

PEEL: Police legitimacy (including leadership) 2017

A report on the limited inspection of Greater
Manchester Police



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Introduction

As part of its annual inspections into police effectiveness, efficiency and legitimacy (PEEL), HM Inspectorate of Constabulary and Fire & Rescue Services (HMICFRS)¹ assesses the legitimacy and leadership of police forces across England and Wales.

Police legitimacy – a concept that is well established in the UK as ‘policing by consent’ – is crucial in a democratic society. The police have powers to act in ways that would be considered illegal by any other member of the public (for example, by using force or depriving people of their liberty). Therefore, it is vital that they use these powers fairly, and that they treat people with respect in the course of their duties.

Police legitimacy is also required for the police to be effective and efficient: as well as motivating the public to co-operate with the police and respect the law, it encourages them to become more socially responsible. The more the public supports the police by providing information or by becoming more involved in policing activities (such as via Neighbourhood Watch or other voluntary activity), the greater the reduction in demand on police forces.

To achieve this support – or ‘consent’ – the public needs to believe that the police will treat them with respect and make fair decisions (while taking the time to explain why they are making those decisions), as well as being friendly and approachable.² This is often referred to as ‘procedural justice’. Police actions that are perceived to be unfair or disrespectful can have extremely negative effect on police legitimacy in the eyes of the public.

Police officers and staff are more likely to treat the public with fairness and respect if they feel that they are being treated fairly and respectfully, particularly by their own police force. Therefore, it is important that the decisions made by their force about matters that affect them are perceived to be fair.³ This principle is described as

¹ This inspection was carried out before 19 July 2017, when HMIC also took on responsibility for fire & rescue service inspections and was renamed HM Inspectorate of Constabulary and Fire & Rescue Services. The methodology underpinning our inspection findings is unaffected by this change. References to HMICFRS in this report may relate to an event that happened before 19 July 2017 when HMICFRS was HMIC. Citations of documents which HMIC published before 19 July 2017 will still cite HMIC as the publisher.

² *It's a fair cop? Police legitimacy, public cooperation, and crime reduction*, National Policing Improvement Agency, September 2011. Available at:
http://whatworks.college.police.uk/Research/Documents/Fair_cop_Full_Report.pdf

³ *Fair cop 2: Organisational justice, behaviour and ethical policing*, College of Policing, 2015. Available at:
http://whatworks.college.police.uk/Research/Documents/150317_Fair_cop%20FINAL_REPORT.pdf

'organisational justice', and HMICFRS considers that, alongside the principle of procedural justice, it makes up a vital aspect of any assessment of police legitimacy.

One of the most important areas in which internal organisational justice and external procedural justice principles come together is the way in which police forces ensure that their workforce behaves ethically and lawfully. In HMICFRS' 2017 legitimacy inspection, we continued our assessment of how well forces develop and maintain an ethical culture and we re-examined how forces deal with public complaints against the police. How this is done needs to be seen to be fair and legitimate in the eyes of both the police workforce and the general public.

As part of this year's inspection, we also integrated aspects of leadership into our assessment of legitimacy, as the two areas are closely linked. We assessed the role that leadership plays in shaping force culture, the extent to which leadership teams act as role models, and looked at how the force identifies and selects its leaders.

While our overarching legitimacy principles and core questions remain the same as last year, our areas of specific focus continue to change to ensure we are able to assess a full range of police legitimacy topics, including emerging concerns or Home Office commissions. As such, it is not always possible to provide a direct comparison with last year's grades. Where it is possible to highlight emerging trends in our inspection findings between years, we do so in this report.

A separate report on the force's efficiency inspection findings is available on our website (www.justiceinspectorates.gov.uk/hmicfrs/peel-assessments/peel-2017/greater-manchester/efficiency/). Our reports on police effectiveness will be published in early 2018. Our 2016 reports on forces' effectiveness, efficiency, and legitimacy are available on our website:

www.justiceinspectorates.gov.uk/hmicfrs/peel-assessments/peel-2016/greater-manchester/.

More information on how we inspect and grade forces as part of this wide-ranging inspection is available on our website (www.justiceinspectorates.gov.uk/hmicfrs/peel-assessments/how-we-inspect/).

Force in numbers



Workforce

Total workforce (full time equivalents) as of 31 March 2017

10,356

Total workforce breakdown (full time equivalents) as of 31 March 2017

officers

6,318

staff (including section 38)

3,438

PCSOs

600



Ethnic diversity

Percentage of BAME in workforce 31 March 2017

overall workforce

6.3%

officers

6.0%

staff

6.1%

PCSOs

10.0%

Percentage of BAME in local population, 2011 Census

16.2%



Gender diversity

Percentage of females in overall workforce 31 March 2017

Greater Manchester Police

40%

England and Wales population, 2015 estimate

51%

Percentage of females by role 31 March 2017

officers

30%

staff

62%

PCSOs

39%



Grievances

Number of grievances per 1,000 workforce raised and finalised 10 months to 31 March 2017



Stop and search

Number of stops and searches carried out in 2015/16 (excluding 'vehicle only' searches)

4,964

Number of stop and searches per 1,000 population in 2015/16



Note: All figures exclude section 38 staff unless stated otherwise. For further information about the data used, including information about section 38 staff, please see annex A.

Overview – How legitimate is the force at keeping people safe and reducing crime?

Overall judgment⁴

Ungraded

After the terrorist attack at Manchester Arena on 22 May, in which 22 people were killed by a suicide bomber, HMICFRS decided jointly with Greater Manchester Police that we would not undertake our early June inspection fieldwork. HMICFRS later completed a limited inspection, which included a series of interviews and visits to operational departments and police stations. Although we were unable to implement the full inspection methodology, our inspection was sufficient to allow us to report on the legitimacy of Greater Manchester Police and to provide a descriptive assessment, although not to award a graded judgment.

In 2016, the force was judged to be good for legitimacy, including good for the extent to which the force treated people with fairness and respect, good for the extent to which the force ensured its workforce behaved ethically and lawfully, and good for the extent to which the force treated its workforce with fairness and respect.

Overall summary

Police officers and staff in Greater Manchester Police understand the importance of treating the public fairly and with respect. Those we spoke with demonstrated good understanding of unconscious bias and recognised the importance of effective communication skills. Greater Manchester Police monitors the use of force and other coercive powers by its officers and staff, including stop and search, to assure itself that its workforce treats people with fairness and respect. The use of such powers is also subject to external scrutiny by a range of independent bodies.

Officers and staff we spoke with told us that, overall, senior leaders set, model and maintain ethical values. The force's internal standards board and external independent ethics committee provide effective direction and challenge to support ethical decision-making at all levels. The force makes it easy for people to access the complaints system, but we found inconsistent records relating to continuing contact with complainants. The officers and staff we spoke with are confident they can identify and challenge potential discrimination, but we were disappointed to find that the force was not consistently referring cases to the Independent Police Complaints Commission (IPCC) when discrimination was identified. The force has taken action to address both of these areas. The quality of investigations into allegations of discrimination is generally high.

⁴ HMICFRS judgments are outstanding, good, requires improvement and inadequate.

The force works hard to ensure it treats its workforce with fairness and respect. Senior leaders encourage the workforce to provide feedback and challenge, and members of the workforce seem comfortable to do so. The force identifies and responds well to workforce concerns and is taking effective action to reduce disproportionality in the workforce. Workforce wellbeing continues to be a priority for the force. This is reflected both in the force's focus on early intervention to identify and support wellbeing, and the workforce's positive perceptions of the wellbeing provision. The force's approach to managing individual performance remains inconsistent, although this year we were satisfied that line managers are holding regular meetings with their officers and staff. Its identification and management of those with leadership potential is also inconsistent, although it has revised promotion selection processes to ensure fairness, and we found that members of the workforce were confident these processes were more accessible, fair and open.

Areas for improvement

- The force should improve the availability of its printed information about how to make a complaint, particularly at front counters of police stations and in custody units, as well as to non-police premises or organisations, in line with IPCC statutory guidance.
- The force should improve the quality, timeliness and recording of updates to complainants, in line with IPCC statutory guidance. These principles should be extended to witnesses and to those who are the subject of allegations.
- The force should ensure that all allegations which meet the mandatory criteria for referral to the IPCC are so referred.
- The force should implement and then monitor the effectiveness of the revised personal development process for officers and staff throughout the force.
- The force should improve the awareness among the workforce of the talent management process and increase their confidence and participation in the scheme.

To what extent does the force treat all of the people it serves with fairness and respect?

College of Policing research suggests that, in the eyes of the public, police legitimacy stems primarily from the concept of ‘procedural justice’: the expectation that officers will treat the public respectfully and make fair decisions (explaining their reasons openly and clearly), while being consistently friendly and approachable.⁵

While HMICFRS recognises that police legitimacy stems from broader experiences of the police than by direct contact alone, our inspection focuses specifically on assessing the extent to which forces make fair decisions and treat people with respect during their interactions with the public. To do this, we looked at how well leaders can demonstrate the importance they place on procedural justice and how well the workforce understands these principles and applies them. Also, we assessed how well the force scrutinises the extent to which procedural justice takes place, particularly with regard to coercive powers, including the use of force and stop and search.

To what extent does the force understand the importance of treating people with fairness and respect?

HMICFRS assessed the extent to which leaders of the force understand the importance of procedural justice, and the arrangements they have made to provide the workforce with the knowledge, skills and understanding they need to treat all the people they serve fairly and with respect. We examined the workforce’s understanding of the principles of procedural justice (being friendly and approachable, treating people with respect, making fair decisions, and taking time to explain these decisions). We did this by checking their understanding of the concept of unconscious bias,⁶ their awareness of effective communication skills⁷ in all

⁵ *It’s a fair cop? Police legitimacy, public cooperation, and crime reduction*, National Policing Improvement Agency, September 2011. Available at: http://whatworks.college.police.uk/Research/Documents/Fair_cop_Full_Report.pdf

⁶ Personal biases are influenced by factors including people’s background, personal experiences and occupational culture, and they can affect our decision-making. When we make quick decisions, these biases can, without us realising, disadvantage particular groups of people. It is vital that police officers understand their own biases and how to overcome them, to ensure the decisions they make are fair.

⁷ Research into the effect of communication skills training in Greater Manchester Police (e.g. showing empathy, building rapport, signposting and using positive and supportive language) showed this improved officer attitudes and behaviours and had a “significant positive effect” on the quality of interactions between police officers and victims. See: <http://library.college.police.uk/docs/college-of-policing/Technical-Report.pdf>

interactions with the public and their appropriate use of coercive powers (with a specific focus on stop and search and use of force).⁸

Understanding the importance of treating people with fairness and respect

In our 2016 legitimacy inspection HMICFRS found that Greater Manchester Police recognised and understood the importance of procedural justice. We are pleased to see that positive progress has continued this year. The force's target operating model, which sets out the services it will provide by 2020 and how it will do so, includes an emphasis on the importance of treating people fairly and with respect. The force's leadership programme, which all supervisors are required to complete, focuses on ethical and personal leadership, including the importance of procedural justice. A recent review of training courses has ensured they all include an emphasis on equality, diversity, human rights and ethical decision making.

