



METROPOLITAN POLICE SERVICE
DIRECTORATE OF PROFESSIONAL STANDARDS
SPECIALIST INVESTIGATIONS

MPS Peer Review

**MPS Peer Review of Greater Manchester
Police Professional Standards Branch**

S40



9th -10th May 2016

RESTRICTED



**METROPOLITAN
POLICE**

TOTAL POLICING





FREEDOM OF INFORMATION - HEADING TABLE

PROTECTIVE MARKING	Restricted
FOIA EXEMPTION	No
SUITABLE FOR PUBLICATION SCHEME	No
TITLE	MPS Peer Review of Greater Manchester Police Professional Standards Branch
VERSION	Final
PURPOSE	Key objective of considering if practitioners are making a tangible difference to maintaining the highest professional standards within GMP
RELEVANT TO	Assistant Chief Constable lead for Professional Standards GMP
DISSEMINATION	Greater Manchester Police Professional Standards Branch Metropolitan Police Directorate of Professional Standards
SUMMARY	MPS Peer review

S40

CREATING OPERATIONAL COMMAND
UNIT/DIRECTORATE
DATE PUBLISHED

Directorate of Professional Standards, Specialist Investigation
06/01/2017

QUALITY ASSURED BY

S40

(Directorate of Professionalism)

DATE 12/12/2016

REVIEW DATE

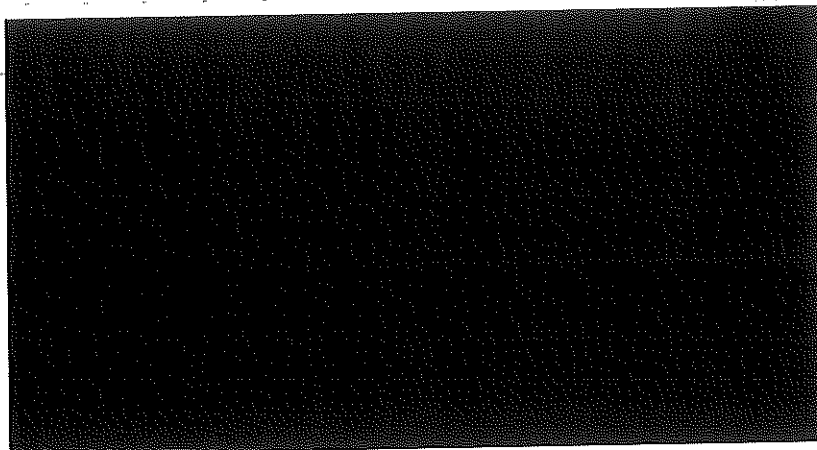
N/A

HANDLING INSTRUCTIONS


This document must be handled in accordance with the protective security marking shown at the bottom of the document and should not be disseminated to outside agencies/partners without the consent of the authorising officer & or Director DPS.

This FOIA table must not be detached from this Document

S40



CONTENTS

	Section	Page
Summary	1	3
Terms of Reference	2	3
Methodology	3	4
Introduction	4	4
Context	5	5
Overview	6	5
Leadership and Governance	7	6
		
Communication	9	8
Assessment, decision making and investigative mind set	10	8
Office Security	11	12
Conclusion	12	13
Appendices		
Copy of transforming Professional Standards presentation dated 3 rd May 2016	A1	
Biography of peers	A2	
Review Schedule	A3	
GMP Peer Review Hot Debrief 10 th May 2016	A4	
Briefing Note	A5	

S31

MPS Peer Review of GMP Professional Standards Branch

1 Summary

- 1.1 The Metropolitan Police Service Directorate of Professional Standards (MPS DPS) were invited to assist Greater Manchester Police Professional Standards Branch (GMP PSB) with a peer review. [REDACTED]

S40

- 1.2 The MPS DPS Peer Review Team attended Greater Manchester Police, Professional Standards Branch (GMP PSB) on the 9th -10th May 2016.

- 1.3 Officers were briefed by the recently appointed Chief Superintendent for GMP PSB, [REDACTED] and introduced to the senior leadership team [REDACTED]

S40

- 1.4 The background regarding the drivers for change, the newly formulated design principles and vision for reforms within PSB were explained with the significant reform milestones already achieved.

- 1.5 The team were briefed with the key objective of considering if practitioners are making a tangible difference to maintaining the highest professional standards within GMP.

S40

- 1.6 At the conclusion of the peer review a hot debrief was conducted [REDACTED] regarding the identified priority areas and observations of the team found during the peer review.

2 Terms Of Reference

- 2.1 Terms of reference for the review were agreed between the MPS Directorate of Professional Standards (DPS) and GMP PSB leads prior to the review to include;

- Assessments.
- Decision making.
- Investigative mind set.

- 2.2 Specific areas of review were:

- Consistency of approach to assessments.
- Allocations and tasking with focus on supervisory oversight and scrutiny through to completion of the investigation.
- Quality of the Appropriate Authority decision making.

3 Methodology

3.1 The Peer Review Team deployed to GMP PSB over the 9th -10th May 2016 and commenced as follows:

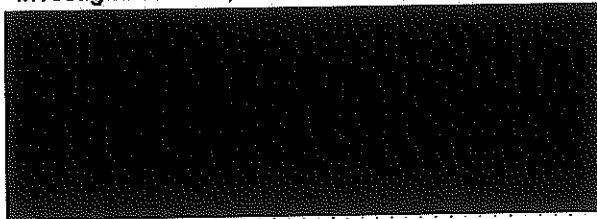
- Document review prior to attending GMP PSB.
- Individuals from MPS DPS were selected with the appropriate vetting and skills to conduct a transparent and intrusive review.
- Unfettered access to GMP PSB and all of its composite functions throughout the review.
- Complete a document review through random dip sampling of open and closed investigations.
- Briefing through PSB SLT regarding transformational developments and milestones.

S40

- Conduct a live hot debrief [REDACTED] followed by a written hot debrief document.
- Full report in relation to the peer review to be sent through GMP PSB for consideration and presentation of its findings, observations and recommendations.

3.2 The Peer Review Team were made up from staff from the Serious Misconduct Investigations Unit, Prevention and Reduction Team and Specialist Investigation [REDACTED]

S40



4 Introduction

4.1 In 2015 the Directorate of Professional Standards within the MPS received a request from Greater Manchester Police to conduct a peer review of their Professional Standards Branch (PSB).

4.2 It is important to note that the review was not an inspection. The methodology used was qualitative in nature and made up of a number of interactive interviews between reviewers and staff along with some thematic reviews of cases selected from case lists at random that were finalised or currently under investigation. Observations were captured and aggregated into themes, no specific review or a particular investigation was undertaken as a part of this process. The results are presented in the spirit of a critical friend.

- 4.3 Reviewers considered the processes in place within GMP PSB and those adopted within the MPS DPS within a volume model, balanced against the relevant framework required through statutory obligations and Home Office Guidance.
- 4.4 A hot debrief was undertaken on the final afternoon providing timely feedback to the organisation with the initial findings of the peer review. This briefing paper provides a summary of views and highlights areas of exception.

