

# **Her Majesty's Inspectorate of Constabulary**



## **Inspection of Greater Manchester Police Professional Standards**

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# INSPECTION OF PROFESSIONAL STANDARDS 2005

## A - INTRODUCTION AND METHODOLOGY

### 1. Introduction

'Professional standards' within the policing context has evolved significantly in recent years, following the HMIC thematic 'Police Integrity' (1999), the establishment of an ACPO Presidential Taskforce to tackle corruption and the introduction of the ACPO Professional Standards Committee. Since 2000, virtually every force in England and Wales has significantly expanded the activities of pre-existing Complaints and Discipline Departments to include an element addressing anti-corruption, including covert investigation. These larger units are generically known as Professional Standards Departments (PSDs).

The issue of complaints holds a unique importance for HMIC in that legislation<sup>1</sup> creates a responsibility on Her Majesty's Inspectors (HMIs) to 'keep themselves informed' as to the handling of complaints in forces. Traditionally this has involved inspection of individual forces on a rolling programme. The advent of HMIC's annual Baseline Assessment (from 2003/04), the establishment of the Independent Police Complaints Commission (IPCC) in 2004, and a series of public inquiries have changed the professional standards landscape significantly. In view of this, HMIC decided to carry out a simultaneous programme of inspection of professional standards in all 43 English and Welsh forces to provide a comprehensive picture of current performance and identify any issues of national importance.

### 2. Inspection scope

While this national programme of inspection of 'Professional Standards' has focused primarily on the operation of the PSDs, and their sub-sections, it has also examined issues of professional standards in the wider policing context, and therefore touched on other departments and areas of responsibility, for example Human Resources (HR). The core elements identified nationally for examination were:

#### **Professional Standards Department**

- The umbrella department within which all 'professional standards' activities are delivered, including the investigation of complaints and misconduct and proactive anti-corruption work.

#### **Complaints and misconduct unit**

- Responsible for reactive investigations into public complaints as well as internal conduct matters.

#### **Proactive unit**

- Responsible for the intelligence-led investigation of vulnerability to or allegations of corruption.

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<sup>1</sup> Section 15(1) of the Police Reform Act 2002

### **Intelligence cell**

- Responsible for:
  - Overall intelligence management
  - Analysis
  - Field Intelligence
  - Financial Investigation
  - Managing risks and grading threats

### **Handling of civil claims, security management and personnel vetting**

- Individuals or units responsible for identifying risks to the integrity of the police service manifested within civil actions, civil claims, employment tribunals, breaches of security and infiltration of the service by inappropriate personnel.

### **Handling 'Direction and Control' Complaints**

- Processes for handling complaints relating to:
  - operational policing policies (where there is no issue of conduct)
  - organisational decisions
  - general policing standards in the force
  - operational management decisions (where there is no issue of conduct)

### **Impact of unsatisfactory performance and grievance**

- Relevant personnel within HR and operational departments, to establish that processes exist to identify any conduct issues or organisational lessons.

NB: The above list is not exhaustive nor does every force have each of these units or responsibilities as separate functions. The inspection sought to examine as many of the identified activities as are relevant to each force.

## **3. Methodology**

Since 2003/04, HMIC's core methodology for assessing force performance has been Baseline Assessment (BA), which consists of a self-assessment process supported by visits to forces for validation and quality assurance. BA assesses performance annually across 27<sup>2</sup> areas of policing via a framework of questions for each area. The mainstream BA process for 2004/05 was completed during spring 2005 and the results published in October 2005.

Professional Standards is one of the BA frameworks and would normally have been included in the mainstream BA activity. With the full programme of professional standards inspections scheduled for October and November 2005, however, the assessment of this framework was deferred to await their outcome.

The programme of inspections has been designed to:

- Provide a full inspection of professional standards in all England & Wales<sup>3</sup> forces;
- Gather evidence for Baseline Assessment reports and grading of professional standards in all forces; and
- Identify key issues, trends and good practice that may have implications for professional standards on a national basis.

