



Promoting improvements
in policing to make
everyone safer

PEEL: Police legitimacy 2016

An inspection of Greater Manchester Police



December 2016

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ISBN: 978-1-78655-288-4

www.justiceinspectorates.gov.uk/hmic

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Introduction

As part of our annual inspections of police effectiveness, efficiency, legitimacy and leadership (PEEL), Her Majesty's Inspectorate of Constabulary (HMIC) assesses the legitimacy 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). It is therefore 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 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 those decisions), as well as being friendly and approachable.¹ This is often referred to as 'procedural justice'. Police actions that are perceived to be unfair or disrespectful can have extremely negative results for 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 themselves are being treated fairly and respectfully, particularly by their own police force. It is therefore important that the decisions made by their force about the things that affect them are perceived to be fair.² This principle is described as 'organisational justice', and HMIC considers that, alongside the principle of procedural justice, it makes up a vital aspect of any assessment of police legitimacy.

¹ *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

² *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

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 tackle corruption. 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.

HMIC's legitimacy inspection assessed all of these areas during 2016. More information on how we inspect and grade forces as part of this wide-ranging inspection is available on the HMIC website (www.justiceinspectorates.gov.uk/hmic/peel-assessments/how-we-inspect/). This report sets out our findings for Greater Manchester Police.

Reports on Greater Manchester Police's efficiency and leadership inspections are available on the HMIC website (www.justiceinspectorates.gov.uk/hmic/peel-assessments/peel-2016/greater-manchester/). Our reports on police effectiveness will be published in early 2017.

Force in numbers



Workforce

Total workforce as of 31 March 2016

10,506

Total workforce breakdown as of 31 March 2016

| officers | staff | PCSOs |
|--------------|--------------|------------|
| 6,297 | 3,461 | 748 |



Ethnic diversity

Percentage of BAME in workforce 31 March 2016

overall workforce

5.4%

| officers | staff | PCSOs |
|-------------|-------------|--------------|
| 4.9% | 5.0% | 11.0% |

Percentage of BAME in local population, 2011 Census

16.2%



Gender diversity

Percentage of females in overall workforce 31 March 2016

40%

England and Wales population, 2011 Census

51%

Percentage of females by role 31 March 2016

29%

Greater Manchester Police

officers

60%

staff

PCSOs

39%



Public complaints

Number of public complaints per 1,000 workforce 12 months to 31 March 2016

Officers

Greater Manchester Police

237

England and Wales force average

268

Staff (including PCSOs)

34

61



Grievances

Number of grievances per 1,000 workforce raised and finalised 12 months to 31 March 2016

Officers

Greater Manchester Police

3.2

England and Wales force average

4.8

Staff (including PCSOs)

1.9

6.8



Victim satisfaction

Victim satisfaction with their overall treatment by the police 12 months to 31 March 2016

Greater Manchester Police

91.1%

England and Wales force average

93.4%

For further information about the data in this graphic please see annex A

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

Overall judgment³



Good

Greater Manchester Police has been assessed as good in respect of the legitimacy with which it keeps people safe and reduces crime.

Greater Manchester Police is good in its external fairness and respect, ethical and lawful behaviour, plus internal fairness and respect. The culture of the organisation reflects this through fair and respectful treatment of people, and ethical, lawful approaches to integrity. The organisation's fair and respectful treatment of the workforce and concern for welfare and wellbeing equally demonstrates this.

Overall summary

Greater Manchester Police strives to treat all of the people it serves with fairness and respect. It uses a variety of methods to seek feedback on public perceptions of treatment. We found good examples of where this feedback, and other issues identified by the force, had led to improvements to service provision.

Greater Manchester Police is good at ensuring that its workforce behaves ethically and lawfully. It has comprehensive vetting arrangements in place. It monitors and, if appropriate, takes positive action in cases where people with protected characteristics,⁴ such as age, disability or gender reassignment, fail the vetting process. The force has re-stated its commitment to the Code of Ethics and we found that staff were aware of this. The policy relating to the workforce declaring their business interests does not apply to all members of police staff. The force recognises this as a risk.

The counter-corruption strategy identifies the main risks to the integrity of the organisation. Processes are in place to identify and monitor members of staff who may be susceptible to abusing their position of authority for sexual gain. The force has introduced a policy of intelligence-led drug testing. It publishes the outcomes of

³ HMIC judgments are: outstanding, good, requires improvement and inadequate.

⁴ For more information about protected characteristics, see: www.gov.uk/discrimination-your-rights/types-of-discrimination

misconduct cases both internally and externally. The force has held five misconduct hearings to which the public and local media were invited. It publishes details of gifts and hospitality and details of chief officer expenses.

Greater Manchester Police is good at treating its workforce with fairness and respect. It has undertaken two wellbeing surveys and a cultural survey in recent years, together with wider engagement with its workforce to identify issues, including the need for wellbeing intervention at an earlier stage, to prevent problems escalating to crisis, and the force has taken action to address this. The force has a wellbeing charter and strategy, with delivery being overseen by the wellbeing board. The wellbeing provision has improved notably in the last 12 months, which many staff attribute to the new chief officer group, which actively encourages direct contact and challenge. The force has trained volunteers to create a peer support network, advising and assisting those showing signs of psychological illness. The force has developed a range of 'toolkits' for managers and staff to identify the early signs of illness and take preventative action. The policy on annual development reviews is not, however, being applied consistently or effectively across the force and action is required to address this. Officers within the force are carrying an unusually high level of rest days in lieu compared with the England and Wales average, which can have an adverse affect on wellbeing.

Recommendations

HMIC has not identified any causes of concern and has therefore made no specific recommendations.

Areas for improvement

- The force should ensure that its business interests policy applies to all members of its workforce.
- The force should ensure that it has the capability and/or capacity to monitor all its computer systems to identify risks to the force's integrity.
- The force should improve how it manages individual performance.

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 them openly and clearly), while being consistently friendly and approachable.⁵

While HMIC recognises that police legitimacy stems from much broader experiences of the police than direct contact alone, our 2016 inspection focused specifically on public perceptions of fair treatment. Our inspection aims to assess how far the force can demonstrate the importance it places on maintaining procedural justice; and the extent to which it is seeking feedback to enable it to prioritise and act on those areas that have the greatest negative impact on public perceptions of fair and respectful treatment (e.g. stop and search, surveillance powers or use of force). This should include how the force is approaching those groups that have the least trust and confidence in the police.

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

It is important for the police to understand that it is procedural justice – making fair decisions and treating people with respect – that drives police legitimacy in the eyes of the public, over and above police effectiveness at preventing and detecting crime.⁶ HMIC assessed the extent to which the importance of procedural justice was reflected in the force’s vision and values, and the extent to which it was understood by the workforce.

Organisational values

On his appointment in October 2015, the new chief constable set out his policing philosophy to the force, which includes the aim of being fair, ethical, clear and consistent with staff, partners and the public.

This approach is central to the implementation of the force’s target operating model (TOM) and is underpinned by the Code of Ethics.⁷ The force has recently undertaken

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 *Ibid.*

⁷ *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, London, July 2014. Available at: www.college.police.uk/What-we-do/Ethics/Documents/Code_of_Ethics.pdf

a nine-week education and awareness-raising programme, focusing on one element of the code each week. We found a good level of awareness and application of the code among both police officers and police staff. Reassuringly, this is an improvement on the findings of last year's inspection, when we found knowledge to be inconsistent and restricted to just four elements of the code: fairness, integrity, honesty and respect.

The force recognises the importance of procedural justice and has embarked on training all officers and staff who come into contact with the public. The force reported that, at the time of the inspection, this mandatory two-day customer service training course had been delivered to around 2,000 frontline officers and staff.

How well does the force seek feedback and identify those issues and areas that have the greatest impact on people's perceptions of fair and respectful treatment?

HMIC's 2015 legitimacy inspection found a positive picture of how forces were engaging with communities. This year HMIC's assessment focused specifically on the extent to which forces are working to identify and understand the issues that have the greatest impact on people's perceptions of fair and respectful treatment, including how well they seek feedback and challenge from the people they serve.

Seeking feedback and challenge

The force continues to develop good links with local communities and, together with the office of the police and crime commissioner, regularly seeks their views through a variety of means. These include:

- traditional public confidence and user satisfaction surveys;
- the extensive use of social media including Facebook, Twitter and Instagram;
- face-to-face methods, including meeting with community representatives in independent advisory groups. These are established in each borough and comprise local residents and representatives of local groups, who are consulted on the impact of local policing;

- monthly surveys with local residents by police and community support officers. These are designed to identify priority issues and concerns as well to understand how well local people think that their neighbourhood officers are working. The results are analysed and reported each quarter.

