



## Community Safety Accreditation Scheme Policy

### Abstract

The Police Reform Act (PRA) 2002 created the opportunity for Police Forces to be able to allow designated people, who are not police officers, to exercise certain police powers by setting up a Community Safety Accreditation Scheme (CSAS).

### Policy

#### 1. Introduction

- 1.1 The Police Reform Act (PRA) 2002 created the opportunity for Police Forces to be able to allow designated people, who are not police officers, to exercise certain police powers by setting up a Community Safety Accreditation Scheme (CSAS).

Under Part 4 of the PRA 2002 any organisation or employer involved in community safety patrols, together with their employees, may seek accreditation. Typical examples include: Local Authorities, Housing Associations, licensed private security Companies, NHS Trusts, charitable organisations.

This policy ensures the Force meets the requirements of the PRA2002 to support public bodies and private companies in gaining accreditation and will ensure that Surrey Police applies robust procedures when processing applications for the CSAS, and that, once accredited, each scheme is properly monitored and becomes an important part of the Extended Police Family of partner agencies, volunteers, Special Constables, and cadets etc.

#### 2. Scope

- 2.1 This policy provides specific information for all members of the Force, people involved in the maintenances of CSAS and those who are considering applying for accreditation.
- 2.2 This policy covers all aspects of the CSAS, including the accreditation standards, the application process and how each accredited employer and their employees will work more closely with Surrey Police.

- 2.3 This policy applies to all applications and monitoring processes for accreditation submitted by public or private bodies.

### 3. Policy Statement

- 3.1 The Chief Constable of Surrey Police supports the establishment of a CSAS for the specific purpose of contributing to community safety and security by permitting accredited staff to work with Surrey Police to combat crime and disorder, public nuisance, and other forms of anti-social behaviour (ASB).

## Procedure

### 1. Background to the Scheme

- 1.1 The Police Reform Act (PRA) 2002 allowed the recruitment of Police Community Support Officers (PCSOs) who have limited powers to provide an additional visible and reassuring presence within communities. The Act also created the opportunity whereby persons who are not police officers are able to exercise certain police powers when discharging functions aimed at community safety and which tackle crime, disorder, public nuisance and ASB.
- 1.2 Any public or private sector organisation may apply to the Chief Constable for the accreditation of their staff.
- 1.3 The powers that Chief Officers can delegate to accredited persons are set out in schedule 5 of the PRA 2002 and have been amended by the Anti-social Behaviour Act 2003, the Serious Organised Crime and Police Act 2005 and the Anti-social Behaviour Crime and Policing Act 2014. A full list of the powers can be found within CSAS Powers Available Under the Police Reform Act 2000.

### 1.4 Overview of Scheme

The National Police Chiefs' Council (NPCC) document on the CSAS and Railway Safety Accreditation Scheme (RSAS) promotes a CSAS within Forces and provides best practice guidance on how this should be managed. The NPCC Community and Railway Safety Accreditation Schemes Guidance underpins Surrey Police CSAS.

- 1.5 CSAS has the potential to be a major factor in the success of local policing, however, Chief Officers apply clear lines of demarcation between Accredited Persons and police staff.
- 1.6 CSAS is not applicable to voluntary community safety schemes, such as Neighbourhood Watch, because the legislation requires arrangements to be made with 'employers' and for Accredited Persons to be the employees.
- 1.7 Applicants for accreditation may only exercise the specific powers included in their accreditation and only the force area where they are accredited (except in the case of escorting abnormal loads).
- 1.8 In the case of abnormal loads, the power of escort applies throughout England and Wales, although the person must be accredited in the force area covering either the departure point of the load or its destination.
- 1.9 accredited organisations and staff, should be disseminated to internal and external audiences. Surrey Police use a variety of media to achieve this. Options to be considered will depend on the nature of each accredited scheme but some examples include:

- Global emails to all staff
- Dedicated CSAS intranet site
- Briefing handouts for staff
- Item in Routine Orders
- Surrey Police Website
- Features in local media / press releases
- Posters and leaflets