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<sup>2</sup> Number of frameworks in the 2004/05 assessment

<sup>3</sup> Also including British Transport Police and Ministry of Defence Police

The standard format for each inspection has included:

- The completion of self assessment questionnaires by all forces;
- Examination of documents;
- Visits to forces with group and individual interviews;
- Consultation with key stakeholders; and
- Final reports with grade.

#### **4. Baseline Assessment grading**

HMIC applies a qualitative grading to the inspection of Professional Standards. These grades are:

- Excellent
- Good
- Fair
- Poor

In allocating individual force grades, HMIC assesses all the available evidence and identifies how well the force matches an agreed set of Specific Grading Criteria. To ensure fairness and transparency in the grading process, HMIC worked with key partners in the APA, IPCC, the Home Office and ACPO to develop and agree these Specific Grading Criteria for Professional Standards.

The criteria set out expectations for a “Good” force. Grades of Fair, Good and Excellent all represent acceptable performance levels but indicate the degree to which the force has met the grading criteria. An Excellent grade indicates ‘benchmark’ performance including significant implementation of good practice.

The full grading criteria are set out in HMIC’s website at:  
[www.inspectorates.homeoffice.gov.uk](http://www.inspectorates.homeoffice.gov.uk).

The key elements appear under four headings, namely:

- **Intelligence** - *what a force knows about the health of professional standards*
- **Prevention** - *how the force tries to improve and prevent the abuse of standards*
- **Enforcement** - *its effectiveness in dealing with emerging problems*
- **Capacity and Capability** – *having the resources and skills to address reactive and proactive challenges (including timely and proportionate response to lapses in professional standards)*
- The remainder of this report is set out under these headings, for ease of reference to the evidence presented.

## **B - Force Report**

### **Force Overview and Context**

The Force vision is to make Greater Manchester safer, bring criminals to justice, be visible on the streets and respect, reassure and respond to local communities; and to achieve this by being professional and well led, efficient and effective, a force which listens and learns and is open and accountable.

Greater Manchester Police (GMP) continues to develop its extensive performance management framework, the GMP Review to Improve Performance (GRIP), creating a scheme to develop leadership skills in staff, and tackling serious and organised crime.

Operations are continuing to have positive effects on performance by reducing robbery and domestic burglary within the force area. The HMIC Protective Services review assessed the areas of major crime and cross-border criminality as 'excellent'.

### **Professional Standards**

The overall portfolio responsibility lies with the deputy chief constable. The DCC is chair of the complaints and professional standards committee. The ACC (specialist operations) is chief officer responsible for the internal affairs branch and other branches. GMP has a number of branches/units looking at professional standards in its fullest sense. An outline is given below:

#### **Internal Affairs Branch**

The branch is headed by a chief superintendent supported by four superintendents and the Force vetting officer. The branch is made up of the following units:

##### *Operations*

The unit is responsible for conduct complaints and misconduct matters relating to police officers, and those cases involving both police officers and police staff. The unit comprises 7 investigating officers (4 chief inspectors and 3 inspectors) and 28 assistant investigating officers (8 inspectors, 12 sergeants and 8 constables). An administration manager supports the unit, along with a team of 15 administrative staff, 1 management information officer and a file manager.

##### *Discipline and Policy*

The discipline and policy unit is staffed by 1 chief inspector, 1 inspector and 1 member of administrative staff.

##### *Internal Investigations*

The internal investigations unit comprises 1 chief inspector, 2 inspectors, 5 sergeants, 15 constables, 2 analysts and 1 member of administrative staff.

##### *Vetting*

The vetting unit comprises 6 members of staff.

#### **Human Resources Branch**

The branch is responsible for discipline and complaint matters relating to police staff, although all staff involved in this work also undertake other work on behalf of the branch. The branch also houses the equal opportunities unit, which, among other responsibilities, administers the grievance procedure.

**Professional Standards Unit**

The unit is located with the Force's corporate development and performance branch and is responsible for corporate development aspects relating to professional standards issues. This includes organisation of the professional standards committee, and monitoring and oversight of direction and control matters and other policy complaints. The unit has two staff, both of whom undertake additional corporate development work.

**Civil Litigation Unit**

This unit is housed in the criminal justice and diversity command. It is staffed by 1 inspector, 5 claims investigators (3 sergeants and 2 police staff), 1 senior civil administrator supported by a deputy, 3 claims administrators, and 3 word processing officers/clerical officers.