Understanding of unconscious bias

Greater Manchester Police has incorporated unconscious bias training into the leaders programme and, according to force records, over 800 first-line supervisors have now completed this course. Those involved in recruitment and promotion selection processes have been trained in the identification and avoidance of unconscious bias, including in the recent recruitment drive targeting applicants from under-represented groups, particularly from black Asian and minority ethnic (BAME) backgrounds. All of the officers we spoke with were able to explain what unconscious bias is and how they are able to identify and avoid it in undertaking their duties, although only a few said that they had received recent training in unconscious bias.

Communication skills

The force is recruiting 500 new police officers in 2017/18 as part of its plan to recruit 2,000 new officers by 2020, largely to replace those officers who are expected to retire. It has incorporated effective communications training into the initial student officer training programme. The force also provides a dedicated communication skills training course for officers and staff who have direct contact with the public, including for police community support officers (PCSOs) and police staff working in public enquiry offices. The course involves an initial two-day session. According to figures provided by the force, over 3,500 officers and staff have completed this training.

⁸ *Authorised Professional Practice on Stop and Search*, College of Policing, February 2017. Available from: www.app.college.police.uk/app-content/stop-and-search/; *Authorised Professional Practice on Use of Force*, College of Policing, October 2013. Available from: www.app.college.police.uk/app-content/public-order/core-principles-and-legislation/police-use-of-force/; and *College of Policing and National Police Chiefs' Council, Personal safety manual*, 2016. Available from: <http://library.college.police.uk/docs/college-of-policing/PSM/PSM-MOD-01-INTRODUCTION.pdf>

During our inspection we spoke with several officers and police staff who had received this training and everyone we spoke with was aware of the importance of effective communication skills.

Use of coercive powers

Greater Manchester Police has provided a range of training to officers and staff on the use of coercive powers, including specific input during initial student officer training, the annual mandatory one-day personal safety refresher training, and a half-day of classroom training on the use of stop and search (which officers undertake after successfully completing the online training package).

The force has revised its mandatory personal safety training to focus on teaching officers to make better decisions on the use of force and coercive powers. Re-branded as “Take a step back and...”, the training comprises an initial classroom-based session covering relevant legislation and powers, the Code of Ethics and the National Decision Model, with the emphasis on teaching officers the discipline of using effective communication skills to create the time and physical space to allow for improved decision making. Officers are taught to use the ‘PLANE’ test: assessing their actions and decisions to ensure that they are proportionate, legal, accountable, necessary and ethical. The classroom session is followed by a series of practical scenarios in which officers demonstrate and reinforce the theoretical learning. Unlike the previous officer safety training, which tested the technical competence of officers to use proportionate techniques, the revised training assesses the application of learning and not all scenarios are designed to result in the use of force.

All the officers we spoke with had received personal safety refresher training in the last 12 months and were able to demonstrate a good understanding of the Code of Ethics and National Decision Model.

How well does the force understand the extent to which its workforce treats people with fairness and respect?

HMICFRS continues to examine the extent to which forces work to identify and understand what affects people's perceptions of fair and respectful treatment. This year we re-assessed a specific aspect of fair and respectful treatment that we examined in PEEL 2015: the use of force⁹ and stop and search powers. Specifically, we inspected the extent to which forces record data and how well they scrutinise data and other information, including through external scrutiny,¹⁰ to understand and improve the use of these powers. In the case of stop and search, the next section sets out our findings. It includes our assessment of the reasonableness of recorded grounds for stop and search.

Scrutiny of use of force to improve treatment

On 1 April 2017, Greater Manchester Police adopted the National Police Chiefs' Council's (NPCC's) standards for recording the use of force. Before implementing the new standards the force held a community review panel, inviting representatives from a wide range of local communities to offer their views on what was important to the public. The introduction of the new requirements was communicated to officers and staff using a variety of methods from electronic briefings to face-to-face communication. The feedback from the community review panel was used by Greater Manchester Police to shape how it monitors the use of force by its officers.

A use of force working group monitors the use of force against a range of criteria, including gender, age, ethnicity, mental health and severity of injury, to identify evidence of potential disproportionality or opportunities for learning. In addition to the requirements of the NPCC's standards, the force records the use of tactical communication by officers and staff and the circumstances in which potentially volatile situations are resolved through effective communication without the

⁹ In 2015 HMICFRS found a generally positive picture of force oversight arrangements for use of Taser. However, in 2016, we found that many forces did not have similar levels of oversight for other types of use of force. As a result of a review undertaken by the National Police Chiefs' Council, all forces have been required to collect a minimum data set in respect of use of force since April 2017. The review is available at:

www.npcc.police.uk/documents/uniformed/2016/Use%20of%20Force%20Data%20Report%20to%20Home%20Sec.pdf. Also see *Authorised Professional Practice on Use of Force*, College of Policing, October 2013. Available from: www.app.college.police.uk/app-content/public-order/core-principles-and-legislation/police-use-of-force/

¹⁰ *Independent Advisory Groups: considerations and advice for the police service on the recruitment, role and value of IAGs*, College of Policing, 2015. Available at: www.college.police.uk/What-we-do/Support/Equality/Documents/Independent_advisory_groups_advice_2015.pdf

escalation to the use of force. The working group reports to the external independently chaired ethics committee and has also provided data and feedback to the community review panel.

Greater Manchester Police's internal confidence and equalities board is responsible for overseeing and monitoring progress against the force's equality, diversity and human rights strategy. This board has representatives from each borough of the force, staff associations, trades unions and staff support networks, as well as senior leaders from the professional standards and organisational learning and workforce development branches. One of the functions of the board is to monitor the use of coercive powers and identify any problematic areas. A recent example of this analysis and monitoring of the use of coercive powers leading to a change in the way the force operates is its deployment of police dogs. The force identified that, compared with other forces in England and Wales, Greater Manchester Police had a disproportionately high number of complaints from people who had been bitten by police dogs. Working with the IPCC, the force reviewed and changed its dog training and deployment policy, including making compulsory the use of body-worn video cameras by dog handlers. As a result of making these changes, the force has reported a reduction in such incidents.

External scrutiny to improve treatment

The force uses a tiered approach to external scrutiny, from local community meetings at the neighbourhood level to the force-wide engagement and oversight groups. In each of the ten boroughs that make up Greater Manchester, there is an established independent advisory group (IAG) whose members are volunteers from the local community. The force has also established local youth councils in each area to engage with young people and gain their views, as well as to provide information and advice on important matters such as stop and search and the use of force. In addition to the use of the community review panel, the force has an independently chaired ethics committee at force level. Chaired by the Bishop of Manchester, the committee is made up of respected local academics and professionals. They meet on a quarterly basis and consider reports on a variety of topics, including the use of force. The assistant chief constable, who chairs the force's internal confidence and equalities board, reports every three months to the independent ethics committee.

How fairly does the force use stop and search powers?

The purpose of stop and search powers is to enable officers to eliminate or confirm suspicions that individuals may be in possession of stolen or prohibited items, without exercising their power of arrest. Except in exceptional circumstances, an officer must have reasonable grounds for carrying out such a search. While this can be valuable in the fight against crime when based on genuinely objective reasonable grounds, the powers to stop and search people are some of the most intrusive

available to the police. Their disproportionate use in respect of black, Asian and minority ethnic communities threatens to undermine police legitimacy. As such, it is crucial that all forces use these powers fairly, and demonstrate to the public that they are doing this.¹¹

HMICFRS has assessed the police's use of its stop and search powers on a number of occasions.¹² Our 2015 legitimacy inspection¹³ found that too many forces were not always recording reasonable grounds on their stop and search records. In 2017, we reviewed the reasonableness of the grounds again to assess how fairly forces are using stop and search in line with national guidance.¹⁴ Also, we assessed how the forces scrutinise use of these powers.

Understanding of national guidance

HMICFRS' 2015 legitimacy inspections identified several forces, including Greater Manchester Police, that were not fully compliant with the Home Office Best Use of Stop and Search (BUSS) scheme. The force subsequently amended its policy and procedures in relation to stop and search and in November 2016 we found it to be compliant with the scheme. The force has also introduced a new recording system for stop and search; now all police officers, including members of the Special Constabulary, are required to complete the College of Policing training package on the use of stop and search, followed by a half-day classroom session to reinforce the learning. During this inspection we found that officers displayed a good knowledge of their powers in relation to the use of stop and search, in line with College of Policing authorised professional practice. However, our review of 200 stop and search records suggests that some officers and supervisors still do not understand what constitutes reasonable grounds (see the section on reasonable grounds for stop and search below).

¹¹ *Authorised Professional Practice on Stop and Search*, College of Policing, February 2017. Available from: www.app.college.police.uk/app-content/stop-and-search/

¹² *Stop and Search Powers – are the police using them effectively and fairly?* HMIC, July 2013. Available at: www.justiceinspectorates.gov.uk/hmicfrs/publications/stop-and-search-powers-20130709/ and *Best Use of Stop and Search revisits*, HMIC, September 2016. Available from: www.justiceinspectorates.gov.uk/hmicfrs/publications/best-use-of-stop-and-search-revisits/

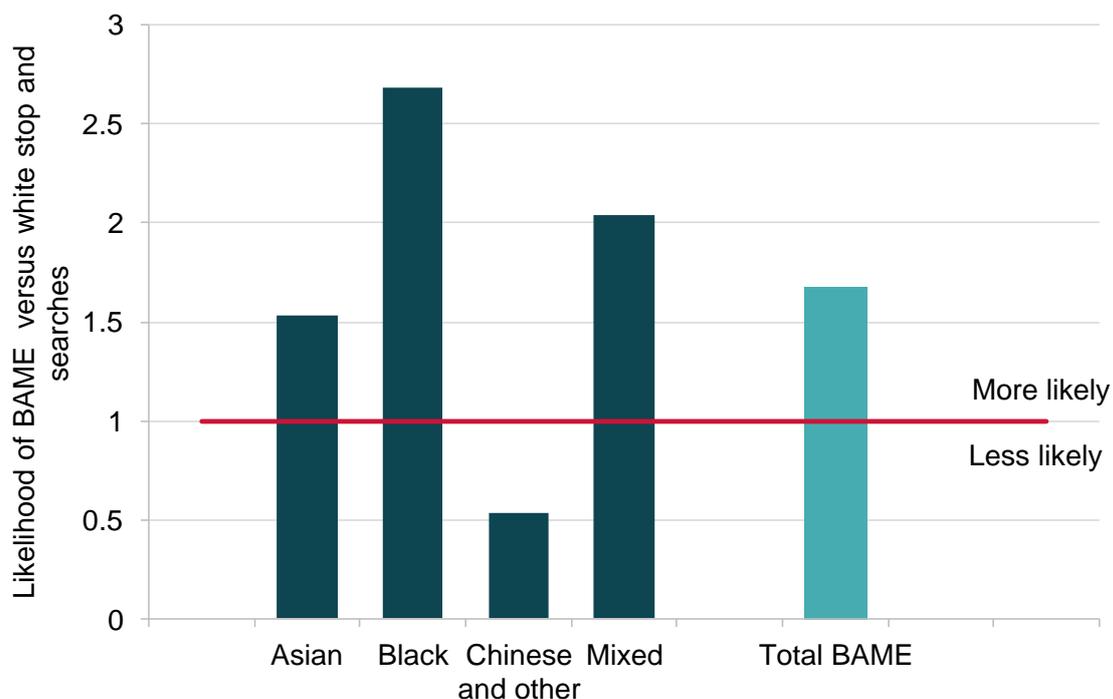
¹³ *Police legitimacy 2015 – a national overview*, HMIC, February 2016. Available from: www.justiceinspectorates.gov.uk/hmicfrs/publications/police-legitimacy-2015/

¹⁴ See annex A for more information about the methodology for our review of stop and search records.