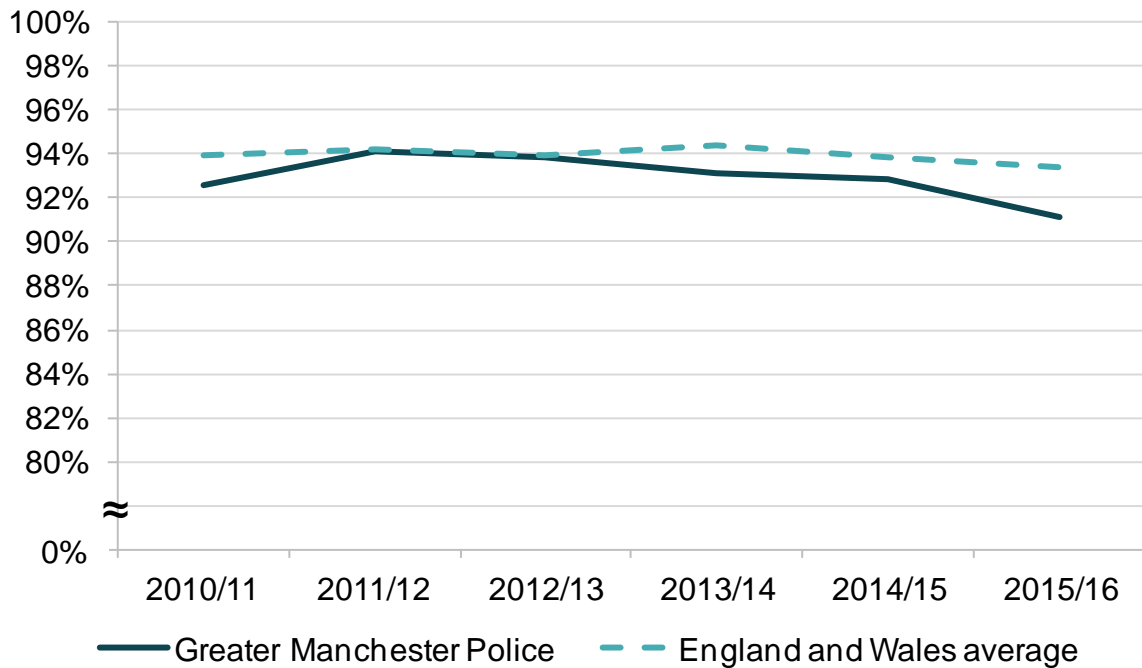
The force is in the process of piloting community review panels in each borough, which meet monthly and act as 'critical friends' advising on local priorities and issues. Pilots involving engagement and communications have been completed and a third, on the use of force, is being planned. After this, the force will review the model and consider whether it should be adopted permanently.

The force has continued its engagement with those who may have less trust and confidence in the police, for example, working collaboratively with the Crown Prosecution Service (CPS) and local groups in relation to victims of disability hate crime. This included training sessions to police officers, police staff and lawyers from the CPS on the fair and respectful treatment of people with a disability. Through the 'Connect2Youth programme', the force has engaged with young people to understand their issues and perspectives. This has led to training for police community support officers and eight members of the special constabulary who provide life skills coaching for young people.

Identifying and understanding the issues

All forces are required to conduct victim satisfaction surveys with specified victims of crime groups and provide data on a quarterly basis. The surveys take account of victims' experience of the service provided to them by the police, and inform forces' improvements to their service provision, including examining how well victims feel they are treated.

Figure 1: Percentage of victims satisfied with overall treatment by Greater Manchester Police compared with England and Wales, from the 12 months to 31 March 2011 to the 12 months to 31 March 2016



Source: Home Office Annual Data Requirement
For further information about the data in figure 1 please see annex A

In the 12 months to 31 March 2016, 91.1 percent of all victims of crime (excluding hate crime) who responded to the victim satisfaction survey were satisfied with the overall treatment provided by Greater Manchester Police, which was lower than the England and Wales average of 93.4 percent; and lower than the 92.9 percent who were satisfied with the overall treatment that the force provided in the 12 months to 31 March 2015, this is a statistically significant difference.

The force seeks to identify and understand key issues that affect public perception. For example, the corporate communications branch monitors and analyses the use of social media across the force, to assess both volume and content. The branch also publishes a quarterly report which identifies effective practice and advises on how to improve engagement with local people.

Each borough across the force has its own established independent advisory group, comprising local residents and representatives, who are consulted on local policing initiatives and their impact. The force has introduced community panel meetings, at which local neighbourhood officers are held accountable by local people. The force also has an independently chaired external ethics committee, which considers a variety of policy, procedural and operational matters. Recent examples of these have included the introduction of a policy on positive action support for members of black and ethnic minority communities who fail the force’s vetting procedures, and unannounced custody visits to monitor the fair and respectful treatment of people detained in police custody.

The force learns from experience how to improve both its practice and the relationship with communities. For example, it met with a local Muslim forum after a national counter-terrorism exercise in a large retail centre in Manchester. During the exercise, the actor playing the role of a suicide bomber made religious comments in Arabic, immediately before 'detonating' his suicide vest. The force recognised that the scenario might have caused offence to Muslims, so it explained to local groups what had happened and apologised for any offence caused. The incident was reported in the national media, but the feedback from local advisory groups was that the force's swift and positive action had reduced the significance and negative impact of the story locally. The force has now given an undertaking to involve such groups in the planning stages of future exercises.

In another example, the local Jewish community were becoming increasingly concerned about long-running protests regarding events in Palestine. The force deployed public order protest liaison officers, who were involved in planning meetings with the protest organisers. As tensions increased, the liaison officers were able to advise both sides as to what was lawful and what would be tolerated by the other. This helped to ensure that the protesters did not stray into illegal activity, while providing confidence to the whole community that the force was impartial and fair.

The office of the police and crime commissioner oversees the independent custody visitor scheme. The scheme currently has 36 trained volunteers who conduct unannounced visits to the force's custody suites. The scheme operates two panels covering the east and west of the force area and members provide regular reports to the force on their findings, highlighting any issues. The inspection found that the force responds promptly to issues raised and reports back to panel members on actions taken. This provides effective assurance to the public that people detained in police custody are being treated fairly and with respect. The force monitors information on complaints, misconduct and grievances to identify any trends or lessons that might be learnt regarding fair and respectful treatment of the public.

How well does the force act on feedback and learning to improve the way it treats all the people it serves, and demonstrate that it is doing so?

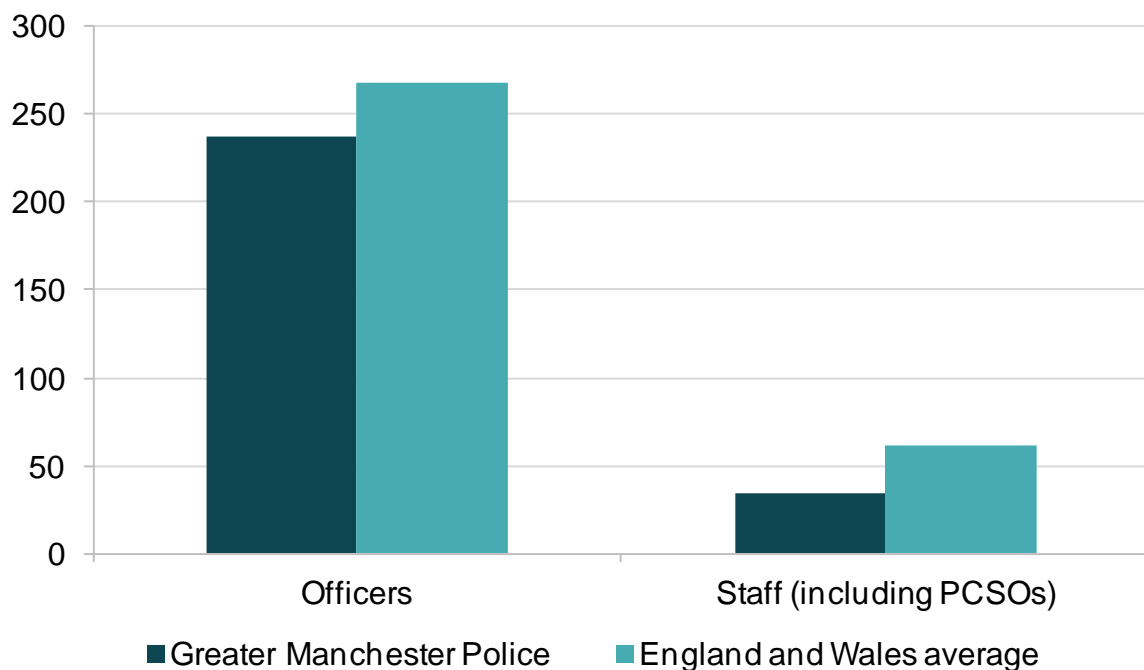
It is important that as well as actively seeking feedback from the public, the force also responds to that feedback. HMIC assessed the extent to which this response includes changes to the way the force operates to reduce the likelihood of similar incidents occurring in future, as well as resolving individual incidents or concerns, and how well the force communicates to the public the effectiveness of this action.

