

BEV HUGHES
DEPUTY MAYOR
OF GREATER
MANCHESTER

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

3rd February 2021

Dear Home Secretary

SUBJECT: Her Majesty's Inspectorate of Constabulary and Fire & Rescue Services (HMICFRS) inspection of the service provided to victims of crime by Greater Manchester Police (GMP).

I write in response to the recent HMICFRS report that reviewed the service provided to victims of crime by Greater Manchester Police.

The inspection has raised many issues of concern and I am able to write to you today to update you on the progress being made on rectifying the issues identified in that report, and our plans for the future.

Before I respond directly to the recommendations, I wanted to provide an overview of the work undertaken in direct response to the report. A wide-ranging improvement plan to address the concerns of the inspectorate has been developed and shared with both HMICFRS and the Home Office. We have also commenced a second piece of work to identify and address the root causes of the issues identified.

Meetings have been held with both the Minister for Crime and Policing and HMICFRS where a number of key actions were agreed for immediate implementation. This includes:

1. The establishment of a dedicated helpline to offer a support service to those victims of crime who may not have had their crime adequately recorded and/ or an appropriate referral in to support services to assist them to cope and recover. This is being provided through Victim Support who currently deliver the Greater Manchester Victims Service offer and is supported by the Greater Manchester Combined Authority (GMCA) and GMP.
2. For every GMP Sergeant and Constable to undertake a refresher course in compliance in crime recording and victim care by the end of January 2021. The Victims' Commissioner for England and Wales, Dame Vera Baird QC, has agreed to offer advice and support in respect of this training and the wider improvements for victims.

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3. To expedite the recruitment of staff to GMP's Central Recording and Resolution unit which has already demonstrated improvements in crime recording, providing a 98% compliance rate and will continue to drive improvement on this matter.
4. To continue to engage collectively with the Home Office, the College of Policing and the National Police Chiefs Council until a time when GMP are able to evidence sufficient improvement and are able to be taken out of the national oversight process.
5. The establishment of a Gold command group overseen by the Chief Constable and chaired by the Deputy Chief Constable to monitor the activity around implementing the HMICFRS report recommendations. This will be supported by officers from the Police and Crime Commissioner's office and the GMCA Audit team and will report weekly to the Mayor and myself on a monthly basis.

In addition;

- PWC have been commissioned to review independently the governance and action planning in place to support delivery of the HMIC Victims Service Assessment Strategy and Improvement Plan.
- GMCA and GMP have engaged with policing partners nationally to seek support and best practice learning available within the sector.
- GMCA ICT specialists have undertaken discussions and workshops with frontline officers, staff and the IOPS team to formulate recommendations for improvements to the system.
- GMP have launched an internal communications campaign, 'Think Victim' to underpin the improvement programme.
- Work is underway to commission an independent, ongoing survey with victims of crime to give a real time indication of the service they are receiving.

In respect of the recommendations outlined within the report. I would like to provide the following update:

The force should immediately:

Take steps to identify and address gaps in its systems and processes for identifying and recording all reports of crime.

A lot of work has been completed to date in relation to grade 1 - 3 incident reporting and the introduction of a prioritised programme board to ensure the effective delivery of a centralised crime recording response. In addition, the Force Crime Registrar continues to review all entry points to GMP to ensure there is assurance that any gaps have been identified and mitigating action taken where required to ensure adherence with National Crime Recording Standards (NCRS).

Put in place arrangements to make sure that adequate supervision is applied to crime-recording decisions made by officers and staff.

Improvements in supervision is being driven as part of the force Crime Standards Board; the newly introduced Investigation Standards and Victim Focus audit and also the supervisory open crime review directive. These audits consider NCRS compliance, VCOP compliance, quality of investigation, any outstanding lines of enquiry, outcomes, supervision and victim engagement. Following the audits a number of incidents from each division are moderated to test the robustness of the audit process.

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Bespoke training for all supervisors outlining the requisite standards and performance requirements is being rolled out and all supervisors are to be trained in supervisory responsibilities by the end of February 2021.

Reinforce the requirement for the use of investigation plans, where these should be recorded and the supervisory responsibilities for overseeing and reviewing these, and introduce effective governance arrangements so it can satisfy itself that this is being done.

This recommendation has made good progress. Improvement is being driven as part of the force Crime Standards Board and the recently introduced Investigation Standards audit. A position has been agreed as to the location of investigation plan updates within the recording systems and these clear messages and processes are to be included in the investigation standards training to be delivered in January to March to all frontline supervisors and officers.

GMP has also made progress in enhancing and embedding clear and accountable governance lines which focus on the delivery of the improvement plan and the improvement of victim satisfaction and crime standards. This includes strong accountable governance lines in each district, chaired by the senior leaders in the relevant areas. In turn, these senior leaders feed into the Force Crime Standards Board, which currently meets bi-weekly to ensure timely progress and information delivery.

