



Date: 24/07/2023
Our ref: 01/FOI/23/002497/S

FREEDOM OF INFORMATION REQUEST REFERENCE NO: 01/FOI/23/002497/S

I write in connection with your request for information dated 22/06/2023, received by Greater Manchester Police (GMP) for the following information:

Do you have any policies, procedures, or other measures (either in place or that you aim to implement) to deter police misconduct (police officers and police staff) against women outside of policing (i.e., the public)? Police misconduct is defined as acts, omissions, statements or decisions (whether actual, alleged or inferred) that have breached the Standards of Professional Behaviour in a way so serious as to justify disciplinary action (The Police (Conduct) Regulations 2020). Misconduct therefore encompasses a broad range of behaviours.

This FOI request does not focus on any specific type of harm or misconduct. If yes, for each policy, procedure or other measure, could you please provide a copy and specify the following information (if not listed within the document itself):

- The aim(s) of the policy, procedure or other measure.
- The date the policy, procedure or other measure was or will be implemented.
- Expected outcomes from the policy, procedure or other measure. If it is not possible to provide a copy of the policy, procedure or other measure, please also specify the name of it.

Result of Searches

Following receipt of your request searches were conducted within Greater Manchester Police (GMP) to locate information relevant to your request. I can confirm that the information you have requested is held by GMP. However, I am not obliged to supply you with all the information as an exemption apply. Section 17 of the Freedom of Information Act 2000 requires

Greater Manchester Police, when refusing to provide such information (because this information is exempt) to provide you, the applicant, with a notice which: (a) states that fact, (b) specifies the exemption in question and (c) states (if that would not otherwise be apparent) why the exemption applies. Where redactions in the attached Crime Management Policy & Procedure document have been made, that information is exempt from disclosure by virtue of the following exemptions: **Section 40(2)(a) – Personal Information**

Where Section 40 has been used, this represents information that identifies a living individual, to disclose this information would breach the principles of the GDPR and the Data Protection Act 2018. Personal data is defined by Article 4 of the GDPR and Part 1 of the Data Protection Act 2018, and means any information relating to an identified or identifiable natural person ('data subject'). An identified natural person is one who can be identified directly or indirectly from that data.

Please find attached copies of GMP's Sexual Harassment Policy and Procedure and Domestic Abuse in the Workplace Policy and Procedure. The details you have requested are included in the policy documents.

Please also refer to the following external policies, all of which are already in the public domain:

- The College of Policing's [Code of Ethics](#)
- The National Police Chiefs Council [Appropriate Personal Relationships](#)
- The College of Policing's [Guidance on Professional Boundaries](#)
- His Majesty's Inspectorate of Constabulary and Fire and Rescue Service's [Inspection of Vetting and Misogyny](#)

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Domestic Abuse in the Workplace

Policy & Procedure

Greater Manchester Police

August 2022



POLICY & PROCEDURE IMPLEMENTED: August 2022

REVIEW DATE: August 2024

POLICY & PROCEDURE OWNER: Detective Superintendent (Force Strategic Lead for Domestic Abuse) - Public Protection Governance Unit, Public Protection and Serious Crime Division

APPROVED BY: [REDACTED]

GOVERNMENT SECURITY CLASSIFICATION: [Official]

IS THE POLICY & PROCEDURE? ☒ New ☐ Revised

IF REVISED, PLEASE COMPLETE TABLE BELOW

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1. Policy Statement

Tackling domestic abuse is a priority for Greater Manchester Police (GMP). We recognise the devastating impact that all forms of domestic abuse have on the quality of life for victims, families, and children.

Greater Manchester Police has a responsibility to provide all officers and staff with a safe and effective working environment and will ensure that officers and staff within the organisation who experience domestic abuse are fully supported and receive the appropriate help and advice they require.

Officers and staff are expected, whether on or off duty, to behave in such a way which does not bring discredit on the police service or undermine public confidence in policing.

Domestic abuse perpetrated by officers and staff will not be condoned under any circumstance nor will it be treated as a purely private matter. Conduct outside of work may lead to disciplinary action being taken against an officer or member of staff.

Police officers and staff who commit domestic abuse-related offences will not be treated differently to any other member of the public. They will be investigated and held accountable through the criminal justice system in the same way as any other person.

1.1 Aims

- Give victims confidence in GMP and encourage the reporting of any DA incident, by dealing empathetically and diligently with criminal investigations into DA offences and that the report will be managed with impartiality and transparency.
- Officers and staff who experience domestic abuse are aware of the [support available to them](#).
- Provision of clear instructions and guidance to all officers and police staff in the identification of police perpetrated domestic abuse and the level of risk it presents.
- Advice and guidance for supervisors and line managers that will effectively support those who report domestic abuse at work.
- Taking appropriate action at all incidents to ensure victims and their families are safeguarded, with offenders being challenged, held accountable for their actions and where appropriate, brought to justice which could include internal discipline actions.
- Appropriately record all offences of DA in line with the [National Crime Recording Standard](#) and [Home Office Counting Rules](#).
- All decisions will be made in accordance with the [National Decision Model](#), [Authorised Professional Practice](#) and [ten risk principles](#).
- Make full use of safeguarding opportunities and legislation to protect victims and witnesses (e.g., Multi-Agency Risk Assessment Conference (MARAC), Domestic Violence Protection Order (DVPO), Domestic Violence Disclosure Scheme (DVDS), restraining orders etc.)