**Data Protection/FOI Section**

The section is also housed in the criminal justice and diversity command department. It is staffed by a team of police staff (16½ posts).

## GRADING : GOOD

### **GMP Findings**

The individual areas which make up professional standards within GMP are all managed to a high standard and show evidence of progression. There remains, however, a need to manage all aspects of this important area of business in a co-ordinated and integrated manner with clear links to quality of service and diversity. This lack of co-ordination has impacted on the overall grade given.

**Intelligence** - *what a Force knows about the health of professional standards.*

#### **Strengths**

- The proactive internal investigation unit (IIU) follows National Intelligence Model (NIM) principles and is intelligence-led.
- The Force maintains a single confidential reporting line with a free-phone number for all complaint, misconduct and professional standards issues. The line is widely advertised through the use of posters, circulations, pocket book inserts, on wage slips etc. The Force has not gone down the route of the independent confidential reporting line (Safe-call). The Force would like to see an independent evaluation of externally managed confidential reporting lines before they consider that option, as the costs involved are substantial. There has been a small but significant increase in the use of the Force in-house confidential system.
- The IIU produces a strategic assessment of corruption every six months, which is then forwarded to NCIS.
- Complaints are risk assessed as part of the recording process against criteria established by the internal affairs branch (IAB). This determines the level of investigation and signposts the complaint to the Independent Police Complaints Commission (IPCC), operations unit or to the relevant basic command unit (BCU). IPCC has identified this as good practice.
- The IIU provides a comprehensive and professional service. Members of staff are skilled and experienced in proactive investigations including covert methods. There is a dedicated intelligence unit within the IIU, which drives activity using NIM principles, including the use of problem and target profiles.
- The Force has employed the services of a management information officer to work within the IAB branch.
- The Police Authority uses a process of analysing data by exception reporting (XMR) to highlight when complaint categories move outside of acceptable tolerances.

#### **Areas for Improvement**

- The operations unit is not NIM compliant and is not fully intelligence-led at this time. A number of problem profiles have, however, been completed to help

identify key areas of vulnerability including highlighted individuals and hotspot areas.

- There is a lack of analytical capability within the area of professional standards.
- Support networks expressed concern that national vetting guidance encourages discrimination by highlighting sexuality as a risk factor. It is acknowledged this is a national issue however the issues around the impact need to be managed by the Force.
- GMP maintains a legacy complaint management information system, which holds 9 years of data. The Force is reluctant to take the national system (Centurion) fearing the loss of the historical data, together with issues over functionality.
- The management of professional standards within GMP is fragmented in that different parts of this area are located and managed within different departments and under different chief officer portfolios. Stand alone information systems have been developed to serve these areas independently and inter-related issues are dealt with in isolation. Members of staff are attempting to compensate through inter-departmental contact on a personal basis. It needs to be acknowledged that in these circumstances the absence of formally managed contact creates a risk to the organisation. The ability of the Force to learn lessons from individual cases and trends would be enhanced by an integrated approach.
- Systems to support the role of the new IAB management information officer need to be developed and supported with appropriate information technology.
- The OPUS operational information system is being developed to include incident handling capabilities. The Force needs to ensure that the facility can be effectively audited.

#### **Recommendation 1**

**It is recommended that the Force develops information systems, which support and link the professional standards functions within the organisation, and ensures connectivity with the relevant statutory bodies. The Force needs to ensure that the OPUS information system can be audited to a standard which aids effective investigation and serves as a deterrent to the misuse of information.**

**Prevention** - *how the Force tries to improve and prevent the abuse of standards.*

#### **Strengths**

- The Force has a dedicated senior level professional standards committee chaired by the DCC and attended by the majority of the ACPO team. In addition there is a dedicated security committee chaired at chief officer level (ACC).

