

---

# Anti-Social Behaviour Management Plan

v1.7 | April 2019



## Tech for good

BT and InLinkUK are working to reduce digital inequality and help make communities better connected. We do this by providing high quality free digital public services through the transformation of BT's legacy payphones into state-of-the-art fibre connected digital community hubs called InLinks.

This not only significantly reduces the number of old payphones, freeing up pavement space and removing sites that previously attracted anti-social behaviour, but each InLink provides communities with an unprecedented suite of essential free services. These include free ultrafast Wi-Fi, phone calls, wayfinding, device charging, an emergency 999 call button, public messaging capabilities, and a platform for future technologies such as air quality monitoring, emergency messaging and 4G/5G mobile coverage.

Since we launched in June 2017 our partnership has seen hundreds of InLinks go live in cities throughout the UK, with over a million unique devices using the InLink Wi-Fi each month, and tens of thousands of tablet sessions and free calls being made each week.

Wherever an InLink is installed we work collaboratively with local stakeholders, including councils and the police to ensure they make a positive contribution to the area. Unfortunately, some users in limited locations abuse this type of service, and we're committed to addressing that.

## Purpose of this Plan

In addition to detailing technical capabilities already developed, this plan presents the process for identification and reporting of anti-social behaviour issues relating to the misuse of the services provided by an InLink, in particular relating to the provision of free phone calls.

It also details the collaborative working process between all parties to agree relevant temporary technical changes (such as call restrictions) and the subsequent extension, removal or amendment of these restrictions in order to support the police and local authorities.

This plan is expected to be an evolving document with future versions building on lessons learned from the application of the agreed process, the testing of existing technical changes and restrictions, as well as the development of new technical features.

Feedback on the approach is welcome from all stakeholders, with all major updates to be undertaken in close consultation with the police to support their work in preventing and managing anti-social behaviour issues in communities across the UK.

As seen with the development of the 'Automatic Anti-Social Call Restriction' technology and to ensure they are well placed to support their local communities now and into the future, InLinkUK and BT are committed to continually improving the InLinks and how any potential misuse is addressed.

## Automatic Anti-Social Call Restriction

The advanced nature of the InLinks and our investment in quality systems means we are able to readily identify the cause of an issue and quickly move to a solution.

Our commitment to working collaboratively with local stakeholders has already led to a number of significant technical and process advances that further help each InLink to make a positive contribution to its local area.

A small number of locations previously saw a concentration effect that drew attention to local drug issues with those involved misusing the InLink free call services. Significant investment saw the development of call restriction capabilities, with these first applied to prevent calls to all mobile numbers on select InLinks in particular problem areas identified in collaboration with relevant police and council community safety teams.

The application of such blanket restrictions (that also disadvantage genuine users), while possibly being suitable for long-term application in some limited circumstances, was used on the InLink network as an interim approach until the following automated call restriction process could be fully developed.

**The automatic recognition of likely anti-social misuse and blocking of the specific identified numbers is based on a proprietary algorithm and technical process developed in consultation with the police and councils from across the UK.** These take into account a range of factors including but not limited to the frequency of attempted and connected calls, the length and distribution of such calls, insights provided by relevant stakeholders, and the experience of BT, as a communications provider, and InLinkUK, as a technology company.

Assessment of call data and application of the algorithm is undertaken directly by BT on a continuous basis with identified numbers restricted for a period of time. If a blocked number continues to be flagged by the algorithm its restriction period will be reset and continued for an extended period.

Should someone believe that their number has been identified in error, they will be able to contact [help@inlinkuk.com](mailto:help@inlinkuk.com) after which the team will consider the case, including in consultation with the police and local council where appropriate. This option will also be highlighted on the warning notification presented on the InLink tablet screen when an attempt is made to call a number that has been restricted.

Subject to internal processes, the police have the capability to 'whitelist' a specific number, ensuring it can still be called where there is an operational need such as being involved in an active investigation.

This Automatic Anti-Social Call Restriction technology is a dynamic feature of the InLinks that can be adapted over time as further insights are gained or as patterns of misuse change.