Monitoring use of stop and search powers to improve treatment

In order to monitor the use of stop and search powers effectively, forces should use a range of data to help them understand how the powers are being used and the subsequent effect on crime, disorder and perceptions in the community. In particular, forces should consider whether the use of stop and search powers is disproportionately affecting one group compared with another. In 2015/16 in the local population of Greater Manchester Police, black, Asian and minority ethnic (BAME) people were 1.7 times more likely to be stopped and searched as white people. Black people were 2.7 times more likely to be stopped and searched than white people, which is the greatest difference in any ethnic group in the force area when looking at the likelihood of being stopped and searched compared with white people. People with mixed ethnicity were 2.0 times more likely to be stopped and searched than white people, and Asian people were 1.5 times more likely.

Figure 1: Likelihood of black, Asian and minority ethnic (BAME) people being stopped and searched (under section 1, PACE)¹⁵ compared with white people, in the local population of Greater Manchester Police in the 12 months to 31 March 2016



Source: Home Office 2016

Greater Manchester Police has effective systems in place to monitor the use of stop and search powers. The stop and search working group is made up of the stop and search leads from each of the ten boroughs and members of the community, and it meets every three months to scrutinise the use of stop and search. The force

¹⁵ Police and Criminal Evidence Act 1984. Available at: www.legislation.gov.uk/ukpga/1984/60/section/1

introduced body-worn video cameras in 2016, and officers are required to use them to record all stop and search encounters. As well as monitoring the age, ethnicity and gender of those subjected to stop and search, the working group also reviews video footage of stop and search encounters to examine aspects such as how officers interact and communicate with people.

Detailed analysis of data on stop and search is presented to the force's confidence and equalities board. At this meeting the board seeks to identify any trends, including potential disproportionality. According to figures the board considered, the number of times the force used stop and search has dropped from over 50,000 in 2011 to fewer than 3,000 in 2016. The analysis also revealed that officers were not always 'tagging' the footage from body-worn video cameras, which made it more difficult to find the relevant footage. The force has addressed this by providing additional advice to officers on the correct procedure. The board also uses the data to identify:

- locations where stop and search activity is highest;
- the individual officers who conduct the highest number of stop and searches; and
- any individual who has been subjected to stop and search on multiple occasions.

Every six months, the force also uses a panel of volunteer police cadets aged under 18 to monitor video footage and provide feedback from the perspective of young people.

External scrutiny of stop and search powers to improve treatment

Greater Manchester Police's use of stop and search powers is scrutinised externally in a number of ways. In accordance with the Home Office BUSS scheme, the force offers members of the public the opportunity to observe officers as part of the lay observer scheme, which is promoted on the force's external website. However, since introducing the scheme in 2014, no public observers have taken part, which suggests that this function is not effective at present.

Each of the force's ten boroughs has IAGs which, quarterly, reviews body-worn video camera footage of stop and search encounters as part of their monitoring of stop and search activity. Any problems or questions arising through such scrutiny are referred to the relevant stop and search lead for the relevant borough, who reports back to the IAG at the next meeting on actions taken. The force publishes comprehensive data on the use of stop and search on its public-facing website, including:

- details of the age, gender and ethnicity of the person searched;
- the legislation under which the search was conducted;

- whether the item searched for was found; the outcome of the search; and
- whether the search involved the removal of more than an outer garment.

The website also provides details of stop and search contacts in each area and information on how the public can become involved in monitoring the use of stop and search.

Reasonable grounds for use of stop and search

The Police and Criminal Evidence Act 1984 requires that, to stop and search a person, the grounds to suspect that person of being in possession of a stolen or prohibited article must be reasonable and that the grounds must be recorded on the stop and search record.¹⁶

In our 2013 inspection into the police use of stop and search powers,¹⁷ we were troubled to see that, of the 8,783 stop and search records we examined throughout all forces in England and Wales, 27 percent did not include sufficient reasonable grounds to justify the lawful use of the power. For Greater Manchester Police, the 2013 inspection showed that 86 of 200 records reviewed did not have grounds recorded that were considered reasonable. In 2015, as part of our PEEL legitimacy inspection,¹⁸ we carried out a further review of the recorded grounds in a sample of stop and search records. In that inspection, our review of 100 records found that 11 did not have reasonable grounds recorded.

During our 2017 inspection of Greater Manchester Police, we reviewed 200 stop and search records; some 17 did not have grounds recorded that we considered reasonable. While the records we reviewed may not be representative of all stop and search records completed by the force, our findings indicate that some officers and supervisors either still do not understand fully what constitutes reasonable grounds, or do not know how to record them properly. Considering the positive work the force is doing in this area, we were disappointed to find that reasonable grounds are still not being recorded in all cases.

It is important to note that a lack of reasonable grounds on the stop and search record does not necessarily mean that reasonable grounds did not exist in reality at the time of the stop and search.

¹⁶ Police and Criminal Evidence Act 1984. Available from: www.legislation.gov.uk/ukpga/1984/60/contents

¹⁷ *Stop and Search Powers: Are the police using them effectively and fairly?* HMIC, 2013. Available from: www.justiceinspectorates.gov.uk/hmicfrs/publications/stop-and-search-powers-20130709/

¹⁸ *PEEL: Police legitimacy 2015*, HMIC, 2016. Available from: www.justiceinspectorates.gov.uk/hmicfrs/publications/police-legitimacy-2015/

In 46 of the 200 records we reviewed, the item searched for was found. This is an important measure: confirming or allaying an officer's suspicions is the primary purpose of the powers. Finding the item searched for is one of the best indications that the grounds for the suspicions are likely to have been strong.

Table 1: Results of HMICFRS stop and search records review 2013-17

| | 2013 | 2015 | 2017 |
|---|-------------|-------------|-------------|
| Records not containing reasonable grounds | 86 of 200 | 11 of 100 | 17 of 200 |
| Item searched for found | – | – | 46 of 200 |

Summary of findings

Police officers and staff in Greater Manchester Police understand well the importance of treating the public fairly and with respect, and those we spoke with demonstrated a good understanding of unconscious bias and effective communication skills. The force monitors its use of stop and search powers to ensure that officers are acting proportionately, lawfully and ethically, but further work is needed by the force to improve the recording of the grounds for conducting searches. Senior leaders monitor the use of force by officers in line with national guidance. The use of such powers is also subject to external scrutiny by local IAGs and the ethics committee, which advises the elected mayor for Greater Manchester. The force monitors those incidents in which effective tactical communications skills have been used successfully in avoiding escalation to the use of physical force.

How well does the force ensure that its workforce behaves ethically and lawfully?

In HMICFRS' 2017 legitimacy inspection, we continued to focus on the extent to which forces develop and maintain an ethical culture to reduce unacceptable types of behaviour among their workforces. We also returned to look at how well forces are handling complaints and misconduct cases,¹⁹ as opposed to last year's focus on how well forces are guarding against corruption.²⁰

How well does the force develop and maintain an ethical culture?

Research tells us that the best way to prevent wrongdoing is to promote an ethical working environment or culture.²¹ Police leaders need to promote ethical principles and behaviour and act as role models, in line with the Code of Ethics.²² Officers and staff should feel confident that they can apply these principles to their decision making. This year, we focused on the way that the leaders of forces demonstrate ethical behaviour and the way that forces approach ethical decision-making across the entire workforce. In addition, where forces had failed to comply with all aspects of the national vetting standards in 2016, we assessed whether their plans are credible and are likely to be compliant by December 2018.²³

¹⁹ *Police legitimacy 2015 – a national overview*, HMIC, February 2016. Available from: www.justiceinspectorates.gov.uk/hmicfrs/publications/police-legitimacy-2015/

²⁰ We did, however, undertake a review of forces' plans in response to our PEEL legitimacy 2016 national report recommendation. The report of our findings is available here: www.justiceinspectorates.gov.uk/hmicfrs/publications/peel-police-legitimacy-2016/

²¹ *Promoting ethical behaviour and preventing wrongdoing in organisations*, College of Policing, 2015. Available at: http://whatworks.college.police.uk/Research/Documents/150317_Integrity_REA_FINAL_REPORT.pdf
The role of leadership in promoting ethical police behaviour, College of Policing, 2015. Available at: http://whatworks.college.police.uk/Research/Documents/150317_Ethical_leadership_FINAL_REPORT.pdf

²² *Code of Ethics: A Code of Practice for the Principles and Standards of Professional Behaviour for the Policing Profession of England and Wales*, College of Policing, 2014. Available from: www.college.police.uk/What-we-do/Ethics/Pages/Code-of-Ethics.aspx; *Literature review – Police integrity and corruption*, HMIC, January 2015. Available from: www.justiceinspectorates.gov.uk/hmicfrs/publications/integrity-matters/

²³ HMICFRS' recommendation in December 2016 was that (i) Within six months, all forces not already complying with current national vetting policy should have started to implement a sufficient plan to do so and (ii) Within two years, all members of the police workforce should have received at least the lowest level of vetting clearance for their roles. The ACPO/ACPOS National Vetting Policy was

Leaders as ethical role models

Greater Manchester Police establishes and reinforces high standards of ethical behaviour in a variety of ways. The deputy chief constable chairs the force's standards board, which sets, monitors and challenges the standards that the force expects. He also holds a series of focus groups twice a year in each of the force's ten boroughs, in which officers and staff are encouraged to raise problems and challenge senior leaders. The force has developed a behaviour and expectations framework, which it is using to revise role profiles and job descriptions for police and staff roles at all levels throughout the organisation. The force also uses the framework in promotion and selection procedures, ensuring that future leaders demonstrate the required behaviours. The framework incorporates the Code of Ethics and has been developed in line with the College of Policing competence and values framework. We found that, in general, members of the workforce felt that leaders throughout the force acted as positive role models, displaying the expected and required behaviour. We were also informed by members of the workforce that they perceived the promotion and selection processes to be fair, open and accessible.

The force publishes on its public-facing website details of its chief officers' salaries, expenses, gifts, hospitality, and any declared business interests, including non-executive positions.

Ethical decision making

Greater Manchester Police has accessible policies and procedures that comply with its equality duty. Policies and procedures are easy for the workforce to find on the force intranet. A large number of unclassified force policies, notably those related to the force's equality duty, complaints and stop and search, are available on the public website. The force commissioned its internal auditors to conduct an independent review of how well the force's policy-making processes reflected its equality duty, which concluded that the force was meeting its equality duty and made no new recommendations.

The force revises its existing policies when they become due for review to ensure that the National Decision Model and Code of Ethics are integrated into all force policies and procedures. It consults its independent ethics committee for advice on policies and procedures for matters such as: body-worn video cameras; the retention and disposal of human tissue; and the use of force and non-lethal weapons such as Taser.

Training on ethical decision making, which incorporates the Code of Ethics and the National Decision Model, is provided to all officers through initial student officer training as well as the personal safety training that all officers must attend each year. The force has revised its personal safety training and now refers to it as ‘Take a step back...’. We spoke with several officers who had recently completed this training, and they reported that it had improved their communication skills and equipped them to make better quality decisions. Ethical decision making is at the heart of the force leaders training programme, which is mandatory for all police and police staff supervisors.

