

**BEV HUGHES**  
**DEPUTY MAYOR  
OF GREATER  
MANCHESTER**

Rt Hon Priti Patel,  
Secretary of State for the Home Department  
2 Marsham Street  
London  
SW1P 4DF

28<sup>th</sup> November 2019

Dear Home Secretary

**SUBJECT: HMICFRS PEEL Spotlight Report Shining a light on betrayal: Abuse of position for a sexual purpose**

I write in response to the publication of the HMICFRS Spotlight report that reviewed the progress made within the police service in tackling abuse of position for a sexual purpose.

Ethics and integrity underpin the ethos of 'policing with consent'. It is imperative that the police service creates and fosters an ethical environment where the abuse of position for a sexual purpose is recognised as police corruption and totally unacceptable.

I am pleased to see that some progress has been made since the previous inspection in 2017, including an improved understanding of the problem across the whole of the police workforce and reinforcement of clear standards from police leaders.

However, this is an area of policing that requires constant review. The report makes a series of recommendations, three of which relate directly to Chief Constables that I will respond to below:

***Recommendation - All forces that are not yet doing so should immediately comply with all elements of the national guidance on vetting. By July 2020, all forces that haven't yet done so should vet all personnel to the appropriate standard. Forces should also have a clear understanding of the level of vetting required for all posts, and the level of vetting held by all their officers and staff. Forces should make sure all personnel have been vetted to a high enough level for the posts they hold.***

GMCA, Churchgate House, 56 Oxford Street, Manchester, M1 6EU

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Greater Manchester Police (GMP) comply with all elements of the national guidance on vetting, including the Vetting Code of Practice and the Authorised Professional Practice (APP). All police officers, staff and non-police personnel who have unsupervised physical or remote access to police premises or assets are vetted in accordance with the Vetting Code of Practice.

In addition, GMP personnel are vetted to the appropriate standard and renewals are carried out in line with the specified time periods, as outlined in the Vetting Code of Practice. Regular reviews are undertaken to ensure that staff are vetted to the appropriate level.

***Recommendation - By April 2020, all forces that haven't yet done so should:***

- ***record corruption using the national corruption categories;***
- ***produce a comprehensive annual counter-corruption strategic threat assessment, in line with the authorised professional practice; and***
- ***establish regular links between their counter-corruption units and those agencies and organisations who support vulnerable people.***
- ***Where forces are yet to implement an effective ICT monitoring system that allows them to monitor desktop and handheld devices, they should do so as soon as reasonably practicable.***
- ***By September 2020, all forces should have completed a review of their use of encrypted apps on police ICT systems to understand the risk they pose and to take any necessary steps to mitigate that risk.***

The GMP Anti-Corruption Unit (ACU) currently records corruption using the national corruption categories and will continue to do so. In February 2019, the ACU produced its annual anti-corruption strategic threat assessment. In April 2019, in collaboration with the ACUs from Cheshire, Cumbria, Lancashire and Merseyside police, the content of the GMP assessment was incorporated into the first combined northwest region anti-corruption unit strategic threat assessment.

The Professional Standards Branch (PSB) has over the past few months engaged with other organisations and stakeholders that support vulnerable people, including all witness care staff and district Multi-Agency Safeguarding Hub (MASH) teams. Inputs have been provided to them around Abuse of Position for Sexual Purposes, what to look for and methods of reporting.

GMP already has access to lawful business monitoring software across its ICT estate and the ACU continues to work closely with the Force Information Services Branch to ensure the highest level of auditing and monitoring of Force systems is maintained. A project is also underway as part of the Integrated Operational Policing System (iOPS) implementation to review the use of mobile applications and provide effective solutions for future development. This work will be completed in early 2020.

***Recommendation - By April 2020, all forces that haven't yet done so should make sure they have enough people with the right skills to look proactively for intelligence about those abusing their position for a sexual purpose, and to successfully complete their investigations into those identified.***

In January 2019, the GMP Anti-Corruption Unit conducted a review of its capacity and capability in order to target effectively the threat of corruption, including that specifically posed by officers and staff abusing their position for a sexual purpose. Staffing levels and capability assessments will remain under review to ensure sufficient resources are available.

In response to the previous inspection into abuse of position for a sexual purpose in 2017 Greater Manchester Police was considered to have comprehensive plans involving covert counter-corruption activity and other activities associated with wider professional standards work. I meet regularly with the head of Professional Standards Branch at GMP to discuss any concerns and the processes in place to ensure that our local police maintain the highest level of professionalism and integrity.

Yours sincerely



**Baroness Beverley Hughes**  
**Deputy Mayor of Greater Manchester**  
**Policing, Crime and Criminal Justice**