## Identification of anti-social behaviour issues

As displayed by the investment detailed above, we take our responsibility towards community wellbeing and addressing concerns about anti-social behaviour seriously. Where possible we seek to address any concerns prior to or as part of the planning application process which every InLink must go through.

Unfortunately this is not always possible, and some other pre-existing issues or emerging concerns around possible misuse that are not picked up by the Automatic Anti-Social Call Restriction technology may need to be addressed once an InLink is active.

**In assessing the course of action to be taken, the advice provided to us from police, other emergency services and local authorities will always take precedence,** followed by feedback from other government bodies, and input from local residents and businesses.

To ensure assess any issues and how best to address them, we require:

- A description of the issue and when it occurred(s)
- Location of the InLink(s) involved and how they contributed

It is also important to be provided with supporting evidence (where legally possible) to help us understand the issue (such as data or images) so that the appropriate action can be considered.

Each InLink is remotely monitored (for service compliance) 24 hours a day 7 days a week, and is physically inspected at least once a week and cleaned at least every two weeks. As such, any issues that may occur are likely to be promptly reported to us directly.

Where a police officer, member of the public, or council officer identifies a possible anti-social behaviour issue, there are a range of methods available to make us aware in a timely manner so we can take action as appropriate.

**Sending an email to [hello@inlinkuk.com](mailto:hello@inlinkuk.com) is the main method for reporting an anti-social behaviour issue associated with an InLink** which will automatically raise a query 'ticket' on our system. All such tickets are actively reviewed and managed by the InLinkUK team. Emails sent from police.uk or .gov email addresses will be treated as priority.

Technical issues like display screen failures, graffiti, etc. should be reported to [help@inlinkuk.com](mailto:help@inlinkuk.com).

Should it not be possible or convenient to send an email, it's possible to call the InLinkUK helpline on 0800 3890917 (open 24 hours 7 days).

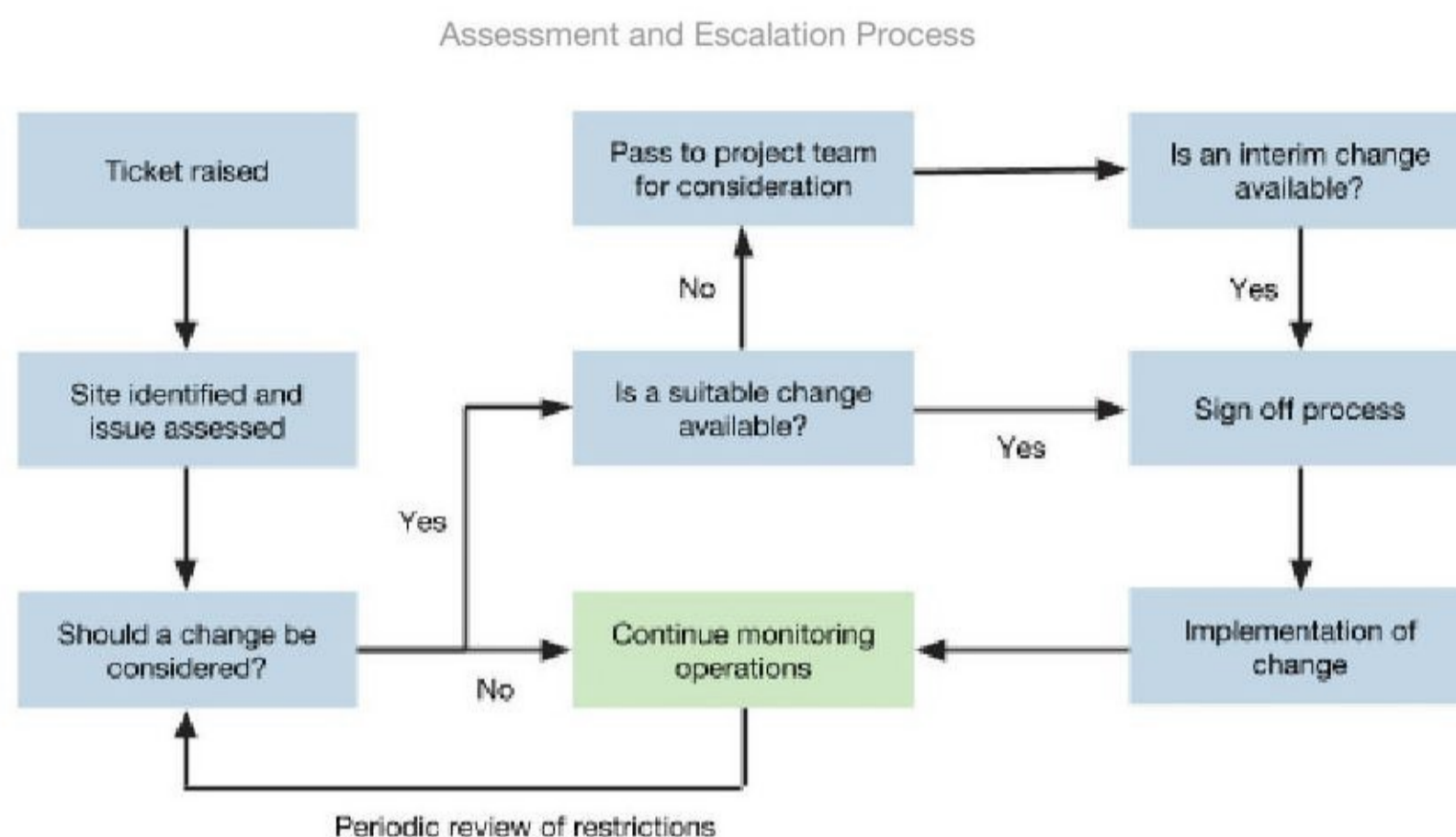
Police and relevant council teams can call the InLinkUK External Affairs Team directly where there is an operational need to deal with something more quickly (contact details provided separately).