Making improvements

The chief constable's orders (a weekly circulation to all staff and officers in a force, with updates and information on important force activity) and the internal staff magazine are two sources of information and advice to staff. The professional standards branch also publishes the outcome of misconduct proceedings, including any common themes that it has identified as leading to public dissatisfaction. The professional standards branch reports to the force's learning and development board in order that consideration is given to any opportunity to address issues through changes to staff training. The force has developed good links with the lesbian, gay, bi-sexual and transgender (LGBT) community and has made improvements as a result of listening to feedback. For example, it has established third-party reporting centres, away from police premises, where people can report hate crime and establish contact with the police through trusted contacts. The force has also provided training to frontline officers and staff on the appropriate treatment of transgender issues, which was provided by transgender people themselves.

Each force in England and Wales is required to record the nature of complaint cases and allegations and be able to produce complaints data annually. The numbers and types of complaints are valuable sources of information for forces and can be used to help them identify areas of dissatisfaction with their service provision, and take steps to improve how they treat the public.

Figure 2: Number of public complaint cases recorded against officers (per 1,000 officers) or staff (per 1,000 staff, including police community support officers) in Greater Manchester Police compared with England and Wales, in the 12 months to 31 March 2016



Source: HMIC Legitimacy data collection

For further information about the data in figure 2 please see annex A

In the 12 months to 31 March 2016, Greater Manchester Police recorded 237 public complaint cases per 1,000 officers, which was broadly in line with the England and Wales average of 268 cases per 1,000 officers. During this period, the force recorded 34 public complaint cases per 1,000 staff (including PCSOs), which was broadly in line with the England and Wales average of 61 cases per 1,000 staff (including PCSOs).

The most recent Independent Police Complaints Commission (IPCC) data from forces show that, for April, May and June 2016, the types of complaint most frequently recorded by Greater Manchester Police are 'other neglect or failure in duty', 'incivility, impoliteness and intolerance' and 'other assault'.⁸ It is important to note, however, an issue identified during our 2014 inspection on police integrity and corruption:⁹ complaint allegation categories used by different forces may overlap with each other. For instance, similar allegations might be recorded by one force as 'other neglect or failure in duty', and by another force as 'other irregularity in procedure' or 'lack of fairness and impartiality'. This means there is no definitive way of establishing accurately the number of public complaints about certain behaviours.

The deputy chief constable chairs the force's standards board, which considers all aspects of professional behaviour and standards. The board is one of the mechanisms through which the chief officer team aims to change the culture of the organisation. Most recently it has considered the force's expectations on the dress and deportment of police officers and staff and has subsequently clarified the expected standards.

Demonstrating effectiveness

As mentioned above, the force uses a variety of appropriate mechanisms to review the effectiveness of its actions, to improve the way it treats the public, and to demonstrate to the public that it has done so. Opportunities for this include different ways of engaging with people, such as the independent advisory groups established in each borough of the force. For example, having identified that young people, especially those from black, Asian and minority ethnic backgrounds, were concerned and mistrusted the police's use of stop and search powers, the force responded in a variety of ways. In Manchester a local youth group gave training to local officers. In Salford the police worked with media students at the University of Salford, who produced a video on stop and search from the perspective of young people, which was used in training local officers to treat fairly and respectfully people whom they stopped and searched. At force level, working with the police and crime commissioner, a number of public forum events were held targeting young people

⁸ Independent Police Complaints Commission data is available at:
www.ipcc.gov.uk/reports/statistics/police-complaints/police-performance-data

⁹ *Integrity matters*, HMIC, January 2015. Available from:
www.justiceinspectorates.gov.uk/hmic/publications/integrity-matters/

and representative youth groups, culminating in the police and crime commissioner launching an online application¹⁰ which provides information and advice on stop and search, including the powers of the police and the rights of the individual. This application also allows people to provide feedback on how they were treated by the police and, if necessary, make a complaint.

In August 2014, following HMIC's 2013 inspection on the effective and fair use of stop and search powers¹¹ the Home Office published guidance to police forces on how to implement the Best Use of Stop and Search (BUSS) scheme.¹² The scheme aims to increase transparency and community involvement, and to support a more intelligence-led use of the powers, leading to better outcomes. All police forces in England and Wales signed up to participate in the scheme. In 2015, HMIC's legitimacy inspection¹³ considered the extent to which the force was complying with the scheme and found that it did not comply with all features of the scheme. In autumn 2016, HMIC is due to re-assess the force's compliance with those features of the scheme that it was not complying with in 2015. We will publish our findings in early 2017.

The force has recently experienced significant levels of environmental protest in response to proposed fracking activity in the area. Following concerns expressed by local residents and protesters, the force worked with both parties, listening to their respective concerns, and responded by changing its operational response to policing such protests.

Following the autumn 2015 budget settlement, which was better than it had been expecting, the force is looking to recruit 500 new officers per year from 2015/16 through to 2019/20. The focus in the first year has been on recruiting a more representative workforce, to improve legitimacy in the eyes of the public. The force has undertaken a positive action programme to attract applicants from black, Asian and minority ethnic (BAME) backgrounds. The force did not advertise the recruitment campaign to the wider public, knowing it would be inundated with applications from white males, who are traditionally over-represented. Instead, the force targeted those areas where such under-represented groups were more likely to be found – including places of worship, community centres, youth groups and education establishments –

¹⁰ For more information, see: <https://gmpcc.org.uk/stopandsearch/>

¹¹ *Stop and Search Powers – are the police using them effectively and fairly?* HMIC, July 2013. Available from: www.justiceinspectorates.gov.uk/hmic/publications/stop-and-search-powers-20130709/

¹² *Best Use of Stop and Search Scheme*, Home Office, August 2014. Available from: www.gov.uk/government/uploads/system/uploads/attachment_data/file/346922/Best_Use_of_Stop_and_Search_Scheme_v3.0_v2.pdf

¹³ *PEEL: Police legitimacy 2015 – A national overview*, HMIC, February 2016. Available at: www.justiceinspectorates.gov.uk/hmic/publications/police-legitimacy-2015/

and provided advice on the application process and information about working at Greater Manchester Police. The force reports that the programme resulted in over 800 applications for 200 vacancies, with approximately 70 percent of these applications from people from BAME backgrounds being successful. Although force statistics are promising, at the time of our inspection, the process was continuing, and therefore it has not been possible for the force or HMIC to assess the full effectiveness of the programme.

Summary of findings



Good

Greater Manchester Police strives to treat all of the people it serves with fairness and respect. The force has reinforced the standards it expects from its police officers and staff and it has clarified and highlighted the importance of the Code of Ethics. In contrast to the findings of the legitimacy inspection last year, in this inspection we found widespread understanding and awareness, not just of the code but also the importance of treating people properly. The force uses a variety of methods to seek feedback and challenge from the public on perceptions and experiences of treatment. These range from traditional surveys to extensive use of social media, independent advisory groups and the developing community panels to increase the voice and participation of local people. This includes, in particular, those who traditionally have less trust and confidence in the police. We found several good examples where this way of working with people had led to improvements.

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

In 2014, HMIC inspected the extent to which the police were acting with integrity and guarding against corruption.¹⁴ Given the continued importance of this topic, we are returning in this question to those national recommendations emerging from the 2014 report from that inspection, that our 2015 legitimacy inspection did not cover. Our inspection focus this year also reflects research showing that prevention is better than cure: the best way to ensure that police workforces behave ethically is for the forces to develop an ethical culture and to have systems in place to identify potential risks to the integrity of the organisations, so that forces can intervene early to reduce the likelihood of corruption.¹⁵

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

One of the first things forces can do to develop an ethical culture is to use effective vetting procedures to recruit applicants who are more likely to have a high standard of ethical behaviour and to reject those who may have demonstrated questionable standards of behaviour in the past, or whose identities cannot be confirmed.¹⁶

Once recruited, one of the best ways to prevent corruption from occurring among the workforce is by establishing an ethical working environment or culture. To achieve this, forces need to clarify and continue to reinforce and exemplify acceptable and unacceptable standards of behaviour, including the Code of Ethics.¹⁷ This year, HMIC focused on assessing progress in those areas highlighted for improvement in our 2015 legitimacy inspection and our 2014 integrity and corruption inspection.