5 Context

- 5.1 The purpose of the peer review was not to replicate or duplicate any recent or ongoing work of the;
- Statutory governance role of the IPCC,
 - The inspection function of HMIC through their Police effectiveness, efficiency or legitimacy (PEEL inspections),
 - Accountability and scrutiny function of the OPCC.
- 5.2 Greater Manchester Police have identified the need for change and developed a number of key strands to transform their Professional Standards Branch.
- 5.3 Included in the areas identified as drivers for change were:
- Inconsistent and ineffective processes, procedures and controls
 - Stakeholder held reputation that GMP PSB lacked integrity, fairness and impartiality.
 - Deteriorating stakeholder relationships.
- 5.4 This was a short two day review involving four peers with the agreed terms of reference and identifying any opportunities, threats, strengths or weaknesses through the hot debrief process.
- 5.5 The report should be considered in context and should be accepted that in the time spent with GMP there is a limit regarding what can be achieved through the review process. It is an opportunity to reflect on where PSB are and what they wish to achieve to support the identified drivers for change.

6 Overview

- 6.1 Transforming Professional Standards is a clear priority for GMP. This is driven through the Chief Officer and was evident throughout the briefing from the Chief Superintendent, SLT and staff.

S40

- 6.2 [REDACTED] a senior officer, has been attached as a consultant to assist GMP PSB drive their change program.

6.3 GMP PSB are on a journey and have made a significant commitment to tackling the challenge of transforming the delivery of professional standards for the communities of Greater Manchester.

6.4 Priority areas established during the Peer Review and discussed for the consideration of GMP PSB were:

S31

- Communication
- Assessment and Decision Making
- Implementation of a PSB Complaints IT system.
- Assessment process
- Review of Local Resolution.
- Performance.
- Prevention & Organisational learning.
- Office security.

7 Leadership and Governance

7.1 Transforming Professional Standards is clearly a strategic priority for GMP from the Chief Officer throughout the ranks the Peer Review Team (PRT) met during the period of the review.

7.2 The change program has led to the introduction of new staff within PSB both at SLT level and operationally throughout the PSB department. A number of staff demonstrated passion, energy and positivity needed to develop continuous business improvement. These appointments should lead to stability in leadership during the implementation of the change program.

7.3 The Professional Standards framework of the Code of Ethics, IPCC Statutory Guidance, Home Office Guidance, Police Conduct Regulations and various Acts make this area a complex arena to operate. PSB staff require knowledge of the legislation, regulations and guidance to ensure compliance and the most appropriate way to progress matters of complaint, conduct or criminal behaviour. The change program seeks to ensure that this is a consistent and transparent process.

7.4 As part of the transformation of GMP PSB the PRT were informed regarding the significant milestones that had been achieved:

- The introduction of a formal scheme of delegation to enable PSB to discharge their Appropriate Authority responsibilities,
- Adoption of enhanced initial and final assessments for all conduct matters where the Special Requirements apply,
- Formulation of Terms of Reference for all casework,
- Implementation of the PSB Scheme of Governance,
- Review and implement revised responsibilities for the PSB investigator.
- Formal process mapping of complaint resolution across PSB, death or serious injury and conduct matters.

- 7.5 The Peer Review Team were shown documented reform implementation timetables and structured plans for GMP PSB. These were built upon with clear design principles, with a stakeholder's charter and engagement built in with a willingness to respond to constructive criticism.
- 7.6 The design documents identified an agreed strategic direction and 'what good looks like' with a framework for structure, function, and process. This is a conscious roadmap regarding the transformational journey in the reform of PSB.
- 7.7 There was synergy regarding some aspects of the priority areas established within the Peer Review and those already identified by the GMP PSB scoping through the change process. These areas were IT, communication, office security, performance management and prevention.
- 7.8 During interviews with front line staff they did outline a variety of practices locally in relation to Local Resolution (LR) which may require a clear cultural mandate from the centre to operational heads. The Review Team were concerned about the local interpretation and implementation of policy and process and advised that one of the priority areas identified was an urgent review of LR. Through the focus groups with PSB practitioners, good practice was identified from an area to consider as a way forward after suitable evaluation.
- 7.9 The local practice could impact on staff perceptions of organisational justice. Research would suggest that where procedural fairness is perceived to be present there is more likely to be greater levels of discretionary effort. Where organisational fairness is perceived not to be present there is a likelihood of tick box cultures of so called 'dull compliance' (research conducted by ██████████ Durham Police and the NPJA).
- S40
- 7.10 This change program is an opportunity to build consistency of approach throughout GMP with oversight of the Professional Standards Branch.

S31

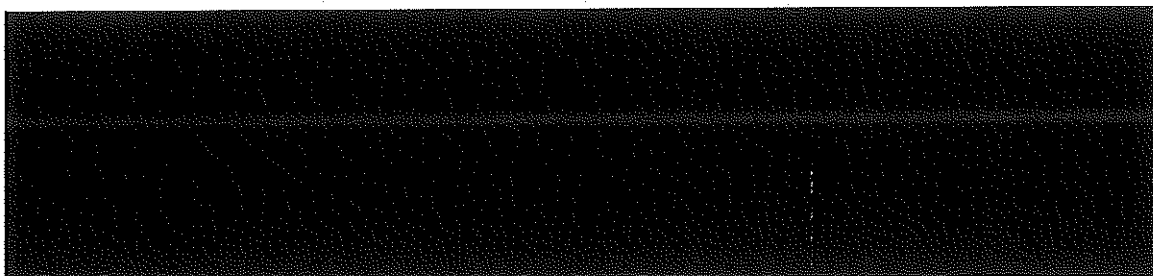
9 Communication

- 9.1 There was clear evidence of staff wishing to become involved in the transformational process within GMP PSB. Staff were proud to work for GMP and PSB, volunteering for the opportunity to become involved in practitioner based groups to assist in finding solutions as part of the change process. It was felt by the Review Team that this would be a significant bonus to the change team and organisation.
- 9.2 PSB staff focus group feedback gave differing personal opinions regarding the consistency of messaging regarding the transformational journey that PSB are engaged in. Staff wanted to be more involved in the process than they had been and expressed the request for more staff involvement as the change program progresses.
- 9.3 This priority area was covered during the hot debrief [REDACTED] explained that a PSB vision statement with specific expectations is in development through the Change Team along with a formal Communication Strategy. S40
- 9.4 This will only build on the HMIC PEEL Legitimacy report 2015 regarding embedding the Code of Ethics within GMP. This area links into the leadership and constant business improvement by GMP further complimented within the HMIC Efficiency Inspection 2016 report stating that GMP is a 'good force requiring no recommendations'. The PRT accept that this transformational journey is 'work in progress', with a dedicated change team now formed to develop a clear strategy internally and externally.
- 9.5 During the focus groups a recurring theme regarding a clear prevention strategy was raised. It was clear that this had been identified by staff who were willing to become actively involved in frontline delivery and the change team. Research would suggest where staff are exposed to the rationale for change they are more inclined to accept change and build a desired culture. Given the shift in culture achieved this will further build towards the design principles and counteract the drivers for change.
- 9.6 This may be an opportunity to formalise the capture of organisational learning from different people within PSB and define how it is fed into the training and development strategy with formal recognition of contributions by staff.

