
BEV HUGHES

**DEPUTY MAYOR
OF GREATER
MANCHESTER**

Rt Hon Suella Braverman MP,
Secretary of State for the Home Department
2 Marsham Street
London
SW1P 4DF

December 2022

Dear Home Secretary,

SUBJECT: An inspection of vetting, misconduct, and misogyny in the police service

I write in response to the recent HMICFRS inspection on vetting, misconduct, and misogyny in the police service.

I welcome this much-needed HMICFRS inspection report that not only inspects the police's vetting and counter-corruption arrangements but also assesses forces' abilities to detect and deal with misogynistic and predatory behaviour by police officers and staff.

The inspection has reported some deeply concerning practice and inconsistency of approach across the police service in the areas of initial recruitment and vetting and the management of complaints and misconduct matters. Only by working through and tackling these issues head on will we begin to start to re-gain trust and confidence with victims and communities particularly among women and girls. Whilst the report focuses on misogyny and sexualised misconduct, I do believe that the learning should be applied to all protected characteristics and that there is some clear read across to areas such as the National Police Chief's Council (NPCC) / Association of Police and Crime Commissioners (APCC) Police Race Action Plan pillars and actions.

As you may be aware, in Greater Manchester we published our Gender-Based Violence strategy back in December last year. The 10-year strategy sets out a comprehensive, responsive programme of service delivery to enhance the safety of women and girls, while preventing gender-based violence from occurring in the first place and challenging the attitudes and inequalities that enable it. I have been pleased with the policing response to this strategy and the actions that Greater Manchester Police (GMP) have taken through their Violence Against Women and Girls strategy. However, it will remain a challenge for GMP to implement this strategy and deal with predatory and misogynist behaviour within communities without transforming their own systems and cultures. I find it alarming that the number of female officers and staff who responded to the survey alleged appalling behaviour by male colleagues and this must be addressed as a priority. Despite large increases in female officers, I hear that there is still a culture that women must adapt their values and behaviours to fit male cultures to 'get on' in policing and this must also change. I will therefore be recommending to our Chief Constable that the Equality, Diversity, and Inclusion strategy, which he personally leads on, takes account of these recommendations.

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

<u>BOLTON</u>	<u>MANCHESTER</u>	<u>ROCHDALE</u>	<u>STOCKPORT</u>	<u>TRAFFORD</u>
<u>BURY</u>	<u>OLDHAM</u>	<u>SALFORD</u>	<u>TAMESIDE</u>	<u>WIGAN</u>

The report makes 43 recommendations, 29 of which are for policing. I have grouped these into themes as presented within the report:

Updating minimum standards for pre-employment checks.

The need for robust and consistent pre-employment checks and processes is important. Having received a response from the Chief Constable I am assured that the required work will be undertaken to ensure GMP fully adopt the College of Policing's guidance as a minimum standard of pre-employment checks. The Mayor and my successor will hold him to account in this regard.

Establishing better processes for assessing, analysing, and managing risks relating to vetting decisions, corruption investigations and information security.

The report highlights the need for practices and systems to improve, in order to effectively manage the risks around vetting and employment.

The GMP Force Vetting Unit (FVU) has recently updated its vetting case management system to ensure there was capability for the identification of vetting clearance records where the applicant had committed criminal offences (findings of a criminal conviction, caution, reprimand, or restorative justice). Additional work will be undertaken to identify the records of all applicants which contain 'other adverse information.' The FVU has also had an increase in its establishment.

It is important that the FVU maintains a close relationship with the Anti-Corruption Unit (ACU) and Human Resources (HR) units to develop and manage any risk mitigation strategies for its workforce. Whilst the GMP Professional Standards Branch (PSB) manage the vetting and anti-corruption processes, including Business Interests and Notifiable Association policies, assessments will be made to strengthen the relationships between the PSB and Human Resources to ensure a rounded view to any presenting risks.

GMP receives a significant volume of Business Interests applications with administration and approval undertaken by PSB, with refusals and more complex issues being undertaken by the ACU. GMP also has a high level of notifiable associations, and an updated risk assessment tool is being formulated by the ACU, alongside a review process which is triggered by an alert to ensure that conditions are being complied with.

As part of this work, PSB will collaborate with Workforce Development to ensure a targeted period of activity for the workforce to update any change of personal circumstances as part of the personal / annual development review (P/ADR) process, with the necessary updates communicated back with the FVU.

In respect of vetting, I welcome the greater clarity that will come from the relevant recommendations within the report regarding the justification for a post being designated. In June 2021, the FVU commenced a review of all posts across the Force to determine their appropriate vetting clearance level, including designated posts requiring management vetting. This work will remain an area of focus into the next year.

Finally, all corruption related intelligence is categorised by the ACU analyst in accordance with the nationally recognised counter corruption categories. The APP for Counter Corruption is currently being updated and it is anticipated that the categories will remain the same, but this will be checked on its completion to ensure that GMP remains compliant. The categorisation of intelligence received is recorded for supervision and oversight. In addition, the ACU produces an annual counter corruption strategic threat assessment which feeds into the North-West threat assessment and the National Crime Agency (NCA) Counter Corruption Threat Assessment.

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

<u>BOLTON</u>	<u>MANCHESTER</u>	<u>ROCHDALE</u>	<u>STOCKPORT</u>	<u>TRAFFORD</u>
<u>BURY</u>	<u>OLDHAM</u>	<u>SALFORD</u>	<u>TAMESIDE</u>	<u>WIGAN</u>

Improving the quality and consistency of vetting decision-making and improving the recording of the rationale for some decisions.