How accessible is the complaints system to all members of the public?

An accessible complaints system is crucial to building public confidence in the police and to a force’s ability to improve the extent to which its workforce acts ethically and lawfully. As such, we assessed how easy it is for the public to make a complaint – including how well forces support those people that may require additional help to gain access to the complaints process.²⁴ Also, we used a review of case files to assess the level of information provided to complainants and looked at how well forces keep complainants updated about the progress of their complaints.

Ease of making a complaint

Greater Manchester Police’s public-facing website and all its social media sites contain comprehensive and easily-accessible information on making a complaint, including how to make both a complaint through other agencies and a third-party complaint. At the time of the inspection, this information, although comprehensive, was available only in English. The force had already identified this problem and was exploring options to make this information available in other languages, as well as working with the members of deaf community to make it available via sign-language videos.

People who are the subject of stop and search are provided with a written copy of the search record. This contains information on how to make a complaint in addition to a QR code which, when scanned by mobile devices, allows the user to provide feedback or make a complaint. The force has agreements in place with several agencies, including Citizens Advice and Refugee Action, whereby those who may

²⁴ These could include people with learning difficulties, mental health issues, young people or people whose first language is not English. *IPCC Statutory Guidance to the police service on the handling of complaints*, IPCC, May 2015. Available at: www.ipcc.gov.uk/sites/default/files/Documents/statutoryguidance/2015_statutory_guidance_english.pdf and *Access to the police complaints system*, IPCC, September 2015. Available at: www.ipcc.gov.uk/sites/default/files/Documents/research_stats/Access_to_the_police_complaints_system.pdf

have less confidence in approaching the police directly can make complaints. We were disappointed that we did not find posters or leaflets containing information about the complaints system when we visited police station front counters. Staff working at the public enquiry counters, although aware of the leaflets, were unable to find any when we asked for them.

Keeping complainants updated

Prior to inspection, HMICFRS reviewed a sample of case files relating to complaints and internal misconduct cases investigated by Greater Manchester Police's professional standards branch. Among other things, the review assessed whether the force had provided the complainants with the statutory information at the beginning and end of the investigation, namely a copy of the complaint record, the findings of the investigator and the force's determination. We also assessed:

- the consistency with which complainants, witnesses and those who were the subject of the allegations were kept updated on the progress of their investigations;
- the ability of the force to correctly identify discrimination; and
- the overall standard of discrimination investigations.

We were pleased to find that out of 25 complaints we reviewed, 24 complainants had been provided with the required information at the beginning and end of the investigation. Our review also found that for cases in which the complainant required special assistance, this had been identified and the force had put in place the necessary support. The force was less good at providing updates during the investigations; we found that only 17 complaint cases recorded meaningful updates, and that only 12 of the 15 misconduct cases we examined contained meaningful updates.

We brought these findings to the attention of the force at the end of the file review and, as a result, it introduced a revised system. This new system ensures that investigating officers are prompted to make contact with victims, witnesses and officers at least every 28 days, or more frequently if necessary. Senior managers in the professional standards branch dip sample and monitor the new process to ensure compliance, and we found evidence that this has led to improvements in the timeliness and quality of such contact. The same system ensures that, at the conclusion of an investigation, complainants are sent a letter from the appropriate authority setting out the findings, the force's own determinations and information about the complainant's right to appeal.

How well does the force identify and investigate potential discrimination by officers and staff?

For the public to have confidence in the police and the police complaints system, it is vital that allegations of discrimination arising from police complaints, conduct matters, and death and serious injury investigations are handled fairly and appropriately. We reviewed complaint, misconduct and grievance files to assess the extent to which forces identify and respond to discrimination appropriately and at the earliest opportunity (including referrals to the IPCC), and the extent to which these allegations are investigated in accordance with the IPCC guidelines for handling allegations of discrimination.²⁵

Identifying and responding to potential discrimination

Of the police officers and staff in Greater Manchester Police we spoke with, we found they had a good understanding of what constitutes discrimination and they all expressed confidence that it is dealt with appropriately. Our review of case files confirmed that potential discrimination had been identified quickly and correctly in all but one of the cases we examined. Moreover, the review identified a problem with the force making referrals of discrimination cases to the IPCC. Of the eight public complaints and five internal misconduct matters reviewed that met the IPCC threshold for referral, none of the complaints and only three of the misconduct cases had been referred. HMICFRS raised this with the senior leadership team in the force's professional standards branch at the conclusion of the case file review, and it was evident that it had already identified this as an area for improvement (following an independent review of the branch commissioned by the force in 2016). A daily review meeting is now held within the professional standards branch in which all new allegations and complaints are assessed to ensure that appropriate cases are referred promptly to the IPCC. During our inspection, HMICFRS contacted the IPCC, which confirmed that the force had addressed the problem and improved its approach for referring discrimination cases in accordance with the Police (Complaints and Misconduct) Regulations 2012.

Investigating allegations of discrimination

Senior leaders in Greater Manchester Police's professional standards branch hold a daily tasking and review meeting, in which each new allegation is assessed to identify any potential discrimination. Overall, we found the quality of investigations into discrimination complaints and misconduct to be high and in line with IPCC guidelines for handling allegations of discrimination. Of the ten discrimination cases we reviewed, all were handled satisfactorily. Each had clear terms of reference that

²⁵ See annex A for more information about our case file review. *IPCC guidelines for handling allegations of discrimination*, IPCC, September 2015. Available at: www.ipcc.gov.uk/sites/default/files/Documents/statutoryguidance/Guidelines_for_handling_allegations_of_discrimination.pdf

were consistent with the nature of the allegation, and the lines of enquiry that were followed generally satisfied the terms of reference. For cases in which the complainant required special assistance, we found that the force had identified this and put in place steps to support the person concerned. We found that all of the ten such complainants received a satisfactory service from the force.

The local resolution process was generally being used appropriately to resolve problems at an early stage, to the mutual benefit of complainants, police officers and police staff.

There was no evidence throughout the review that police officers or staff are treated differently as a result of any protected characteristic or job type. This was regardless of whether the case involved a public complaint, internal misconduct or grievance, and the evidence we saw suggests fair and equitable practice throughout the force.

Summary of findings

Leaders in Greater Manchester Police were generally seen by the workforce to set, display and maintain ethical values and behaviours. The force has an internal standards board as well as an independent ethics committee, which are used to provide both direction and challenge in terms of ensuring that decisions and policies are ethical. The complaint procedure is accessible, although our review of files found the force needs to improve the way it keeps complainants updated on the progress of their case. We were also disappointed to find that the force was not always referring allegations of discrimination to the IPCC, in line with legal requirements. We are pleased the force has already taken action to address this problem. The officers and staff we spoke with were confident that they understood and felt able to challenge discrimination. Investigations into allegations of discrimination are generally of a high quality with a good overall level of service provided to the complainant.

Areas for improvement

- The force should improve the availability of its printed information about how to make a complaint, particularly at front counters of police stations and in custody units, as well as to non-police premises or organisations, in line with IPCC statutory guidance.
- The force should improve the quality, timeliness and recording of updates to complainants, in line with IPCC statutory guidance. These principles should be extended to witnesses and to those who are the subject of allegations.
- The force should ensure that all allegations which meet the mandatory criteria for referral to the IPCC are so referred.

To what extent does the force treat its workforce with fairness and respect?

A workforce that feels it is treated fairly and with respect by its employers is more likely to identify with the organisation, and treat the public in a similarly fair and respectful way. Conversely, perceived unfairness within police organisations can have a detrimental effect on officer and staff attitudes and types of behaviour.²⁶ As such, this concept of ‘organisational justice’, and its potential effect on ‘procedural justice’ forms an important part of HMICFRS’ assessment of police legitimacy and leadership. As no comparative data exist on how fairly officers and staff perceive forces have treated them, we continue to focus our assessment on how well forces identify individual and organisational concerns within their workforces and act on these findings.

In our 2017 inspection, we focused specifically on how well forces identify and act to improve fairness at work, including what action they are taking to make their workforces more representative of the communities they serve. We continued to look at how well forces provide for the wellbeing of their workforces, particularly through preventative and early action, and at the way individual performance is managed and developed.

How well does the force identify and act to improve fairness at work?

Research suggests that forces that involve officers and staff in decision-making processes, listen to their concerns, act on them, and are open about how and why decisions were reached, may improve workforce perceptions of fair and respectful treatment.²⁷ HMICFRS assessed how well force leaders seek feedback from their workforces and use this, alongside other data and information – including that on grievances²⁸ – to identify, understand, prioritise and resolve their workforces’

²⁶ *Fair cop 2: Organisational justice, behaviour and ethical policing*, College of Policing, 2015.

Available at:

http://whatworks.college.police.uk/Research/Documents/150317_Fair_cop%202_FINAL_REPORT.pdf and *Organisational justice: Implications for police and emergency service leadership*, Herrington, C. and Roberts, K. AIPM Research Focus, Issue 2, 2013. Available at: www.aipm.gov.au/wp-content/uploads/2013/08/Org-Justice-Final.pdf

²⁷ *Ibid.*

²⁸ Grievances are concerns, problems or complaints that a member of staff raises formally with an employer, so data on numbers and types of grievances can provide forces with useful information about matters of concern to their workforces.

concerns. Part of our assessment involved reviewing a small number of grievance cases to assess if these adhere to Acas guidance and the Code of Practice.²⁹

Unfairness, or perceived unfairness in recruitment processes, opportunities and limited career progression can lead to good officers and staff leaving the service prematurely and fewer women and people from black, Asian and minority ethnic (BAME) communities wanting to join the police in the first place. As such, we re-examined how well forces address disproportional workforce representation in a variety of areas – including recruitment, retention and progression for those people with protected characteristics.³⁰ We looked at the treatment of BAME officers and staff subject to allegations of misconduct – to improve fairness at work and to make forces more representative of the communities they serve.³¹

Leaders seeking feedback and challenge from the workforce

Greater Manchester Police has a range of mechanisms and processes in place to seek feedback and challenge from the workforce, which it continues to develop. In 2015 the force used the independent staff engagement survey devised by Durham University, which it plans to repeat in 2017. The results of these surveys are considered and acted on by the confidence and equalities board. Changes are reported back to the workforce through a series of posters and updates on the force intranet. The organisational learning board also considers the survey information together with other information, including from the force grievance system, to identify any themes or emerging problems and to suggest changes to the force's working practices. As an example: after introducing a new operating model in 2016, the force surveyed frontline officers and staff and, as a result, made changes to both the deployment of officers and staff and the shift system.