10 Assessment, decision making and investigative mind set.

- 10.1 Complaint handling, investigation and performance management could be improved by the implementation of a bespoke complaints Information Technology system.

S31



S31

10.5 GMP may wish to consider how its approach to measuring performance aligns with training priorities around leadership, culture, prevention and reduction.

10.6 A review of open, closed and Locally Resolved case files highlighted issues with a paper based system. This was also remarked upon within staff focus groups as a potential problem area in the future.

Assessment and decision making.

10.7 The PRT Identified what was thought to be inefficient processes in making recording and severity assessment decisions.

10.8 It is suggested that the change team review the process in order to future proof PSB for the anticipated changes and to ensure transparency in recording and decision making.

10.9 PSB change team may wish to consider the influence of workload on the assessment process

S31

10.10 The process of assessment and recording of matters may benefit from specific training and benchmarking reviews to those delegated as Appropriate Authority. If implemented, this process will inevitably lead to an increase in matters recorded and allocated which will require careful monitoring of workloads and the staffing requirements within PSB.

10.11 The PRT would welcome the Customer Service Desk (CSD) from GMP to visit the equivalent Customer Support Team (CST) in the MPS to review the processes within a volume complaint environment and would suggest visits to other high volume PSB's to obtain a diversity of approach suitable for GMP.

10.12 During the document review there were positive indications regarding the scheme of delegation with clear entries detailing the decisions made as delegated Appropriate Authority.

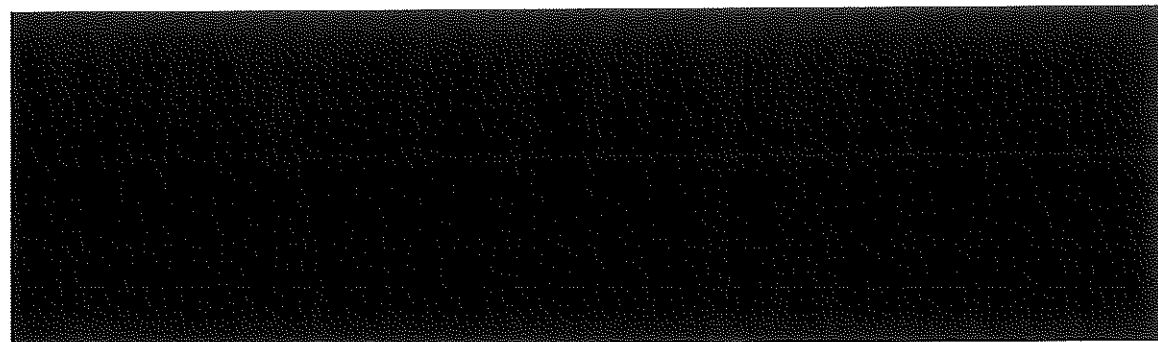
10.13 However recent changes to PSB working practices led the Peer Review Team to the opinion that staff are completing disproportionately complex severity assessments. In the drive to ensure thoroughness and professionalism there were examples of significant severity assessment reports that were eventually resolved. This does not appear to be proportionate to the outcome.

S31

10.14 However this new detailed oversight was welcomed by some, as it allowed for a detailed overview

S31

S31



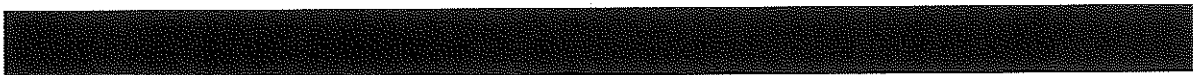
- 10.17 GMP PSB may wish to consider a simplified process which involves the CSD assessing the complaint, severity assess and allocate in accordance with the assessment.

S31

Local Resolution

- 10.18 The PRT would suggest that an urgent review of Local Resolution (LR) is completed.

S31



- 10.20 This review should clarify:

- What Local Resolution is used for,
- How it is recorded,
- How it is supervised,
- Timeliness of resolution,
- The Local Resolution outcomes are tracked versus the appeal rate.

- 10.21 Good practice was identified from PSB staff regarding the quality of investigations from GMP Divisions.

- 10.22 GMP may wish to consider a review of this good practice as part of this process and if appropriate, disseminated as training and organisational learning.

- 10.23 This would allow consistency of approach by GMP with local performance monitoring of appeals, organisational learning and UPP as outcomes from the LR process.

Performance

- 10.24 The IT requirements for performance management have been identified by GMP regarding the benefits of demonstrating transparency.

- 10.25 Data was requested in relation to gross misconduct and misconduct. Unfortunately complete data for gross misconduct, other than detailed below, was unavailable at the time of the review.

- 10.26 Figures made available for misconduct between 01/04/15 and 31/03/16 were:
- Six (6) hearings
 - Six (6) meetings
 - Three (3) officers resigning with immediate effect prior to gross misconduct hearings.
- 10.27 The need for performance data is a window into the area of complaints and could assist in building confidence with stakeholders. It was felt that the figures provided were low for a metropolitan force, given the complexity of policing an area such as GMP. It is noted that these figures maybe an indication of the lack of performance management information available, as this data does not feature Special Case Hearings
- 10.28 Within the drivers for change and reversing the inconsistent and ineffective processes therefore eroding stakeholder confidence, the facet of staff development was probed through the focus group forums.
- 10.29 There was positive feedback regarding the GMP initial PSB staff training in the misconduct processes and the investment of external providers to facilitate learning.
- 10.30 Detective Inspectors from the investigation teams were asked regarding SIO accreditation which they have not have the exposure to at this stage of their careers.
- 10.31 Given their role in some of the most complex and contested areas of policing this may be a consideration as an investment for professionalism and GMP for the future. PSB staff should be at the 'top of their game' given the intricacies of these investigations.
- 10.32 Additional training in discrimination was discussed and the role of the CSD assessment team in allegations of this nature.
- 10.33 GMP may wish to replicate the investment the MPS have made in obtaining training by specialist Counsel in the issues of discrimination for CSD staff in the complexities of discrimination.
- 10.34 This investment in people and the constant professional development may contribute towards enhancing the reputation and ability of the staff within PSB while enabling staff to gain the required skills to allow for natural organisational rotation throughout GMP.

S31

- 10.36 Concerns were raised regarding workloads and supervision to staff ratio.

S31

Performance management will allow monitoring of these levels and the appropriate management, staffing and risk mitigation processes to be implemented.

- 10.37 Staff ratios were discussed with DI's stating they had significant staff on Division and now have one team within PSB. GMP may wish to consider a staff rationalisation program with careful monitoring of work demands for appropriate team strengths and excess staff redeployed into critical roles elsewhere within PSB, investment in a prevention team or elsewhere in GMP.

Prevention & Organisational Learning

- 10.38 This area was a consistent theme throughout the review with almost all staff stating this should be a clear tranche within GMP PSB.

- S40 10.39 [REDACTED] a GMP Prevention Strategy is in development through the Change Team. [REDACTED]

S31

- 10.40 Within the focus groups there was clear passion from a number of staff of willing to be involved in the transformation process to find the most appropriate resolution to issues they encounter. GMP may wish to consider a number of staff solution groups to 'problem solve' from a practitioner perspective.