- The IAB is taking a proactive approach to prevention, communicating lessons learned through the Force newspaper and the intranet.
- The professional standards committee holds biannual professional standards consultative committee meetings with representatives from the staff and support associations. The support networks and staff associations see a benefit in the development of the lines of communication with the wider professional standards arena.
- The Force promotes professional standards through the 'Do the Right Thing' campaign. This is supported by regular publications in the Force newspaper entitled 'Raising Standards', a page dedicated to professional standards. These initiatives have been acknowledged by the Commission for Racial Equality (CRE). A recent issue of 'Raising Standards' focused on local resolution and featured an article from the IPCC aimed at raising confidence in the local resolution process. Collaboration between the IPCC and the Force has been highlighted as good practice by the IPCC.
- The operations unit and the IIU make a significant commitment to training members of the Force at different levels aimed at raising awareness.
- There was clear evidence at BCU level (Bolton) of a joined up approach to professional standards, in the widest sense. There was an appreciation of the implications of professional standards on quality of service and neighbourhood policing issues.
- The Force has produced its own complaints leaflets to complement those issued by the IPCC. Each federated member of staff received a personal IPCC/Police Federation leaflet entitled 'You and the Police Complaints System'. The GMP Federation magazine (Manchat) has a regular article dedicated to discipline matters and also shows information relating to professional standards on its website.
- The Police Authority conducts thematic reviews in respect of highlighted areas of concern in order to ensure all possible lessons are learnt and improvements made. This process applies to direction and control issues as well as complaint and misconduct issues.
- Following a misconduct hearing the Force ensures appropriate action is taken through the personal development plan process in order to address individual learning and performance issues.
- In order to improve vetting capabilities the Force is moving towards an extended centralised vetting unit under the direction of the IAB.
- GMP's response to the 'Secret Policeman' documentary was to lead a multi-force investigation. The IPCC Commissioner has subsequently commented that, *"the Force themselves, in the wake of "The Secret Policeman" are extremely conscious of the need to address effectively complaints relating to allegations of racism"*. She also remarked early in 2005 that, *"I have been impressed by Internal Affairs Department's efforts to address thoroughly complaints and conduct matters relating to allegations of racism and on experience to date, I have confidence in their willingness and ability to investigate these effectively."*

- A study by the Manchester Employers Coalition highlighted that although there were some communication issues around employees' understanding of flexible and part time working arrangements, the Force has a higher than the national average success rate in making the appropriate arrangements when required.

### **Areas for Improvement**

- The Force finds it difficult to communicate and co-ordinate a response to lessons learned because of the disjointed structure of the different professional standards functions.
- The professional standards committee is not providing a co-ordinated strategic overview and direction to the wider professional standards arena at the present time.
- The Force needs to ensure the induction of police staff is equal to that of police officers in respect of professional standards and organisational values.
- The Force has highlighted the vetting of foreign nationals seeking employment within the police environment as an area of concern, being hindered by the restricted availability and timeliness of information from sources outside of the UK. In addition, the extended use of fixed penalty notices for certain offences do not result in a PNC record of criminal activity. These are national issues, which need to be considered and addressed at both a Force and national level.
- The Force acknowledges that further work needs to be undertaken in respect of the requirement for financial checks on all members of police staff, and the need to ask all staff on an annual basis to inform the Force of any material changes in their circumstance from the point of original vetting clearance.

### **Enforcement - *its effectiveness in dealing with emerging problems.***

#### **Strengths**

- There is active Police Authority involvement ensuring a clear focus with effective scrutiny of cases, on an individual and thematic basis.
- A review of the suspension policy by the chief officer lead (ACC) has resulted in a significant reduction in the number of police officers suspended from duty. The Force now seeks to apply alternative means to suspension, i.e. use of restricted duties and relocation.
- The chief officer lead personally reviews more serious complaints and conduct matters. All decisions are committed to paper demonstrating transparency and accountability. The reviews are circulated to BCU/department heads and the staff associations.
- A dedicated full time Federation officer has been appointed for professional standards issues. This demonstrates the strong commitment of the Force to this area and has been well received by staff.