The chief constable and his deputy undertake regular online web-chats and answer questions posed by officers and staff. The deputy chief constable also holds face-to-face challenge and engagement sessions in each of the force's ten boroughs, twice a year. We found that, in general, members of the workforce appreciated efforts to engage with them and expressed confidence that if they raised problems directly

²⁹ *Code of Practice on Disciplinary and Grievance Procedures*. Acas 2015. Available from www.acas.org.uk/media/pdf/f/m/Acas-Code-of-Practice-1-on-disciplinary-and-grievance-procedures.pdf. Also *Discipline and grievances at work: The Acas guide*, Acas, August 2017. Available from: www.acas.org.uk/media/pdf/9/g/Discipline-and-grievances-Acas-guide.pdf

³⁰ The Equality Act 2010 defines the following characteristics as protected characteristics: age; disability; gender reassignment; marriage and civil partnership; pregnancy and maternity; race; religion or belief; sex; sexual orientation. Available from: www.legislation.gov.uk/ukpga/2010/15/section/4

³¹ We last examined these issues as part of our 2015 PEEL legitimacy inspection. See *Police legitimacy 2015 – a national overview*, HMIC, February 2016. Available from: www.justiceinspectorates.gov.uk/hmicfrs/publications/police-legitimacy-2015/

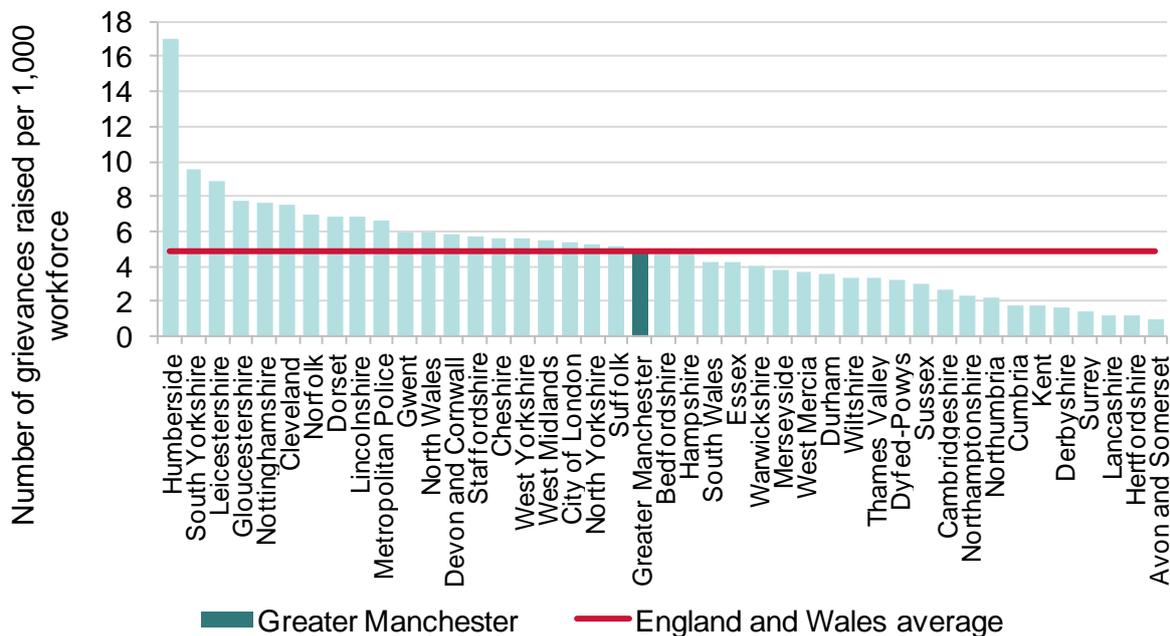
with both line managers and senior officers they would be listened to and that action would be taken. In our legitimacy inspection in 2016 we suggested that the force may wish to improve its engagement with the wide range of staff support networks that exist within Greater Manchester. As a result the force has established an engagement forum in which these groups have direct access to the chief officer team.

Identifying and resolving workforce concerns

Data on the numbers and types of concerns, problems or complaints (collectively known as grievances) that have been raised by officers or staff can provide forces with useful information about matters of concern to their workforces.

All forces have grievance procedures but the number of grievances in each force differs widely across England and Wales. We requested data for the ten months from 1 April 2016 to 31 January 2017 on the number of grievances raised by the workforce. Figure 2 below shows that Greater Manchester Police had 4.7 grievances raised per 1,000 workforce. This is broadly in line with the England and Wales average of 4.9 grievances raised per 1,000 workforce.

Figure 2: Grievances raised per 1,000 workforce, in Greater Manchester Police in the ten months from 1 April 2016 to 31 January 2017

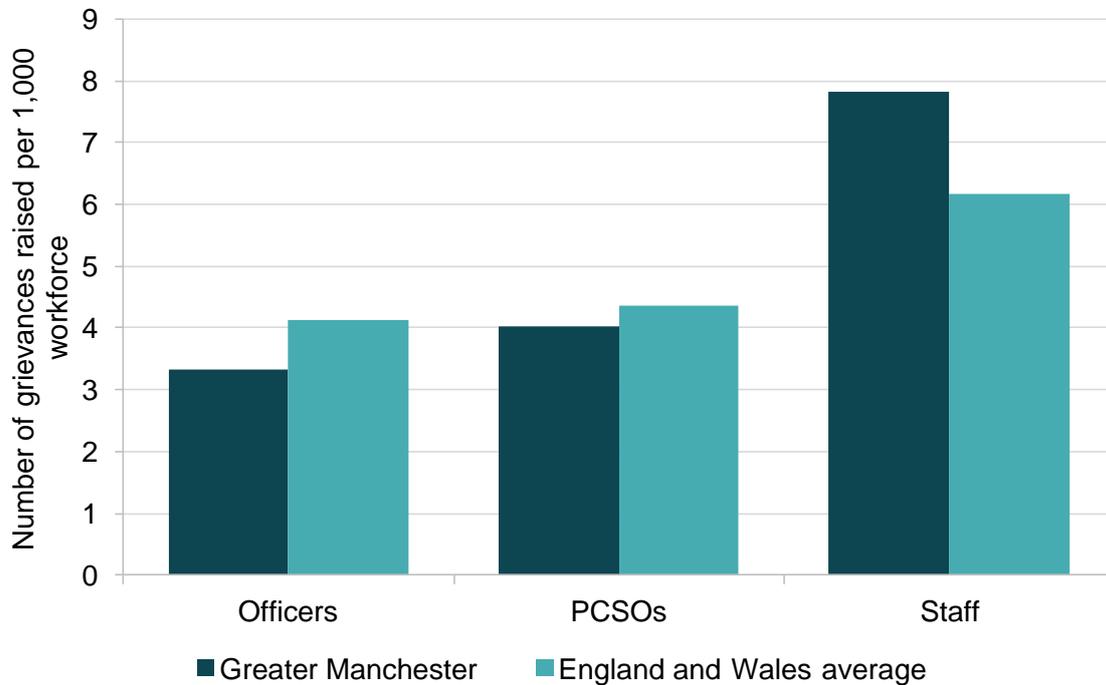


Source: HMICFRS Legitimacy data collection

Figure 3 shows that the number of grievances raised by officers in Greater Manchester Police was 3.3 grievances per 1,000 officers, and the England and Wales average for the same period was 4.1 per 1,000 officers. In the same period PCSOs raised 4.0 grievances per 1,000 PCSOs, and the England and Wales average was 4.4 grievances per 1,000. Police staff raised 7.8 grievances per 1,000

staff in the same period; and the England and Wales average was 6.2 grievances per 1,000 staff.

Figure 3: Grievances raised by officers, PCSOs and staff (per 1,000 officers, PCSOs and staff), in Greater Manchester Police in the ten months from 1 April 2016 to 31 January 2017



Source: HMICFRS Legitimacy data collection

Greater Manchester Police frequently monitors a range of information and data to identify the matters that affect the workforce, and it holds web chats and challenge sessions in its boroughs. The force’s behaviour change team holds discussions with frontline officers and staff to identify problems, concerns and barriers to progress. The team also undertakes observational studies to monitor how frontline officers and staff operate. The results from the discussion sessions and observations are then used to identify improvements needed. For example, the behaviour change team identified a lack of consistency in the force response to requests for flexible working. Information from the discussion sessions was used to inform revised guidance to managers, which was supported by an online system to assess the effect and viability of proposed flexible working arrangements. Another recent example of the force identifying and resolving matters of importance to the workforce is the ‘walk a mile in my shoes’ initiative in Stockport: senior leaders are exposed to the demands faced by frontline officers and staff. The force is also tracking a cohort of new recruits through a study to understand the expectations, demands and problems faced by those entering the force.

The force has recently revised its grievance procedures and re-introduced them as part of its new fairness at work policy. The level of grievances raised is in line with the average for forces in England and Wales. Under the new policy, problems raised are managed locally, and overseen by a dedicated senior lead in each borough and

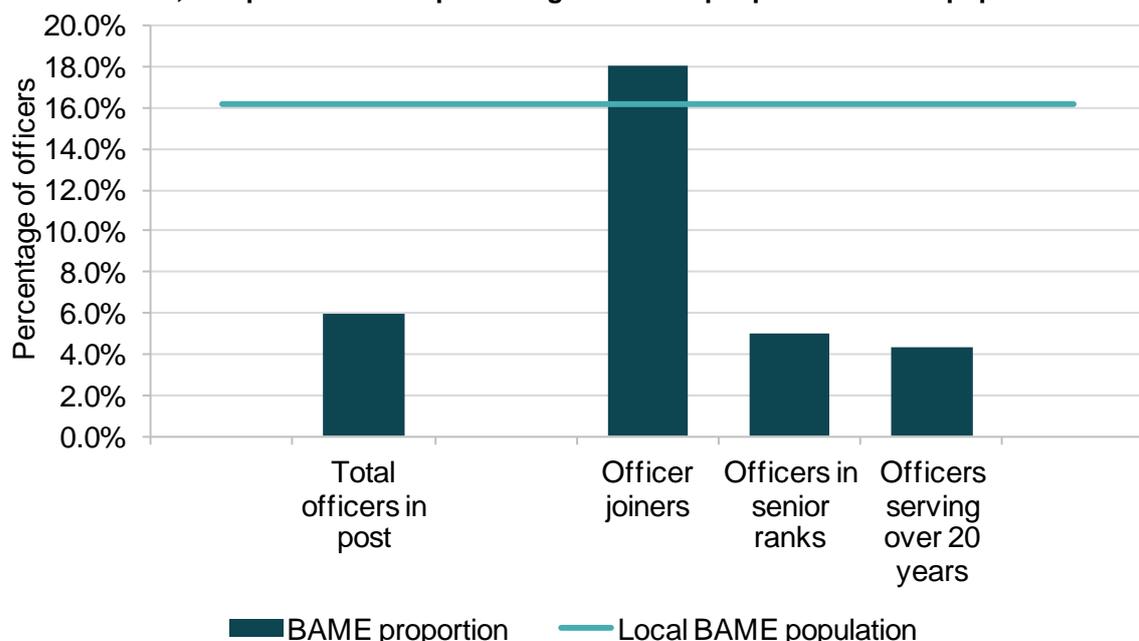
branch. Central co-ordination and oversight is provided by the organisational learning and workforce development branch, and any identified themes or trends are reported to the organisational learning board. Members of the workforce we spoke with said that they were most likely to raise any problems or concerns through their line manager and were confident that this would lead to resolution. As part of our file review, we examined a small number of grievance files and found that these were well-presented and appropriately documented, and that some difficult problems had been resolved to the benefit of both the parties involved as well as the force. In two of these cases, discrimination allegations within the grievance had been properly identified.

Creating a more representative workforce

To assess how well the force reflects the local population, we considered data on the number of women and people from BAME communities recruited to the force, the number at senior officer level and the number who have served for over 20 years. We used these data to compare the make-up of the force with the make-up of the community it serves.