- S40 10.41 A separate MPS DPS Prevention Strategy document has been forwarded [REDACTED] for consideration. This document includes subject areas:

- Prevention of complaints occurring.
- Support when a complaint or conduct matter arises.
- Managing complaints.
- Getting complaint outcomes right first time.
- Review of processes and organisational learning.

- 10.42 The benefits of a prevention team is they can focus on complaints, assist with structured intervention plans re officers, educate new entrants and promotion courses while facilitating positive engagement with internal and external stakeholders

11 Office Security

- 11.1 The Peer Review Team found that the PSB office at GMP HQ has the potential to be an extremely efficient office. It is a single location housing the PSB staff which should allow for moderation and consistency in decision making.

- 11.2 The security of this office is paramount due to the sensitive nature of their investigations, reducing the potential of compromise and risk to the organisation. [REDACTED]

S31

12 Conclusion

- 12.1 Greater Manchester Police have committed to a clear change program for Professional Standards.
- 12.2 The Peer Review Team found that the leadership team and staff were openly passionate and committed to improving the processes and service delivery in professional standards.
- 12.3 In the context that many of the areas identified within the peer review were already subject of the PSB focus regarding areas to review, the organisation is on a journey of continuous business improvement.
- 12.4 As part of this approach they had achieved a number of key fundamental milestones in developing the systems and processes. This demonstrates compliance with the required guidelines but also transparency in their conscious decision to openly improve their delivery to the public.
- 12.5 The design and implementation of the transformational change is well structured with a strategic vision and timetable of key operational objectives. The Peer Review Team were of the opinion that these initial principles will be incrementally improved as part of their journey.
- 12.6 There are inclusive plans for conscious engagement with stakeholders which we were unable to analyse during the timetable of the peer review.
- 12.7 As mentioned earlier in this report, the findings of the review should be viewed in the context of the time spent with GMP PSB and the findings are presented as a critical friend for consideration by GMP and the change team.



METROPOLITAN POLICE SERVICE

DIRECTORATE OF PROFESSIONAL STANDARDS

ANTI - CORRUPTION COMMAND

SPECIALIST INVESTIGATIONS

MPS Peer Review

**MPS Peer Review of Greater Manchester
Police Professional Standards Branch**

Appendices

Copy of Transforming Professional Standards
presentation dated 3rd May 2016

S40



Review Schedule

GMP Peer Review Hot Debrief 10th May 2016

Briefing Note

RESTRICTED



**METROPOLITAN
POLICE**

TOTAL POLICING



A1 **Copy of Transforming Professional Standards presentation dated 3rd May 2016**

Transforming Professional Standards in

Greater Manchester Police

Presentation to MPS Directorate of Professional Standards

Tuesday 3rd May 2016

S40



Drivers for Change

- (1) **Inconsistent and ineffective processes, operating procedures and controls** which have led to inconsistency and variability of outcome of investigation, excessive time taken to achieve resolution, an inability to demonstrate or evidence fairness and proportionality, and erosion of stakeholder confidence.
- (2) **A stakeholder held reputation that PSB lacks integrity, fairness and impartiality** which results in allegations of PSB is outcome and sanction focused, rather than focusing on education and prevention and which reduces stakeholder collaboration in achieving early or more appropriate resolution and leads to ongoing challenges and appeals against investigations and conduct outcomes.
- (3) **Poor - and deteriorating - stakeholder relationships** evidenced by negative media coverage, social media comment and reducing public confidence and unnecessary and unhelpful challenges in working effectively with the IPCC and others.

Design Principles guiding all aspects of transformational change

Organisational effectiveness – to assure consistent and appropriate outcomes

As evidenced by:

- Robust processes and procedures to resolve complaints, conduct and DSI matters, including critical control points and documentation
- Clear accountability, responsibility and authority for decision-making within a comprehensive Scheme of Delegation and Governance
- Robust performance scrutiny and internal challenge that ensures high quality investigations and casework
- An ability to operate in a timely and consistent fashion across all aspects of assessments and casework

A culture of integrity, fairness and impartiality – to assure reputation

As evidenced by:

- Strict adherence to the regulatory and legislative framework
- Demonstrable, auditable transparency in decision making and procedures
- Appropriate internal and external mechanisms to provide challenge and accountability
- Clear and consistent reporting structures

Constructive and positive stakeholder engagement – to maintain and enhance relationships

As evidenced by:

- A clear and current understanding of internal and external stakeholder perspectives
- An agreed and documented "Stakeholder Charter" describing what outcomes and behaviours Stakeholders can expect from PSB
- Regular engagement with stakeholders, especially those who have least confidence in the police complaints and misconduct system
- A willingness to respond to constructive commentary and to influence improvements in policing standards

Vision for a Reformed Professional Standards Branch

Vision, Strategy & Leadership			
Values	Goals & Objectives		Purpose
A culture of integrity, fairness and impartiality , consistent with the Police Code of Ethics Full disclosure, subject to "harm test"	Documented and agreed Branch Goals and Objectives that address the full range of PSB Purpose and Services Goals and Objectives that address change and improvement as well as operational performance		"To Develop, Inform, Educate and Enforce the maintenance and enhancement of Professional Standards within GMP"
Focus & Intent			
Stakeholders	Services	Competences	Controls
Proactive , professional relationships with all Stakeholders based upon a commonly agreed Charter of expectations and undertakings	Monitor PS developments Inform and educate Officers and Staff in PS matters Prevent PS breaches Manage and Resolve Complaints Investigate conduct matters	Investigative skills and experience Intelligence gathering Proactive prevention activity Inform, educate and communicate	Agreed schemes of Delegation and Governance Threat and harm based management and reporting of investigations Effective and timely Complaint resolution
Operating Model			
Organisation	Processes	Data & Information	Assets & Equipment
Dissolution of Branch / Division teams & squads Flexible , responsive to fluctuation in demand Independent of Legal Services	Robust, repeatable and transparent processes and procedures, capable of withstanding external / internal scrutiny	Integrated information systems, [REDACTED]	Fit for purpose IS system [REDACTED]

S31

PSB commitments to drive and embed change

Vision, Strategy & Leadership			
Values	Goals & Objectives		Purpose
Agree, document and maintain sustaining Values as a component of future PSB Operating Model	Agree, document and maintain SMART Branch Performance Goals and Objectives		Develop and agree PSB Purpose with Appropriate Authority [AA] and PSB SLT
Focus & Intent			
Stakeholders	Services	Competences	Controls
Define & agree PSB Stakeholder Charter to reflect agreed Purpose Agree adoption ,and ongoing monitoring of Charter with Stakeholders	Agree, document and maintain PSB Services to reflect agreed Purpose Expand Services provided to Increase Education, Awareness and Prevention	Agree, document and maintain Competences required to deliver PSB Services. Design and provide training and education to address s capability shortcomings	Implement and operate Schemes of Delegation and Governance. Design and implement governance , operational control and assurance procedures.
Operating Model			
Organisation	Processes	Data & Information	Assets & Equipment
Provide alternative arrangements for leadership of Legal Services and Community Engagement & Relations	Implement and operate, fit for purpose processes to deliver all PSB Services Design , document and maintain PSB operating processes and procedures	Define statutory , management and reporting Information requirements Implement reporting procedures	Evaluate , select and Implement PSB Case Management and Reporting tools / systems

