accredited and, where appropriate, to utilise limited police powers to help them undertake their roles more effectively. CSAS are seen as an integral part of the Government's Neighbourhood Policing Strategy, which explicitly recognises their importance in, "forging links, improving communication and delivering effective policing to neighbourhoods". The schemes also provide an opportunity to improve the quality, consistency and transparency of the "mixed economy" of private and public sector community patrols that now exists.

Forces which have introduced CSAS within their communities have already indicated benefits of crime reduction, improved communication and cohesion, and public reassurance. They have also contributed to improving police effectiveness and efficiency and freeing up police officer time.

This good practice document follows from a series of case studies of schemes in Essex, Lancashire, Hertfordshire, Durham and Kent during 2006. It gives guidance to police forces in respect of the establishment, maintenance and development of CSAS. In doing so it seeks to establish the key processes involved in establishing and maintaining such schemes. It also seeks to highlight good practice currently in operation throughout England and Wales and to identify potential barriers to CSAS as a means of assisting forces to more effectively introduce or expand their schemes.

In particular the guide seeks to identify the wide range of benefits currently being achieved by those forces undertaking such schemes. The guide also seeks to improve the consistency of the schemes and identify and provide solutions for some of the identified barriers to the establishment and maintenance of such schemes.

The good practice guide is designed and intended to be read in conjunction with, and be complementary to, the ACPO Community Safety Accreditation Schemes Guidance (available on the ACPO website available at www.acpo.police.uk/policies.asp) which contains specific policy and procedural guidance.

This is a Home Office document. It was produced with Symbia Consultancy and has been agreed by ACPO. Appreciation is given for the valued contribution of CSAS staff from forces throughout England and Wales, without whose assistance and support this good practice guide could not have been developed.

2 Benefits of Community Safety Accreditation Schemes

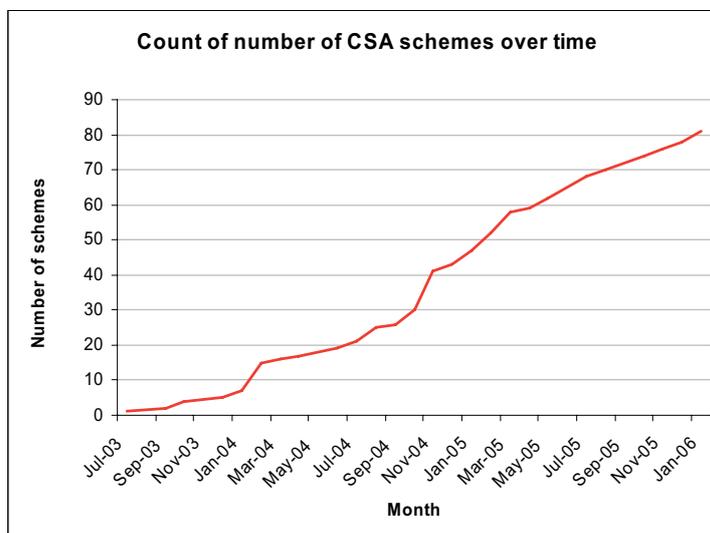
This review has found evidence of clear and widespread benefits resulting from CSAS for accredited individuals, approved organisations and the police. A series of case studies, conducted in January 2006, showed that CSAS were delivering the following benefits:

- Individuals: providing improved career development for accredited persons with new skills and variety to their work, and empowering them, making it easier for them to do a good job
- Approved organisations: enhanced community engagement and a closer partnership working with the local force, resulting in better intelligence/information flows and improved performance
- Police: as well as enhanced community engagement, closer partnership working and better intelligence flows, CSAS free up police resources to focus on other important priorities and increases their flexibility, leading to improved overall performance.

Many schemes reported that the most significant benefit was closer partnership working, with the knock on effects of enhanced intelligence and improved performance. These benefits were particularly effective in those forces which have already started to integrate CSAS into their Neighbourhood Policing Strategy as part of targeted and prioritised mixed policing teams.

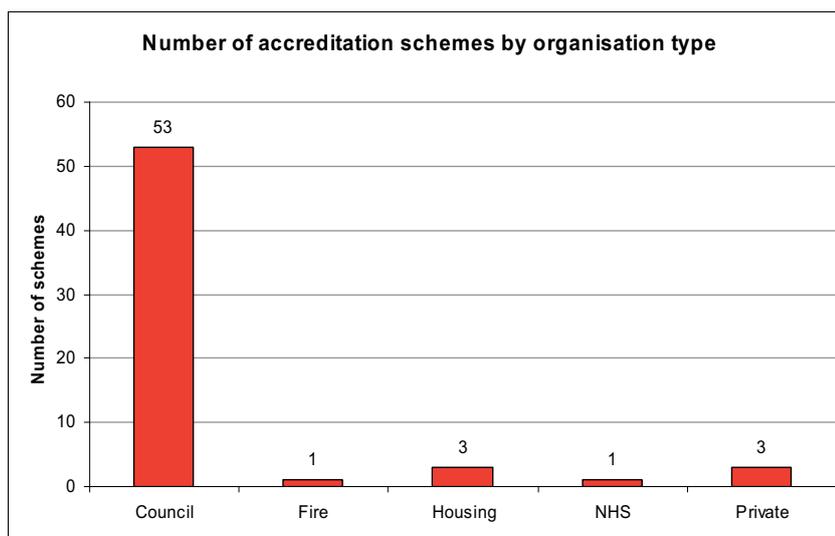
2.1 Take up and type of schemes

Since the inception of CSAS take up by forces has been steady, as shown in the following chart:



This review found that currently 33 forces have established CSAS. In addition, the vast majority of forces have accredited vehicle inspectors from the Vehicle Operating Services Agency (VOSA) with the power to stop vehicles.

Forces have often found that existing close working relationships with local authorities provide a good starting point for CSAS. The following chart shows the types of organisations accredited within existing schemes:



Lancashire Police – Implementing CSAS

Lancashire has 11 CSAS in place, all of which were set up during 2004. Lancashire sees clear benefits in CSAS and has approved a variety of public and private sector organisations, including:

- Service tenancy officers in housing associations
- Community protection managers in the Fire Rescue Service
- Street crime wardens
- Beach patrols
- Parks inspectors
- Dog wardens
- Community safety street officers.

By focusing on those areas where partnership working can deliver real results, Lancashire identified and approved a broad range of organisations. This extended police family is now more capable and able to deliver improved performance both locally and across Lancashire.