- There has been an increase in local resolutions - 59% of all complaints are resolved in this way. An impressive 73% of local resolutions are resolved at BCU level demonstrating an understanding and strong commitment to the process by local managers. This is clear evidence that the Force make effective use of the local resolution process to deal with local complaints.
- The Force has published its own guidance on local resolution and this is made available across the organisation.
- There has been a 'sea change' in approach to professional standards from punishment and blame towards learning and development, initiated by the chief officer lead. The ethos of GMP's approach to complaints is now much more customer focused.
- The Force has introduced a substance misuse policy involving police recruits and applicants to high risk posts. In addition, the IIU request 'with cause' screening samples on a voluntary basis directed by intelligence. There is a belief in GMP of the need for statutory support in this area.

### **Areas for Improvement**

- The Force acknowledges that professional standards data needs to feature in the professional standards committee. Data is also to be included in post internal review (GRIP) data circulation, and specific issues may be raised at the GRIP process.
- The disproportionately high number of complaints and investigations involving members of staff who are from black and minority ethnic (BME) communities is an area of concern. Research is being undertaken within the operations unit in conjunction with the 'Respect Programme'. Support networks within the Force highlight the fact that the six strands of diversity need to be incorporated into all aspects of professional standards.
- Although the Force uses independent advisory groups (IAGs) on a critical incident basis, there is a need to have consistent and informed input from an IAG which aids the development of the philosophy of standards and quality across the organisation.
- The HMIC Police National Computer (PNC) compliance report June 2005, made a significant number of recommendations which should be actioned as a priority.
- The Force has expressed the view that all complaints should be dealt with under the same set of processes. Direction and control complaints and misconduct are all managed through different systems. A view was expressed that as far as the public are concerned a complaint is a complaint. The complaints system should be simplified to accommodate this.

**Capacity and Capability** - *(Having the resources and skills available to address the reactive and proactive challenge and providing a timely and proportionate response to lapses in professional standards.)*

## **Strengths**

- There is a strong chief officer lead and an effective working relationship with the head of the IAB in driving the professional standards agenda.
- The Force has committed significant resources to all functions within the professional standards business area.
- There is an effective and proactive professional standards department within corporate development unit addressing quality of service issues.
- The structures and processes used to manage direction and control complaints are effective.
- There is effective civil litigation capability within the legal services department.
- The Force continues to develop effective working relationships with the IPCC.
- The Force grievance resolution procedure is being re-launched (October 2005) and is supported by training and awareness activity throughout the organisation. The scheme is supported by a workplace mediation scheme, which has been in place for four years and is being promoted as part of the new grievance resolution scheme. This should address some of the concerns about misconceptions among members of staff about the grievance procedure and their expectations.
- Documents including complaint forms have been amended to include a mechanism for accurately recording across the six strands of diversity.

## **Areas for Improvement**

- There is a need for an internal review of the professional standards business area. At the present time such a review is being carried out within the IAB taking on board standards included in the Taylor and Morris reports, together with those of HMIC, the CRE and the IPCC. This should be applied to the whole of the professional standards arena.
- IT security sits within the information technology department and information security sits within the criminal justice and diversity portfolio. The activities of these functions are overseen by the security committee, which is separate from the professional standards committee.
- The current business plan does not fit the vision for the IAB. This will be amended following the review of the branch.
- The professional standards strategic statement does not meet the needs of the organisation.
- The business of the operations unit is not directed by a strategic assessment or control strategy.
- Different parts of the professional standards functions sit within the portfolios of different specialist lead members of the Police Authority. There is no Police Authority representation on the internal review of the IAB; however the Police Authority chair of the professional standards committee has been consulted.