## 2 **Control and Tasking**

- 2.1 Applicants for accreditation may only exercise the specific powers included in their accreditation and only in the force area where they are accredited.
- 2.2 Wherever possible, Accredited Persons should take part in joint briefing and tasking processes. Alternatives to this, such as the circulation of emails, text messages or video conferencing, have also been put into practice with success in Surrey. The exact nature of such engagement and communication though will depend on the location and business of the accredited organization and will form part of the Operating Protocol. Refer to Appendix A: Guidelines for a Proposed Operating Schedule.
- 2.3 Although schemes are maintained through Surrey Police, employers are accountable to their customers, giving rise to possible conflicts of interests with the local police. The management of such conflict is key to developing effective working relationships. Accreditation does not mean that Surrey Police will be able to direct Accredited Persons nor control their roles, or day to day activities. Their employers remain entirely responsible for these matters.
- 2.4 Surrey Police will consider what level of access, if any, they will allow Accredited Persons to briefing information, regarding, for example crime hot spots and persistent offenders. To facilitate sharing of information, organisations and companies granted CSAS accreditation would be required to agree and sign an Information Sharing Agreement (ISA). Refer to Appendix B: CSAS ISA.
- 2.5 Accredited Persons working in vulnerable areas such as shopping centres and universities should have the appropriate PREVENT counter-terrorism training.
- 2.6 Surrey Police has adopted the CSAS fees agreed by the South East Regional CSAS Group. Refer to Appendix C: Agreed Fees.

## 3 **Period of Accreditation**

- 3.1 Surrey Police offers accreditation for an initial period of 1 year. On re-accreditation this can be extended by periods of no longer than 3 years, with an understanding that criteria for renewal may differ from those applied initially and may be subject to annual review.
- 3.2 The Local Policing Problem Solving Team CSAS coordinator keep records of accredited organisations and their employees.

## 4 **Applying for Accreditation with Surrey Police**

- 4.1 Any employer wishing to apply for accreditation must be able to provide evidence that they have the appropriate procedures, practices, supervision, and training in place to manage accredited employees.

- 4.2 The application process will differ, depending on whether the employer is in the public sector or private sector. Appendix D gives a summary of the application process for a public sector employer and Appendix E gives a summary of the application process for the private sector. A list of what Surrey Police requires from employers and employees seeking accreditation is at Appendix F.
- 4.3 Employers applying for accreditation will need to submit, as a minimum, the following written / signed documentation
- Employer's application form (Appendix G)
  - Proposed Operating Protocol (Guidelines at Appendix A)
  - Statement of compliance (Appendix H)
  - CSAS ISA (Appendix B)
  - Disclaimer (Appendix I)
  - Jpeg company logo (for use on each accredited employees CSAS ID badge)
- 4.4 Employees applying for accreditation will need to submit, as a minimum, the following written / signed documentation:
- Employee's application form (Appendix J)
  - Vetting Non Police Personnel Vetting Form (Appendix K)
  - Security of information (Appendix L)
  - Evidence of appropriate CSAS training
  - Jpeg passport photograph (for use on their CSAS ID badge)
- 4.5 The PRA sets out a number of requirements that must be met by employers before employees of their organisation may be granted accreditation. There are also specific requirements that must be met by the individual employee. Both sets of requirements are summarized below.

### **Employer Requirements**

- The employer is a fit and proper person to supervise the carrying out of the functions for the purpose of which accreditation is to be granted. Sec 41 (4) (a)
- Employers have established and maintain satisfactory arrangements for the handling of complaints. Sec 40 (9)
- Provision for employers to supervise the carrying out by their employees of the community safety functions for the purpose of which powers are conferred by the grant of accreditations. Sec 40 (8)

### **Employee Requirements**

- The minimum age for an Accredited Person is 18 years of age.
- That the person is a suitable person to exercise the powers that will be conferred on them by virtue of the accreditation.
- That the person is capable of effectively carrying out the functions for the purposes of which those powers are to be conferred on them **and**
- That the person has received adequate training for the exercise of those powers. • That the person has received adequate training for the exercise of those powers.

