BLACK TAXPAYER PROTECTION PLAN

Black Taxpayer Protection (BTP)

Protecting IC3 Black and IC6 Mixed-Black taxpayers from anti-Black racism — fair treatment, real remedies, public accountability.

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Executive Summary

Black Taxpayer Protection (BTP) is an **ic3 Crime Scene Investigators (ic3csi)**–supported effort to **establish an independent delivery entity** that protects **IC3 Black** and **IC6 Mixed-Black** taxpayers from **anti-Black racism**. ic3csi will **support efforts to establish** this entity by publishing standards, providing a verification pathway, and sharing learning via a dedicated BTP section on https://ic3csi.com. The **independent entity** (separate from ic3csi) will operate clear reporting routes, independent case support, prevention and training, and transparent public dashboards—under rigorous governance, safeguarding, and data protection.

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1) Purpose and Scope

- **Purpose:** Ensure IC3/IC6 taxpayers can access timely protection, fair treatment, and effective remedies when harmed by anti-Black racism in public services, workplaces, and markets.

- **Scope:** UK-wide, with phased local pilots. Includes incident reporting/triage, independent case support, prevention and training for institutions, and insight reporting to inform systemic fixes.

- **Approach:** Standards-led, trauma-informed, community-grounded, and evaluation-driven.

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2) What BTP Is (and Is Not)

- **Is:** A taxpayer-focused programme to **stand up** a **separate** organisation that delivers protection and prevention services, measured against published standards and KPIs.

- **Is Not:** ic3csi "running the service." ic3csi acts as **supporter of establishment, standards-setter, verifier, convener, and publisher of learning—not** the operator or controller of service-user data.

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3) Definitions (Clarity for Readers)

- **IC3 Black, IC6 Mixed-Black:** UK race/ethnicity codes used by ic3csi in its framework; this programme centres those taxpayers' experiences and protections.

- **Anti-Black racism:** Racial discrimination, harassment, victimisation, or unfair outcomes directed at Black and Mixed-Black people; includes structural, institutional, interpersonal, and online harms.

- **Independent delivery entity ("the Entity"):** A legally separate organisation responsible for all operations, data, staffing, finances, performance, and reporting.

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4) Theory of Change (Textual)

If we provide safe reporting routes, independent case support, and prevention/training to institutions—under clear standards, transparent KPIs, and independent evaluation—**then** IC3/IC6 taxpayers will experience faster, fairer remedies and fewer repeated harms, **because** institutions will face practical fixes, accountability, and learning loops supported by credible evidence.

Inputs → Activities → Outputs → Outcomes → Impact

- Inputs: Founders, standards, policies, funding, tech, training, community partners.

- Activities: Intake/triage, case support, escalation, prevention training, dashboards, evaluation.

- Outputs: Case actions, prevention plans, learning notes, quarterly public scorecards.

- Outcomes: Faster resolution, higher trust/satisfaction, institutional changes implemented.

- Impact: Reduced disparities, fewer harms, better equality outcomes for IC3/IC6 taxpayers.

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5) Core Service Components (for the Entity)

1. **Intake & Triage**

   o Channels: web form, email, phone, postal, trusted-referrer pathway.

   o Accessibility: plain language, multi-language support, reasonable adjustments.

   o Safety: risk screening; onward safeguarding where required.

2. **Independent Case Support**

   o Functions: advice, signposting, assistance with complaints/grievances, employer/agency engagement, escalation to regulators/ombuds services where appropriate.

   o Boundaries: not legal representation; maintains impartiality and records.

3. **Escalation & Resolution**

   o Protocols for time-bound follow-up, evidence collation, written representations, and negotiated resolution plans.

   o Closure quality checks and user feedback on fairness.

4. **Prevention & Training**

   o Short courses, workshops, and coaching for public bodies and employers (frontline and managers).

   o Practical policy/process improvements with before/after measures.

5. **Insights & Learning**

   o Pseudonymised trend analysis; quarterly learning briefs; annual thematic report.

   o Community assurance sessions to validate findings and priorities.

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6) Non-Negotiable Standards

- **Equality & Integrity:** Mission explicitly focused on protecting IC3/IC6 taxpayers from anti-Black racism.

- **Safeguarding & Whistleblowing:** Written policies; safer recruitment; incident logging; protected channels for staff and users.

- **Data Protection:** DPIA completed; lawful basis documented; minimisation; retention schedule; encryption; access controls; incident response.

- **Transparency & Accountability:** Quarterly public dashboards; annual report; independent evaluator; open methodology.

- **Community Governance:** Advisory panel with IC3/IC6 members; regular public forums.

- **Conflicts of Interest:** Register, policy, and declarations at board and staff levels.

- **Complaints & Redress:** Accessible, time-bound process with escalation routes.

- **Independence:** No operational control by ic3csi; arms-length oversight only for standards verification.

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7) Governance Model (Entity)

- **Legal Form:** Recommended—**CIC** or **Company Limited by Guarantee** (non-profit).