2.2 Intelligence

One of the main areas of benefit has been the local community level intelligence that accredited persons are providing. There is a feeling that because of their predominantly non-enforcement role, accredited persons are able to develop a good community based relationship with good knowledge of both the local environment and the people. One co-ordinator said; “They are an extra pair of eyes and ears and if tasked properly they will get results, because unlike police officers who can get diverted, they are usually on the street for seven hours engaging with the community.”

The case studies provided examples of the amount and quality of the intelligence resulting from accredited persons, and this was particularly the case where time had been invested in developing effective channels of intelligence and providing the necessary skills.

Essex Police – Positive Intelligence

- Accredited person attending the Christmas Crime Reduction briefing was able to identify a key suspect and provide details of his whereabouts for officers to action.
- Accredited person attending routine tasking and co-ordination meeting was able to provide details of a targeted drug dealer, providing address details, vehicle details and also an outline of his dealing habits and locations.

In order to motivate and encourage accredited persons to provide good information and intelligence, forces need to ensure that positive intelligence and information which emanates from accredited persons is recorded and that feedback is provided where positive outcomes are achieved.

2.3 Neighbourhood Policing

The integration of CSAS into Neighbourhood Policing Strategies as part of mixed policing neighbourhood teams was seen to be very effective within some Pathfinder BCU's where CSAS was already supported. This has allowed priority based joint patrolling in targeted areas to maximise visibility and reassurance, increase awareness of community issues and priorities, develop community links and improve community cohesion. It is particularly beneficial to use accredited persons to effectively target those community problems that are deemed unsuitable for the police because police enforcement might be seen to be excessive by the community.

2.4 Reducing Crime & Increasing Detection

The case studies illustrated effective use of accredited persons through providing actionable intelligence and targeted patrols both reduced crime and led to increased detections. In respect of targeted patrols they have been used in the following initiatives:

- Crime hot spots to deter crime and educate the public in crime prevention;
- Involvement in vehicle excise offence initiatives;
- Under age drinking and licensed premises operations;
- VOSA operations;
- Town centre anti-social behaviour operations;
- Illegal off-road motorcycle use.

Lancashire Police – Crime Reduction

As part of a joint police and local authority crime reduction initiative, accredited persons were deployed to high crime car parks in order to provide directed crime reduction advice to car park users and undertake crime reduction and detection patrols. After three months of the initiative **crime in the target location had reduced by 46%**.

2.5 Public Satisfaction and Reassurance

Because of their particular role and relationship to the community, accredited persons are able to deal effectively with those quality of life issues which are a key factor in community cohesion, public reassurance and satisfaction. This is particularly true of litter, graffiti, low level crime and antisocial behaviour. Also, as a majority of accredited persons work closely with the local authority, they are able to quickly and effectively provide specialist local authority services or information that the police do not have direct access to, whilst at the same time providing a highly visible reassurance presence within neighbourhoods.

On a personal level Section 46 of the PRA 2002 provides increased protection to accredited staff in respect of assault, whilst the increased communication provides reassuring links to the police.

2.6 Reducing Demand & Increasing Police Availability

The case studies provided strong indications that the introduction of CSAS has reduced the demand on police and freed up policing resources from non-essential roles. By providing additional powers to accredited persons the police are no longer the sole resource able to deal with low level public nuisance offences. Although not currently measured, it is expected that the level of general information calls from the public and enquiries from officers to call centres is reduced when accredited persons are on patrol in particular locations to respond to quality of life issues.

In some areas the accreditation of VOSA officers has allowed forces to release police officers from VOSA duties and also provided greater flexibility and effectiveness to VOSA operations which has led to increased detections of offences.

Lancashire Police – VOSA Operations

Lancashire Police have evaluated the impact of the introduction of accreditation for VOSA officers and have found that efficiency savings equivalent to two officers for every day of the year have been released for deployment elsewhere. They have also found that the number of VOSA offences detected as a result of their increased flexibility has also increased.

Because the management, tasking and co-ordination of CSAS staff is done by approved organisations rather than the police, the benefits gained through CSAS are all the more efficient due to the minimum demand on police resources.

3 Establishing the Schemes

3.1 Consultation

Section 40 of the PRA 2002 places an obligation on the Chief Officer of police to consult with:

- the police authority maintaining that force, and
- every local authority any part of whose area lies within the police area.

The Commissioner of Police of the Metropolis must consult with:

- the Metropolitan Police Authority;
- the Mayor of London; and
- every local authority any part of whose area lies within the metropolitan police district.

Whilst the decision to establish accreditation schemes is ultimately that of the Chief Officer, the case studies have identified a number of benefits that schemes have experienced through effective consultation. The examples also suggest that the wider the consultation, the greater the benefits.

Some of the benefits that have been identified include:

- reinforcing the need for CSAS;
- helping forces to direct and shape schemes;
- assisting in refining the required role, structure, powers, standards and uniform of CSAS;
- providing clarity of existing community services, schemes, roles and responsibilities;
- encouraging executive and community ownership and support;
- improving communication links for CSAS;
- marketing the schemes to a wider audience;
- identifying other potential organisations for CSAS.

Overall, the main outcome of such wider consultation has been its assistance in introducing CSAS in a more effective, efficient, and economic way and is seen as good practice.

Outside of the statutory requirements, the nature of such consultation is at the discretion of Chief Officers in recognition of local community circumstances and established partnership arrangements. However the following bodies have been identified as providing particular benefits through consultation:

- **Police Authorities and Local Authorities:** although consultation with police authorities and local authorities are a statutory requirement, they have been found to provide particular help in identifying and achieving benefits and have played a key role in communicating the schemes to the wider community;
- **CDRP's:** CDRP's play a critical role in neighbourhood policing and their involvement in consultation has led in particular to the improved integration of CSAS into existing schemes and a wider consultation with local community through existing CDRP partnerships;
- **BCU Commanders:** although seen as an internal consultation, BCU Commanders play a critical role in the success of CSAS and their early consultation by some forces has been particularly beneficial in identifying potential organisations, establishing effective schemes and removing one of the key barriers to their success, namely cultural resistance;
- **Emergency Services:** consultation with emergency services has been seen to be beneficial in respect of providing awareness and support for the schemes. It has also led to the identification of opportunities for their involvement in the schemes.
- **Chamber of Commerce:** It was also thought that as forces seek to engage more closely with private sector organisations, it would be good practice to consult with local Chamber of Commerce groups as an efficient and effective way of gauging local business opinion and encouraging their involvement and support.

