
KATE GREEN
**DEPUTY MAYOR
OF GREATER
MANCHESTER**

Rt Hon Yvette Cooper
Secretary of State for the Home Department
2 Marsham Street
London
SW1P 4DF

Date: Tuesday 5th November

Dear Home Secretary,

SUBJECT: HMICFRS Inspection response - *An inspection into activism and impartiality in policing*

I write in response to the recent publication of the HMICFRS report '*An inspection into activism and impartiality in policing*'.

I wish to start by thanking HMICFRS for producing such a comprehensive and thorough report into a topic they themselves describe as "one of the most challenging inspections...carried out". I very much welcome the findings and the 22 recommendations identified by HMICFRS. Further, I pay specific notice to the nine recommendations within the report specifically identified as for the attention of chief constables and forces. I have discussed the report with the Chief Constable of Greater Manchester Police (GMP) and provide below responses to each of those nine recommendations. We will continue to discuss the findings, particularly in respect of 'operational independence', and to monitor implementation of recommendations.

I was particularly pleased to see within the report that GMP were spotlighted for several positive actions they take in ensuring a diverse range of voices are heard in the development of their policies and processes. This is something that has been subject to continuing dialogue between myself and the Chief Constable since the atrocities committed by Hamas last year. I have been reassured and I remain confident in GMP's approach to the very challenging context faced that has followed that attack, and it is welcome to see further validation from HMICFRS. Such examples include

- The way in which GMP ensure that Equality Impact Assessments are conducted for all policies prior to sign off.
- How GMP consider how the cost of living and financial hardship may have affected their officers and staff and how such considerations are used when making decisions about where to post them
- How GMP aims to provide equal support to different protected characteristic groups.
- The breadth of consultation undertaken when policies are written or amended
- The use of positive imaging in its recruitment campaigns to attract candidates from under-represented communities within its workforce, rather than an overtly targeted recruitment campaign.

Before providing a summary of GMP's responses to the nine recommendations for Police forces, I wish to provide my own thoughts on Recommendation 7 and the challenge identified within the report as to

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the fine balance needed between political oversight and accountability of police forces versus political interference and influence.

This issue is something that the Mayor, myself and my staff take very seriously. The Chief Constable takes the same view and we are very clear between ourselves where the line lies in respect of 'operational independence.' As you will appreciate, at times this can be a very difficult balance, as the public often believe that the Mayor has the power to direct the force what to do. As the report identifies, this perception can often be reinforced by the public comments of other elected politicians or indeed the media. The Mayor and I are always very clear about this issue in public, the Mayor most recently clearly articulating this at his public Question Time last month. However, given the emphasis in HMICFRS' report, this is an issue that I intend to continue to give ongoing attention.

Recommendation 7

By 31 July 2025, the Home Office, in consultation with the National Police Chiefs' Council and the Association of Police and Crime Commissioners, should publish guidance for the term "operational independence" within the Policing Protocol Order 2023.

Notwithstanding the positive and mature relationship that exists between the Mayor, myself and the Chief Constable, it is clear that there are differing relationships and experiences on some parts of the country. I support the recommendation and will participate with the APCC in terms of developing their approach, working with the Home Office and NPCC.

Summary of GMP response to HMICFRS Recommendations

Recommendation 9

Within six months of the College of Policing updating its engagement and communication authorised professional practice, forces should update their policies to reflect the College of Policing advice on communicating about politicised and contentious issues.

This has already been built into GMP's policy plan and they will update the impacted policies as and when further advice is published by the College of Policing.

Recommendation 10

By 31 March 2025, chief constables should give clear direction to their workforce about wearing and displaying visible representations. They should make sure that they clearly communicate such policies to the workforce and that they enforce the policy. Chief Constables should regularly review these policies to respond to new causes that arise. The National Police Chiefs' Council should support chief constables in achieving a consistent approach.

In GMP, it is the Uniform & Dress Standards Policy which dictates the rules in respect of wearing of badges and Velcro patches. The Uniform & Dress Standards Policy is reviewed on a two-year rolling basis or as and when changes and updates are required under the Governance of the Uniform and Equipment Review Group, chaired by an Assistant Chief Constable.

The Policy was last published on Chief Constable's Orders in January 2023. The policy is extremely clear on the wearing of visible representations in that the only authorised patches and badges are those that support a legitimate policing operational requirement. Other Velcro patches or symbols that have no authorised operational function, nor are police related, but are linked to specific dates, celebrations or memorials are not permitted without clear authorisation from district/branch Commanders. The Governance of the Uniform and Equipment Review Group maintains oversight of all authorisations.

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These requests and authorisations are assessed on a case-by-case basis and wearing of them may be restricted to a particular timeframe e.g. wearing of the remembrance poppy during November.

The Chief Constable, from immediately upon taking up his post, has been very clear that it is not appropriate for officers and staff to purchase Velcro patches and wear these upon their uniform if they do not satisfy either of the above requirements.

