

By Email

Ref: FOI 2018-46

16 January 2019

Dear Mr Wilby,

## **FREEDOM OF INFORMATION REQUEST**

Thank you for your email of 17 December 2018, in which you ask for information held by Her Majesty's Inspectorate of Constabulary and Fire & Rescue Services (HMICFRS) relating to professional standards in Greater Manchester Police.

2. Your request has been handled as a request for information under the Freedom of Information Act 2000. Your request is set out in **Annex A**.

3. I can confirm that HMICFRS does hold information relevant to your request. There have been three reports produced by HMICFRS after November 2015 that contain information relating to the efficacy of the approach to professional standards adopted by greater Manchester Police. We believe that all of these reports are already accessible to you. They can be found at:

(a) PEEL Legitimacy 2015 - <https://www.justiceinspectorates.gov.uk/hmicfrs/publications/police-legitimacy-2015-greater-manchester/>

(b) PEEL Legitimacy 2016 - <https://www.justiceinspectorates.gov.uk/hmicfrs/publications/peel-police-legitimacy-2016-greater-manchester/>

(c) PEEL Legitimacy 2017 - <https://www.justiceinspectorates.gov.uk/hmicfrs/publications/peel-police-legitimacy-2017-greater-manchester/>

4. In 2017, we reviewed all plans and associated documentation provided by forces in response to our 2016 recommendation that all forces should have started to implement a plan to achieve the capability and capacity required to seek intelligence on potential abuse of position for sexual gain. The letter sent to Greater Manchester Police's chief constable setting out our assessment of their force's plan can be found at: <https://www.justiceinspectorates.gov.uk/hmicfrs/publications/abuse-of-position-assessment-greater-manchester/>

5. As part of the legitimacy inspections HMICFRS collects data relating to professional standards from all forces. Some of this data is published on our website and available via the following links:

(a) PEEL Legitimacy 2015 - <https://www.justiceinspectorates.gov.uk/hmicfrs/wp-content/uploads/legitimacy-data-2015.ods>

(b) PEEL Legitimacy 2016 - <https://www.justiceinspectorates.gov.uk/hmicfrs/wp-content/uploads/legitimacy-open-data-2016.ods>

(c) PEEL Legitimacy 2017 - <https://www.justiceinspectorates.gov.uk/hmicfrs/wp-content/uploads/police-legitimacy-2017-data-1.ods>

6. Please note that the published data represents England and Wales as a whole and not individual forces. I can confirm that HMICFRS does hold this data at the force level, however due to the differing methods and formats in which this data is submitted and a current and ongoing change in the way we store and archive this data we have estimated that the cost of meeting your request would exceed the cost limit of £600 specified in the Freedom of Information and Data Protection (Appropriate Limit and Fees) Regulations 2004 (known as the Fees Regulations for brevity). We are therefore unable to comply with it.

6. The £600 limit is based on work being carried out at a rate of £25 per hour, which equates to 24 hours of work per request. The cost of locating, retrieving and extracting information can be included in the costs for these purposes.

7. We estimate that retrieving and extracting all of the relevant data for the period covered by your request would take considerable time and cost considerably more than the £600 limit.

8. If you refine your request, so that it is more likely to fall under the cost limit, we will consider it again. You could do this by narrowing the timeframe, or by being more specific about the type of information you are interested in. The published data provided in the links above may help you identify specific areas of interest.

9. However, please also note that even if a revised request were to fall within the cost limit, it is possible that other exemptions in the Act might apply.

10. Finally, you also request data relating to an external reference group set up by Greater Manchester Police. We have carried out a thorough search and established that HMICFRS does not hold any information relevant to this aspect of your request.

11. If you are dissatisfied with this response you may request an independent internal review of our handling of your request by submitting a complaint within two months to the address below, quoting reference FOI 2018-46. If you ask for an internal review, it would be helpful if you could say why you are dissatisfied with the response.

Chief Operating Officer  
HMICFRS  
6th Floor, Globe House  
89 Eccleston Square  
London  
SW1V 1PN  
E-mail: [haveyoursay@hmic.gsi.gov.uk](mailto:haveyoursay@hmic.gsi.gov.uk)

12. As part of any internal review HMICFRS's handling of your information request will be reassessed by staff who were not involved in providing you with this response.

13. If you remain dissatisfied after this internal review, you would have a right of complaint to the Information Commissioner as established by section 50 of the Freedom of Information Act.

Yours sincerely,

On behalf of

**HMICFRS FoI Team**

Her Majesty's Inspectorate of Constabulary and Fire & Rescue Services

## **Annex A**

In a response to a request by investigative journalist, Neil Wilby, for a statement concerning a peer review that allegedly took place in May 2016, the press office of Greater Manchester Police said, inter alia:

“The Peer Review by the Metropolitan Police originally planned for 6 weeks in late 2015 had been delayed due to operational matters. This was rescheduled to May 2016 by which time substantial work was already underway as part of the independent review. The peer review therefore was focused as an assessment of the progress that had been made and changes which were planned. This was reduced from the initial scope to two days as this was sufficient for its revised purpose - to support the independent review and transformational change programme which had started in Nov 2015. The Peer report was provided to GMP in December 2016.

“The external reference group was established in Feb 2016 with an independent chairperson. Representatives on the group included a wide range of individuals with expertise and views about the work around professional standards. They continued to provide support and advice until June 2017.

“The programme of work has led to changes being made to the way professional standards operates in GMP and we are continuing to review and develop this work. Since then there have been reviews by HMICFRS (Her Majesty's Inspector of Constabulary, Fire and Rescue Service) and the IOPC (Independent Office for Police Conduct) who have raised no issues of significant concern.”

Disclosure is, therefore, requested from HMFRIC for (i) all data held relating to the review referred to in the above paragraph and (ii) the external reference group referred to in the penultimate paragraph.