- **Board:** Diverse skills (governance, safeguarding, finance, data, equality, service delivery). Registers of interest published.

- **Advisory Panel:** IC3/IC6 lived-experience voices; input to priorities, risk, and evaluation framing.

- **Committees:** Audit & Risk; Safeguarding & Ethics; Data & Privacy; Remuneration (if needed).

- **Policies:** Governance charter, code of conduct, anti-fraud, expenses, gifts/hospitality.

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8) Operating Model

- **Staffing:** Service lead; case managers; intake coordinators; safeguarding lead; DPO (named); evaluation/learning officer; training lead; administrator.

- **Caseload:** Defined thresholds per caseworker; triage rules for complexity/risk.

- **Hours & Channels:** Minimum Mon–Fri office hours, with emergency signposting out of hours.

- **Accessibility:** Reasonable adjustments policy; accessible formats; interpreter access.

- **Trauma-Informed Practice:** Supervision, reflective practice, vicarious trauma supports.

- **Vendor Management:** Due diligence on any subprocessor or tech vendor.

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9) Data & Privacy Framework

- **DPIA:** Conduct pre-go-live; review on change; record risks and mitigations.

- **Data-Sharing Agreements:** Executed **before** data flows with any partner.

- **Minimisation:** Only collect what is necessary; prefer pseudonymisation for analytics.

- **Security Baseline:** Encryption at rest/in transit; role-based access; MFA; logging and audit trails; secure backups; tested restorations.

- **Subject Rights:** Processes for access, rectification, erasure, restriction, portability, objection; identity verification steps.

- **Records & Retention:** Clear schedules (e.g., case files X years, training records Y years); secure disposal.

- **Incident Response:** Playbook with timelines, roles, notification criteria, learning capture.

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10) Measurement & KPIs

- **Access:** % of IC3/IC6 users reaching support; channel mix; digital inclusion.

- **Timeliness:** Median time to first action; median time to closure/resolution.

- **Outcome Quality:** Independent file audit pass rate; proportion of resolved cases with user-agreed remedy or documented institutional change.

- **User Experience:** Satisfaction and trust scores (post-case and periodic).

- **Prevention Impact:** Number and quality of institutional changes; reduction in repeat harms.

- **Value for Money:** Verified cost avoidance (complaints, disputes, litigation); delivery cost per resolved case.

- **Equality Impact:** Movement in disparities for IC3/IC6 taxpayers where measurable.

Reporting cadence: Monthly internal, **quarterly public dashboard**, annual report with evaluator's findings.

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11) Evaluation

- **Design:** Mixed-methods; baseline + endline; contribution analysis; case audits; user interviews; institutional feedback.

- **Independence:** External evaluator appointed; access to non-identifiable data and staff/users (with consent).

- **Learning Loop:** Quarterly learning notes; changes implemented and tracked.

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12) Risk Register (Illustrative)

1. Data breach → strong controls, DPO, drills.

2. Safeguarding incident → policies, training, escalation.

3. Mission drift → charter, KPIs, board review.

4. Under-reporting → outreach, multiple safe channels, partners.

5. Burnout → supervision, caseload limits, wellbeing plan.

6. Funding gaps → mixed funding model, reserves target.

7. Legal challenge → clear scope, advice, documentation.

8. Reputational attack → comms plan, facts-first responses.

9. Vendor failure → exit clauses, backups, redundancy.

10. Conflicts of interest → register, recusals, audits.

11. Inconsistent quality → SOPs, audits, training.

12. Low institutional uptake → engagement plan, incentives.

13. Scope creep → change control; prioritisation.

14. Security incident (cyber) → MFA, patching, monitoring.

15. Accessibility gaps → user testing, fixes, budget line.

13) Founders' Pathway (Stages)

- **Stage 0 — Publication (Now):** BTP page on ic3csi.com and this PDF.

- **Stage 1 — Expressions of Interest:** Prospective founders signal intent.

- **Stage 2 — Incorporation & Policies:** Choose legal form; adopt core policies (safeguarding, data, complaints, conflicts, equality).

- **Stage 3 — Verification by ic3csi:** Check against standards; list verified entities publicly.

- **Stage 4 — Pilot Mobilisation (~3 months):** Recruit team; agreements; DPIA finalised; tech ready.

- **Stage 5 — Pathfinder Delivery (~12 months):** Operate, publish dashboards, embed learning.

- **Stage 6 — Evaluation & Next Steps:** External evaluation; decide scale-up, replication, or handover.

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14) Verification Checklist (ic3csi)

- Certificate of incorporation and governing documents.

- Board list, biographies, and conflicts policy/register.

- Safeguarding policy & lead; training records.

- Data protection policy; **DPIA** (completed); incident response plan; named DPO.

- Complaints procedure; whistleblowing procedure.

- Equality policy (explicit to anti-Black racism and IC3/IC6 focus).

- Case management SOPs (intake, triage, escalation, closure, audit).

- KPIs and reporting plan; evaluation plan (external).