Although InLinkUK and BT are committed to working closely with communities to address concerns around anti-social behaviour, suspected incidents of criminal behaviour may need to be managed through official police channels by contacting 101 or 999 in an emergency.

## Assessment and escalation process

On receipt of an identified issue such as a Crime Risk Assessment from the police or similar report from a local authority indicating concern that an InLink or its services may be contributing to crime or anti-social behaviour in an area, InLinkUK and BT will assess the technical solutions available to them to minimise/reduce this from happening.

The location of each InLink means the way they are used and experienced varies. As such, each issue raised is considered on its merits as per the following process:



Where a formal request to apply a technical change is received by a police officer on the rank of Police Inspector or above, InLinkUK and BT will look to promptly apply a suitable technical change in good faith where available and practical to do so (such as restricting calls to mobiles) for a period of 14 days while the relevant evidence is assessed. These will be considered to be an ‘emergency request’ and must be limited to a single InLink or small number thereof.

While each situation will be considered on a case-by-case basis and every effort will be made to act as quickly as possible, we will work toward the following response timelines:

ASB Management Milestone	Response timeline
Acknowledge report of possible anti-social issue	Within two (2) working days
Assessment of evidence provided (or request for further information)	Within ten (10) working days
Application of a suitable or interim change	Within fifteen (15) working days
Emergency assessment of evidence and application of a change	Within five (5) working days
Standard risk location periodic review period	Three months (typical)
High crime risk location periodic review period	Six months

## Determining the suitability of technical changes

Where it has been determined that a temporary or interim technical change to an InLink should be considered, we look to work with the local council and police wherever possible to gather timely evidence and information to allow us to understand what is happening and how best to respond. This could include:

- Reviewing the information provided from any previous tickets;
- Visiting the location and meeting with local stakeholders;
- Speaking with the local police and council to understand any reports they have received and what they are already doing to tackle similar issues in the area;
- Collating relevant media reports, historic records, etc; or
- Assessing InLink data such as anonymised call information, Wi-Fi usage, etc.

Requests for some types of data may need to be made through official channels (such as with requests under the Regulation of Investigatory Powers Act) but where possible and appropriate, InLinkUK and BT will assist with providing councils or the police with details of such channels.

Situations that follow a similar pattern may be handled more quickly based on recommendations from groups such as the police. For example, temporarily restricting the ability to call mobile numbers where it has been proven that an InLink is being misused to buy Class A drugs .

## Implementing available technical changes

The InLinks are actively monitored and adaptable technology, with a range of temporary and interim technical changes available to support the management of anti-social behaviour issues that were included as part of the original design or have been developed over time.