In the geographical areas served by Greater Manchester Police, the 2011 census indicates that BAME people made up 16.2 percent of the local population. In 2016/17, in Greater Manchester Police 6.0 percent of officers were BAME (see figure 4). In relation to officers, 18.0 percent of those joining the force, 5.0 percent of those in senior ranks and 4.3 percent of those who had served over 20 years were BAME.

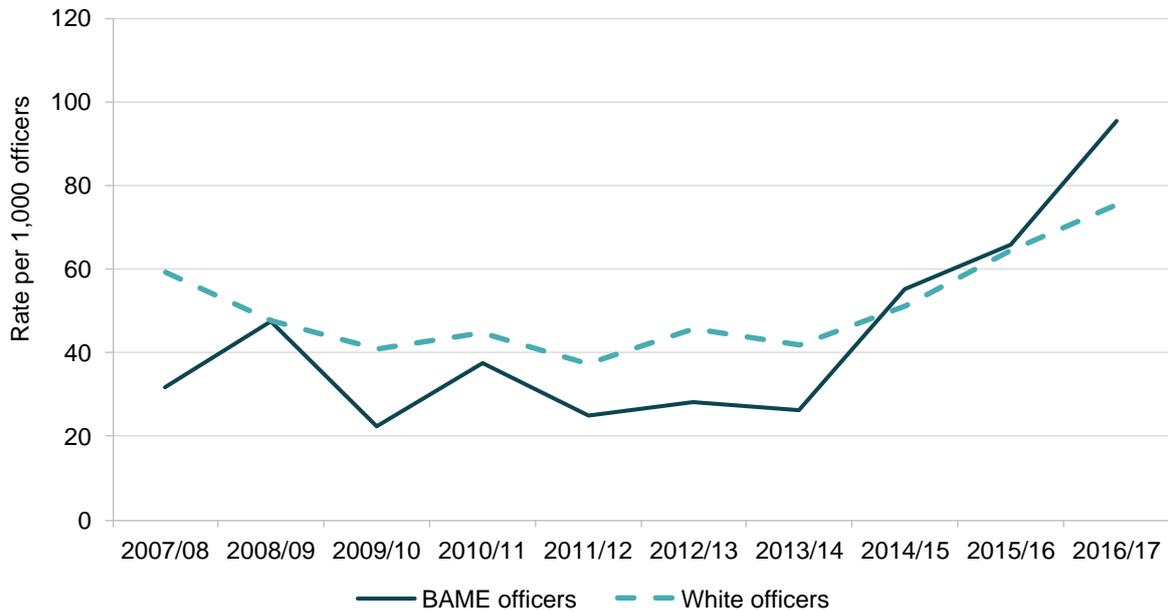
Figure 4: Percentage of officer joiners, officers in post, officers in senior roles and officers serving over 20 years who are black, Asian or minority ethnic (BAME), in Greater Manchester Police in 2016/17, compared with the percentage of BAME people in the local population



Source: Home Office Annual Data Requirement

Note: High percentages may be due to low overall numbers. The figure above represents officers where an ethnicity was stated.

Figure 5: Comparison of officer leaving rates between white and black, Asian or minority ethnic (BAME) officers (per 1,000 white or BAME officers), in Greater Manchester Police from 2007/08 to 2016/17



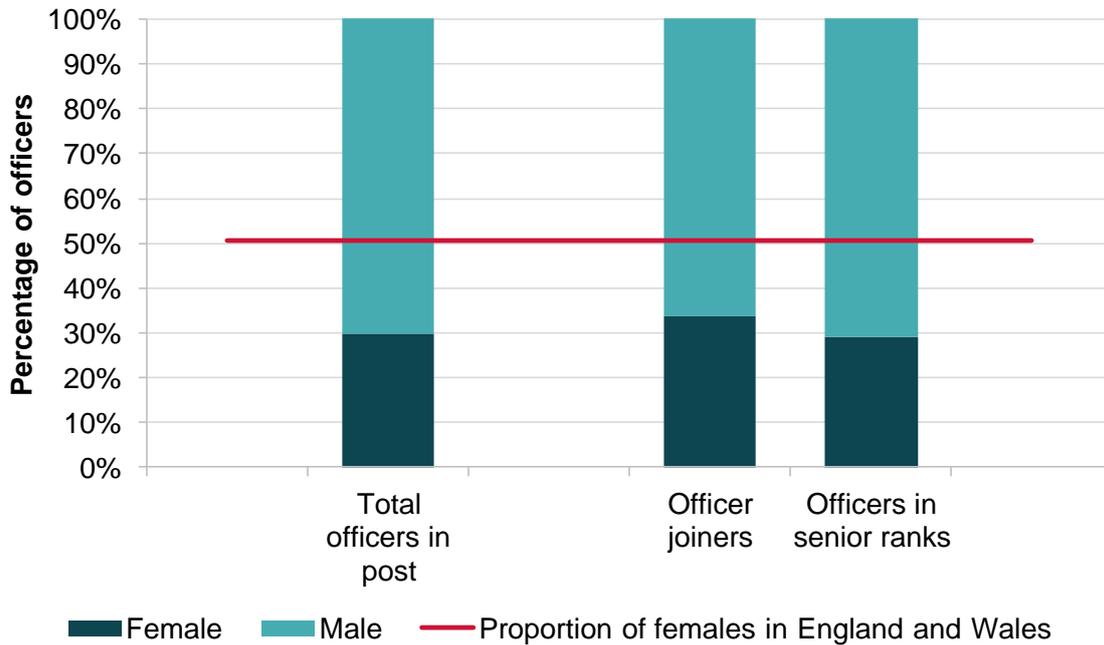
Source: Home Office Annual Data Requirement

In 2016/17 in Greater Manchester Police for the equivalent of every 1,000 BAME officers, 96 left the force (see figure 5 above), while for every 1,000 white officers, 75 left. Fluctuations in the BAME officer leaver rate may be due to low numbers of BAME officers in the force.

The proportion of female officers is lower than the proportion of females in the general population (51 percent), at 30 percent. In the 12 months to 31 March 2017 in Greater Manchester Police, 34 percent of those joining the force and 29 percent of those in senior ranks were female (see figure 6 below).

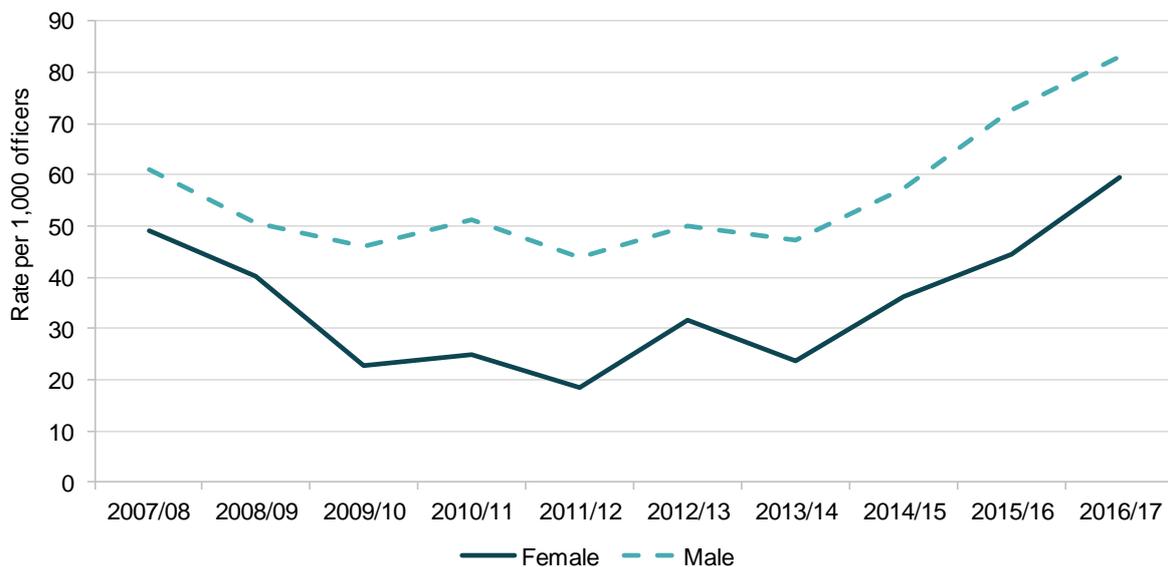
In 2016/17 in Greater Manchester Police 59 per 1,000 female officers left the force, compared with 83 per 1,000 male officers (see figure 7 below).

Figure 6: Percentage of officer joiners, officers in post and officers in senior ranks, by gender, in Greater Manchester Police in 2016/17 compared with the percentage of women in the England and Wales population



Source: Home Office Annual Data Requirement

Figure 7: Comparison of officer leaving rates between male and female officers (per 1,000 male or female officers), in Greater Manchester Police from 2007/08 to 2016/17



Source: Home Office Annual Data Requirement

Greater Manchester Police understands the importance of addressing potential disproportionality in its recruitment, retention, progression, complaint and misconduct processes. The organisational learning board regularly reviews and monitors information and data on all of these areas. The professional standards branch holds

a monthly tasking meeting to consider a wide range of data and intelligence on complaints and misconduct to ensure that internal processes do not unfairly discriminate against any particular group.

The force has recently begun recruiting police officers after four years in which recruitment was suspended. Rather than advertise to the general public, the force embarked on a programme of positive action, in particular targeting applicants from under-represented BAME groups in the force. The HR recruitment team in the force includes a positive action team, which is responsible for specific community engagement activity and also for providing practical advice and support to applicants throughout the recruitment process. Although the positive action was initially aimed at police officer recruits, the team has expanded its work to attract recruits to police staff, including PCSOs and the Special Constabulary.

According to Home Office figures, the proportion of local police officer recruits from BAME backgrounds recruited in the year 2016/17 was 18 percent, compared with an average of 5.1 percent between 2007 and 2016. The force intends to continue recruitment of new officers through to 2020. Progress of the positive action programme is monitored by a 'gold group', which the deputy chief constable chairs. This group also monitors the progression and retention of those with protected characteristics. During the inspection we found that the workforce generally understood the reasons behind the positive action programme and were supportive of it. We spoke with two officers who had been recruited through the positive action programme who were complimentary about the support and guidance it provided.

Greater Manchester Police has revised its processes for selecting officers and staff for promotion, removing the necessity for candidates to obtain the support of their line manager and also ensuring that application forms are anonymised before shortlisting and selection decisions are made. In designing the new assessment process for selecting officers for promotion to sergeant, the force engaged with the College of Policing and officers from BAME backgrounds to ensure that the system did not discriminate against those from different backgrounds. Anyone who is involved in recruitment and promotion selection processes in the force is required to complete training in unconscious bias. All those we spoke with, including a few who had been unsuccessful in the recent constable to sergeant promotion selection process, in addition to representatives from staff associations and trade unions, expressed confidence that the system was fair and free of bias.

The force has established an inclusion team within the organisational learning and workforce development branch to improve development and progression opportunities for those with a BAME background through the PEDALs (personal development and action learning sets) programme. To date the force has completed two PEDALs cohorts, one for police officers and one for police staff, and is currently running a third cohort with a mix of officers and staff.

How well does the force support the wellbeing of its workforce?