¹⁴ *Integrity matters*, HMIC, January 2015. Available from:
www.justiceinspectorates.gov.uk/hmic/publications/integrity-matters/

¹⁵ *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

¹⁶ *College of Policing: Authorised Professional Practice on vetting*. Available at:
www.app.college.police.uk/app-content/professional-standards/vetting/

¹⁷ *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
and *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
and *Literature review – Police integrity and corruption*, HMIC, January 2015. Available at:
www.justiceinspectorates.gov.uk/hmic/publications/integrity-matters/

Initial vetting

Greater Manchester Police has robust arrangements for vetting applicants to the force. All police officers, police staff, volunteers, partners and contractors who have unsupervised or unrestricted access to police information, assets or premises undergo vetting proportionate to the risk and in accordance with the national police vetting policy.¹⁸

The force monitors the number of applicants who are screened out by the vetting process, including those with protected characteristics, such as age, disability or gender reassignment, and has a detailed understanding of the reasons why people have been unsuccessful. The head of the vetting unit reviews all vetting rejections to ensure that the decision was correct and to ascertain if there are any practical steps that the applicant could take to achieve successful vetting, such as by changing address or ending inappropriate associations. The head of the unit was able to provide evidence of occasions where his intervention had resulted in the successful vetting of people with protected characteristics who had previously been rejected. The head of vetting reports quarterly to the force's disproportionality working group on the vetting outcomes for people with protected characteristics.

The force is aware of the requirement to undertake vetting of police officers and staff who joined the force prior to the introduction of the current vetting standards in 2006. At the time of the inspection, the force reported that all serving police officers have been vetted to current standards and it plans to complete the vetting of the remaining police staff (approximately 800) by April 2017. In the interim, police staff are vetted if they move post or if their role involves exposure to information and assets considered high risk. The force always re-vets officers and staff if they change role, get promoted or if there is a significant change in personal circumstances. The force conducts annual reviews on all staff in designated posts and renews such vetting every five years.

The College of Policing's 'disapproved register' contains details of those officers who have been dismissed from the service or who either resigned or retired while subject to a gross misconduct investigation where it had been determined there would have been a case to answer. The force complies with its obligations to provide the College of Policing with details of those officers and staff who have been dismissed from the service for inclusion on the current disapproved register.

¹⁸ ACPO / ACPOS National Vetting Policy for the Police Community, Association of Chief Police Officers, 2012. Available from: [www.northants.police.uk/files/documents/Freedom Of Information/ac^ACPO National Vetting Policy.pdf](http://www.northants.police.uk/files/documents/Freedom%20Of%20Information/ac^ACPO%20National%20Vetting%20Policy.pdf)

ACPO is now the National Police Chiefs' Council.

Clarifying and reinforcing standards of behaviour

In our inspection of legitimacy in 2015,¹⁹ we found that the force had adopted the Code of Ethics, although it had focused on just four of the code's nine elements: fairness, respect, integrity and honesty. As mentioned above, the force has recently re-launched its commitment to the Code of Ethics and has run a nine-week programme of education and awareness raising, concentrating on one element of the code each week, including exploring ethical dilemmas to bring alive the code and ethical decision-making principles. It was reassuring to find during our inspection that police officers and staff across the force demonstrated a good understanding of the code and also confirmed the practical value of the recent training. In addition, the Police Federation has undertaken a series of 'prevent and educate' road shows to give the workforce information on integrity issues, including the registration of business interests, gifts, hospitality and notifiable associations.²⁰ The road shows also highlighted the dangers and consequences of integrity issues for officers and the force. This work is now being supported by the force's professional standards branch. During the inspection we found that police officers and staff across the force demonstrated a good awareness of such issues.

A record of gifts, hospitality and chief officer expenses is published both internally, via the intranet, and externally on the force's public website.

How well does the force identify, understand and manage risks to the integrity of the organisation?

HMIC's 2014 police integrity and corruption inspection emphasised the need for forces to make arrangements for continuous monitoring of their ethical health, through active monitoring of force systems and processes to spot risks to their integrity, including – but not limited to – business interests, gifts, hospitality and public complaints.²¹ These findings reflect the research commissioned by the College of Policing, which highlights the importance of taking a problem-solving approach to preventing wrongdoing, by scanning and analysing police data to identify particular officers or hotspots for targeting prevention activity.

¹⁹ *PEEL: Police legitimacy 2015 – Greater Manchester Police*, HMIC, 2016. Available from: www.justiceinspectorates.gov.uk/hmic/publications/police-legitimacy-2015-greater-manchester/

²⁰ A notifiable association policy is designed to identify those individuals who could pose a risk to the integrity of an individual employee or the force itself. It requires the officer or staff member to report such associations, which then allows a full evaluation of the risk posed to both the individual and the force to be undertaken.

²¹ *Integrity matters*, HMIC, January 2015. Available from: www.justiceinspectorates.gov.uk/hmic/publications/integrity-matters/

This year, HMIC was particularly interested in how well forces – from dedicated anti-corruption units to individual supervisors – are identifying and intervening early to reduce individual and organisational vulnerabilities (i.e. those individuals, groups or locations that may be susceptible to corruption). We also assessed how well forces are seeking and assessing intelligence on potential corruption, with a focus on those areas for improvement identified in our previous inspections.

Identifying and understanding risks to integrity

The force's professional standards branch and the counter-corruption unit have recently refreshed their strategic intelligence assessment. This has led to the production of a counter-corruption control strategy which drives the daily activity of the units.

In respect of business interests, compulsory registration only applies to police officers, members of the special constabulary and police staff members at Grade G and above. This leaves a significant proportion of the workforce exempt from the requirement. The force is aware of the risk this poses to the organisation, although initial indications are that the trade union would not support widening of the policy to include all police staff. The raising of awareness has, however, led to an increase in staff declaring notifiable associations and business interests, to the point that the force is considering introducing a triage system based on risk for prioritising such notifications.

The professional standards branch and the counter-corruption unit hold a daily tasking and co-ordination group meeting to identify and review individual or organisational risks, and allocate resources accordingly. The force has identified social media attacks on its staff as a risk to the integrity of the organisation. However, due to the number of staff in the force, its monitoring of social media is limited to areas of greatest risk. The force recognises the gap that this leaves and has issued a bulletin to all staff about the risks associated with the use of social media.

Opportunities for live-time monitoring of force IT systems are limited. However, the force has the ability to audit its systems, for example, when responding to intelligence or conducting investigations. The force is in the process of replacing its major IT operating systems with new technology, as part of the information systems transformation programme. The programme includes consideration of protecting information assets and mitigating identified risks.

The force vetting unit monitors the risk to the organisation from non-vetted staff. As mentioned above, the force is taking steps to vet those who joined before the requirement for vetting was introduced in 2006, and plans to complete this by April 2017. In the interim, any non-vetted member of staff who moves post, is promoted or moves to a designated post, is subject to the appropriate level of vetting. The vetting

unit undertakes annual reviews of staff in designated posts. Where the unit receives an adverse report about an individual, they make initial enquiries and decide on action, if necessary, in conjunction with the counter-corruption unit.

Intervening early to manage risks to integrity

With its existing technology, the force cannot easily identify officers who have been subject to multiple complaints. This is done by manual audit and both the professional standards branch and the counter-corruption unit have the intelligence and research capability to do this.

The professional standards branch and counter-corruption unit meet daily to discuss emerging issues and intelligence and identify any potential conflict between overt and covert investigations. The senior leadership team from professional standards branch, including the counter-corruption unit, meet every two weeks with the deputy chief constable. This provides a high level of operational oversight. The meetings focus on those cases that carry the greatest actual or potential risk to the integrity of the force.

The professional standards branch monitors trends in intelligence, complaints and the outcomes of misconduct cases. It reports any lessons identified which might prevent future recurrence through regular force bulletins. The Police Federation has also been active in promoting to its members the importance of behaving with integrity and the consequences when things go wrong. The force has established an organisational learning board to identify key themes and lessons learnt, so it can take action to prevent future risks.

Looking for, reporting and assessing intelligence on potential corruption

The force uses a variety of mechanisms to look for and encourage the reporting of potential corruption, including a confidential telephone reporting line for officers and staff, and an integrity line, for supervisors to report concerns or seek professional advice and guidance.

The majority of police officers and staff we spoke to were aware of the various reporting mechanisms and expressed confidence in using them, however, many said they would feel more comfortable raising issues with their supervisors in the first instance.

Following the recommendation in the police integrity and corruption inspection of 2014,²² the force has introduced a policy on drug and alcohol testing, which permits testing only on individuals where there is reason for concern.

²² *Police Integrity and Corruption – Greater Manchester Police*, HMIC, 2014. Available from: www.justiceinspectorates.gov.uk/hmic/publications/police-integrity-corruption-force/

The counter-corruption unit has established links with the North West organised crime unit, Titan, and also with the force's own major crime investigation and public protection teams. These links increase access to information and intelligence about officers and staff who may be associating with organised criminals.