These include but are not limited to:

- Using the display screens to include warnings and relevant information;
- Further reducing the InLink's call speaker volume at night or 24 hours a day;
- Changing the InLink's call service to headset only at night;
- Preventing calls being made to specific types of phone number such as mobiles at certain times of the day or 24x7; or
- Blocking calls to specific telephone numbers (only when agreed with the Police in addition to those captured under Automatic Anti-Social Call Restriction)

Where a change is made it is preferred that this is undertaken in collaboration with relevant stakeholders to minimise any unintended social impacts that may arise. For example, a local council or police command providing additional street teams in the area.

**Case Study: Drug Use in the London Borough of Tower Hamlets**

Following the installation of InLinks in areas around Whitechapel and Bethnal Green Road a number were being misused by some members of the public to purchase Class A drugs.

While it was a long-standing issue in the area and the removal of existing payphones helped alleviate some issues, the introduction of the InLinks drew attention to this type of anti-social behaviour, acting as a congregation point for dealers and users alike.

At the request of the police, no changes were made initially as they were gathering evidence which supported the eventual prosecution and conviction of sixteen people who were given sentences in August 2018 ranging from two years to four years and 8 months.

Following this, it was agreed that InLinkUK would develop the functionality to restrict the ability to call mobile numbers from an InLink, with this tested in November 2018 and implemented as part of a borough-wide trial the following month, supported by additional street teams from the local council.

Additionally, content was placed on the screens to advise the community of the change.



*Example of the message received when trying to call a mobile number*

This collaboration with the council and the police collectively saw a reduction in reports of anti-social behaviour in the areas affected. As such, the decision was made collectively to extend the trial, collect more information, and review the benefits along with the community feedback.

## Sign off and implementation

Any change made to how an InLink is configured at a hardware or software level will require the involvement or agreement of InLinkUK and BT.

BT is designated by OFCOM as a Universal Service Provider of public call boxes for the provision of a publicly available telephone service. This means that any decision to restrict the provision of the phone call service will need to be made exclusively by BT, which will be based in part on the detail provided by the police and local authority, and pay due regard to the evidence presented.