Police forces need to understand the benefits of having a healthier workforce – a happy and healthy workforce is likely to be a more productive one, as a result of people taking fewer sick days and being more invested in what they do.³² HMICFRS assessed how well force leaders understand and promote these benefits by developing a culture that fosters workforce wellbeing, and how well forces use data and information – including feedback from the workforce – to identify and understand their wellbeing. Also, we assessed how well forces use this information to take preventative and early action to support workforce wellbeing at both an individual and organisational level.

Understanding and promoting wellbeing

In our 2016 legitimacy inspection of Greater Manchester Police we commented that the majority of people we spoke with recognised the improvements that the force had made in understanding and promoting wellbeing in the previous 12 months. We are pleased to report that this year everyone we spoke with felt that the force took wellbeing seriously and that it was a priority for leaders in the force.

The force understands and invests in a variety of methods to promote the importance of wellbeing. Workforce support and wellbeing is identified as one of the five strategic principles of the force's target operating model. The wellbeing board oversees the implementation of the wellbeing strategy and devises, monitors and updates the wellbeing action plan. The force has signed up to the Blue Light Wellbeing Charter and has completed an initial self-assessment, which it has used to update the wellbeing action plan. Each of the force's ten boroughs and all its branches have a wellbeing lead, whose role is to actively promote wellbeing and increase awareness of the availability of support to the workforce, and they meet regularly to exchange ideas and good practice.

Identifying and understanding workforce wellbeing needs

Analysis of sickness data can give an indication of whether there are problems relating to wellbeing within a police force. It provides a useful point of comparison between forces who can also use sickness data to help them understand the nature and causes of sickness across the organisation to help them prevent sickness and manage it when it occurs.

³² Well-being and engagement in policing: the key to unlocking discretionary effort, Ian Hesketh, Cary Cooper and Jonathan Ivy, 2016, Policing. pp. 1–12. Available from: <https://oscarkilo.org.uk/wellbeing-and-engagement-in-policing-the-key-to-unlocking-discretionary-effort/> Also see <https://fitforwork.org/employer/benefits-of-a-healthy-workforce/>

We compared force data on the percentage of police officers, PCSOs and police staff on long-term and short or medium-term sickness absence. On 31 March 2017 in Greater Manchester Police, 2.6 percent of officers were on short or medium-term sick leave. The England and Wales average was 1.8 percent. The latest year for which data is available was 2017, which saw an increase of 0.1 percentage points from the previous year, which is in line with changes in the last ten-year period (see figure 8).

Figure 8: Percentage of officers on short or medium-term sick leave, in Greater Manchester Police compared with the England and Wales average, on the 31 March from 2008 to 2017



Source: Home Office Annual Data Requirement

On 31 March 2017 the proportion of officers in Greater Manchester Police on long-term sick leave was 3.3 percent and the England and Wales average was 1.9 percent. The latest year for which data were available is 2017, which saw an increase of 0.2 percentage points from the previous year, which is in line with changes in the last ten-year period.

Figure 9: Percentage of officers on long-term sick leave, in Greater Manchester Police compared to the England and Wales average, as at 31 March from 2008 to 2017



Source: Home Office Annual Data Requirement

Greater Manchester Police’s understanding of the risks and threats to the wellbeing of its workforce and the underlying causes is adequate. It has conducted two specific wellbeing surveys, as well as the Durham University staff engagement survey, in an effort to identify and understand any such problems. The wellbeing surveys identified that many officers and staff felt anxious because they could not see how their individual roles contributed to the overall purpose and effectiveness of the force. Using this awareness, the force recently revised all of its role profiles and made sure it explained more clearly the purpose and expectations of each role. As a result, all role profiles now contain specific wellbeing objectives appropriate to the level of seniority, from the personal responsibilities of team members to the expectations on team and senior leaders.

The force’s leaders training programme, which is mandatory for all police and police staff supervisors, also includes specific ‘know your staff’ training, which focuses on the importance of line managers getting to know and understanding the health and wellbeing needs of their officers and staff. In response to problems HMICFRS raised previously, the force has also revised its attendance policy, which now stresses the importance of not treating everyone exactly the same, but rather providing support that meets individuals’ needs. The force has published online guides and toolkits for managers on a range of wellbeing matters, including dealing with and reducing short-term and long-term sickness and specific guidance on identifying and managing stress and psychological problems.

Taking preventative and early action to improve workforce wellbeing

Greater Manchester Police has continued to improve its capability and capacity of taking preventative and early action to improve the wellbeing of its workforce. As well as providing a range of physiological services, the force's occupational health and welfare unit employs a registered mental health nurse, welfare officers and psychotherapists who can provide specific support and therapy to members of the workforce experiencing psychological problems. New recruits and student officers are given training on the 'five ways to wellbeing' to help them develop their resilience and to ensure they are aware of the wellbeing support available.

The force has continued to expand its network of wellbeing support volunteers and, at the time of our inspection, there were over 60 volunteers identified as the single points of contact in their respective locations who meet quarterly to discuss good practice and problems. The force has approximately 160 wellbeing and resilience coaches who are volunteers from the workforce and have received training in coaching, mindfulness and stress management techniques. The force is currently supporting five of these coaches through a 12-month accredited mindfulness practitioners course provided by the mental health charity, MIND.

During the inspection we spoke with a wellbeing co-ordinator who provided examples of the positive effect her role had for the wellbeing of officers and staff, which included the provision of massage and mindfulness sessions. We spoke with several other members of the workforce who had taken part in wellbeing days that had been built in to the shift system, and which allowed whole teams to take part in organised healthy activities, including fell walking and gym sessions.

After the operational response to the terrorist attack at Manchester Arena on 22 May 2017, the force responded quickly to provide support to the workforce. This included a message to all staff from the deputy chief constable highlighting the availability of a wide range of support services, not just from the occupational health and welfare unit, but also from its partner agencies and other external providers. The Police Federation in Greater Manchester provided effective trauma risk management (TRiM) support to the force, helping to identify and support those who may need additional support but may not request it themselves. Although the TRiM support was provided by the Police Federation, it was made available to any member of the workforce who needed it. The force may now wish to consider how, working with the Police Federation, it can further develop the TRiM service and integrate it into the force's wellbeing provision. We spoke with officers who were involved in the response to the Arena bombing, and all of them had been contacted by qualified medical practitioners to assess their individual needs. The majority of those we spoke with reported that this was a welcome intervention and appreciated the proactive contact.

How fairly and effectively does the force manage and develop both the performance of its individual officers and staff and its selection processes?

College of Policing research on organisational justice suggests that the process for promoting people and failure to deal with poor performance may have an adverse affect on workforce perceptions of fairness, and this in turn may lead to negative attitudes and types of behaviour in the workplace.³³ In addition, effective performance management and development mitigate risks to the force and ensure continuous improvement. HMICFRS assessed how fairly and effectively forces manage the performance of individual officers and staff, including the value that forces place on continuing professional development (CPD), in line with guidance from the College of Policing.³⁴ Also, we looked at how fairly forces identify and select their leaders, and the extent to which these decisions result in leaders who represent a range of styles, approaches and backgrounds.

Managing and developing individual performance

In last year's legitimacy inspection of Greater Manchester Police³⁵ we found its performance development review (PDR) system was not mandatory and its uptake among officers and staff was very mixed. We concluded that the force's approach to managing individual performance was "at best...patchy", and we recommended that the force improved the way it manages individual performance. Since then the force has revised its PDR process, which was due to be piloted in locations throughout the force from the beginning of June 2017. The pilot was suspended as a result of the effects which the recent terrorist attack had on operational policing.

The new approach is based on College of Policing guidance and incorporates the behaviours outlined in the policing professional framework and the assessment and recognition of competence. During our limited inspection we found little evidence that PDRs are being completed widely, other than by those seeking promotion or police staff in professional departments such as finance and legal services (where

³³ *Fair cop 2: Organisational justice, behaviour and ethical policing*, College of Policing, 2015.

Available at:

http://whatworks.college.police.uk/Research/Documents/150317_Fair_cop%202_FINAL_REPORT.pdf.

³⁴ College of Policing guidance on the police performance development review (PDR) process is available from www.college.police.uk/What-we-do/Support/Reviewing-performance/Pages/PDR.aspx. See also the College of Policing's competency and values framework. Available from: www.college.police.uk/What-we-do/Development/competency-and-values-framework/Pages/Competency-and-Values-framework.aspx

³⁵ *PEEL: Police legitimacy 2016 – An inspection of Greater Manchester Police*, HMIC, 2016. Available from: www.justiceinspectorates.gov.uk/hmicfrs/publications/peel-police-legitimacy-2016-greater-manchester/

individuals use the PDR process to evidence their occupational competence and continuing professional development). However, we did find that one-to-one discussions between workforce members and their line managers were being regularly and widely completed. The force requires that officers and staff who put themselves forward for promotion, or who are being considered for the talent management scheme, have a structured and current development plan in place. The force provides training to line managers and supervisors as part of the leadership programme that covers officer and staff performance management and development.

Identifying potential senior leaders

Greater Manchester Police's talent management scheme is designed to identify and support potential future leaders. Senior leaders in boroughs and branches are responsible for identifying and managing those with leadership potential up to sergeant and police staff equivalent level. Similarly, the force's organisational learning and workforce development branch manages the process for those aspiring to chief inspector and equivalent police staff levels and above. Officers and staff who are selected for the talent management programme are provided with additional support based on their individual development plan. As a minimum, they will be allocated a coach or mentor and given access to development tools, including 360-degree feedback and personality profiling to identify their preferred individual methods of learning and development. Additionally, the force provides external coaching support for those recognised as having chief officer potential. However, we found little evidence that members of the workforce know about or value the talent management processes. The force may wish to consider how it can improve awareness among its officers and staff to increase their confidence and participation in the talent management scheme.

The force has implemented the personal development and action learning sets (PEDALs) programme in conjunction with the College of Policing to identify and develop those with leadership potential. The first two cohorts, one of police officers, the other police staff, were exclusively open to those from BAME backgrounds, who are under-represented in senior leadership positions. The force is now working with a third cohort which is open to all officers and staff.

The force has been successful in securing nine officers as part of the Police Now programme, and has also selected three direct entry officers at inspector level and one at superintendent level, who will start work later in the year.

Selecting leaders

In consultation with staff association representatives and members of the independent ethics committee, Greater Manchester Police has recently reviewed its promotion selection processes and re-designed them to maximise fairness. All those involved in making selection decisions are required to successfully complete training in the identification and avoidance of unconscious bias. Selection is made against the published standards and expected behaviours. Moreover, members of the workforce can put themselves forward for consideration without the need for their line manager's endorsement. Shortlisting processes are conducted using anonymised application forms and all candidates are provided with individual feedback at the end of the process. All of those we spoke with who are involved in promotion selection processes, including representatives of the Police Federation, Police Superintendents' Association and trade unions, felt that they were fair, open and accessible. This view is supported further by a few officers who reported that they had recently been unsuccessful in the promotion process to the rank of sergeant.

