

**KATE GREEN**  
**DEPUTY MAYOR  
OF GREATER  
MANCHESTER**

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

Date: 5<sup>th</sup> December 2024

Dear Home Secretary,

**SUBJECT: HMICFRS Inspection response - *The policing response to antisocial behaviour: PEEL spotlight report***

I write in response to the recent publication of the HMICFRS report '*The policing response to antisocial behaviour: PEEL spotlight report.*'

I wish to start by thanking HMICFRS for producing a comprehensive spotlight report from their recent PEEL inspections and for sharing best practice from across the country. I very much welcome the findings and note the eight recommendations set out in the report. I have discussed the report with the Chief Constable of Greater Manchester Police (GMP) and outline below the forces responses to the five recommendations that require action.

From the Greater Manchester Police & Community Safety Survey, we know that Anti-social behaviour is by far the biggest driver for residents feeling unsafe in their local area, with 43% of those who say they feel unsafe / very unsafe in their local citing it as the primary reason.

As the responses provided below evidence, GMP are fully committed to ensuring that they have effective intelligence, risk and response polices in place to address reports of Anti-Social Behaviour. Further, through their neighbourhood policing teams, GMP are ever strengthening their place-based partnerships to implement robust and effective problem-solving approaches, which are implemented where significant ASB issues have blighted communities for far too long.

**Summary of GMP response to HMICFRS Recommendations**

**Recommendation 1**

**By 31 March 2025, forces should review their processes for recording antisocial behaviour to make sure all antisocial behaviour and associated crime are recorded correctly.**

GMP's Corporate Development Branch is revising ASB recording processes to meet the updated National Standards for Incident Recording & Auditing (NSIR&A). The introduction of two specific ASB codes — ASB Personal and ASB Community — will help clarify and improve data categorisation and response:

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**ASB Personal:** Captures incidents perceived as targeted toward specific individuals, potentially impacting their quality of life. This category includes a range of behaviours, from minor nuisances to serious harassment. By using an ASB Personal qualifier, repeated incidents involving the same victim are easily identifiable, facilitating tailored support and interventions.

**ASB Community:** Applies to incidents affecting public spaces and community well-being, such as public disturbances or environmental issues like littering. This code enables GMP to monitor community-impacting behaviours, allowing data-driven responses and interventions that align with community priorities.

This approach aims to streamline data retrieval, reduce administrative burdens, and improve incident tracking. With more focused auditing practices, GMP expects to boost response quality and ensure accurate crime recording for effective resource allocation.

**Timeline for completion:** This revision is scheduled to be completed before 31 March 2025, enhancing GMP's ASB incident visibility and enabling timely interventions in line with national crime recording standards.

## Recommendation 2

**By 30 September 2025, forces should make sure personnel are appropriately trained to identify and record antisocial behaviour and associated crime when they are first reported.**

GMP has implemented the THRIVE model (Threat, Harm, Risk, Investigation, Vulnerability, and Engagement) for ASB incident handling across all contact points (phone, online, and social media). Recently, all FCCO (Force Contact and Crime Operations) personnel received enhanced THRIVE training to:

- **Standardise Risk Assessment:** THRIVE allows staff to evaluate ASB incidents for risk and vulnerability comprehensively, prioritising cases that may require immediate attention.
- **Ensure Consistent Recording:** Staff apply THRIVE to determine and record relevant risk factors systematically, ensuring uniform data entry and reliable incident tracking across platforms.
- **Support Decision-Making Flexibility:** The GMP ASB policy, updated in November 2024, establishes guidelines that encourage victim-centred decisions, empowering staff to respond based on case-specific needs while aligning with national best practices.

**Timeline for completion:** THRIVE training review will complete by March 2025, with full staff readiness targeted by 30 September 2025.

## Recommendation 3

**By 31 March 2025, forces should:**

- **Review their risk assessment processes for antisocial behaviour cases to make sure that risks are properly assessed from initial contact to case closure; and**
- **Make sure completed risk assessments are retained in line with management of police information guidelines.**

GMP uses the THRIVE model to conduct risk assessments on all ASB cases, employing the following protocols:

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- **Comprehensive Incident Logging:** ASB incidents are recorded and tracked in GMP’s Control Works and Police Works systems, enabling continuity in risk assessment. Risk levels are routinely reassessed throughout an incident’s lifecycle.
- **Multi-Agency Support:** If an ASB incident includes safeguarding concerns, officers escalate the case to the Multi-Agency Safeguarding Hub (MASH) or district safeguarding teams. This process involves completing a Care Assessment Plan (CAP), which activates support from external agencies, ensuring a collaborative approach.
- **Targeted Safeguarding for Vulnerable Individuals:** GMP mandates that officers reassess vulnerabilities if an incident initially categorised under another offence, such as criminal damage, is later linked to ASB. This ensures risk factors are not overlooked and provides additional protection for vulnerable victims.
- The implementation of CAPs within neighbourhood policing teams ensures cases are managed with continuity, allowing officers to maintain a victim-focused approach.