#### 4.6 **'Single event' accreditation**

Single event accreditation is available for traffic management companies seeking to use the following powers only:

- Power to control traffic for purposes other than escorting a load of exceptional dimensions
- Power to require name and address for road traffic offences

This allows traffic management companies, who are not such an integral part of the local policing team, to move around the county operating at different events, rather than being 'location specific', to apply for accreditation up to a maximum of 3 single events in a 12 month period, at a reduced cost. This restriction is necessary so that the process is not unfair for those companies who pay for full accreditation. The charge is £50 per organisation per event, plus £10 per accredited person per event per event. In order to take advantage of this option, applicants must:

- Already be accredited in another police force
- Provide documentary proof that they have current Police Crime Prevention Initiative (CPI) approval
- Provide documentary proof from another force that the accreditation and vetting for each Accredited Person is valid
- Provide confirmation that the company in question has operated in a policing area and has used conferred traffic control powers to a satisfactory standard.

Traffic management companies taking advantage of these arrangements will be required to complete an evaluation report questionnaire (Appendix M) of their performance following each event.

A copy of the 'single event' application form is at Appendix N.

#### 4.7 **Accredited Persons also acting as Special Constables**

There may be occasions when employees who are accredited under CSAS are also Special Constables. Each such application will be considered on an individual basis and both parties (Surrey Police and the employer) will be asked to sign a suitable agreement clearly laying out the terms of the arrangement. Such applications are likely to be exceptional.

## 5 **'Fit and Proper' Employer Standards**

- 5.1 Public sector organisations will be asked to supply a range of documentation to confirm their suitability as employers. For example, documentation to demonstrate that they have policies in relation to equal opportunities, health and safety, diversity, and staff appraisal, that these are known to and understood by all staff; and that they are complied with.
- 5.2 Private sector organisations will be asked to approach Police CPI Ltd, who will carry out an assessment and then make recommendations to the Chief Constable as to whether their staff are suitable to be considered for accreditation. The CSAS application pack is available to download from the Police CPI website. There is a charge for this service that the organisation pays directly to Police CPI.

### 5.3 **Handling of Complaints Standard**

All employers working in the community safety and security sector should be familiar with the need to have good customer relations, as this is a standard feature of good business practice. An organisation must show that it deals effectively with complaints and takes action to address failures if they are identified.

- 5.4 Complaints made against Accredited Employees should be dealt with by employers, but any allegations made should also be highlighted to the Force CSAS Lead.

### 5.5 **Supervision Standard**

This requirement is most relevant to organisations seeking to exercise powers and for those organisations a written agreement on supervision may be created. Some areas that such an agreement should cover are:

- The role requirement of an existing supervisor is amended to include supervision of the exercise of powers.
  - That the supervisor is trained in the use of the powers whether or not they are accredited.
  - That documents produced in the course of the use of powers are supervised to ensure powers have been used properly and that the documents are completed to a satisfactory standard.
  - That 'on street' supervision is carried out from time to time.
  - That records are kept of the use of powers by Accredited Persons.
- 5.6 For organisations that are not seeking to exercise powers it may be useful to ask for information on supervision ratios, and a copy of a supervisor's role requirement to ensure it contains 'on street' supervision and a commitment to helping staff to improve performance. The existence of an appraisal or work assessment process should also demonstrate that supervision takes place.

## 6 **'Fit and Proper' Employee Standards**

### 6.1 **Vetting Standard**

The purpose of vetting is to maintain transparency and confidence that members of the police community and those with access to our assets are fit to hold that responsibility. Effective vetting systems reduce the possibility of inappropriate applicants, those with links to criminality or those susceptible to corruption gaining

employment or access to police information. We have a duty of care to all in society and the underpinning principle is to ensure that the safety of the public and sensitive information relating to them, and our national security is in safe hands.

- 6.2 Prior to vetting enquiries being undertaken the employer of the applicant must have completed initial recruitment checks to confirm an individual's identity, nationality, employment eligibility and residency qualification. The obtaining of employment and personal references will also be the responsibility of the applicant's employer..
- 6.3 Vetting will be carried out in accordance with the Joint Force Vetting Policy (Surrey and Sussex) (592).

