
BEV HUGHES

**DEPUTY MAYOR
OF GREATER
MANCHESTER**

Rt Hon Priti Patel,
Secretary of State for the Home Department
2 Marsham Street
London
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15th April 2021

Dear Home Secretary

SUBJECT: Disproportionate use of police powers: A spotlight on stop and search and the use of force

I write in response to the recent HMICFRS Spotlight report on the disproportionate use of police powers.

The shocking death of George Floyd and the Black Lives Matters protests that followed in the Summer of 2020 were a stark reminder of the challenges we continue to face as a society and our failure to address properly the scourge of racism and disproportionate practice. It is important that these issues are tackled head on and I welcome the HMICFRS report into the disproportionate use of police powers.

In November of 2020, the Greater Manchester Race Equality Panel was launched. This group, formed and led by community leaders, has a focus to ensure that there is systematic challenge to the structural inequalities that exist between our different communities. This group will have an important role to play in assisting the development of future policy and processes across the Greater Manchester landscape.

Greater Manchester Police is also responding positively and will be publishing a quarterly Race Equality Policing Report on the use of policing powers. These reports will provide information on operational policing, including data on stop and search and the use of force as well as details about progress to increase the diversity of its workforce. It is important to involve communities in the policing matters that impact on them and to be transparent with the data and actions taken. The first report is due for publication in the near future along with a comprehensive action plan. Regular reports will be published thereafter.

The HMICFRS report provides some encouraging findings to suggest that the police service is improving the way data is monitored and analysed, particularly around stop and search. There is also an acknowledgement and appreciation of the need to go further to improve training for police officers to improve the way that they interact with communities. We recognise that if we are to achieve enduring and meaningful change, the leadership in our force has to drive forwards a culture of diversity, inclusion and equality.

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The report highlighted some innovative practice being undertaken by some forces that others may benefit from, including surveys, approaches to training, newsletters and additional scrutiny of stop and search. I have asked my team to consider these aspects for further discussion with police colleagues.

I do however note fully the aspects of the report that the police service is not able to demonstrate consistently. The report makes six recommendations for Chief Constables, that I can respond to as follows:

Recommendation 1 - By July 2022, forces should ensure that officers and staff have effective communication skills, in line with the National Policing Guidelines on Conflict Management. This should be in addition to existing training on conflict management and de-escalation.

It is right that all officers and staff have effective and meaningful training in this area to enable them to understand, assess and manage those situations presented to them. Greater Manchester Police delivers Personal Safety Training that incorporates tactical communications, situational awareness and communication skills. The communication models that are delivered include; the Five Step Appeal, Betari's Box and LEAPS as per the Personal Safety Manual. All inputs being delivered are included in the National Policing Guidelines on Conflict Management, as produced by the College of Policing (CoP) and supported by the Personal Safety Manual.

In February 2021 GMP trainers attended the College of Policing online training course on Conflict Management Delivery and provided feedback to the College to assist in the development of the final training package. Once this package has been finalised, GMP will be in a position to fully implement this with officers.

Recommendation 2 - By July 2021, forces should ensure that communication skills are reinforced as part of the programme of continuing professional development for officers and staff, and that supervisors are supported to routinely and frequently debrief officers on these skills using body-worn video footage.

As referenced above, GMP achieves these deliveries through the Personal Safety Training programme. Communication skills are also reinforced annually when learners return for their continuing professional development refresher training, complying with College of Policing training requirements.

The current training for body-worn video (BWV) is through an online package, which has to be completed to give authority for its use. Within the Personal Safety Training programme there are delivery specific references and presentations around its operational use and the recording.

The subject of Stop and Search continues, rightly, to be an area of discussion and concern for local communities. As part of the ongoing work around improving the use of stop search in GMP, a new training package has been developed internally which will be delivered to all front-line officers over the coming months. Within this training package there is a focus on communication skills and how officers engage with members of the public when conducting a stop and search.

In Greater Manchester, all police stop and search Body Worn Video is currently subject to audit and review, where good practice is identified and promoted. Where there is need for improvement, learning is observed and fed back to the officer at supervision in support of reflective practice.

Recommendation 3 - By September 2021, forces should:

- **ensure that officers record on body-worn video (when this is available) the entirety of all stop and search encounters, including traffic stops and use of force incidents;**
- **have a structured process for regularly reviewing and monitoring internally a sufficient sample of body-worn video footage to identify and disseminate learning and hold officers to account when behaviour falls below acceptable standards; and**
- **provide external scrutiny panel members with access to samples of body-worn video footage showing stop and search encounters and use of force incidents, taking account of the safeguards in the College of Policing's Authorised Professional Practice.**

I understand that GMP is in the process of developing the Use of Force Policy, and this will include the requirement to activate BWV where use of force is anticipated. The use of BWV is already heavily encouraged where conflict situations occur.

In addition, a dip sample process has been established which requires all districts to check ten use of force incidents based on a random sample of custody records. This dip sample process includes the completion of use of force forms and the checking of BWV. The use of BWV is reported through to the Assistant Chief Constable with responsibility for Specialist Operations and is monitored through a number of review groups to ensure compliance and consistency.

On the matter of external scrutiny, a data sharing agreement is in place to allow for the sharing of BWV with independent advisory groups (IAG) and scrutiny panels. There are a number of these panels in place at present and work is ongoing to ensure a consistent model is replicated across all districts. I see this as an important process and my office will continue to work with the police to review the progress made.

Recommendation 4 - By July 2021, forces should ensure they have effective internal monitoring processes on the use of force, to help them to identify and understand disproportionate use, explain the reasons and implement any necessary improvement action.

I am aware that a number of internal strategic and tactical review groups are in place to regularly review the volumes of use of force instances, implement the dip sampling processes and bring together GMP's Professional Standards Branch (PSB) and civil litigation data to review inappropriate use of force. Importantly, these groups also review any disproportionality of use of force with regard to race and age.

Recommendation 5 - By July 2021, forces should ensure they have effective external scrutiny processes in place in relation to the use of force. Forces should take account of feedback and update the scrutiny panel and the community on the action taken.

As outlined above, the involvement of external scrutiny is important to instil public confidence in police processes and actions. The development of such processes across all districts is ongoing and is something my officers will be linking in with.

Recommendation 6 - With immediate effect, forces should ensure that all stop and search records include detail of the self-defined ethnicity of the subject. When this information is refused by the subject, the officer-defined ethnicity code should be recorded.

The computer systems used by Greater Manchester Police have been designed to prompt the completing officer to seek the subjects' self-defined ethnicity at the time of the stop and this then forms part of the stop and search record. On occasions where the subject declines to define, the officer records their own interpretation of the subject's ethnicity. This process is supported with additional officer training where required and through local quality assurance checks by supervision.

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I am confident that we are making good progress in light of HMIC's recommendations and my team will be working closely with the Chief Constable and our officers in continuing to drive forward improvements in light of these.

Yours sincerely



Rt. Hon Baroness Beverley Hughes
Deputy Mayor for Police and Crime

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