Recommendation 12

By 31 July 2025, chief constables should make sure that those personnel responsible for completing equality impact assessments are appropriately trained to do so. Chief constables should also make sure there are effective governance measures in place to improve the quality of these assessments and make sure they are completed when required.

GMP's Head of Strategy, Policy and Planning officers, Strategy and Policy Officers, and all Policy Assistants have completed two training courses on how to effectively complete equality impact assessments (EIAs), including an input from the College of Policing EIA Team.

To ensure effective governance and improve quality, the Strategy, Planning and Policy Team have built a bank of good practice and reputable sources to consult when completing EIA's. This includes re-building partnerships with local third sector organisations, community groups and advisory groups, to consult with and gain further advice and guidance. Localised knowledge of specific issues that may impact those covered by EIAs (and those the Force include although not set out as necessary in law) ensures that GMP is cognisant of how policies and procedures will impact the populations of Greater Manchester, including staff.

Recommendation 13

By 31 March 2025, all chief constables should audit their policies that include or relate to the Equality Act 2010. They should make sure there is an effective process for regularly reviewing and updating policies and have appropriate governance arrangements in place.

GMP have commissioned their Corporate Development and Diversity, Equality, Inclusion (DEI) Teams to scope all existing policies that relate to the Equality Act 2010.

An overall policy review is also in progress, meaning that all Force policy that is past its review date has been risk rated and is in progress to be updated. This review has been built into the force's Policy Plan.

GMP have also taken steps to develop and implement a robust policy life cycle process, along with a policy dashboard, which will be reported on monthly to the Force's performance meeting. This new structure will make it easier for GMP to review policy in a timely manner, and ensure organisational buy in to policy review, making it more effective and efficient.

Recommendation 16

By 31 March 2025, forces should update and implement their policies and guidance for non-crime hate incidents to provide clear direction to officers and staff for the assessment and recording of, and response to, these incidents.

All GMP staff received, via email, the briefing from the College of Policing on 'Key Terms for the process for Recording Non-Crime Hate Incident. (NCHI)' This set out a list of terms and an accompanying flowchart. Policies and guidance were published to all staff in June 2023.

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Training guidance has also been issued, which includes:

- Information on the Code of Practice
- APP issued June
- College of Policing (CoP) Training
 - An e-briefing learning product: Process for recording NCHIs (this product is designed for call takers, officers and staff involved in recording and reviewing NCHIs to help them understand and apply the Code's provisions)
 - A flow chart and key terms document (designed to be downloaded and to provide a visual aide to support decision making)
 - An interactive decision tree (designed for officers and staff to use as an online tool to support decision making. This product is accessible on a mobile device)
- CoP decision tree to assist decision making for staff.
- Interactive Decision Tree for Recording NCHIs
- NCHI training for all frontline officers and officers and staff within Force Contact, Crime and Operations (FCCO) including Crime Recording and Resolution Unit (CRRU) and Dispatch officers and staff.

An audit of policies and guidance in this area will also be undertaken by the Corporate Development Branch prior to March 2025.

Recommendation 17

By 31 March 2025, forces should make sure their recording processes for hate-related incidents allow them to analyse data relating to hate crimes and non-crime hate incidents.

A guidance document has been produced by the Prevention Branch within GMP and has been disseminated to all staff to help them to familiarise themselves with NCHI recording processes.

The flagging and qualifier systems allow hate crime data to be analysed along with NCHI. This system is being reviewed to ensure that all flags are captured when crimes are recorded to improve the data quality. Training guides and guidance around flags and qualifiers were recirculated as part of hate crime awareness week (October 12th – 19th), and in addition a more robust local hate crime governance structure for districts and branches has been put in place and will begin in November 2024.

Recommendation 18

By 31 March 2025, chief constables should make sure their force has an effective and efficient process for assessing and reviewing hate incidents.

A process has been implemented by the Prevention Branch with an accompanying guidance document and is now business as usual. It was presented to HMICFRS in September 2023. Other police forces have since been in contact to request assistance for implementation of this process in their organisation.

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A weekly download is conducted by the Prevention Branch. All NCHI are audited and if an incident fails this audit, further work is done to identify and review the failures for appropriate correction and organizational learning and development.

Recommendation 20

By 31 March 2025, forces should make sure they clearly define in policies the requirements for recording personal data for non-crime hate incidents. If the force approach differs from ‘Non-Crime Hate Incidents: Code of Practice on the Recording and Retention of Personal Data’, the force should record the rationale for this.

GMP already falls in line with the correct policies and guidelines, which have been sent to all staff and are readily available on the intranet.

Recommendation 22

By 31 March 2025, all forces should make sure they have a robust assessment process for allocating funding and giving support to their networks. They should prioritise funding and support based on local need.

The Staff Support Networks (SSN) in GMP have allocated funding based on historic needs. This is currently in the process of being reviewed along with the SSN Memorandum of Understanding and governance to ensure that SSNs have clarity around their role and sufficient support and funding.

Yours sincerely,



Kate Green
Deputy Mayor of Greater Manchester