Lancashire Police – Fire & Rescue Service accreditation

Lancashire Police have accredited 50 fire and rescue officers. This has led to closer links with neighbourhood policing initiatives and in particular arson reduction without being specifically identified as enforcement officers. Discussion is currently ongoing regarding their use of appropriate powers under the Act to supplement existing statutory powers.

3.2 Policy, Structure, Management and Co-ordination

The nature, structure and practice of CSAS varies from force to force in accordance with local resource availability and demand. Some forces have established dedicated units whilst others have incorporated CSAS within existing departments and roles. As in any specialist policing area, there is a level of expertise, experience and knowledge required and this is particularly true of CSAS, where a good knowledge of approved organisations and their employees can be critical in developing successful schemes and identifying and responding to potential problems.

Although the management of schemes and the overall role of the “nominated officer” varies from force to force, the case studies show that forces that have been able to institute dedicated units have generally been more effective in establishing, processing and maintaining CSAS, and in sustaining high levels of motivation both within forces and with approved organisations and employees.

It is important that CSAS are seen, both internally and externally, as an integral part of community safety and neighbourhood policing. Therefore in order to reinforce this role CSAS should be incorporated within existing community safety and neighbourhood policing structures and should be an integral and explicit part of force’s developing “Neighbourhood Policing” policy and strategy.

3.3 Business Continuity

Because of the specialist nature of CSAS, and the limited number of police staff involved in its administration (in some cases only one responsible person), there is a need to ensure that consistency of process and business continuity is maintained. Problems have occurred where key members of staff have not been available due to unforeseen absence. Such problems can be minimised by adopting a process that can be undertaken with the minimum of previous knowledge by including user-friendly task check lists and designing forms with comprehensive details as to the information required and the standards required for accreditation.

Essex Police - Forms

Essex Police have produced a clear procedural flowchart which is linked to administration templates for CSAS application and assessment forms (see Appendix A). This provides a clear framework for administrators of the scheme and improves quality, consistency and business continuity.

Business continuity can also be achieved by establishing joint schemes, working in close liaison with other forces and by establishing explicit protocols of mutual assistance when required.

Cleveland/Durham Police – Joint protocols

Cleveland and Durham Police have worked in partnership in introducing and developing their CSAS. This has resulted in increased efficiency and uniformity of process, the sharing of good practice and has maximised awareness of the benefits and opportunities CSAS provides. It has also provided a contingency for business continuity by establishing an identified point of reference within both forces in the event of unforeseen absence.

Similarly South West region forces are currently undertaking a joint project to facilitate CSAS which again will improve efficiency and effectiveness and provide the basis for business continuity.

3.4 Administration of Schemes

3.4.1 Guidelines, Minimum Standards and Applications

Having established the need for CSAS the next stage is to ensure that the administration of the schemes maximises their effectiveness and efficiency. The first stage in this process is to inform potential CSAS employers and employees of the required CSAS guidelines. These guidelines should include the minimum standards for CSAS and details of the calibre of staff, available powers, accountability, vetting, management and training. They should also provide clear details of the accreditation process.

Whilst local circumstances dictate that such standards may differ from force to force (and will be subject to the judgement of individual Chief Constables), due consideration should be given to incorporating the basic principles and standards for the schemes as detailed in the ACPO Guidance on CSAS. Application forms should also incorporate the relevant employer/employee disclaimer and statement of compliance sections.

Most forces currently running CSAS schemes have developed comprehensive information and application packs for potential applicants. Some forces have also incorporated the relevant guidance and documentation within their force internet sites allowing potential applicants to download the necessary documentation. Such initiatives are seen as good practice as they provide an effective and efficient means of administering CSAS. Companies operating across force boundaries should be directed towards ACPO CPI, full details of which are on the ACPO website.

Lancashire Police – Application Pack

Lancashire Police were one of the first forces to develop a comprehensive information and application pack which incorporates both booklets outlining the scheme and loose-leaf standards, specifications and application forms. This provides both consistency and flexibility to respond to changes in legislation or force policy regarding minimum standards.

Essex Police – Internet Application Packs

As well as a hard copy format, Essex Police have developed a comprehensive information and application facility on their force website. This facility maximises access to their CSAS and provides an effective and efficient means of application and administration. The details can be accessed through www.essex.police.uk/csas.

3.4.2 Vetting

Employers and employees of relevant organisations need to meet a number of specified requirements before accreditation may be granted (See section 40 and 41 of the PRA Act 2002 and Section 6 of the ACPO Guidance on CSAS for details). Chief Constables need to establish a practical, auditable and robust process in order to satisfy themselves that the required standards are being met and to respond to any subsequent challenge where accreditation is refused. A key part of this process involves vetting both employers and their employees seeking accreditation.

The level of vetting will vary from force to force in accordance with individual accreditation schemes and should be proportionate to the roles, responsibilities and tasks carried out by those accredited under the scheme. The levels of vetting evident in the areas studied varied between a standard Criminal Records Bureau (CRB) check, enhanced CRB check and Counter Terrorist Check, with a small number of schemes employing internal vetting. The majority of schemes relied on some form of CRB check.

The level of vetting is particularly important for VOSA employees because of their limited specified role. Access to vulnerable people, sensitive material and information, along with particular powers authorised under CSAS, must be central and explicit to any risk assessment carried out to determine the level of vetting applied. The level of vetting will also be influenced by previous qualification of some applicants as a result of existing roles such as Neighbourhood Wardens or Security Industry Authority Accreditation.

Vetting was highlighted as a potential barrier to CSAS because of its resource, cost and time implications, with some vetting taking so long that the applicant had since changed employment. A review of vetting throughout England and Wales revealed considerable variation from force to force with some forces undertaking full police officer level vetting, (including terrorist and financial checks and interviews) and some merely carrying out external contractor checks. Although some risk assessment based justification was given for the level of vetting, this was not always clear and in some cases the level of vetting adopted appeared to be cautionary rather than pragmatic.

In accordance with the ACPO Guidance on CSAS, this review recommends that the common basis for vetting should be that of enhanced Criminal Records Bureau (CRB) checks, with any lower or higher variance being specifically and explicitly justified.