How well is the force tackling the problem of officers and staff abusing their authority for sexual gain?

In 2012 the Independent Police Complaints Commission (IPCC) and Association of Chief Police Officers (ACPO) published *The abuse of police powers to perpetrate sexual violence*.²³ This report states that “the abuse of police powers for purposes of sexual exploitation, or even violence, is something that fundamentally betrays the trust that communities and individuals place in the police. It therefore has a serious impact on the public's confidence in individual officers and the service in general.” The report identified this behaviour as a form of serious corruption that forces should refer to the IPCC for its consideration of how it should be investigated.

The *Code of Ethics*²⁴ – which sets out the standards of professional behaviour expected of all policing professionals – explicitly states that they must “not establish or pursue an improper sexual or emotional relationship with a person with whom [they] come into contact in the course of [their] work who may be vulnerable to an abuse of trust or power”.

The most recent national counter-corruption assessment, in 2013, highlighted corruption for the purposes of sexual gratification as a major threat to law enforcement.²⁵ HMIC's 2015 report *Integrity matters*²⁶ identified police sexual misconduct as an area of great concern to the public. We share the public's disquiet and so we looked at this issue specifically as part of our 2016 inspection. Our work was given additional emphasis in May 2016 by a request from the Home Secretary

²³ *The abuse of police powers to perpetrate sexual violence*, jointly published by IPCC and ACPO (now the National Police Chiefs' Council), September 2012. Available at: www.ipcc.gov.uk/sites/default/files/Documents/research_stats/abuse_of_police_powers_to_perpetrate_sexual_violence.PDF

²⁴ 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, London, July 2014. Available at: www.college.police.uk/What-we-do/Ethics/Documents/Code_of_Ethics.pdf

²⁵ Every three years, the National Counter Corruption Advisory Group commissions a strategic assessment of the threat to law enforcement from corruption. The most recent assessment was completed in June 2013 by the Serious Organised Crime Agency. The assessment was based upon three years of intelligence reports on possible corruption gathered by forces in England and Wales, supplemented by information from other forces and national agencies.

²⁶ *Integrity matters*, HMIC, January 2015. Available from: www.justiceinspectorates.gov.uk/hmic/publications/integrity-matters/

that we inspect forces' response to the issue of officers and staff developing inappropriate relationships with victims of domestic abuse and abusing their position of power to exploit victims.

Recognising abuse of authority for sexual gain as serious corruption

The force's professional standards branch has identified the abuse of authority for sexual gain as a priority and it is identified as such in the branch's strategic threat and risk assessment and in its control strategy. This inspection found good evidence of awareness among police officers and staff, who recognised such behaviour as being serious misconduct. The force provides specific training to officers on the abuse of authority for sexual gain in its domestic abuse and safeguarding training courses. Following criticism in last year's legitimacy inspection, the force has recently restated its commitment to the Code of Ethics, including asking officers and staff to consider and resolve a series of ethical dilemmas, one of which centred on an officer seeking to abuse their position for sexual gain.

Looking for and receiving intelligence on potential abuse of authority for sexual gain

The counter-corruption unit seeks intelligence on those who might seek to abuse their position of authority for sexual gain from a variety of sources, predominantly from confidential and overt reporting by officers and members of staff, but also by encouraging partners who work with vulnerable victims, such as independent domestic abuse and sexual victim advocates, to report any concerns. Since 2013 the force has maintained a database of officers who it believes may be at risk of such behaviour. The counter-corruption unit routinely scans and monitors force systems and information against this database, such as media reports, complaints, criminal and professional standards investigations and intelligence. The counter-corruption unit reviews this database on a monthly basis, identifying those who present the highest risk and considering tactical options. The head of the counter-corruption unit was able to provide a number of recent examples where the unit had intervened following the development of intelligence. These included investigation of an officer who was suspected of pursuing sexual relationships by targeting repeat victims of domestic abuse; this resulted in the officer being dismissed for gross misconduct. Another example included investigation into an officer who had formed a relationship with a domestic abuse victim, who went on to commit criminal offences; this resulted in his conviction and imprisonment.

Taking action to prevent abuse of authority for sexual gain

In addition to the intelligence and investigative capability of the counter-corruption unit and the professional standards branch, the force seeks to prevent officers abusing their authority for sexual gain by providing training for its officers. As well as the previously mentioned domestic abuse and safeguarding training, the force has also worked with the local police federation to raise awareness of the issue and its

consequences. Police Federation officials have run a series of road shows to officers, highlighting the seriousness of officers seeking to form inappropriate relationships with vulnerable people, such as victims of domestic abuse and sexual offences. This input uses real examples to reinforce the message. The professional standards branch and counter-corruption unit give training to all transferees and new starters on their initial induction course, with a similar input to supervisor training courses. The counter-corruption unit has also established links with its counterparts in other forces across the north-west region and with the National Crime Agency, which it uses to share information and learning, including assessing its own capability against issues experienced in other forces. At the time of the inspection, the force was refreshing its service confidence policy to consider intervention and preventative action in cases which fail to meet the threshold for criminal or misconduct proceedings.

Building public trust

Greater Manchester Police has had a number of cases involving police officers and staff who have abused their position of trust and authority for personal and sexual gain. Where such cases have resulted in dismissal or criminal conviction, the investigating officer works with the corporate communications branch to develop a communications strategy to determine the appropriate internal and external messages. Such matters will often be classified as critical incidents, and the communications strategy will include the involvement of senior officers in the relevant borough, to manage how they work with the relevant community.

How well does the force engage with the public and its workforce about the outcomes of misconduct and corruption cases?

HMIC's 2014 literature review on police integrity and corruption emphasised the importance of collection and dissemination of information about misconduct to the public, on the basis that it shows police forces are taking the problem seriously, and detecting and punishing wrongdoing.²⁷ This information also forms the basis for deterring misconduct and enhancing integrity within police forces themselves. This year, HMIC looked at how well forces engage with the public online and through police officer misconduct hearings in public, and also more widely following high profile incidents with the potential to undermine public perceptions of police integrity. We also looked at how aware the workforce is of these outcomes.

²⁷ *Literature review – Police integrity and corruption*, HMIC, January 2015. Available at: www.justiceinspectorates.gov.uk/hmic/publications/integrity-matters/

Working with the public

In the period from May 2015 to April 2016, the force held a total of eight misconduct hearings, five of which were open to the public. Details of all five hearings were published in advance on the force's public website, and the corporate communications team provided advance notification to local media. The other three hearings were conducted under previous regulations, which had no provision for public hearings.

The force publishes the outcome of all complaints and misconduct hearings involving both police officers and members of police staff, to the public via its website. If the force identifies a complaint or misconduct issue which might affect a specific group or community, contact is made with them to explain what happened and deal with any concerns.

The force provides a monthly update to the College of Policing with details of any disapproved officers.

Working with the workforce

In our 2014 inspection of police integrity and corruption²⁸ we recommended that “the force should ensure it has an effective process to communicate to all staff, both locally and nationally identified lessons to be learnt on integrity and corruption”. As a result, the force now publishes anonymised information of the outcome of misconduct and corruption cases to the workforce, and the details are provided in the chief constable's orders on the force intranet. However, a number of police officers told us that these reports were not sufficiently detailed to enable them to identify and learn lessons. We consider that the force should assure itself that the information is adequate and appropriate for staff to identify and understand easily.

Summary of findings



Greater Manchester Police is good at ensuring that its workforce behaves ethically and lawfully.

The force has comprehensive vetting arrangements in place for new applicants, which are compliant with national guidance. The force has vetted all police officers who joined prior to the requirement for vetting being introduced. It has plans to vet

²⁸ *Police Integrity and Corruption – Greater Manchester Police*. Available at: www.justiceinspectorates.gov.uk/hmic/publications/police-integrity-corruption-force/

police staff in the same position. The force monitors and takes positive action where appropriate in cases where people with protected characteristics, such as age, disability or gender reassignment, fail the vetting process.

Following criticism in last year's legitimacy inspection, the force has re-stated its commitment to the Code of Ethics. It has reinforced standards of acceptable behaviour, focusing separately on each of the nine elements of the code.

The force has a counter-corruption strategy that identifies the main risks to the integrity of the organisation and has effective processes in place to identify and monitor members of staff who may seek to abuse their position of trust and authority for sexual gain.

The force publishes the outcome of complaints misconduct cases to the public and has held five misconduct hearings to which the public were invited through local media.

Areas for improvement

- The force should ensure that its business interests policy applies to all members of its workforce.
- The force should ensure that it has the capability and/or capacity to monitor all its computer systems to identify risks to the force's integrity.