Summary of findings

Greater Manchester Police works hard to treat its workforce with fairness and respect. Senior leaders seek feedback and challenge through a range of channels, and the force is good at communicating improvements made as a result. We found that the workforce had confidence in the grievance process and the force is taking effective action to reduce disproportionality in the workforce. The wellbeing of the workforce continues to be a priority for the force, and the importance of early intervention is acknowledged and understood. All officers and staff with whom we spoke were positive regarding the force response to wellbeing following the terrorist bombing in May 2017. The force approach to managing individual performance remains inconsistent, although this year we were satisfied that line managers are holding regular meetings with their officers and staff. The identification and management of those with leadership potential is also inconsistent. Promotion selection processes have been revised to ensure fairness and eliminate bias and we found confidence among the workforce that such processes are fair, open and accessible.

Areas for improvement

- The force should implement and then monitor the effectiveness of the revised personal development process for officers and staff throughout the force.
- The force should improve the awareness among the workforce of the talent management process and increase their confidence and participation in the scheme.

Next steps

HMICFRS will assess progress on any recommendations and areas for improvement identified within its reports in a number of ways. We either re-visit those forces where we have identified a serious cause of concern, go back to assess them as part of our annual PEEL inspection programme or receive updates on their progress through regular conversations with forces.

HMICFRS highlights recurring themes emerging from our PEEL inspections of police forces within our national reports on police effectiveness, efficiency, legitimacy and leadership. These reports identify problems that are reflected across England and Wales and may contain additional recommendations directed at national policing organisations, including the Home Office, where we believe improvements need to be made at a national level.

Annex A – About the data

Data used in this report

The source of the data is presented with each figure in the report, and is set out in more detail in this annex. The source of Force in numbers data is also set out below.

Methodology

Please note the following for the methodology applied to the data.

Comparisons with England and Wales averages

For some datasets, the report states whether the force's value is 'lower', 'higher' or 'broadly in line with' the England and Wales average. This is calculated by using the difference from the mean average, as a proportion, for all forces. After standardising this distribution, forces that are more than 0.675 standard deviations from the mean average are determined to be above or below the average, with all other forces being broadly in line.

In practice this means that approximately a quarter of forces are lower, a quarter are higher, and the remaining half are in line with the England and Wales average for each measure. For this reason, the distance from the average required to make a force's value above or below the average is different for each measure so may not appear to be consistent.

The England and Wales averages will differ slightly from the Value for Money Profiles because we have included City of London Police and the Metropolitan Police Service within the average in this publication.

Statistical significance

When commenting on statistical differences, a significance level of 5 percent is used.

For some forces, numbers described in the text may be identical to the England and Wales average due to decimal place rounding, but the bars in the chart will appear different as they use the full unrounded value.

Population

For all uses of population as a denominator, unless otherwise noted, we use the Office for National Statistics (ONS) mid-2015 population estimates.

Note on workforce figures

All workforce figures are from the Home Office Annual Data Return (ADR) published in the Home Office's published police workforce England and Wales statistics (available from www.gov.uk/government/collections/police-workforce-england-and-wales), or the Home Office police workforce open data tables (available from www.gov.uk/government/statistics/police-workforce-open-data-tables).

This year we have tried to align our workforce categories with those in the Home Office workforce Statistics publication.

This means data presented on the gender and ethnic diversity of the workforce we have not included Section 38-designated officers within the 'Police Staff' category so that these figure will read across to the workforce publication more easily. However we have included Section 38-designated officers within descriptions of the total workforce to be consistent with HMICFRS Efficiency reports.

Please note that all workforce figures are in full-time equivalent (FTE) unless otherwise stated and exclude traffic wardens and special constables.

Force in numbers

Workforce (FTE) for 2016/17

Data may have been updated since the publication. Workforce includes Section 38-designated investigation, detention or escort officers, but does not include Section 39-designated detention or escort staff³⁶. The data are the actual full-time equivalent (FTE) and data for 2016/17 are as at 31 March 2017.

For FTE, these data include officers on career breaks and other types of long-term absence, and excludes those seconded to other forces.

Ethnic diversity and gender diversity

Data may have been updated since the publication. As noted above to align categories with Home Office publication the Police Staff category does not include Section 38-designated officers. Staff ethnicity data are derived from headcount rather than FTE.

Grievances

Data are derived from the HMICFRS data collection conducted prior to inspection. The data refer to those grievances that were raised and subject to a formal process (not including issues informally resolved with a line manager).

³⁶ See sections 38 and 39 of the Police Reform Act 2002. Available at: www.legislation.gov.uk/ukpga/2002/30/section/38

Stop and search

Data are derived from the Home Office Police Powers and Procedures England and Wales year ending 31 March 2016 publication (available at www.gov.uk/government/statistics/police-powers-and-procedures-england-and-wales-year-ending-31-march-2016). Stop and search totals used exclude vehicle only searches and those searches where the ethnicity of the subject was 'not stated'. The population data used is usual residents by ethnicity from the 2011 census.

Figures throughout the report

Figure 1: Likelihood of black, Asian and minority ethnic (BAME) people being stopped and searched (under section 1, PACE) compared with white people, in the local population of Greater Manchester Police in the 12 months to 31 March 2016

Data are derived from the Home Office Police Powers and Procedures England and Wales year ending 31 March 2016 (available at www.gov.uk/government/statistics/police-powers-and-procedures-england-and-wales-year-ending-31-march-2016). Stop search totals used exclude vehicle only searches and those searches where the ethnicity of the subject was 'not stated'. Data may have been updated since publication. The likelihood of a stop and search is based on the number of stop searches per 1,000 population for each ethnic group. The population data used is usual residents by ethnicity from the 2011 census. These are the most robust and up-to-date population breakdowns by ethnicity.

Figure 2: Grievances raised per 1,000 workforce, in Greater Manchester Police in the ten months from 1 April 2016 to 31 January 2017

Figure 3: Grievances raised by officers, PCSOs and staff (per 1,000 officers, PCSOs and staff), in Greater Manchester Police in the ten months from 1 April 2016 to 31 January 2017

Data are derived from the HMICFRS data collection conducted prior to inspection. The data refer to those grievances that were raised and subject to a formal process (not including issues informally resolved with a line manager). Differences between forces in the number of raised grievances may be due to different handling and recording policies.

Figure 4: Percentage of officer joiners, officers in post, officers in senior roles and officers serving over 20 years who are black, Asian or minority ethnic (BAME), in Greater Manchester Police in 2016/17, compared with the percentage of BAME people in the local population

These data are derived from ADR 511, 512 and 521. Data may have been updated since the publication. Officer ethnicity totals are based on numbers of people (referred to in the Home Office data as headcount) rather than FTE.

Figure 5: Comparison of officer leaving rates between white and black, Asian or minority ethnic (BAME) officers (per 1,000 white or BAME officers), in Greater Manchester Police from 2007/08 to 2016/17

These data are derived from ADR 511 and 531. Data may have been updated since the publication. Officer ethnicity totals are headcount rather than FTE.

Figure 6: Percentage of officer joiners, officers in post and officers in senior ranks, by gender, in Greater Manchester Police in 2016/17 compared with the percentage of women in the England and Wales population

These data are derived from ADR 502 and 521. Data may have been updated since the publication.

Figure 7: Comparison of officer leaving rates between male and female officers (per 1,000 male or female officers), in Greater Manchester Police from 2007/08 to 2016/17

These data are derived from ADR 502 and 531. Data may have been updated since the publication.

Figure 8: Percentage of officers on short or medium-term sick leave, in Greater Manchester Police compared with the England and Wales average, on 31 March from 2008 to 2017

Data used in the above data were obtained from Home Office annual data returns 501 and 552 and published in the Home Office police workforce open data tables (available from www.gov.uk/government/statistics/police-workforce-open-data-tables).

Figure 9: Percentage of officers on long-term sick leave, in Greater Manchester Police compared with the England and Wales average, as at 31 March from 2008 to 2017

Data used in the above data were obtained from Home Office annual data returns 501 and 552. (available from www.gov.uk/government/statistics/police-workforce-open-data-tables). Long-term sick leave is defined as an absence due to sickness that has lasted for more than 28 days as at 31 March 2017. Data may have been updated since the publication.

Stop and search record review methodology

HMICFRS was commissioned by the Home Office to conduct a further assessment of reasonable grounds, building on the assessments we carried out in 2013 and 2015 so that we could demonstrate any changes over time. We used a similar methodology to do this: forces provided details of stop and search records by

working back in time from 7 January 2017 until a total of 200 was reached.³⁷ This amounted to a total of 8,574 records – some records provided were not actually records of stop and search encounters, and these were excluded. As part of our assessment, we gave forces the opportunity to review our findings and make representations.

As in 2013 and 2015, HMICFRS reviewed each record to assess the reasonableness of the recorded grounds. However, this year we also identified how many of the records reviewed were carried out to search for drugs and whether stop and search was carried out for drugs, whether the suspicion involved possession only or the more serious supply-type offence. Currently forces are not required to differentiate between the two. We did this so that we could ascertain how many in our sample were for possession of drugs, rather than supply, as high rates of possession-only searches are unlikely to fit with force priorities.

This year, for the first time, we assessed whether or not the use of stop and search powers prevented an unnecessary arrest. We did this to ascertain how many of the records reviewed involved allaying the officer's suspicion in circumstances where the person would otherwise have been arrested, thereby representing a positive use of the powers. Allaying suspicion and preventing an unnecessary arrest is as valuable as confirming suspicion by finding the item searched for.

Professional standards case file review methodology

During February and March 2017, inspection teams from HMICFRS visited the individual or professional standards departments working collaboratively of each force to conduct a case file review. We asked forces to provide us with the last case files they had finalised up to 31 December 2016; but going back no further than two years. We asked to see:

- 10 complaints the force had recorded as containing an allegation of discrimination
- 15 complaints the force had recorded in categories we felt may contain unidentified allegations of discrimination
- 10 service recovery complaints (if the force operated a separate service recovery scheme)
- 10 internal misconduct allegations the force had recorded as containing an allegation of discrimination

³⁷ City of London Police was unable to provide records up to 7 January 2017 but instead provided 200 records from 4 October 2016 to 26 November 2016.

- 10 other internal misconduct allegations (so that we could ascertain if they contained unidentified allegations of discrimination)
- 10 grievances (and 10 workplace concerns if the force recorded these separately)

We assessed these case files against the relevant legislation, guidance and code of practice³⁸ to answer the following questions:

- Access to the system – Has the force identified those cases where the complainant requires additional support to make their complaint, and has that support been provided?
- Initial information – When the complaint was recorded, did the force provide the complainant with a copy of the complaint record, an explanation of the possible ways the complaint may be dealt with, and advised who will be dealing (including contact details)?
- Keeping complainants updated – Has the force provided complainants, witnesses, and those who are the subject of the complaints with regular, meaningful updates?
- Final outcome – Did the force provide the complainant with the findings of the report, its own determinations and the complainant’s right of appeal?
- Handling discrimination – Has the force failed to identify any allegations of discrimination? Have any discrimination cases that meet the IPCC mandatory referral criteria been so referred? Has the force investigated the complaints alleging discrimination satisfactorily? Overall, has the complainant making an allegation of discrimination received a good service from the force?
- Grievances/workplace concerns – Has the force identified, investigated and resolved the grievance satisfactorily? Has the force put arrangements in place to support the employees or witnesses throughout the process? Did the witness and those who are subject to the allegations receive a satisfactory service from the force?

³⁸ Relevant police complaints and misconduct legislation, IPCC statutory guidance, IPCC guidelines for handling allegations of discrimination, Acas code of practice on disciplinary and grievance procedures and Acas discipline and grievance guide.