Significant reforms to date

- (1) Introduction of a Scheme of Delegation for Professional Standard to enable a proportionate and expeditious discharge of appropriate authority responsibilities**
- (2) Adoption of enhanced initial and final assessments for all conduct matters, including complaints where Special Requirements apply and the formulation of terms of reference for all casework**
- (3) Development, approval and implementation of PSB Scheme of Governance**
- (4) Redesign and implementation of revised role and responsibility of the PSB investigator**

Definition of PSB Purpose, Values and Objectives

Our Purpose and the Values which direct and inform our work	Services provided to the Public, Greater Manchester Police and our colleagues	Key Goals and Objectives for 2016/17	The Risks we address and mitigate
The primary functions of PSB and underlying principles in the discharge of its responsibilities	Core services: those that are statutory, mandatory or are critical to the effective functioning of GMP	Activities ongoing or planned for completion in 2016/17 in addition to the core services	Risks to GMP by either not undertaking or failing to deliver any of our core services
<p>Purpose</p> <p>The primary purpose of GMP's PSB is to:</p> <ul style="list-style-type: none"> • develop, maintain and promote the highest possible professional standards of conduct throughout GMP • reduce and eliminate instances of risks to the integrity of the GMP • identify and promote learning to achieve the highest possible standards of service <p>Values</p> <p>GMP's PSB is committed to the values set out in the College of Policing's Code of Ethics which provides the framework for all the delivery of our services</p> <p>We place particular importance on the values of:</p> <ul style="list-style-type: none"> • instilling and promoting a culture of integrity, fairness, transparency and impartiality • engaging meaningfully and constructively with all our stakeholders 	<ul style="list-style-type: none"> • Public complaint receipt, recording, investigation and resolution compliant with relevant legislation and IPCC's statutory guidance • Assessment, recording and investigation of allegations of misconduct to establish the most appropriate and proportionate response and outcome • Death & Serious Injury recording, investigation and assessment of all incidents to establish an appropriate and proportionate response, including lessons learnt • Reducing and mitigating the risk of corruption and improper practice in all its forms • Training, development and organisational learning provision to improve understanding of the Code of Ethics and required standards of professional behaviour 	<ul style="list-style-type: none"> • Embed the Scheme of Delegation (January 2016) to ensure accountability and responsibility at every level of decision making within PSB. • Introduce and implement schemes of internal and external governance • Work with senior colleagues across GMP to redefine responsibility for policing standards and conduct • Increase the transparency of integrity and accountability across all PSB operational policing and organisational governance • Revise the investigative function and supervisory structures to empower investigators and ensure consistency, quality, timeliness and proportionality in investigations and outcomes • Agree and document a <i>Stakeholder Charter</i> describing what outcomes and behaviours stakeholders can expect from PSB • Improve complaint management procedures to reduce the number of appeals through increased transparency and more effective communication and correspondence with complainants 	<ul style="list-style-type: none"> • Risk of falling levels of public confidence and trust in the integrity of the GMP and the wider police service by ineffective investigations into public complaints and matters of misconduct and lack of commitment to public accountability. • Risk of increased levels of dissatisfaction with the service provided by GMP. • Risk of a loss of confidence of GMP staff in their PSB and thereby decreasing willingness to challenge or report improper conduct. • Risk of reduction in confidence of the IPCC in GMP's willingness to meet exacting commitments to public complaints and police misconduct. • Risk of public censure from failing to meet the exacting requirements identified in HMIC PEEL assessments and HMIC Thematic Reports on Police Integrity and Corruption • Risk to the integrity and reputation of the GMP by failing to prevent the unauthorised disclosure of police information and intelligence; infiltration by organised crime groups; harm to GMP assets; and inappropriate associations and relationships with individuals outside of the police service.

Work in progress

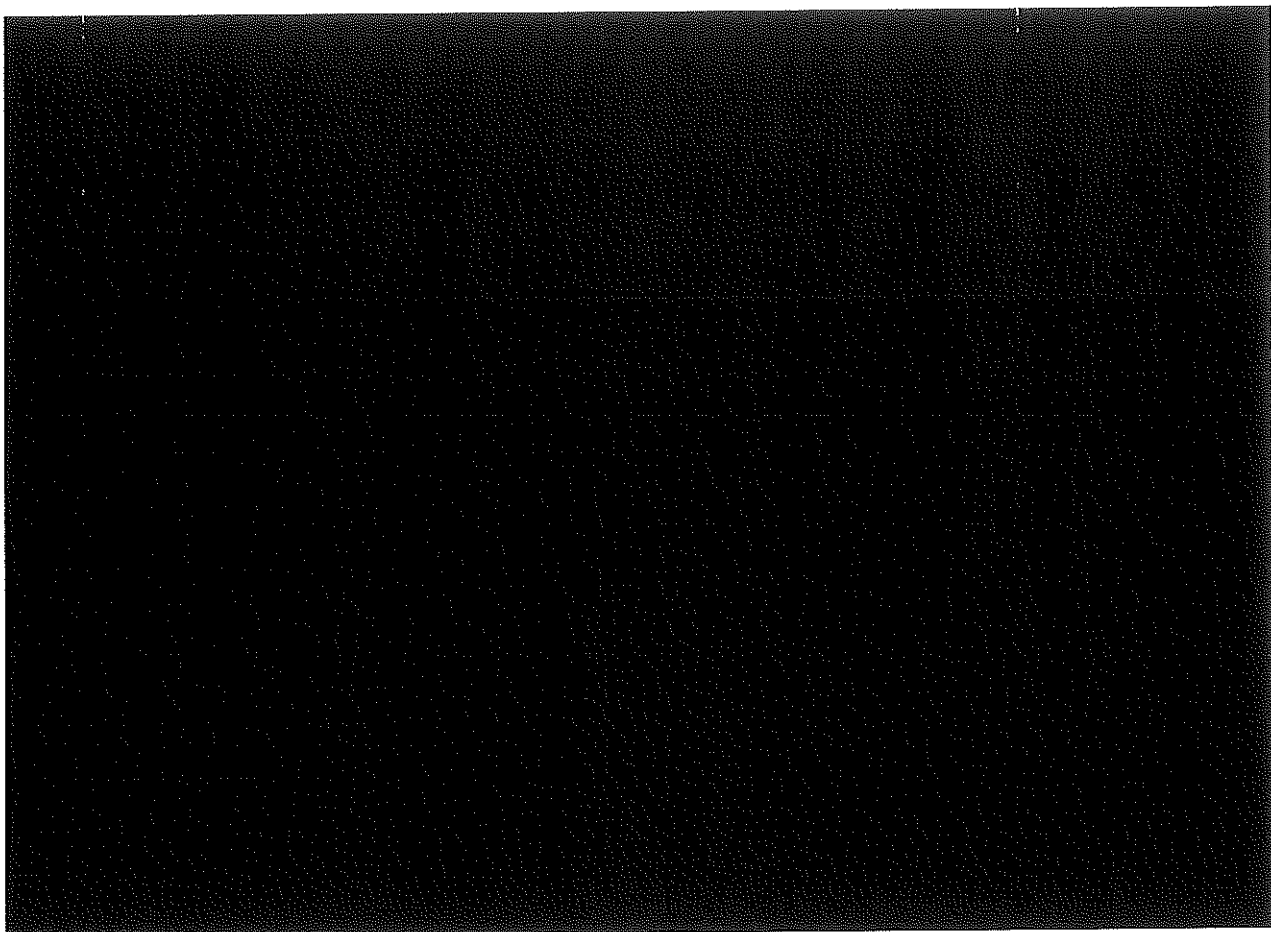
- Expansion of current PSB service provision to take responsibility for organisational review and learning and to become far more proactive in the enhancement of Professional Standards throughout GMP
- Resolution of the role and organisation of the Counter Corruption Unit to improve levels of transparency, consistency and resilience
 - misconduct investigations undertaken by PSBI