The vetting process is triggered by the submission to the Joint Force Vetting Unit of a non-police personnel vetting request form, a copy of which is attached at Appendix K.

The National Vetting Codes of Practice takes a risk-based approach to an applicant's access to police estates and protectively marked assets. NPV Level 2 either 'abbreviated' or 'full' are the recommended minimum standards.

Under current policy NPV2 expires after 3 years and renewal will be required to maintain that persons CSAS accreditation.

- 6.4 Accredited Persons fall under the exception to the Rehabilitation of Offenders Act 1974 Order (1975/1023) Schedule 1, Part II, paragraph 6, covers, 'persons employed for the purpose of, or to assist the constables of, a police force established under any enactment.' This allows spent convictions to be checked and taken into consideration.

Applicants for NPPV have a right to appeal refusal to grant clearance, National Vetting Codes of Practice (APP para 8.43 refers) and should make their submission in writing or via e-mail to the Joint Force Vetting Manager.

- 6.5 Accredited Persons may have undergone security clearance already in order to be employed in a community safety role. If a person has been vetted in the course of their employment within the last 6 months, consideration may be given to building the results into the process of vetting for accreditation in order to avoid duplicating work unnecessarily. It should be taken into consideration that in order to receive a Security Industry Authority (SIA) license less rigorous standards are set on past convictions.

## 7 **Aftercare Considerations**

- 7.1 Aftercare is arguably the most important part of any vetting clearance. Vetting is based on a 'snapshot in time'. The subject's personal circumstances can, and often will, be subject to a significant change over time and this may affect their suitability to maintain their clearance. It is therefore vital that the individual's suitability is assessed over time through a comprehensive aftercare regime.
- 7.2 Accredited persons must notify their employer of any changes in their personal circumstances as soon as possible. Employers will then notify the Force CSAS Lead in writing within 7 days of the date change.
- 7.3 Individuals must be informed that adverse changes in circumstances, or failure to notify such changes, could result in the withdrawal of their vetting clearance and accreditation.
- 7.4 **Training Standard**

Surrey Police does not deliver CSAS training. There are a number of external approved trainers that employers can approach. Whilst there is a degree of flexibility in exactly which course is taken, the overriding principle is that the Local Policing Support Team must be satisfied that Accredited Persons have undertaken and passed appropriate training.

- 7.5 The specification for the Core Competency Training and Qualification for Accredited Persons under Community Safety Accreditation Schemes was revised in 2021 and set out in Appendix O.
- 7.6 Accredited Persons should hold a nationally recognised qualification. Surrey Police do not have the responsibility of assessing, quality assuring or auditing training programs; this will be carried out by the awarding bodies.
- 7.7 CSAS refresher training is the responsibility of employers and one day every 3 years is the recommended minimum training requirement.
- 7.8 **Uniform and Designation Standard**

Accredited Persons should wear identifiable clothing determined or approved by the Chief Constable. It is not considered that "plain clothes" can constitute a uniform: The Chief Constable will ensure that identifiable clothing worn by Accredited Persons is distinct from that worn by police officers or PCSOs.

- 7.9 The Home Office has produced the required badge, including colours and proportions. The badge must always replicate the proportions and colours of the published badge and be worn in the chest region or on the upper sleeve, at chest height, to ensure proper visibility when dealing with the public. It must be a minimum size of 73mm x 80mm. A supply of badges is held by the Local Policing Problem Solving Team CSAS coordinator. Additional supplies are available from the Home Office but can only be supplied to forces not directly to Accredited Persons. Organisations may incorporate embroidered badges onto their identifiable clothing for accredited staff, so long as the badges still meet the criteria above.
- 7.10 The CSAS badge must only be worn by Accredited Persons. While Surrey Police enters into an agreement with an employer, it is the individual employee that is accredited. Unaccredited employees of an organisation involved in a CSAS scheme must **NOT** wear the CSAS badge.
- 7.11 Section 42(1) of the PRA states that any person who exercises their CSAS powers or duties shall produce evidence that accreditation had been granted, if requested to do so by someone they are dealing with. It is therefore required that Accredited Persons carry a card detailing this information on their person. These cards are produced in-house by the Support Services Department (reception team) and include a list on the back of any accredited powers granted.