Put in place arrangements to make sure that in all investigations the risk to victims has been appropriately assessed and sufficiently documented, and that any risks are mitigated.

A considerable amount of progress has been made in delivering key improvements in the identification and assessment of risk to all service users of GMP, whether a victim of crime or reporting any other concern to the police. The Operational Communications Branch (OCB) has commenced THRIVE (Threat, Harm, Risk, Investigation, Vulnerability, Engagement) training to all OCB supervision and this training is to be delivered to all call handlers by the end of February 2021. The THRIVE training enables every call made to GMP to be endorsed with a comprehensive risk assessment at that very first point of contact.

Whilst GMP has processes for the identification and documentation of risk for incidents where vulnerability is identified, and how to provide appropriate responses in partnership, it is acknowledged that further work is required to ensure the risk assessments must be continuous and consider each entry point throughout the investigative process.

Within three months the force should:

Start crime-recording training for all supervisors, officers and staff in a crime-recording role, to include the crime-recording requirements for harassment, stalking and coercive and controlling behaviour offences.

Bespoke continuous professional development sessions have been authored in direct response to this recommendation. These sessions are specifically for all staff and officers in crime recording roles, with three sessions completed before the end of January 2021. In addition, GMP will embark on a Forcwide online training programme for all frontline officers and supervision. This training includes NCRS compliance, behavioural offences, investigation outcome training and the importance of having a victim-focussed mind-set throughout the life of every investigation.

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Complete an assessment of the standard and supervision of investigation plans and put in place any identified remedial actions to ensure the plans support a high standard of investigation and a good service to victims.

In response to this recommendation action was taken in December 2020 with the commencement of the Forcewide Investigation Standards and Victim Focus Audit and the supervisory directive.

Make arrangements to improve the use and supervision of cautions and community resolutions so that they are only applied in appropriate circumstances, taking into account the nature of the offence and the background of the offender. The arrangements should include seeking victims' views about the use of these outcomes, and the force should ensure that it records and considers these views.

As detailed above, bespoke continuous professional development sessions have been developed for all staff and officers in crime recording roles across the Force. In addition, supplementary Forcewide online training programme for all frontline officers and supervision will include NCRS compliance, behavioural offences, investigation outcome training and the importance of having a victim focussed mind-set throughout.

In addition, in my role as chair of the local Justice and Rehabilitation Executive in June last year I established a task and finish group to strengthen the arrangements in respect of out of court disposals. These new arrangements including a standard operating procedure commenced in September 2020. The panels are chaired by the chair of the Police and Crime Panel and as well as GMP have representatives from the lay magistracy, CPS, victim's services, youth justice and probation. The findings of the panels are reported formally to myself and the chief constable by way of a letter from the chair. Already the panels have identified much of the same issues raised by HMICFRS and will provide an additional ongoing mechanism to drive improvement in this particular area.

Complete a review to understand why it uses such a high proportion of outcome 16 (where a victim is recorded as not supporting or withdrawing support for police action) in respect of domestic abuse. This review should ensure the use of this outcome is not being affected by the quality and timeliness of investigations or workload pressures on police officers and staff; and that it is only being used in appropriate circumstances, supported by an auditable record of the victim's decision.

This is a very important point, and one that requires immediate attention. I can confirm that qualitative audits have been completed in relation to the use of outcome 16 in respect of cases of domestic abuse and rape. The findings of these audits are being collated to enable identified learning to be cascaded as part of the overarching improvement plan. To enable a transparent and holistic approach to gaining this understanding, a separate audit of body worn video has also commenced, to provide an insight into what the officer and victim sees and experiences.

Alongside this body worn video review, GMP is using informed risk assessments to contact, via victim services, victims of crime where outcomes 16 have been recorded. This is to allow GMP to hear the thoughts, feelings and experiences from the victims in their own words to ensure these are incorporated into trying to understand why this has happened.

The outcomes from these audits will enable tangible learning points to be include in future training and communications plans to officers.

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Within six months the force should:

Complete a review of its operational governance arrangements. It should ensure the review properly and adequately considers relevant information and data, and has the appropriate authority and is effective in directing the necessary activity and actions needed to address identified shortcomings in the service provided to victims at any stage of their engagement with the force.

This action is progressing, with a wide review underway to assess the operational governance arrangements across GMP. This work will identify where there are gaps and risk and enable plans to be put in place to provide clear oversight.

Whilst I do not avoid the important issues raised in the report, I must also highlight the positive aspects. In particular, the excellent recording rates for rape and sexual offences. This provides a platform to build on over the next six months and beyond.

Both the Mayor and I fully acknowledge the work that needs to be undertaken in response to the concerns raised. The necessary improvements and changes need to be made at pace, ahead of HMICFRS undertaking a follow up review in six months time. Between now and then, as set out previously, I will be closely supporting, and holding to account, GMP on the progress they are making against those HMICFRS recommendations.

Yours sincerely



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

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