S31

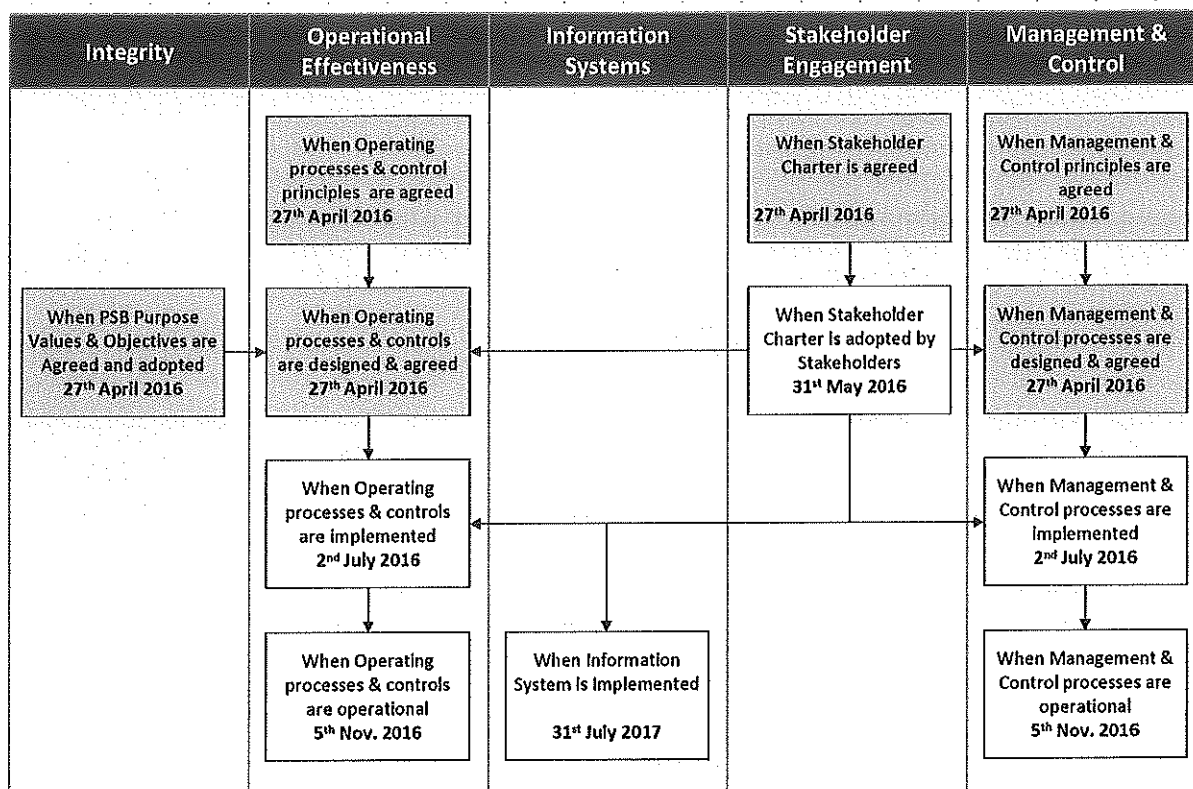


- The procurement of an appropriate and effective Casework and Information System capable of providing integrated support across all PSB activities

S31



PSB Reform Implementation



S40

A3 Review Schedule

GMP Peer Review Schedule

	Monday	9am	10am	11:30am	1230-115pm	1:15pm	2:15pm-230pm	3pm	4pm	5pm	6pm
		Introductions and GMP familiarisation	Core Review	PRT debrief and report update	Lunch	Focus Group PC/DC	PRT debrief and report update	Core Review	Core Review		
		Introductions and GMP familiarisation	Core Review	PRT debrief and report update	Lunch	Focus Group CSD	PRT debrief and report update	Core Review	Core Review	PRT debrief and report update	
Tuesday											
			Focus Group PSB Supervisors	PRT debrief and report update	Lunch	Core Review	Core Review		Travel and debrief		
		PRT Team meeting	Focus Group delegated authority CI	PRT debrief and report update	Lunch	Core Review	Core Review	Hot debrief	Travel and debrief		

A4 GMP Peer Review Hot Debrief 10th May 2016

The MPS Peer Review Team attended GMP PSB on the 9th -10th May 2016 to assist with an external perspective regarding the transformation of Professional Standards in GMP.

Priority areas established during the Peer Review

- PSB Complaints IT system.
- Office security.
- Review of Local Resolution.
- Assessment process.

S31

- Communication.
- Performance.
- Prevention & Organisational learning.

PSB Complaints IT system.

The Peer Review Team (PRT) found that GMP Professional Standards Branch (PSB) have identified they require specialist IT and work has been ongoing to procure a suitable system.

S31

A review of open, closed and Locally Resolved case files highlighted issues with a paper based system. This was also remarked upon within staff focus groups as a potential problem area.

Office security.

The PRT found that the PSB office at GMP HQ has the potential to be an extremely efficient office with a single location, moderation and consistency in decision making involving severity assessments and SLT. The security of this office is paramount due to the sensitive nature of their investigations, reducing the potential of compromise and risk to the organisation

S31

Review of Local Resolution.

The PRT would suggest that an urgent review of Local Resolution (LR) is completed. This should clarify what it is, what it should be used for, how it is recorded, supervised and outcomes tracked versus the appeal rate.

S40

Good practice was identified regarding the quality of investigations from Wigan Division
GMP may wish to consider a review as part of this

process and if appropriate, disseminated as training. This would allow consistency of approach by GMP with local performance monitoring of appeals, organisational learning and UPP as outcomes from the LR process.

Assessment process

The PRT identified inefficient processes in making recording and severity assessment decisions.

It is suggested that the change team review the process in order to future proof PSB for the anticipated changes to ensure transparency in recording and decision making

S31

The process of assessment and recording of matters may benefit from specific training and benchmarking reviews to those delegated as Appropriate Authority. If implemented, this process will inevitably lead to an increase in matters recorded and allocated which, will require careful monitoring of workloads and staff requirements

The PRT would welcome the CSD from GMP to visit the equivalent CST in the MPS to review the processes within a volume complaint environment and would suggest visits to other high volume PSB's to obtain a diversity of approach suitable for GMP.

There were some positive indications regarding the scheme of delegation with clear entries detailing the decision made on behalf of the Appropriate Authority.