- Insurance (professional indemnity, public liability, cyber).

- Financial controls; reserves policy; fraud and expenses policies.

- Vendor/subprocessor list with contracts and security assurances.

- Accessibility statement and reasonable adjustments policy.

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15) Directory Listing Rules (on ic3csi.com)

- Only **verified** entities are listed.

- Displayed fields: name, region, mission summary, contact channel, verification date, renewal date.

- Renewal: annual verification or on material change.

- Delisting grounds: loss of standards, unresolved serious incident, or request by the entity.

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16) Technology & Security (Entity)

- **Core Systems:** Secure case management (CRM), email, document repository, telephony, website with accessible intake form.

- **Controls:** MFA, least-privilege access, audit logs, encryption, secure backups, vendor SLAs, penetration testing as budget allows.

- **Data Map:** Intake data, case notes, correspondence, outcomes, training attendance, institutional actions; retention rules documented.

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17) Training & Prevention Offer (Outline)

- **For Public Bodies & Employers:**
  - Understanding anti-Black racism and fair treatment for IC3/IC6 taxpayers.
  - Complaint handling that reduces harm and escalations.
  - Policy/process redesign clinics with metrics.
  - Leadership sessions on governance, data, and accountability.

- **For Community Partners:** Recognising harm, safe signposting, evidence collection basics.

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18) Communications & Accessibility

- **Tone:** Plain English, respectful, practical; avoid jargon.

- **Materials:** Easy-read summaries; translated leaflets where needed.

- **Channels:** Website updates, newsletters, community meetings.

- **Safeguards:** No case details published; only anonymised insights.

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19) Funding & Sustainability (for the Entity)

- **Contracts:** Compete for outcomes-based service contracts where appropriate.

- **Grants:** Build capacity and prevention work through grants from public bodies and trusts.

- **Donations:** Accept with transparency and conflicts safeguards.

- **Reserves:** Target at least 3 months' operating costs as soon as feasible.

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20) Roles & Responsibilities

- **ic3csi:** Support establishment; publish standards; verify readiness; host directory; convene learning; **no operational control and no routine processing of service-user personal data**.

- **Independent Entity:** Full delivery responsibility; data controller; staffing; finance; performance; safeguarding; reporting.

- **Partners:** Cooperate on prevention and remedies; data sharing where lawful; implement improvements.

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21) Complaints, Safeguarding, and Escalation (Entity)

- **Complaints:** Acknowledgement within set days; investigation; written outcome; option to escalate to external bodies.

- **Safeguarding:** Risk screening at intake; incident management; referrals to authorities as appropriate.

- **Serious Incidents:** Board notification; regulator reporting where applicable; public statement template when needed.

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22) Templates and Annexes (Provided on Request)

- **A. DPIA template (outline)**

  1. Processing description and purposes

  2. Lawful basis and special category considerations

  3. Data flows and recipients

  4. Risks and mitigations

5. Consultation (users, DPO, stakeholders)

6. Residual risk and sign-off

- **B. Data-Sharing Agreement (key clauses)**
  - Purpose, lawful basis, roles, data items, security, retention, rights, incident handling, review.

- **C. Safeguarding Policy (headings)**
  - Principles, roles, safer recruitment, training, reporting, recording, referral, review.

- **D. Complaints Procedure (steps)**
  - Receipt, acknowledgement, investigation, response, escalation, learning loop.

- **E. Whistleblowing Policy (essentials)**
  - Protected disclosures, channels, protection, investigation, non-retaliation.

- **F. KPI Dictionary**
  - Precise definitions for Access, Timeliness, Outcome Quality, User Experience, Prevention Impact, VfM, Equality Impact.

- **G. Quarterly Dashboard (fields)**
  - Volumes, timeliness, outcomes, satisfaction, prevention actions, learning notes, case studies (anonymised).

- **H. Evaluation Framework (matrix)**
  - Questions, indicators, data sources, frequency, responsibilities.

- **I. Risk Register (format)**
  - Risk, likelihood, impact, owner, mitigations, status, review date.

- **J. Privacy Notice (outline)**
  - Controller details, purposes, lawful basis, recipients, retention, rights, complaints.

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23) Version Control & Updates

- **This is Version 1.0 (16 October 2025).** Updates will be posted on the BTP page at https://ic3csi.com with a change log. Verified entities should align to the latest standards within a reasonable timeframe.

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24) How to Engage Now

- Visit the **Black Taxpayer Protection (BTP)** page on https://ic3csi.com for updates.

- If you wish to **establish the independent entity,** signal interest via the BTP contact route to request the starter pack (policies, KPI set, verification checklist).

- Public bodies and employers can register interest in **prevention & training**.

Contact

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Legal Note

This document is informational. It does not constitute legal advice or a commitment to fund or procure services. **Operational delivery will be undertaken by an independent entity** that meets the standards set out above. ic3csi supports efforts to establish such an entity and publishes standards, verification outcomes, and learning on the BTP section of its website.