The current GMP Force Vetting Unit working practice is for all vetting refusals and appeals to be supported by detailed decision and rationale documentation. Decisions are carried out in accordance with the National Decision Making (NDM) model, in respect of reaching a considered conclusion that seeks to meet a legitimate aim. Furthermore, decision making processes conform with the College of Policing's Authorised Professional Practice (APP) for Vetting and the Vetting Code of Practice, and documents appropriately all relevant areas of risk. I understand that the FVU will also develop a dip sampling regime that quality assures decisions and rationale to refuse vetting clearance.

Whilst I am aware that disproportionality monitoring of vetting decisions is currently undertaken through existing IT systems, with oversight by the Head of PSB, I will be supporting the FVU to explore the potential for additional disproportionality monitoring, both in terms of visible and self-defined ethnicity and other protected characteristics.

Understanding and defining what constitutes misogynistic and predatory behaviour in a policing context.

The NPCC Counter Corruption Sexual Harassment policy has recently been reviewed by the GMP PSB Senior Leadership Team. However, I understand that it has not yet been adopted by the Force whilst further work is undertaken to strengthen the policy framework. I expect to see the policy developed, approved and in place soon.

Whilst this work develops, I am aware that PSB are in the final stages of introducing a guide to tackling workplace sexual harassment across the full spectrum of prepare, prevent, protect, and pursue. In addition, in January 2023, GMP is presenting a Sexual Harassment and Misogyny seminar with senior officers at force headquarters, which will include support from national experts as well as GMP leads.

I note a report recommendation that the NPCC work with the Independent Office for Police Conduct (IOPC) to introduce a new prejudicial and improper behaviour identifier flag to the professional standards database used to record complaints and misconduct. There is a need for the police service to await the creation of this and for this to be included within the Centurion case management system. There is also a need to ensure that the definition for the new flag does not overlap with other defined allegations or behaviours. Effective engagement with professional standards leads will be key to the success of the development and implementation of this flag.

Improving the way the police collect corruption-related intelligence.

All intelligence relating to sexual misconduct is subject to a risk assessment by use of a specific tool. This leads to a red, amber, green (RAG) rating. A range of options for each of these cases is then considered and documented. A comprehensive suite of options is contained within the ACU risk assessment document. Where information or intelligence as to sexualised behaviour initially comes to the attention of the PSB, it is immediately passed to the ACU, with a checking mechanism at Daily Demand Management meetings.

The ACU has established relationships with external bodies that support vulnerable people. In 2021, the ACU single point of contact engaged with all the North West Local Authority Designated Officers to give an overview of the GMP position. I am pleased to report that this activity encouraged reporting and provided the necessary information as to the established route in to GMP for reports of this type via the ACU. Contact details were provided, and delegates were assured of the fact any information would stand as valuable intelligence and / or would be a starting point for an investigation.

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

<u>BOLTON</u>	<u>MANCHESTER</u>	<u>ROCHDALE</u>	<u>STOCKPORT</u>	<u>TRAFFORD</u>
<u>BURY</u>	<u>OLDHAM</u>	<u>SALFORD</u>	<u>TAMESIDE</u>	<u>WIGAN</u>

The ACU actively seeks corruption-related intelligence as a matter of routine. GMP has good levels of intelligence reported and captures the sources of this intelligence to assist understanding.

Liaison has taken place between the ACU, Association of Women in Policing (AWP) and the Force Violence Against Women and Girls (VAWG) lead to explore the opportunities for proactive intelligence development from the listening circles initiative. An introductory document has been provided by the ACU for the facilitators of these events to encourage reporting.

I am also aware that a poster campaign has been undertaken to advertise the numerous routes of reporting into the ACU. For in-force communications that link to corruption, there is signposting to the Crimestoppers integrity reporting telephone number, and a web portal now with the repetitive tag line 'See it, report it, sort it.'

Improving the way police assess and investigate allegations of misconduct.

A criminal investigation for any offence, whether it be on or off duty, is recorded in compliance with the Home Office National Crime Recording Standards (NCRS) and documented on the iOPS crime recording platform, ensuring such allegations are featured within all appropriate annual data returns.

Each complaint or conduct investigation is subject to an initial severity assessment and all proportionate and reasonable lines of enquiry will be identified together, alongside a formulation of a Terms of Reference (TOR), as is the statutory requirement. Lines of enquiry will include both overt enquiries and covert enquiries led by the ACU.

Within the PSB, specifically the overt Complaints and Misconduct Unit function, work will be undertaken to ensure there is a clear investigative plan recorded on Centurion for every case. Additionally, when conducting criminal inquiries there is an opportunity for investigators to better record investigation plans.

Finally, as GMP did not form part of the initial fieldwork for this inspection, I have since received confirmation from the Chief Constable to undertake and document a review of all allegations relating to prejudicial and improper conduct, in addition to taking forward any learning identified. Whilst it is anticipated that there will be a degree of complexity in identifying all applicable cases over a three-year period, due to a change in case management systems and the need to agree a definition to use for the review, there is a commitment to do so, and I will ensure this is followed through and reported back to my office.

I am confident that we are making good progress in light of the report recommendations and my team will be working closely with the Chief Constable to drive further improvements.

Yours sincerely



Rt. Hon Baroness Beverley Hughes
Deputy Mayor of Greater Manchester

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

<u>BOLTON</u>	<u>MANCHESTER</u>	<u>ROCHDALE</u>	<u>STOCKPORT</u>	<u>TRAFFORD</u>
<u>BURY</u>	<u>OLDHAM</u>	<u>SALFORD</u>	<u>TAMESIDE</u>	<u>WIGAN</u>