ACPO Crime Prevention Initiative Limited (a company owned by ACPO) have been nominated by ACPO to undertake the assessment of private sector companies seeking approval. The term 'Private Company' includes limited companies, PLC's, Trusts and Charities. ACPO CPI Ltd is not responsible for granting or refusing accreditation of staff. It undertakes the examination of a company and then makes recommendations for the approval of the company for a Chief Constable to accredit employees of that company in that Chief Constables area. This provides consistency in dealing with private sector applications for approval, avoids repetition of enquiries and security checks on a company seeking accreditation in more than one police force area, and reduces paperwork and costs. ACPO CPI Ltd will make a charge for undertaking this assessment should a private sector company seek approval. Further information can be found on this under the policies section of the ACPO website. (See also Section 3.4.4 Renewal of Accreditation.)

3.4.3 Fees

There is considerable variance in the level of fees currently being charged for accreditation and renewal by forces and the basis for the charges appeared to be arbitrary and historical rather than based on actual resource costs. The range of fees currently being applied by those forces consulted were:

Public Sector	Accreditation	Renewal
Employer	£300 - £315	£55 - £300
Employee	£35 - £90	£15 - £90

Private Sector	Accreditation	Renewal
Employer	£450 - £600	£75 - £500
Employee	£35 - £132	£15 - £132

The charging of fees has to be balanced around realistic resource costs and the encouragement of organisations to seek accreditation. This applies equally to both the public and private sectors, although it has to be recognised that there is a clear commercial advantage for private sector organisations in terms of the positive marketing that accreditation can bring. This added value for private sector organisations may legitimately influence charges and provide a basis for supplementing the charges to not for profit and public sector organisations. It is also the case that the majority of forces are choosing not to charge private sector organisations on the basis of encouragement, joint enterprise and the reality that funds are ultimately gained from the same source.

This good practice guide recommends that forces seek to evaluate the real costs of accreditation and renewal, for both the public and private sector organisations, as a means of accurately and transparently determining the true cost/benefits of CSAS. In carrying out this evaluation, forces need to be clear about the value added nature of the accreditation and renewal process they adopt. This is particularly true for vetting. The rate at which public and private sector organisations are subsequently charged will then be subject to local circumstances. Costs should be reviewed on an annual basis.

Hertfordshire Police – Process Cost Evaluation

Hertfordshire Police carried out a real time cost evaluation of their accreditation process based on the processing and materials costs for those involved. This was then used as the basis for the eventual charge for private and public sector applicants. For further information, please contact Hannah Riley on 01707 638875.

3.4.4 Renewal of Accreditation

Forces currently aim to review and renew CSAS accreditation after the first twelve months and thereafter every three years and this is recognised as good practice. However, the nature of the renewal process varied from force to force along with the related cost implications. This was particularly true of the vetting process adopted on renewal with some forces choosing to re-vet at every renewal, including year one, and some forces choosing to re-vet only after year three. The ACPO National Non Police Personnel Vetting policy recommends that vetting should be reviewed every five years. As with initial vetting (See Section 3.4.2) the exact criteria for re-vetting is a matter for individual forces based on risk assessment, however, because of the associated process costs, there should be explicit clarity as to the reasoning behind the re-vetting process adopted on renewal.

Cleveland/Durham/Lancashire Police – Re-vetting Policy

Cleveland and Durham Police adopt a policy of re-vetting after year three. On the initial renewal application, both the approved organisation and person are required to complete and sign a written declaration that there have been no new convictions, fixed penalty notices or other adverse matters or issues which may impact on the applicant's suitability to continue as an accredited person.

Lancashire adopt a similar policy which is also supplemented by a small number of random vetting checks

Because of the dynamic nature of CSAS it is recommended that forces state on their initial application forms that the criteria for renewal may be different from the criteria applied to initial applications.

3.5 Training

3.5.1 Initial Training

Along with the necessary suitability and capability requirements of accredited persons, Chief Officers must be confident that accredited persons have undertaken and qualified in the appropriate training commensurate to their role. Currently the nature, content and provision of such training varies from force to force. Despite this lack of consistency, most forces required that applicants undertake a recognised core competency course and also provided the adaptable option of additional modular training for additional skills/roles which also recognised existing qualification and experience.

This training was predominantly provided by external approved trainers, although a number of forces were delivering their own training at an appropriate cost. Varied cost/benefit advantages and disadvantages were identified for both approaches such as economies of scale, resource availability and flexibility, without any clear advantage for one approach or the other being determined. Ultimately the manner of training provision will be reliant on individual force circumstances.

Considerable work has recently taken place to develop a core competency training programme which will result in the awarding of a nationally recognised Community Safety Accredited Person Qualification (CSAPQ). The course specification is currently being finalised. It will be available shortly and placed on the National Qualification Framework. Adoption of the training programme will still allow the flexibility to decide who provides the training but will result in a greater consistency being achieved that will add to the flexibility and cost-effectiveness of the schemes. It also removes the need for individual forces having to assess, quality assure or audit their own training programmes. Details of the core competency training and qualification will be included in the ACPO Guidance on CSAS once reviewed.

This good practice guide recommends that forces adopt the CSAPC core competencies as a basis for accredited persons training and continue to deliver additional modular training as necessary to meet local needs. In doing so forces need to be aware of the potential barrier that training costs can have on CSAS and seek to provide the most cost-effective training available. Ultimately costs have to be balanced against the added value and reassurance such training provides both to the police and approved organisations and persons.

3.5.2 Refresher Training

CSAS refresher training is the responsibility of approved organisations and they must satisfy themselves and the police that they have the processes in place to evaluate and deliver any refresher training deemed necessary in order to maintain the standards required of accredited persons. Forces may wish to assist in this process by working with other partners in providing necessary advice and support in respect of the requirement for additional or enhanced role-related skills or changes in police practice, regulation or legislation.

3.6 Uniform, Badges and Identification Cards

Section 42(1) of the PRA 2002 states that an accredited person exercising their powers under the Act shall produce their designation in written format if requested. Section 42 (2) also states that accredited persons cannot validly exercise their accredited powers under the Act unless they are wearing a badge as specified by the Secretary of State and a uniform determined or approved by their Chief Officer.

This review found that all forces were following the legislation and guidelines in respect of badges and written accreditation. Forces were using a combination of both approved woven badges and removable badges which conform to the requirements of the Act but allow greater flexibility and efficiency in respect of the variety of garments accredited persons wear throughout the year in accordance with CSAS guidelines.

Although it is a requirement for accredited persons to wear a uniform, forces should not set the uniform specification to be so stringent that it becomes a barrier to approving suitable organisations. Further advice on badge and uniform requirements is detailed in the ACPO Guidance together with some examples of written designations used by forces.