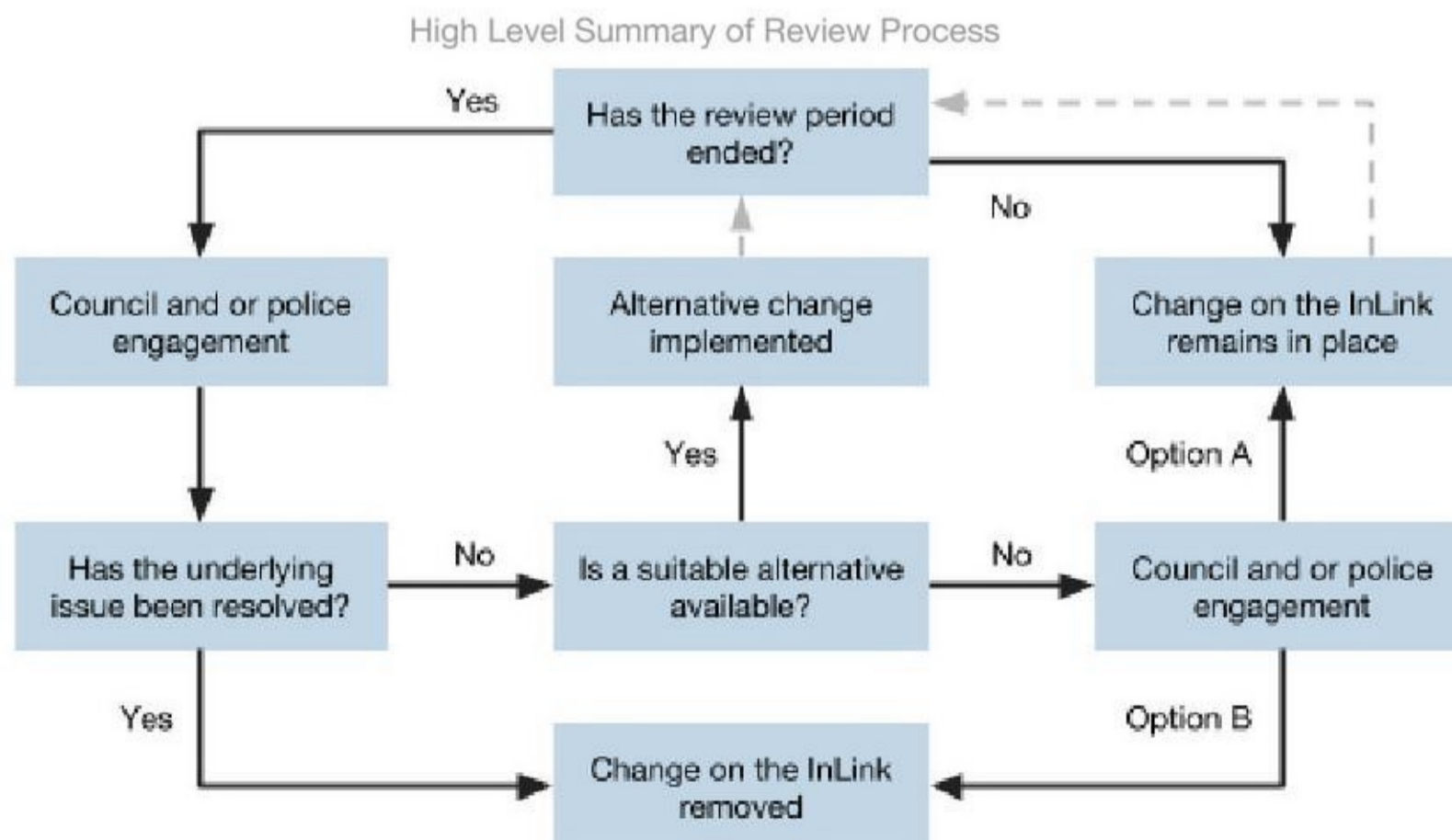
We would always seek to balance any requirement to restrict any services the InLinks provide in order to manage anti-social behaviour with the desire to make them available to all as part of our work to help make communities better connected and reduce digital inequality.

## Review process

Our approach to addressing anti-social behaviour associated with an InLink is to be collaborative, with the success of any intervention relying on the police and or councils taking reasonable steps to help address the underlying issues and the review process being tailored to each local situation.

In the small number of cases where a need to implement a technical change (such as restricting phone calls) has been identified, such a change will be considered to be temporary and applied for a limited period of time (typically three months but up to twelve months in high risk locations). This temporary period enables the police and local council to investigate and take appropriate action.

At the end of the temporary period BT and InLinkUK will review the impact and agree, through consultation with the police and/or council on a case-by-case basis, whether to remove, amend or continue with the temporary change. For example, where the police are looking to undertake an investigation and wish to have a restriction on preventing calls removed.





## Planning conditions

To ensure the effective application of this Plan and to give greater confidence to the police and other stakeholders, we recommend one of the following conditions be included in the planning consent for each InLink depending on its local circumstances:

### Option A

InLink proposed in a standard risk location:

This InLink must be managed in accordance with the InLink Anti-Social Behaviour Management Plan, including the possibility to temporarily restrict phone calls if agreed with the Police Service.

### Option B

InLink proposed in a 'Crime Risk area' as defined by a Designing Out Crime Officer (or equivalent) and agreed by their manager:

A temporary restriction will be put in place on this InLink from activation as agreed with the Police Service, which for example could include the restriction of free calls to mobile numbers, for a minimum period of three (3) months and will not be removed without the Police Service being given a reasonable opportunity to agree in accordance with the escalation process detailed in the InLink Anti-Social Behaviour Management Plan

As noted above, the intention of the Automatic Anti-Social Call Restriction technology is to significantly reduce the opportunities to misuse the free call services provided by an InLink. Over time this will make the application of Option B increasingly less likely.

## Further information

We want each InLink to provide the best possible experience for users and the communities around them and will continue to work with Councils, police and the wider community to make sure they do.

For more information on the InLinks and how they are managed contact [hello@inlinkuk.com](mailto:hello@inlinkuk.com)

This document is authored and owned by InLinkUK. All rights reserved.