- The organisational structure of all of the professional standards functions is fragmented and sits under different chief officer portfolios and different departmental heads supported by different processes and information systems.
- Units working within the professional standards business area maintain their own data bases and information systems. There is little connectivity between these systems. This will impact on the effective implementation of the NIM by increasing the numbers of researchers and analysts required to support the process.
- There is a need for regular management reports to inform the lessons learned process.
- Concerns have been expressed by the Force over the timeliness of investigations. Key issues highlighted include delays in the return of files, decision making and comment from the CPS and the IPCC. Action has been taken to address this and the IPCC annual report highlights a national reduction in the average time taken to complete supervised investigations from 157 working days under the Police Complaints Authority to 128.7 working days.
- The monitoring and analysis of the six strands of diversity has yet to be undertaken. The means of achieving this is in the process of being put in place. However, the ethnicity and gender issues in complaints are monitored on a monthly and a quarterly basis for the Home Office, IPCC and Police Authority.
- Members of staff within the IAB do not reflect that of the Force/community at the present time. The Force has acknowledged this and positive action is being taken including secondment of suitable staff members. The IAB has been identified as one of five key areas within the Force for the recruitment of BME members of staff. There is a need to ensure members of staff within the professional standards arena have received an enhanced level of training in respect of equality and diversity issues.
- The Force network of IAGs is consulted on a critical incident basis by the IAB. There is, however, no IAG to support and inform the development of the business of professional standards on a continuous basis.
- Of concern to the Force is the status of the professional standards department within the organisation. There is a perception among members of staff that career prospects may not be enhanced by joining the department.
- The Force needs to satisfy itself that it is receiving value for money in respect of the use of external legal services. This particularly applies to the areas of corporate and employer liability.

## **Recommendation 2**

**It is recommended that the Force needs to articulate the vision for professional standards required within Greater Manchester Police and the relationship with diversity and quality of service to the community.**

### **Recommendation 3**

**It is recommended that the Force reviews the structure of those units that manage professional standards across the organisation to ensure that they are fit for purpose to deliver the Force vision and meet standards set by relevant policies, bodies and reports.**

### **Recommendation 4**

**It is recommended that the Force develops processes in line with the National Intelligence Model to provide a means of delivering the professional standards vision and linking in to other areas of the organisation.**

## **Recommendations**

The recommendations should be seen in sequence as inter-related issues:

### **Vision**

It is recommended that the Force needs to articulate the vision for professional standards required within Greater Manchester Police and the relationship with diversity and quality of service to the community.

### **Structure**

It is recommended that the Force reviews the structure of those units that manage professional standards across the organisation to ensure that they are fit for purpose to deliver the Force vision and meet standards set by relevant policies, bodies and reports.

### **ICT**

It is recommended that the Force develops information systems which support and link the professional standards functions within the organisation, and ensures connectivity with the relevant statutory bodies. The Force needs to ensure that the OPUS information system can be audited to a standard which aids effective investigation and serves as a deterrent to the misuse of information.

### **Process**

It is recommended that the Force develops processes in line with the National Intelligence Model to provide a means of delivering the professional standards vision and linking in to other areas of the organisation.

## **GLOSSARY**

ACC	assistant chief constable
ACCAG	ACPO Counter-Corruption Advisory Group
ACPO	Association of Chief Police Officers
ACPO PSC	ACPO Professional Standards Committee
BA	baseline assessment
BCU	basic command unit
BME	black and minority ethnic
CHIS	covert human intelligence source
CID	criminal investigation department
CPS	Crown Prosecution Service
DCC	deputy chief constable
DSU	dedicated source unit
ESU	ethical standards unit
FTE	full-time equivalent
HMI	Her Majesty's Inspector
HMIC	Her Majesty's Inspectorate of Constabulary
HoD	head of department
HQ	headquarters
HR	human resources
IAG	independent advisory group – a body advising a force or BCU on race and diversity issues
IiP	Investors in People
IPCC	Independent Police Complaints Commission
LR	local resolution
MMR	monthly management review
MSF	most similar forces – a way of grouping forces to which each police force can be compared that has similar social and demographic characteristics
NCDG	National Complaints and Discipline Group
NCIS	National Criminal Intelligence Service
NIM	National Intelligence Model
PA	police authority
PCSO	police community support officer
PDR	performance development review
PNC	Police National Computer
PPAF	Police Performance Assessment Framework
PS	professional standards
PSD	professional standards department
RDS	Research, Development and Statistics
RES	race equality scheme
RIPA	Regulation of Investigatory Powers Act, 2000
QA	quality assurance
SGC	specific grading criteria
SLA	service level agreement

SPI(s)	statutory performance indicators (SPIs) are used to monitor key aspects of police performance and form a critical component of performance assessments. SPIs are set each year following consultation with partners in line with powers under the Local Government Act 1999. SPIs are also known as 'best value performance indicators'
SPOC	single point of contact
TCG	tasking and co-ordination group
UPP	unsatisfactory performance procedure