Kent Police – Joint Training Protocol

Kent Police have established a joint training programme with Kent County Council with shared facilities which also provides additional modular training. One current training module is the “Expert Witness” training which provides a wide range of benefits to both accredited persons and relevant organisations.

3.7 Roles and Powers

3.7.1 Roles

A wide range of organisations have been approved and their employees accredited under the Act, predominantly within the public sector. Having established a scheme, a number of forces are now actively encouraging the involvement of private sector organisations. However, there is still a reluctance from private sector organisations to become involved and forces need to market the very clear advantages that accreditation can bring them in terms of improved professionalisation, greater consistency and, most significantly, the potential to establish market advantage through the establishment of safer environments.

Some examples of the variety of organisations and persons undertaking accreditation are listed below:

Security Staff	Licensing Officers	Car Park Attendants
Park Wardens/Rangers	Council Wardens	Dog Wardens
Anti-social Behaviour Coordinator	Fire Brigade Officers	Housing Officers
Hospital Security Staff	Leisure Group Staff	Trading Standards
	Environment Officers	Retail Outlet Security

3.7.2 Powers

Schedule 5 of the PRA 2002 outlines the range of powers available to accredited persons. This review found that the full range of powers were being utilised through CSAS with some accredited persons operating without powers but with the added security accreditation brings to their role, and other accredited persons utilising the full powers available. A review of the scheme identified that powers were mainly used as a reactive rather than proactive resort, as accredited persons sought to maintain their unique non-enforcement image with the public, preferring instead to resolve issues without the use of powers wherever possible.

It is important that the use and usefulness of accredited powers is included in any evaluation or review of CSAS. Feedback particularly from councils and local authorities suggests that apart from powers accredited to VOSA officers, currently the most useful and used powers were:

- Power to request name and address for acting in an anti-social manner;
- Confiscation of alcohol from persons under 18;
- Confiscation of alcohol in a public place and
- Issue of fixed penalty notices for litter.

Further guidance on the powers available to accredited persons can be found in the ACPO Guidance and on the Home Office website at:

<http://police.homeoffice.gov.uk/news-and-publications/publication/community-policing/accpersonspowers>

The review of the ACPO Guidance which is currently underway will be looking at various aspects of powers, in particular the issuing of Fixed Penalty Notices and Penalty Notices for Disorder by accredited persons.

3.8 Management of Schemes

3.8.1 Supervision and Accountability

CSAS must include provisions to make arrangements with approved employers to supervise those of their employees undertaking community safety functions for which powers have been conferred by means of accreditation. The ACPO Guidance on CSAS details a number of supervisory standards that forces may wish to include as part of such arrangements.

Supervision requirements are specifically aimed at those organisations whose employees exercise accredited powers. However, all accredited staff are clearly identified as such to the public; hence some forces have applied the same supervisory standards to employers with or without accredited powers. This approach is seen to encourage consistency and facilitate more easily those non-power employers who subsequently seek to apply for powers. However the benefits of such an approach has to be evaluated at a local level against the possible barriers to accreditation that such a rigorous approach may bring.

Forces must ensure that they have a suitable process in place to satisfy themselves that employers are continuing to meet the required standard of supervision and accountability to inform decisions regarding subsequent renewals under the scheme. This review found that the majority of forces running CSAS schemes had a robust monitoring process in place and had experienced few problems in respect of supervision and accountability.

3.8.2 Complaints

Section 40(9) of the PRA 2002 requires Chief Officers to ensure that employers who have employees with powers under the scheme have established and maintain satisfactory arrangements for handling complaints. In reality forces are making it a requirement of all accredited employees to have such arrangements in place. All forces had made it clear within their accreditation process that the responsibility for managing and responding to complaints belonged to the employers. Advice on codes of conduct and complaints procedures is contained in the ACPO Guidance on CSAS.

All forces consulted had also adopted the principle that unless a complaint was particularly serious then their nominated officer would only be informed if an accredited person was the subject of three or more complaints in any one year. This would then allow them to respond as necessary in respect of satisfying themselves that any necessary action was being undertaken in respect of removing accreditation, undertaking discipline procedures or addressing the training and development needs of the person concerned. This complaint system appeared to be working well and was seen as good practice in terms of both effectiveness and efficiency.

3.9 Barriers and unexpected impacts

Feedback on existing schemes has been almost universally positive. However, there are some barriers and unexpected impacts that should be taken into account when implementing schemes locally.

Some of the common unexpected impacts that became apparent after implementation of some schemes were:

- Vetting process can be too lengthy for organisations with a high turnover of staff. Be sure that you have the appropriate level of vetting for the role
- Communication can be difficult due to different systems. Make it easy for accredited persons to contact you by, for example, having a dedicated phone number
- Lack of public awareness of schemes. Be sure to advertise these schemes on both organisations' websites, in the local press and where the accredited persons will be working

A significant number of the schemes studied identified no barriers. In the schemes which did identify barriers the most common were:

- Lack of awareness in other agencies regarding the schemes
- Time delays, particularly with vetting
- Changing existing working practices to incorporate the new roles
- Ensuring that accredited persons have appropriate powers
- Benefits to partner organisations were originally unclear
- Financing for the role
- Acceptance by the force that powers should be awarded to non-police officers

4 Tasking, Co-ordination and Control

4.1 Joint Operating and Information Sharing Protocols

CSAS can play a vital role in neighbourhood policing strategies and accredited persons provide an effective source of information and intelligence not always available to Police Officers or Police Community Support Officers. Accredited Persons may be regarded as an integral part of the community and because of their role can, if developed properly, contribute to NIM Level 1 intelligence gathering.

In order to provide a clear framework of transparency, understanding and expectancy in respect of operational issues, there is a need to establish Joint Operating and Information Sharing Protocols between forces and approved organisations. This is particularly true of agreed methods of communications between forces. Such Joint Operating Protocols should, as a minimum, provide written details of the key outcomes of the agreement along with the agreed communication, consultation and information sharing protocols necessary to achieve those key outcomes.

Essex Police – Joint Operating and Information Sharing Protocol

The Joint Operating Protocol regulates data protection, information sharing and access to I.T. It is signed by the accredited parties, the Divisional/BCU Commander and the CDRP. It is then used by the identified Liaison Officer as the basis for developing effective schemes and achieving a level of consistency against which outcomes can be measured. It is also used as a basis to maximise operational awareness.