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 behaviours.²⁹ As such, this concept of ‘organisational justice’ and its potential impact on ‘procedural justice’ forms an important part of HMIC’s assessment of police legitimacy. As there is no comparative data on how fairly officers and staff perceive forces to have treated them, we focused our assessment on how well forces identify these perceptions within their workforces and act on these findings. In particular, we looked at the extent to which organisational ‘fairness’ is reflected through the way individual performance is managed, and how ‘organisational respect’ is reflected through how forces provide for the wellbeing of their workforces, particularly through preventative and early action.

How well does the force identify and act to improve the workforce’s perceptions of fair and respectful treatment?

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.³⁰ On this basis, HMIC assessed how well the force engages with its staff to identify and understand the issues that affect them, and how well it acts on these issues and demonstrates it has done so.

²⁹ *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

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

³⁰ *Fair cop 2: Organisational justice, behaviour and ethical policing*, College of Policing, 2015, page 11. Available at:

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

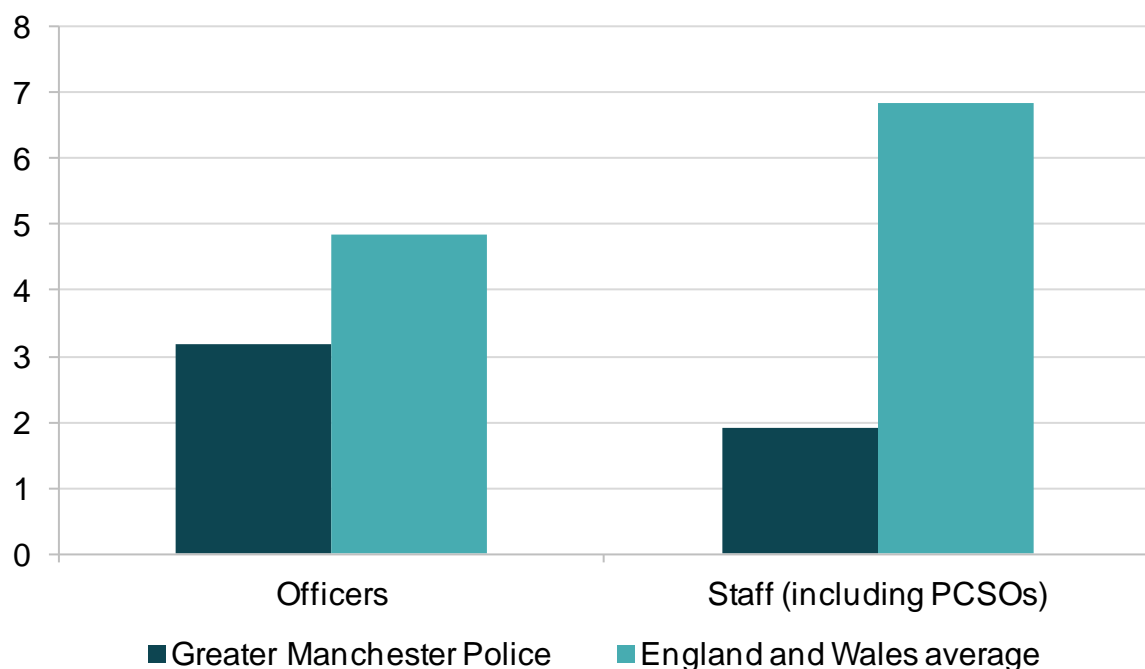
Identifying and understanding the issues

In the last two years, the force has undertaken both a staff perception survey and also a cultural survey. More recently, this year the force has engaged Durham University to undertake a staff engagement survey, which was reportedly completed by around a third of the workforce. At the time of the inspection, the results of the survey had just been received by the force and circulated to the workforce, which might explain why not everyone we asked was aware of the results. The force has reintroduced exit interviews for staff who leave the organisation and they can choose to have the interview with their line manager or with an independent interviewer.

The force has a formal grievance procedure, although many people told us that they were more likely to raise issues and seek resolution through line managers before resorting to the formal procedure.

Grievances are concerns, problems or complaints raised formally to employers by officers or staff. Data on numbers and types of grievances provide forces with a useful source of information about the sorts of issues that staff and officers are concerned about.

Figure 3: Number of grievances raised by officers (per 1,000 officers) or staff (per 1,000 staff, including police community support officers) that Greater Manchester Police finalised compared with England and Wales, in the 12 months to 31 March 2016



Source: HMIC Legitimacy data collection

For further information about the data in figure 3 please see annex A

In the 12 months to 31 March 2016, Greater Manchester Police finalised 3.2 formal grievances raised by officers per 1,000 officers, which was broadly in line with the England and Wales average of 4.8 per 1,000 officers. During this period, the force

finalised 1.9 formal grievances raised by staff per 1,000 staff (including PCSOs), which was lower than the England and Wales average of 6.8 per 1,000 staff (including PCSOs).

Data and trends in terms of grievances, complaints, exit interviews and diversity issues are monitored by the strategic resource development group, which is chaired by the assistant chief officer.

The chief constable and his chief officer group encourage direct contact from staff and have hosted a series of online web chats, and visits across the force, where staff have been encouraged to raise issues of concern directly with them. The majority of the police officers and staff we spoke to told us that there was a positive attitude and approach from the new chief constable and his team; they expressed confidence in being able to raise issues of concern.

The force has an extensive network of representative groups which meet on a regular basis. However, unlike the trade union and staff associations, they do not have regular meetings with the chief officer group unless they attend the statutory joint negotiation and consultation committee. We were told that this is a concern to some of the staff networks, who feel their voice is limited, and the force may wish to consider how this issue can be addressed.

Making improvements and demonstrating effectiveness

In the nine months prior to the inspection, the force had seen major changes in its chief officer team. The chief constable was appointed in October 2015, the deputy chief constable joined from another force in January 2016 and two new assistant chief constables were appointed in May 2016. Many of the officers and staff we spoke to commented on the positive improvements and clarity of purpose which they attributed to the formation of the new chief officer team.

Following a series of online web chats and visits around the force, the chief officer team compiled a video entitled 'Did you know?' This reflected the issues raised by staff and the chief officers' response to these, in a 'you said, we did' format. As well as operational issues, the workforce raised concerns about their workload, the treatment of staff and wellbeing issues. Responses to the concerns have included the implementation of a new shift pattern to align resources better to demand, a revised leadership programme which focuses on understanding and empathising with staff and the introduction of wellbeing coaches. The video has been circulated to staff on the internal intranet.

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. Last year our inspection was concerned with what efforts forces were making to consider, and provide for, the wellbeing needs of their workforce. This year we looked at the progress the force had made since the last inspection, with a particular focus on preventative activity to encourage wellbeing.

Understanding and valuing the benefits

Greater Manchester Police has a wellbeing strategy which recognises the importance of wellbeing and the benefits for the individual and the organisation as a whole. The Wellbeing Board, which draws together representatives from every borough and support department, oversees the implementation of the wellbeing strategy.

The force has established several initiatives to reinforce its commitment to workforce wellbeing and promote the services available. These include: wellbeing champions in each borough and branch; the availability of 'mindfulness' coaching; an internal media campaign to raise awareness during mental health week; occupational health days providing information and advice on issues such as stress management and mental health.

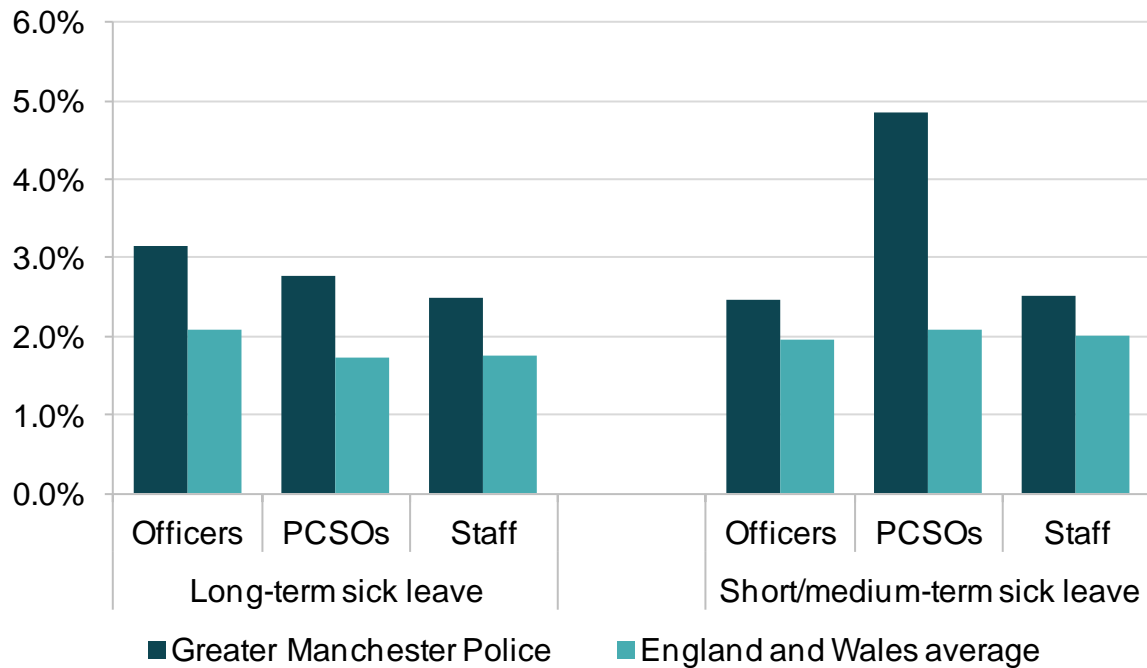
The majority of police officers, staff and representatives from staff associations and networks commented positively on the improved awareness and accessibility of wellbeing and occupational health support over the last twelve months, which many attributed to the new chief officer group.