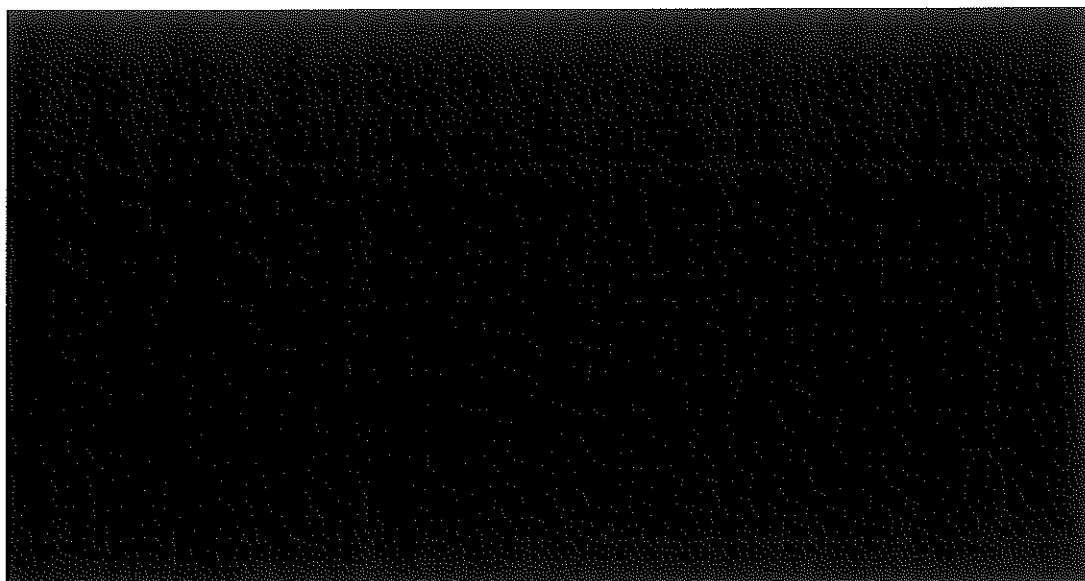
However recent changes to PSB working practices have led to disproportionate severity assessments [REDACTED] This new oversight was welcomed by some, as it allowed for a detailed overview [REDACTED]

S31

S31

GMP PSB may wish to consider a simplified process which involves the CSD assessing the complaint, severity assess and allocate in accordance with the assessment. [REDACTED]

S31



Communication

S40

[REDACTED] a PSB vision statement with specific expectations is in development through the Change Team along with a communication strategy. This will build on the HMIC report regarding embedding the Code of Ethics within GMP. PSB staff Focus Group feedback gave differing opinions regarding the consistency of messaging regarding the transition of PSB. The PRT accept that this is 'works in progress with a dedicated Change Team now formed to develop a clear strategy internally and externally.

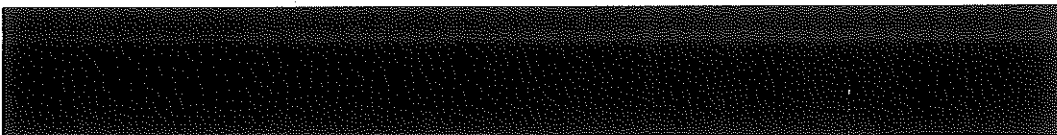
Performance

The IT requirements for performance management have been identified by GMP regarding the benefits of demonstrating transparency.

There was positive feedback regarding initial PSB staff training and the investment of external providers to facilitate learning. Detective Inspectors from the investigation teams were asked regarding SIO accreditation which they have not have the exposure to at this stage of their careers. Given their role in some of the most complex and contested areas of policing this may be a consideration as an investment for professionalism and GMP for the future.

Additional training in discrimination was discussed in light of the Lewis report and GMP may wish to replicate the investment the MPS have made in training by specialist Counsel in the issues of discrimination for CSD staff.

S31



Concerns were raised regarding workloads and supervision to staff ratio. [REDACTED]



Appendices

A5 Briefing note

S40

The MPS Peer Review Team attended Greater Manchester Police (GMP) Professional Standards Branch based at GMP HQ on the 9th -10th May 2016 to assist with an external perspective regarding the transformation of Professional Standards Branch (PSB) in GMP.

This transitional progress was with the assistance [REDACTED] in the capacity of the subject matter expert in the field of professional standards. A reference document was provided to the review 'Transforming Professional Standards in Greater Manchester Police' [REDACTED] dated December 2015 outlining the rationale for the change process. This was discussed [REDACTED] with a revised review protocol agreed. The revised qualitative functions to be reviewed and part of the review were agreed as the following:

- Assessment and decision making.
- Investigation mind set.
- Prevention and education.

The team conducted staff focus groups with various key staff within the Customer Service Desk, along with other key staff throughout the PSB Detective Inspectors and Sergeants

Part of the review allowed for a number of random files to be selected to establish the transition in PSB. This file review related to cases closed through Local Resolution and closed cases

Methodology.

The PRT found that the PSB office at GMP HQ has the potential to be an extremely efficient office with a single location, moderation and consistency in decision making involving severity assessments and SLT. The security of this office is paramount due to the sensitive nature of their investigations, reducing the potential of compromise and risk to the organisation

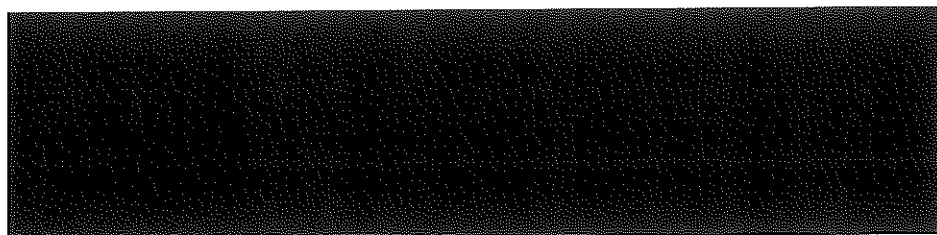
The methodology for the review took place over the 9th -10th May 2016 as follows:

- Document review prior to the visit.
- Assessment of the Review and the required skills of the Peer Review Team (PRT).
- Assemble the PRT.
- Visit to GMP PSB.

S40

- Complete a 'hot debrief' to the Head of PSB [REDACTED] on the final afternoon.

S40



Introduction

S40

In December 2015 Greater Manchester Police requested assistance with peer review through [REDACTED] Professionalism Command within the Metropolitan Police area. The peer review was to be a non-threatening, neutral and supportive approach to the transformation approach to PSB in GMP. This is an important element that the review was not an inspection, the methodology was qualitative in nature and made up from a number of interactive interviews between reviewers and staff, observations and opinions were captured and aggregated into the themes delivered in the hot debrief

To ensure consistency paper file reviews were carried out across similar framework with all thematic areas reported through a hot debrief to the head of GMP PSB

A hot debrief was delivered by the PRT with Chief Superintendent [REDACTED] on the final afternoon with the key identified themes for consideration. This briefing paper provides a summary of views and highlights areas of exception.