Whilst forces will want to shape their protocols in accordance with local needs and circumstances, a framework document for both joint operating and communication protocols is detailed in Appendix I of the ACPO Guidance on CSAS.

4.2 Tasking and Co-ordination

The effective two-way flow of information and intelligence is critical to the success of CSAS schemes. There was strong indication that the closer the relationship between the force, BCU's and accredited persons and organisations, the greater the benefits achieved. This was particularly true of joint tasking and co-ordination and information exchange. In seeking to develop this relationship there was a wide variation between BCU's throughout the country and in particular the access of CSAS persons to police premises, intelligence, and tasking and co-ordination meetings.

The issue about access to potentially sensitive information is a major concern to police officers. However, officers need to be clear within their risk assessments as to the reasons why information and collaboration cannot be provided and this good practice guide recommends that they should start with the principle that information should be provided unless the risk assessment clearly identifies that it should not. The information sharing protocol and individual security of information protocols provide a reasonable basis for establishing the nature of the access to information and responsibilities of the accredited person in respect of information received.

A number of forces have established CSAS Liaison Officers and recognised single points of contact within approved organisations and provide regular briefing information to these identified points of contact, which is then used for cascade briefing. The more successful schemes have also encouraged the submission of information and intelligence by providing development training for CSAS employees in filling in intelligence forms, including the utilisation of an intelligence grading system. (for example 5x5).

Cleveland/Durham Police – Joint Tasking and Co-ordination

In Redcar and Peterlee, CSAS staff work out of established police premises and in Darlington they work out of shared premises. In all cases there is a high level of co-operation and co-ordination in respect of targeted joint tasking, intelligence sharing and perceived benefits.

In Middlesbrough the joint police/council tasking and co-ordination system (known as the Active Intelligence Mapping Project) has provided an effective action forum for identifying and resolving Level 1 crime.

The case studies showed that the greatest benefits from CSAS were gained as a result of accredited persons being directly involved in joint tasking and co-ordination meetings, whether such meetings are led by the police, approved organisations or Authorities and this review recognises such development as good practice. The development of joint tasking and co-ordination was made easier in those areas where CSAS staff and the police had shared access to premises or police stations. There were numerous examples of such shared access and none of the forces consulted had experienced any significant breach of protocol or compromise of sensitive information or material.

There were several examples of accredited persons providing actionable information and intelligence which resulted in positive outcomes, including arrests. However, it was clear that there was limited feedback regarding outcomes to accredited persons providing such information, which limits their motivation and can ultimately lead to their reluctance to provide such information in the future. Therefore, this good practice guide recommends that wherever possible forces should seek to provide the necessary feedback as a means of improving performance, satisfaction and motivation.

4.3 Communication

Effective communication systems are critical to CSAS whether they be general, priority or emergency communications. As well as improving the tasking co-ordination and response of CSAS, effective and reliable communications also provide the necessary level of reassurance to accredited persons in carrying out their role. This review found a great variance in levels and modes of communication, ranging from the access and use of airwave radios to reliance on mobile phones. It also found that one of the main concerns of accredited persons is their ability to call upon and rely on the timely support of the police.

Such a variance in communication is to be expected due to local circumstances and availability of resources. However, whatever system of communication is adopted it must be conducive to the role, responsibility and powers of accredited persons. The higher the perceived risk of possible confrontation arising, the more critical the need for effective real-time communication and response. In this respect, communication has to be integral and explicit within the occupational risk assessment for accredited persons. It should also be an integral part of the Joint Operating Protocol where it can provide clarity of role and responsibility and shape realistic expectation. Both Essex and Hertfordshire Police have a unique non emergency number set up for their accredited persons to ensure accredited persons have appropriate access to the police when they need it (see below).

Hertfordshire Police – Unique Non Emergency Telephone Number

CSAS within Hertfordshire rely heavily on mobile phones for access to force Contact Centres. However, it was clear that undue delays were being experienced due to level of normal public non-emergency calls. In order to improve communication and response Hertfordshire Police created a unique non-emergency telephone number for use by accredited persons which carried a higher priority than general public non-emergency calls. The system was seen to be working well and provided a greater level of reassurance to accredited person. They also closely monitor the calls made by accredited persons in order to identify problems and improve support.

5 Marketing

Effective internal and external marketing is critical to obtaining ownership and support for CSAS and improving its success in achieving their stated aims. It also serves to help reduce the fear of crime and maximise community safety and satisfaction. This review of CSAS found that despite extensive local effort there was still a considerable lack of awareness about the nature, role and benefits of the schemes. Although marketing of CSAS from the centre may be beneficial it is essential that forces introducing CSAS put into practice a clear marketing strategy at the earliest opportunity and those with existing schemes ensure that they continue to market the existence role and identified benefits of such schemes.

This review found that forces had adopted numerous means of internal and external marketing of CSAS. A good practice selection of which are presented below:

	Forcewide	BCU/Local Authority Level
Internal	<ul style="list-style-type: none"> ■ CSAS Link on the Intranet ■ Force e-mails ■ CSAS Briefings/Roadshows ■ Police Publications ■ Quarterly Newsletters ■ Force CSAS Screensaver ■ Police Authority Briefing ■ Integral part of Probationer training 	<ul style="list-style-type: none"> ■ Initial Consultation ■ Shift Briefings/Roadshows ■ Divisional e-mails ■ BCU Publications ■ Police Publications ■ Quarterly Newsletters ■ Force CSAS Screensaver ■ Use of Neighbourhood Policing Seminars
External	<ul style="list-style-type: none"> ■ Initial Consultation ■ CSAS Seminars/Roadshows ■ County Council Executive Briefings ■ Police/County Council Publications ■ Targeted Mailshots ■ CSAS Link on the Force Intranet ■ Quarterly Newsletters ■ Media exploitation ■ County Shows and other exhibitions ■ Private Security Forums 	<ul style="list-style-type: none"> ■ Initial Consultation ■ CSAS Seminars/Roadshows ■ Local Authority Briefings ■ CDRP/Community Safety Briefings ■ Private Sector Briefings ■ Police/Local Authority Publications ■ Targeted Mailshots ■ CSAS Link on the Force Internet ■ Quarterly Newsletters ■ Media Exploitation

6 Community Safety Monitoring and Evaluation

In order to continue to develop and improve CSAS, identify the considerable benefits such schemes offer, and to evaluate the effectiveness of the schemes, it is important that forces put in place relevant measurement, monitoring and evaluation processes. Whilst these processes are likely to differ from force to force, as a minimum they should seek to evaluate the three key aspects of the scheme, namely:

- impact on levels of crime, recorded crime and anti-social behaviour;
- impact on levels of fear of crime, feeling of public safety, public reassurance and quality of life issues like, abandoned vehicles, littering, graffiti and vandalism;
- improve information-sharing and co-operation between forces and accredited partners.