Identifying and understanding the workforce's wellbeing needs

The force has a wellbeing charter, which has been developed and informed by two force-wide wellbeing surveys held in 2012 and 2014, and a cultural survey completed in 2015. It has also undertaken a strategic review of attendance management to understand better the health and wellbeing needs of the workforce. This identified a number of principal issues and trends, including issues relating to female staff returning from maternity leave and increases in absence due to psychological and musculoskeletal issues.

Sickness data can provide a useful point of comparison for assessing the wellbeing of police workforces. Analysis of this data can also help forces to identify and understand the nature and causes of sickness at individual and organisational levels, and inform targeted activity to prevent and manage sickness.

Figure 4: Percentage of officers, police community support officers and staff on long-term and short/medium-term sick leave in Greater Manchester Police compared with England and Wales, as at 31 March 2016



Source: Home Office Annual Data Requirement

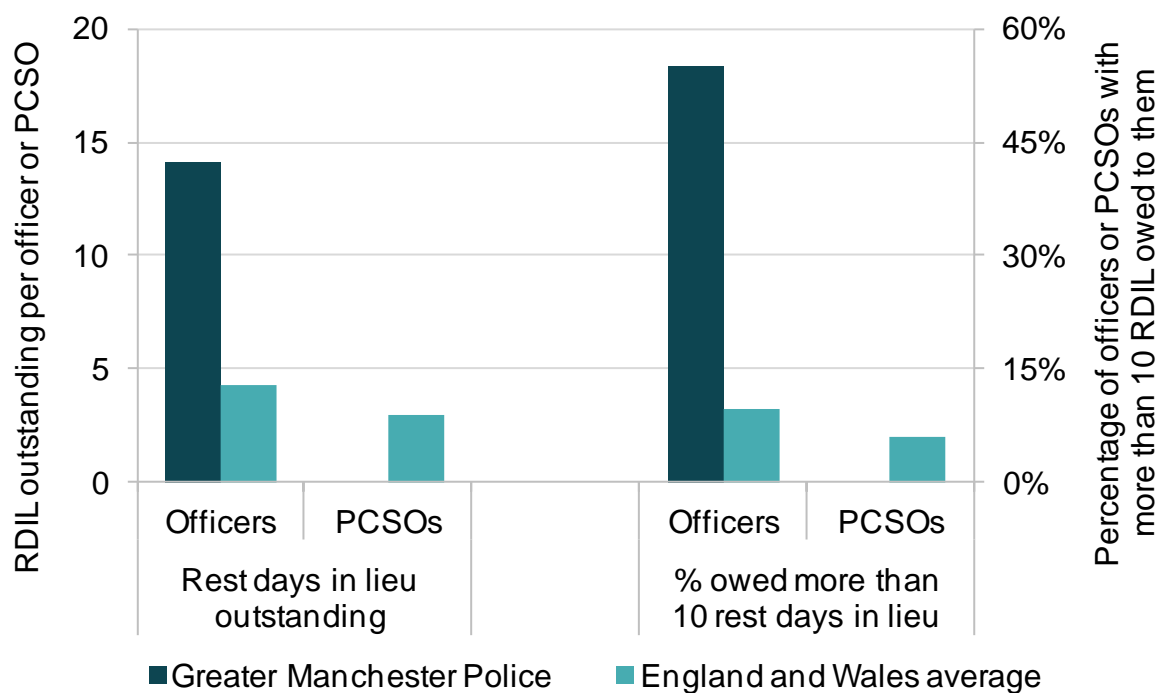
Note: Long-term sickness is defined as an absence due to sickness that has lasted for more than 28 days as at 31 March 2016. For further information about the data in figure 4 please see annex A.

Figure 4 provides data on the proportion of officers, PCSOs and staff who were absent due to sickness on 31 March 2016.

- 3.1 percent of officers were on long-term sick leave, which is higher than the England and Wales average of 2.1 percent.
- 2.5 percent of officers were on short or medium-term sick leave, which is higher than the England and Wales average of 2.0 percent.
- 2.8 percent of PCSOs were on long-term sick leave, which is higher than the England and Wales average of 1.7 percent.
- 4.9 percent of PCSOs were on short or medium-term sick leave, which is higher than the England and Wales average of 2.1 percent.
- 2.5 percent of staff were on long-term sick leave, which is higher than the England and Wales average of 1.7 percent.
- 2.5 percent of staff were on short or medium-term sick leave, which is broadly in line with the England and Wales average of 2.0 percent.

Rest days in lieu (RDIL) are leave days owed to officers or police community support officers when they have been required to work on their scheduled rest day for operational reasons. Long working hours can have a detrimental impact on the health and wellbeing of the workforce, so it serves as a useful point of comparison for assessing the extent to which the force is managing the wellbeing of its workforce. Analysis of the numbers of RDIL accrued, but not yet taken, can be useful tools for forces to identify and understand potential wellbeing concerns for individuals and teams.

Figure 5: Number of rest days in lieu outstanding per officer or police community support officer (PCSO) and the percentage of officers or PCSOs with more than 10 rest days in lieu owed to them in Greater Manchester Police compared with England and Wales, as at 31 March 2016



Source: HMIC Legitimacy data collection

Note: For some police forces data about the number of rest days in lieu outstanding are estimated from data on hours owed. For further information about the data in figure 5 please see annex A.

As at 31 March 2016, there were 14.1 rest days in lieu outstanding per officer in Greater Manchester Police, which was higher than the England and Wales average of 4.2 days per officer. Greater Manchester Police could not provide data for rest days in lieu outstanding for PCSOs as at 31 March 2016. On the same date, the England and Wales average was 2.9 rest days in lieu outstanding per PCSO. As at 31 March 2016, 54.9 percent of officers in Greater Manchester Police had more than 10 rest days in lieu owed to them, which was higher than the England and Wales average of 9.8 percent. Greater Manchester Police could not provide data for the percentage of PCSOs owed more than 10 rest days in lieu as at 31 March 2016. The England and Wales average was 6.0 percent of PCSOs.

Taking preventative and early action to improve workforce wellbeing

As a consequence of its understanding of the key issues, the force has created toolkits for managers to enable them to identify issues and intervene at an earlier stage, and changed policy, for example allowing people to opt for flexible working or to work from home, allowing them to return to work earlier. The force has also employed a mental health nurse within the occupational health unit, to provide an assessment and triage service and signpost staff to the most appropriate support services.

The force has revised its attendance management policy, with the emphasis on preventing people from having to go on sick leave. In order to help managers and staff identify the early signs and take preventative action, the force has developed a series of toolkits, with information, advice and guidance on a wide variety of issues. These include short and long-term illness, managing disability, stress and psychological ill health, serious and chronic conditions, and musculoskeletal issues.

The force has trained members of the workforce in stress management and mindfulness, and has created a peer support network. This network is made up of volunteers, some of whom have experienced psychological issues themselves, to advise and assist those showing signs of psychological illness. The force has also worked with external professionals to try to remove the stigma of coping with mental health issues.

Many officers and staff told us that the force provides sufficient support services with regard to physical and mental health and that the support offered was positive. However, a number of people reported that it was sometimes difficult to secure the support of occupational health due to demand being greater than capacity. The force has introduced a clinical triage system for occupational health referrals, to ensure the most appropriate treatment path. During the inspection, the force also provided data which showed the average wait for occupational health services was between seven days for nurse referrals and 28 days for referrals to the doctor and, although this does not appear excessive, the force may wish to consider how it can improve the awareness, understanding and expectations of its workforce and better communicate the occupational health referral process to its workforce.

How fairly and effectively does the force manage the individual performance of its officers and staff?