This approach has improved management and documentation of ASB risk, ensuring compliance with police information management guidelines and safeguarding protocols.

**Timeline for completion:** Processes for continuous risk assessment and documentation are fully implemented, with governance in place to ensure ongoing compliance.

#### Recommendation 4

**By 31 December 2024, forces should:**

- **make sure all antisocial behaviour problem-solving plans fully specify the problem, contain sufficient detail, are effectively supervised; and**
- **evaluate all antisocial behaviour problem-solving plans for an outcome in line with national police Chiefs’ Council Neighbourhood Policing Outcome and Performance Guidelines.**

GMP has developed a structured process for ASB problem-solving plans that includes:

- **Initial Quality Assurance (QA):** Each ASB problem-solving plan undergoes an initial QA to ensure the problem is clearly defined and meets the organisation’s standards. This step ensures that plans contain sufficient detail and align with the SARA model (Scanning, Analysis, Response, and Assessment).
- **Regular Reviews:** Problem-solving plans are reviewed monthly by the Prevention Branch, and interim assessments are conducted every three months. If a plan proves ineffective, alternative tactics are implemented to adjust the approach.
- **Outcome Evaluation:** Plans are assessed based on demand reduction, sustainability, community and stakeholder impact, and cost-effectiveness. High-performing plans are documented in a “What Works” library, serving as models for other districts.
- **Enhanced Accountability:** GMP’s IOPS system now categorises problem-solving plans by outcomes (e.g., “Outcomes Achieved,” “Problem Ceases to Exist”), allowing for ongoing tracking of plan effectiveness and compliance with NPCC guidelines.
- The NPCC Performance Guidelines have shaped the current framework, particularly regarding the importance of robust initial, interim, and final assessments, which were identified early as critical for success. The final assessment will be further strengthened through community feedback gathered via the GMP Community Messaging service ‘Bee in Loop system’. Feedback from Tilley Judges has consistently recognised the strength of the current final assessment approach.

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The structured approach to ASB problem-solving, including scheduled assessments and tracking outcomes, ensures plans are both transparent and outcome focused.

**Timeline for completion:** Full implementation and continuous monitoring are in place, with ongoing compliance due by 31 December 2024.

### Recommendation 8

**By 30 September 2025, forces should give all neighbourhood policing teams antisocial behaviour training that makes best use of the College of Policing’s antisocial behaviour guidance and resources.**

To prepare neighbourhood policing teams, GMP has integrated ASB-specific training into the City & Guilds Accredited Neighbourhood Policing course. This training program includes:

- **Updated ASB Toolkit:** Distributed in the Neighbourhood Handbook, this toolkit offers situational guidance on ASB policies, powers, and legal tools, promoting a consistent response across all teams.
- **ASB Case Review Process Training:** GMP collaborated with ASB Help to develop training for Neighbourhood Senior Leadership Teams (SLTs) and Community Safety Partnerships (CSPs) on the ASB Case Review process, helping them engage effectively with ASB cases and raise awareness among their teams.
  - GMP’s City & Guilds Accredited Neighbourhood Policing course - Training Completion Summary:
    - 837 people have attended the course
    - 656 people have completed and certificated
    - 143 people are still working towards completion
    - 38 have withdrawn (changed roles / retired /left the force)
- **Continuous Professional Development (CPD) Access:** GMP’s membership with RESOLVE UK provides neighbourhood teams with CPD resources and tools. This ensures teams stay informed of best practices in ASB management and community engagement until the national Neighbourhood Policing Pathway becomes available.

With this ASB training program, GMP seeks to equip officers with essential skills for community-centred policing, improving both ASB intervention and public trust and confidence.

**Timeline for completion:** Training is ongoing, with full support for the College of Policing’s Neighbourhood Policing Pathway once nationally available by 2025-2026.

We know that Anti-Social Behavior can often go unreported due to the public’s perception that ASB is something that cannot be effectively addressed by the Police and partners. That perception is something the Mayor, myself and the Chief Constable are committed to changing in Greater Manchester. I am confident that the work GMP have already undertaken and their commitment to fulfilling all of HMICFRS’s recommendations, will send a clear message to communities that effectively tackling ASB is a clear priority in Greater Manchester.

Yours sincerely,



Kate Green  
**Deputy Mayor of Greater Manchester**

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