Section 10 of the ACPO Guidance on CSAS provides further details of what forces may wish to consider as part of their evaluation programme and a number of forces are now undertaking effective monitoring and evaluation of CSAS. The Office of Deputy Prime Minister have also produced a Community Based Evaluation tool kit on 'How to conduct Warden Programme evaluations' which may also be of assistance to forces in developing effective CSAS evaluation processes.

Northamptonshire/Essex/Hertfordshire Police – Evaluation Schemes

All three forces have developed and undertaken evaluation schemes which are recognised as good practice. Details of the Northamptonshire Police Evaluation Programme can be found at Appendix H of the ACPO Guidance on CSAS.

Hertfordshire Police have just completed their first year evaluation of their scheme, details of which can be obtained by contacting Hannah Riley (01707 638875).

Essex Police undertake quarterly monitoring and evaluations of both the police and the approved organisations (See Appendix B).

7 Conclusion

In terms of effectiveness and efficiency, the case studies highlight some of the benefits to the community, the police, organisations and individuals, that CSAS can provide if introduced and managed effectively. The indication is that where CSAS is an integral part of force's Neighbourhood Policing Strategy and mixed policing teams it can be particularly valuable. The studies also suggest that CSAS is able to provide these benefits in an efficient manner and may result in the release of highly valued policing resources. There is also an indication of the positive effect CSAS is having on public reassurance and satisfaction, by providing an increased response to those quality of life issues that concern the community.

The conclusion of this good practice guide is that, CSAS can provide real benefits in support of community safety and security. Therefore forces, with the continued support of the Home Office and ACPO, should continue to introduce, develop and improve CSAS within their areas, working closely with public and private sector organisations.

Appendix A

For Essex Police use only

Community Safety Accreditation Scheme Assessment Form

Note: The CSAS Assessment form will be filled in during the assessment meeting by the CSAS Section. The CSAS Section must ensure they receive evidence of the organisations polices and procedures listed below, as this will help to determine if the organisation is suitable for accreditation. A copy of the completed form will be sent back to the organisation detailing the areas of concern or if the organisation has passed the initial assessment enabling them to apply for accreditation.

Name of Organisation

Address

Post Code

Telephone No

Date of Assessment

1. Number of employees to be accredited

Note: Only employees being put forward for accreditation are to be counted here. It also must include Managers and Supervisors who must also apply for accreditation.

2. Do the employees work in a Community Safety role?

Note: It is imperative that employees applying for accreditation must be in a community based role. Details of the role should be noted here.

3. Do the employees wear a uniform?
If not, would a uniform be appropriate to the role?

Note: Details of the uniform should be listed here, including details of organisation logos, colour of uniform etc.

4. Are the employees directly employed?
If not, name of employing company

Note: Organisations may employ contracted staff, if this is the case then, the contract company details must be listed. i.e. organisation's full name, contact names and numbers. The organisation must inform any contract company of their intention to gain accreditation. It should be noted that all appropriate companies must be accredited in their own right.

5. Have all employees achieved SIA licensing, if applicable?

Note: The CSAS Section must establish if the organisation has completed any and all legislation requirements regarding the SIA licensing.

6. Is the organisation involved in the CDRP process?

Note: The CSAS Section must establish if the organisation is involved, or has been involved with any crime, disorder and reduction partnerships. This will help the CSAS Section to identify how constructive the organisation is towards working in partnership and in helping to reduce anti social behaviour, within their patrol areas

7. Has the organisation ever worked in conjunction or in partnership with Essex Police?

Note: If the organisation has ever worked in conjunction or in partnership with Essex Police it must be stated here the role of the organisation and the outcome of the partnership. It would also be useful to get the Essex Police contact details.

All partnership initiatives must be listed for example BOBB, Pubwatch etc.

8. What community safety initiatives is the organisation involved in?

Note: If the organisation has ever worked in a community safety initiative it must be stated here what the initiative was and if they worked with any other organisations i.e. was the initiative internal or external.

How was the need identified?

Note: The CSAS Section must establish why/how the organisation was involved in any initiative undertaken and whether the initiative was successful and/or if it has become a regular project.

9. What areas do the employees patrol?

Note: All areas to be patrolled should be listed, for example, Chelmsford town centre, parish of Springfield, or Chancellor park area.

10. How are the employees supervised?

Note: The CSAS Section must be satisfied that the organisation has suitable supervisory policies (As listed in the policy and procedure table below). Each organisation will supervise in a different way therefore as long as there is regular contact/de briefings, for the purpose of the assessment, this should be identified.

11. Does the organisation have a management committee, if appropriate, what is the remit?

Note: If the organisation does have a management committee, it must be stated here what their remit is and what dealing they have with the employees/organisation. There should be a structure in place to ensure compliance to the needs of the community.

12. Do you complete risk assessments on your employees? How often do they take place?

Note: The CSAS Section must be satisfied that the risk assessments have taken place and any/all risks have been considered and steps taken to rectify. It must also be noted and how frequently the meetings take place.