## 8 **Decision Making**

- 8.1 The PRA contains no provisions for the consideration of appeals against unsuccessful applications. The power to accredit individuals rests solely with the Chief Constable. Given the wording of the PRA, the Chief Constable is not empowered to allow any other person to make that decision, as to do otherwise would be ultra vires.

In light of the potentially adverse effect of refusal on a commercial enterprise, it is possible that such a refusal will be challenged, although the grounds for doing so are limited. In the absence of clear guidance to the contrary, it is considered appropriate

to advise unsuccessful applicants, as a last resort, to seek judicial review of Chief Officer's decisions.

## 9 **Evaluation**

- 9.1 Surrey Police monitor the effectiveness and impact of each accredited scheme. It is important that, once accredited, an organisation and their staff are able to demonstrate the impact of their accreditation on community safety and that the scheme is meeting its intended aims.
- 9.2 There are a variety of data sources that can be used in order to assess the impact of accreditation. The data collected will depend on the nature of the accredited scheme, its physical location and powers granted. An example of an evaluation questionnaire to be completed by the employer is at Appendix P and an evaluation questionnaire specifically for traffic management companies is at Appendix M, with one for Surrey Police officers / staff working with traffic management companies at Appendix Q. Further information on evaluation data sources can be found within NPPC Community and Railway Safety Accreditation Schemes Guidance.
- 9.3 Effective evaluation will be a key part of the re-accreditation process. Employers are required to build in an evaluation process as part of their application evidence.

## 10 **Renewing Accreditation**

- 10.1 Accreditation should be granted for no longer than twelve months in the first instance. It is at the Chief Constable's discretion to decide how frequently it will be renewed, although no longer than three years is recommended. At the time of any re-accreditation, the Local Policing Problem Solving Team CSAS coordinator will need to be fully informed of the performance of the scheme over the previous period, including the number of complaints made against Accredited Persons, the employer, and their outcomes. Where performance has been below the standard expected, alternatives to denying renewal, such as retraining and/or closer supervision, should be considered.
- 10.2 The Local Policing Support Team will consider not recommending to the Chief The Local Policing Problem Solving Team CSAS coordinator will consider not recommending to the Chief Constable that a particular scheme is renewed, where no immediate improvement appears likely or where the number of complaints is so great that this indicates a corporate failure to provide a service. Clear and robust ongoing assessment processes will be required to continue an accreditation in these circumstances: alternatives for consideration may include refusal to re-accredit, temporary suspension of accreditation pending a full review, restriction, or removal of powers and/or a shortened period before the next re-accreditation procedure is due.

## 11 **Suspension or Revocation of Accreditation**

- 11.1 From time to time, concerns surrounding Accredited Persons, or their employers will come to light that will require Surrey Police to take action. Employers should notify the Force CSAS Lead at the time a complaint is received if it involves a criminal allegation or other serious misconduct, where the reputation of the partnership may suffer. The Force CSAS Lead may wish to review the person's accredited status immediately, referring to the standards on vetting and take advice from the Vetting Unit to ensure a consistent national approach for Accredited Persons.
- 11.2 Where an Accredited Person is employed in a particularly sensitive role or where an enhanced level of vetting was initially required, this will be taken into account when reviewing the individual's suitability and a higher standard of behaviour will be expected. The Chief Constable can refuse to accredit or withdraw an accreditation at any time without appeal.

11.3 Individuals may need to have their accreditation suspended if their suitability and competence falls below standard, or during any investigation into allegations of sub-standard behaviour. Two forms of suspension are possible: suspension of accreditation and suspension of powers.