S40

Context

S40

Greater Manchester Police Professional Standards Branch PSB have enlisted the assistance [REDACTED] to assist the transformation of the PSB department. GMP have apparently had a number of inspections and external reports. This review that may have contributed to the transformation process /HMIC reports

Overview

PSB Complaints IT system.

- Office security.
- Review of Local Resolution.
- Assessment process.

S31

- Communication.
- Performance.
- Prevention & Organisational learning.

HMIC report page 7 of GMP doc

Leadership and Governance

Design Principles

Process mapping

Scheme of Delegation sets out clearly the roles of those performing as the Appropriate Authority.

HMIC – Legitimacy report.

S31

[REDACTED]
Involvement

Communication

Investigation

Appendices

S40

[REDACTED]
Review schedule

Hot Debrief

Priority areas established during the Peer Review

- PSB Complaints IT system.
- Office security.
- Review of Local Resolution.
- Assessment process.

S31

- [REDACTED]
- Communication.
 - Performance.
 - Prevention & Organisational learning.

PSB Complaints IT system

The Peer Review Team (PRT) found that GMP Professional Standards Branch (PSB) have identified they require specialist IT [REDACTED]

S31

[REDACTED]

A review of open, closed and Locally Resolved case files highlighted issues with a paper based system. This was also remarked upon within staff focus groups as a potential problem area

Office security

The PRT found that the PSB office at GMP HQ has the potential to be an extremely efficient office with a single location, moderation and consistency in decision making involving severity assessments and SLT. The security of this office is paramount due to the sensitive nature of their investigations, reducing the potential of compromise and risk to the organisation.

S31

Review of Local Resolution.

The PRT would suggest that an urgent review of Local Resolution (LR) is completed. This should clarify what it is, what it should be used for, how it is recorded, supervised and outcomes tracked versus the appeal rate.

S40

Good practice was identified regarding the quality of investigations from Wigan Division. GMP may wish to consider a review as part of this process and if appropriate, disseminated as training. This would allow consistency of approach by GMP with local performance monitoring of appeals, organisational learning and UPP as outcomes from the LR process.

Assessment process

The PRT identified inefficient processes in making recording and severity assessment decisions.

It is suggested that the change team review the process in order to future proof PSB for the anticipated changes to ensure transparency in recording and decision making.

PSB change team may wish to consider the influence of workload on the assessment process

S31

The process of assessment and recording of matters may benefit from specific training and benchmarking reviews to those delegated as Appropriate Authority. If implemented, this process will inevitably lead to an increase in matters recorded and allocated which, will require careful monitoring of workloads and staff requirements.

The PRT would welcome the CSD from GMP to visit the equivalent CST in the MPS to review the processes within a volume complaint environment and would suggest visits to other high volume PSB's to obtain a diversity of approach suitable for GMP

There were some positive indications regarding the scheme of delegation with clear entries detailing the decision made on behalf of the Appropriate Authority

However recent changes to PSB working practices have led to disproportionate severity assessments. This new oversight was welcomed by some, as it allowed for a detailed overview

S31

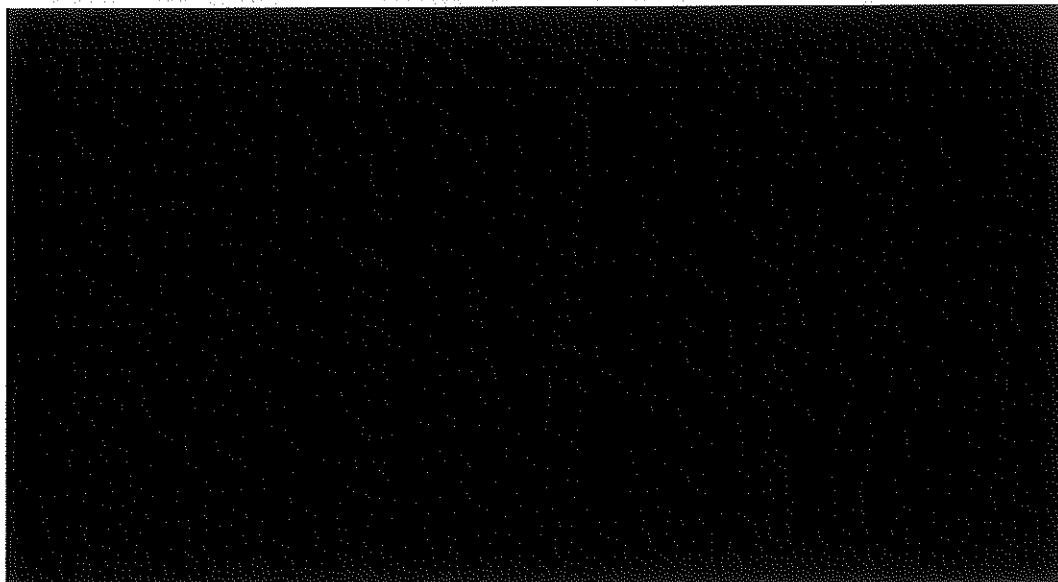
S31

[REDACTED]

GMP PSB may wish to consider a simplified process which involves the CSD assessing the complaint, severity assess and allocate in accordance with the assessment.

[REDACTED]

S31



Communication

S40

[REDACTED] a PSB vision statement with specific expectations is in development through the Change Team along with a communication strategy. This will build on the HMIC report regarding embedding the Code of Ethics within GMP. PSB staff Focus Group feedback gave differing opinions regarding the consistency of messaging regarding the transition of PSB. The PRT accept that this is 'work in progress' with a dedicated Change Team now formed to develop a clear strategy internally and externally.

Performance

The IT requirements for performance management have been identified by GMP regarding the benefits of demonstrating transparency.

There was positive feedback regarding initial PSB staff training and the investment of external providers to facilitate learning. Detective Inspectors from the investigation teams were asked regarding SIO accreditation which they have not have the exposure to at this stage of their careers. Given their role in some of the most complex and contested areas of policing this may be a consideration as an investment for professionalism and GMP for the future.

Additional training in discrimination was discussed in light of the Lewis report and GMP may wish to replicate the investment the MPS have made in training by specialist Counsel in the issues of discrimination for CSD staff

[REDACTED]

S31

[REDACTED]
Concerns were raised regarding workloads and supervision to staff ratio. [REDACTED]

[REDACTED] Performance management will allow monitoring of these levels and the appropriate management, staffing and risk mitigation processes to be implemented.

Staff ratios were discussed with DI's stating they had significant staff on Division and now have one team within PSB. GMP may wish to consider a staff rationalisation program with careful monitoring of work demands for appropriate team strengths and excess staff redeployed into critical roles elsewhere within PSB, investment in a prevention team or elsewhere in GMP

Prevention & Organisational Learning

This area was a consistent theme throughout the review with almost all staff stating this should be a clear tranche within GMP PSB

S40

[REDACTED] a GMP Prevention Strategy is in development through the Change Team. [REDACTED]

S31

Within the focus groups there was clear passion from a number of staff of willing to be involved in the transformation process to find the most appropriate resolution to issues they encounter. GMP may wish to consider a number of staff solution groups to 'problem solve' from a practitioner perspective

S40

A separate MPS DPS prevention strategy document will be forwarded [REDACTED] for consideration