13. Have you got the following Policies and Procedures in place:

Policy	Yes / No	Comments
Health and Safety Policy <i>Risk assessments</i> <i>Health and Safety Induction courses</i> <i>Hazards</i> <i>Record Keeping of incidents</i>		<i>Note: All company's applying for accreditation must have a well documented Health and Safety policy, fully applying with the requirements of the Health and Safety at Work Act 1974 and all other relevant statutory provisions and recognised codes of practice. It maybe worth while to ask to see records of Health and Safety matters.</i>
Complaints Procedure <i>Record keeping</i> <i>Receipt of complaints</i>		<i>Note: It is imperative that the organisation hold and abide by a comprehensive complaints procedure. The procedure will include definitions of complaints, misconduct procedure etc. For both the public and the employees. Again ask to see the last 12 months of complaints received and their outcomes.</i>
Equal Opportunities Policy <i>Under: Employment policy</i> <i>HR Policy/Recruitment Policy</i> <i>Application forms</i> <i>Contracts</i>		<i>Note: The organisation must include a policy or statement which demonstrates how the organisation practices equal opportunities. The organisation must be able to prove that they practice a fair recruitment, training, development and monitoring of all employees or future employees. Again ask to see, if necessary.</i>
Human Rights Policy <i>ECC Legislation</i>		<i>Note: The organisation must provide suitable documentation that demonstrates their policy on Human Rights. This is to ensure that their Human Rights are upheld.</i>
Data Protection Policy <i>Under: Employment policy</i> <i>HR Policy/Recruitment Policy</i> <i>Application forms</i> <i>Contracts</i>		<i>Note: The organisation must provide suitable documentation that demonstrates their policy on Data Protection, computer misuse, freedom of information etc.</i>
Disciplinary Procedure <i>Can be found under code of conduct, At work doc, recruitment policy or employment policy.</i>		<i>Note: The organisation must provide suitable documentation that demonstrates their procedures on discipline within the work place. It should also show an appeals process procedure.</i>
Environmental Policy <i>This is a new policy – help can be given</i>		<i>Note: The organisation must provide suitable documentation that demonstrates their policy on the environment. This deals with the company's responsibility on the environment.</i>
Recruitment Policy <i>Maybe found under Employment Policy/HR</i>		<i>Note: It will also be necessary to include a recruitment criterion for every post applying for accreditation. This will list both essential and desirable experience required by the candidate. Best person for the job i.e. do they carry out advertising and selection interview criteria.</i>

Policy	Yes / No	Comments
Employment Policy <i>Maybe found under Recruitment Policy/HR</i>		<i>Note: The organisation must provide suitable documentation that demonstrates their policy on employment i.e. contracts, time off, sickness, termination, probationary period etc.</i>
Do your employees have an employment contract?		<i>Note: If appropriate, the organisation must provide suitable documentation of employment contracts and length of contracts.</i>
Grievance Complaints Procedure		<i>Note: The organisation must provide suitable documentation that demonstrates their procedure on grievance complaints. (This maybe covered in the complaints policy). Grievance from employees against the organisation and /or other employee i.e. working remit will be stated in here.</i>
Do you have a Supervisory Structure in place?		<i>Note: If appropriate, the organisation must provide suitable documentation that demonstrates the supervisory structure and the policies and procedures involved within that role. How, Where and When.</i>
Annual Report		<i>Note: An updated copy of the organisation's annual report must be in place.</i>
Do you have accreditation by other bodies i.e. Charter Mark		<i>Note: If appropriate, the organisation would include any certificates awarded by any other bodies in their application pack.</i>
Existing Enforcement Policies		<i>Note: The organisation must include any existing enforcement policies this may include the purpose and method of enforcement, the principles and the prosecution process.</i>
Training Policy <i>Can be found under; Assessment forms Contract of employment</i>		<i>Note: The training plan should include a comprehensive list of the training development required for each employee, how this has been achieved and the dates they have completed/expected to complete their training. The employer should also list a future training programme for future development by the individual.</i> <i>Ask how the training is identified.</i>
Liability Insurance (How much)		<i>Note: The organisation must provide documents stating their liability insurance and how much it is. It must be a minimum of £5 million.</i>
Inspection Reports by other appropriate agencies		<i>Note: If appropriate, the organisation must provide copies of inspection reports by other appropriate agencies, in their application pack. List which organisation conduct regular inspection on the company.</i>

Name of Authorised

Signatory

Note: Authorised Signatory will be nominated by a Director or a Senior Manager of the organisation – this must be decided at these early stages so that whoever has been given the title can sign all relevant documents in the application and the employee's verification forms.

Position Held

Work Contact Address

Work Telephone No

Mobile No. (if applicable)

E-Mail Address

Website Address

Why are you seeking accreditation?

Note: The CSAS Section must have enough evidence that the organisation is a "fit and proper" organisation who wants to work in partnership with Essex Police to combat anti social behaviour and reduce crime.

Is the organisation a suitable candidate for accreditation?

Yes. Note: If they are suitable then the organisation can start to complete the application forms and the checklist. No

If not, what recommendations have been proposed by the CSAS section?

Note: All recommendations must be listed here so that the organisation can put in place the areas which are not of a high enough standard, or especially, are not in place. A timescale should be given for when the organisation could reasonably expect to reapply for accreditation.

Signed

Date

Note: When the assessment form is complete it must be signed and dated by the CSAS Section before sending back to the organisation.



Appendix B

Community Safety Accreditation Scheme Monitoring and Evaluation Form

Company Name		Department	
Name of Authorised Signatory		Date Accredited	
Name of Liaison Officer		For Office Use Only	

Questions	Action taken by organisation	Internal Comments (CSAS use only)

Questions	Action taken by organisation	Internal Comments (CSAS use only)
How often do you communicate with your Liaison Officer and/or his personnel and by what method?		
Please indicate, if appropriate, how the working relationship could be improved between your organisation and the Liaison Officer/Division?		
What feedback (negative or positive) have you received from your AP's on accreditation? Please specify		
If appropriate, what powers have you used? Please state the incident and outcome.		
Please indicate what level of co-operation the AP's have received from Essex Police Personnel, please explain any comments		
Has your organisation had any complaints against your AP's? Please provide a report on any complaint made against your AP.		
Please list any joint initiatives between Essex Police and your company along with any outcomes		
Any other comments		

Community Safety Accreditation Scheme Monitoring and Evaluation Form – Divisions

Company Name		Department	
Name of Authorised Signatory		Date Accredited	
Name of Liaison Officer		For Office Use Only	

Questions	Action taken by organisation	Internal Comments (CSAS use only)
Do you think the training for AP's should be refreshed or expanded? If so, please indicate in which area.		
Has all aspects of the JOP Addendum been addressed? If not, please clarify which areas still need attention and expected timescales		
Have you received any intelligence from the AP's? Please indicate how many CID 61's they have submitted.		
If so, was the intelligence useful to the Division? Please indicate how		
Did you supply any feedback to the AP's regarding any intelligence submitted? If not, why?		
How often do you communicate with the organisation and by what method?		
Are there any issues/problems that need to be resolved between the local Division and the organisation?		

Questions	Action taken by organisation	Internal Comments (CSAS use only)
Has the division had any complaints against the AP's? Please provide a report on any complaint made against the AP's.		
Please list any joint initiatives between your Division and the company, please include all outcomes		
Has there been any media coverage or publicity?		
Any other comments		

Signature _____

Date _____