11.4 An individual may have their accreditation suspended pending an investigation if:

- They have been arrested or received a PND (for a recordable offence) where, if convicted of the offence they would fail to meet the vetting standard.
- Where the circumstances of the Accredited Person have changed in such a way as to bring their vetting status into question.
- Where there is suspicion or information that the Accredited Person is in the process of becoming bankrupt, insolvent, or has an impending County Court Judgement (CCJ).
- Where the Accredited Person has been the subject of multiple complaints by clients or members of the public and there is cause for concern over civility, integrity or honesty.
- Where there is suspicion or information identifying misuse or unauthorised access to police premises or IT systems.
- Where there is suspicion or information identifying an Accredited Person in breaches of Data Protection Act 2018 legislation.
- Where there is suspicion or information that the Accredited Person has abused their authority as an Accredited Person.

11.5 The investigation may be undertaken by either Surrey Police or by the employer. If investigated by the employer, the Force CSAS Lead will be kept informed of progress and be informed of the results in sufficient detail to enable a decision on how to resolve the suspension.

11.6 Where a shortfall in standard can be attributed to a training deficit or could be positively improved by training, it may be more appropriate to consider suspension of some or all powers while the necessary training is provided. In circumstances where that training fails to achieve the required improvement, then Surrey Police may revoke that individual's powers. Surrey Police and the employer should be aware that having Accredited Persons with different powers within the same organisation may create management issues.

11.7 There are circumstances in which immediate revocation of an individual's accreditation will be appropriate. These are where the Accredited Person

- Changes employer or becomes unemployed.
- Is convicted of an offence that would cause them to fail to meet the vetting standard.
- Has a change of circumstances that alters their vetting status.
- Is confirmed bankrupt, insolvent, or CCJ would result in a vetting failure.

- Has proven complaints against them, which indicate that they lack the civility, integrity or honesty to undertake the role.
- Has been found to have misused or had unauthorised access to police premises or IT systems.
- Has been found to have breached Data Protection Act 2018 Legislation **or**
- Has been found to have abused their authority as an Accredited Person.

11.8 Employers previously approved as fit and proper can have that status reviewed in the following circumstances:

- Failure to adhere to the CSAS principles of reducing crime, disorder, and anti-social behaviour.
- Poor control and supervision of staff.
- Unsatisfactory implementation of joint working initiatives.
- Number of complaints registered by clients / customers about either the employer or their employees.
- Identification of financial problems, i.e., bankruptcy, insolvency.
- Identification of improper practices.

11.9 If the conclusion of a review is that an employer no longer meets the expected standard, action should be taken. This may be an agreed plan for remedial action or, for more serious or prolonged deficiency, treated as grounds for terminating the joint operating and information sharing protocols with that employer and for revoking the accreditation of its employees.

## 12 **Staff Changes**

- 12.1 Employers must notify Surrey Police immediately of any Accredited Person leaving their employment or otherwise ceasing to carry out the functions for which accreditation was granted. That person's CSAS identification card must be returned. New employees seeking accreditation will need to meet the required training standards and will be vetted to the appropriate level.
- 12.2 When an Accredited Person changes employer and wishes to remain accredited, the standard process for vetting the new employer will normally be undertaken. This can happen when security personnel are contracted out and there is a change in service provider albeit the same staff are utilised both pre-contract and post-contract change.

## 13 **Changes to Accredited Persons' Powers**

- 13.1 Employers may wish to add or remove powers available to their accredited staff under Schedule 5 PRA 2002. These will be considered upon receipt of a written request to the Chief Constable, explaining why additional powers are needed, what training will be provided and setting out any changes to supervisory arrangements. Consideration will be given to how the anticipated use of these powers will impact on existing police systems before denial or approval, with or without conditions.
- 13.2 Powers requested to be withdrawn can be affected immediately without the need for further evidence.

13.3 Refer to CSAS Powers Available Under the Police Reform Act 2000\_for more information on the powers available under the PRA.

14 **Contact Details**

14.1 For all enquiries and any further information please contact Surrey Police CSAS  
Lead via: CSASenquiry@Surrey.police.uk

TEAM Neighbourhoods - Local Policing