College of Policing research on organisational justice suggests that lack of promotion opportunities and not dealing with poor performance may adversely affect workforce perceptions of fairness, which in turn may lead to negative attitudes and behaviours in the workplace.³¹ HMIC assessed how fairly and effectively the force manages the individual performance of its officers and staff, including the extent to which the process aligns with guidance produced by the College of Policing.³²

The performance assessment process

The force policy mandates that every member of staff will have an annual development review with their line manager, to assess performance and identify the individual's career aspirations and development needs. The policy also allows for members of staff to request an enhanced development review, which will focus specifically on development opportunities. The policy also requires regular one-to-one meetings between staff members and their line manager, during which the supervisor will undertake an integrity and wellbeing assessment. However, during our inspection, everyone we spoke to (from frontline staff to senior managers) accepted that this policy was not being applied consistently across the force. Supervisors and workforce were not complying with the mandatory requirement for an annual development review, although some individual officers and members of staff do request and receive development reviews with their line manager. The force has produced a toolkit to assist and advise line managers in conducting effective reviews with their staff. However, the force is unable to demonstrate that this process is either fair or effective, as the force does not keep any data on the use and effectiveness of annual development reviews.

The results of performance assessment

In the absence of reliable data, the inspection found that results of the annual development review process could, at best, be described as patchy. For example, staff in the legal services branch said that they routinely used the annual development review process to document and demonstrate their continued professional development, in line with the requirements of the legal profession. Others who said they participated in the annual development process tended to be those police officers and staff who were seeking promotion or lateral development.

³¹ *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

³² College of Policing guidance on the police performance development review process is available at: www.college.police.uk/What-we-do/Support/Reviewing-performance/Pages/PDR.aspx

Summary of findings



Good

Greater Manchester Police is good at treating its workforce with fairness and respect.

Having undertaken two wellbeing surveys and a cultural survey in the last few years, the force has a good understanding of the wellbeing needs of its workforce, and has established a wellbeing charter and a wellbeing strategy. Implementation is overseen by the wellbeing board, chaired by the head of organisational learning and workforce development. The majority of people we interviewed confirmed that the wellbeing provision had improved notably in the last 12 months, many attributing this to the new chief officer group, which also actively encourages direct contact and challenge.

The force has recruited and trained volunteers, who form a peer support network, to advise and assist those showing signs of psychological illness. The force has developed a range of 'toolkits' to help managers and staff to identify the early signs of potential illness and take preventative action. The force policy on annual development reviews is not being applied consistently or effectively across the force and action is required to rectify this. The force's officers are carrying an unusually high level of rest days in lieu compared with the England and Wales average. This can affect wellbeing and should be closely monitored.

Area for improvement

- The force should improve how it manages individual performance.

Next steps

HMIC assesses progress on causes of concern and areas for improvement identified within its reports in a number of ways. We receive updates through our regular conversations with forces, re-assess as part of our annual PEEL programme, and, in the most serious cases, revisit forces.

HMIC highlights recurring themes emerging from our PEEL inspections of police forces within our national reports on police effectiveness, efficiency, legitimacy and also leadership. These reports identify those issues 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 can be made at a national level.

Findings and judgments from this year's PEEL legitimacy inspection will be used to direct the design of the next cycle of PEEL legitimacy assessments. The specific areas for assessment are yet to be confirmed, based on further consultation, but we will continue to assess procedural and organisational justice aspects of police legitimacy to ensure our findings are comparable year on year.

Annex A – About the data

Please note the following for the data presented throughout the report.

The source of the data is presented with each figure in the report, and is listed in more detail in this annex. For the source of force in numbers data, please see the relevant section below.

Methodology

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

Comparisons with England and Wales average figures

For some data sets, the report states whether the force's value is 'lower', 'higher' or 'broadly in line with' the England and Wales average. To calculate this, the difference to the mean average, as a proportion, is calculated 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.

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.

Where we have referred to the England and Wales average, this is the rate or proportion calculated from the England and Wales totals.

Population

For all uses of population as a denominator, unless otherwise noted, we use the ONS mid-2015 population estimates.

Force in numbers

Workforce figures (based on full-time equivalents) for 31 March 2016

These data are obtained from the Home Office annual data return 502. The data are available from the Home Office's published Police workforce England and Wales statistics, www.gov.uk/government/collections/police-workforce-england-and-wales, or the Home Office police workforce open data tables, www.gov.uk/government/statistics/police-workforce-open-data-tables. Figures may have been updated since the publication.

Projections for March 2020 are budget-based projections and therefore are likely to take into account a vacancy rate depending on a force's planning strategy. In some instances an increase in budgeted posts may not actually indicate the force is planning to increase its workforce. In other cases, forces may be planning to reduce their workforce but have a current high vacancy rate which masks this change.

Police staff includes section 38 designated officers (investigation, detention and escort).

Data from the Office for National Statistics 2011 Census were used for the number and proportion of black, Asian and minority ethnic people within each force area. While the numbers may have since changed, more recent figures are based only on estimates from surveys or projections.

Figures throughout the report

Figure 1: Percentage of victims satisfied with overall treatment compared with England and Wales, from the 12 months to 31 March 2011 to the 12 months to 31 March 2016

Forces are required by the Home Office to conduct satisfaction surveys with specific victim groups. Victim satisfaction surveys are structured around core questions exploring satisfaction with police responses across four stages of interactions: initial contact, actions, follow up, treatment plus the whole experience. The data in figure 1 use the results to the question on treatment, which specifically asks "Are you satisfied, dissatisfied or neither, with the way you were treated by the police officer and staff who dealt with you?"

When comparing with the England and Wales average, the standard methodology described above has been used. When testing whether the change in percentage of respondents who were satisfied between the 12 months to 31 March 2015 and the 12 months to 31 March 2016 is statistically significant, a chi square hypothesis test for independence has been applied.

Figure 2: Number of public complaint cases recorded against officers (per 1,000 officers) or staff (per 1,000 staff, including police community support officers) compared with England and Wales, in the 12 months to 31 March 2016

The Independent Police Complaints Commission (IPCC) defines a complaint for the purposes of recording as “an expression of dissatisfaction by a member of the public with the service they have received from a police force. It may be about the conduct of one or more persons serving with the police and/or about the direction and control of a police force”. A police complaint can be about more than one officer or member of staff and can refer to one or more allegations.³³

Data used in figure 2 are data extracted from the Centurion case recording and management system for Police Professional Standards data. We were able to collect the majority of this data through an automated database query, written for us by the creators of the software, Centurion (FIS Ltd). Forces ran this query on their systems and returned the outputs to us. This system is used in 41 of the 43 forces inspected. In order to collect the appropriate data from the two forces not using Centurion (Greater Manchester Police and Lancashire Constabulary), they were provided with a bespoke data collection template designed to correspond to information extracted from the Centurion database.

Although the IPCC categories used to record the type of public complaint and the accompanying guidance are the same in all police forces, differences in the way they are used still may occur. For example, one force may classify a case in one category while another force would classify the same case in a different category. This means that data on the types of public complaint should be treated with caution.

Figure 3: Number of grievances raised by officers (per 1,000 officers) or staff (per 1,000 staff, including police community support officers) finalised compared with England and Wales, in the 12 months to 31 March 2016

The data refer to those grievances that were subject to a formal process (not including issues informally resolved with a line manager). Some of the grievances finalised in this period may have been raised in a previous year. Finalised refers to grievances where a resolution has been reached, after any appeals have been completed. Differences between forces in the number of finalised grievances may be due to different handling and recording policies. Data used in figure 3 were provided to HMIC by individual forces via a bespoke data collection in April 2016 prior to inspection.

³³ *Guidance on the recording of complaints under the Police Reform Act 2002*, Independent Police Complaints Commission. Available at: www.ipcc.gov.uk/sites/default/files/Documents/statutoryguidance/guidance_on_recording_of_complaints_under_PRA_2002.pdf

Figure 4: Percentage of officers, police community support officers and staff on long-term and short/medium-term sick leave compared with England and Wales, as at 31 March 2016

Long-term sickness is defined as an absence due to sickness that has lasted for more than 28 days as at 31 March 2016. Data used in figure 4 were obtained from Home Office annual data returns 501 and 551. Data on long-term absences can be found in the Home Office police workforce open data tables:

www.gov.uk/government/statistics/police-workforce-open-data-tables

Figure 5: Number of rest days in lieu outstanding per officer or police community support officer (PCSO) and the percentage of officers or PCSOs with more than 10 rest days in lieu owed to them compared with England and Wales, as at 31 March 2016

Rest days in lieu are leave days owed to officers or police community support officers when they have been required to work on their scheduled rest day due to operational reasons. Data used in figure 5 were provided to HMIC by individual forces via a bespoke data collection in April 2016 prior to inspection.