2. Scope

This policy applies to all police officers, members of police staff, special constables and police support volunteers of Greater Manchester Police who experience or perpetrate domestic abuse, either in the workplace or within their private life.

3. Roles & Responsibilities

3.1 Public Protection Governance Unit

- Provide Force wide strategic delivery plan for domestic abuse.
- Take strategic responsibility for GMP's DA policy and procedures.
- Provide leadership and direction for districts dealing with DA.
- Provide the link between district tactical delivery and strategic oversight and governance at chief officer level.
- Review Force Performance and collate statistics on behalf of the Force.
- Work with People & Development Branch to ensure all staff have received relevant and adequate training to deal with DA.
- Engage with partners at a strategic level across Greater Manchester (GM) working in partnership with the Greater Manchester Combined Authority to improve outcomes for victims of DA.

3.2 Professional Standards Branch

- 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.
- Record and monitor incidents and crimes of domestic abuse committed by officers and staff.
- Identify and report to the IOPC those incidents that meet the referral threshold.
- Collate performance data quarterly around domestic abuse misconduct and criminal outcomes.
- Ensure that all misconduct files for domestic abuse are flagged as DA according to the Domestic Abuse Act definition.
- Where an officer or staff self-notifies that they have been involved in a DA incident, that you have not been notified about, ensure Force policy is complied with in respect of the investigation and misconduct.
- Liaise with professional standard departments about DA cases committed by GMP employees in another force area to ensure misconduct matters are recorded appropriately within GMP.

3.3 All officers and staff

If you are experiencing domestic abuse or have concerns about your own behaviour, we encourage you to seek support from your line manager, or other support networks in the organisation which can be accessed via the People Pages on the intranet.

Police officers are duty bound to report any criminal offences that they are made aware of under National Crime Standards.

Police officers must notify Professional Standards Branch if they have been arrested or interviewed, whether voluntary or not, for a criminal offence regardless of where they reside.

Police staff must inform Professional Standards Branch of any convictions or cautions they receive.

If you are told by a colleague that they are experiencing, or have committed domestic abuse, please see [Appendix 5](#) for further information.

Operational roles and responsibilities are outlined in Section 5 of this Policy and Procedure.

4. Terms and Definitions

A comprehensive glossary of terms is available in the Domestic Abuse Policy and Procedure, available on the intranet.

DA	Domestic Abuse
ELP	Evidence Led Prosecutions
C&C	Controlling and Coercive Behaviour
PPDA	Police Perpetrated Domestic Abuse
OHWU	Occupational Health and Welfare Unit
IOPC	Independent Office for Police Conduct
P&D	People and Development Branch
PSB	Professional Standards Branch
DAB	Domestic Abuse Event in PoliceWorks
DASH	Domestic Abuse Stalking and Harassment
HBA	Honour Based Abuse

4.1 Domestic Abuse

The new Domestic Abuse Act 2021 defines that domestic abuse is behaviour by a person, towards another and:

- a) Both persons are each aged 16 or over and are personally connected, and
- b) The behaviour is abusive.

Behaviour is abusive if it consists of any of the following:

- physical or sexual abuse
- violent or threatening behaviour
- controlling or coercive behaviour
- economic abuse (see notes below)
- psychological, emotional, or other abuse

Economic abuse means any behaviour that has a substantial adverse effect on a victim's ability to acquire, use or maintain money or other property, or obtain goods or services.

The new Domestic Abuse Bill also introduces for the purposes of this act, that perpetrators who direct their conduct towards another person, for example the child of a victim, would be abusive behaviour towards the victim.

For further information on this subject, please refer to the College of Policing, [Authorised Professional Practice \(APP\) on Domestic Abuse](#).

4.2 Personally Connected

The new definition seeks to ensure that opportunities for identifying domestic abuse are not limited and include where people:

- are, or have been, married to each other
- are, or have been, civil partners of each other
- have agreed to marry one another (whether the agreement has been terminated)
- have entered into a civil partnership agreement (whether the agreement has been terminated)
- are, or have been, in an intimate personal relationship with each other
- is a child in relation to whom they each have a parental relationship
- are relatives (includes mother, father, sister, brother, daughter, son, cousin, niece, nephew, auntie, uncle, and grandparents, whether directly related, in-laws or stepfamily)

Domestic Abuse and HBA incidents involving 16- and 17-year-olds will be recorded on iOPS by creating a Domestic Abuse (DAB) event. This is to ensure the DASH Risk Assessment can be completed. However, these cases may also be considered child protection matters, and relevant procedures should be followed under Section 17 and 47 of the Children's Act (Child in Need or Child at Risk of Significant Harm). Please seek further advice your district adult or child safeguarding team.

4.3 Evidence Led Prosecutions

Domestic abuse has one of the lowest conviction rates in criminal justice. This is quite often because whilst the perpetrator is nearly always known, the personal connection between victim and perpetrator can make it especially difficult to prosecute. Further challenges can occur when one or both parties are employed by a law enforcement agency such as the police. There are a variety of reasons why victims may be reluctant to support a prosecution, some of these barriers are outlined at [Appendix 1](#), therefore it is vital that evidence led prosecutions are considered in all circumstances, especially given the role that the perpetrator may hold in the organisation and the risk to the public this can carry.

In building evidentially strong cases, the starting point is to build cases that do not rely on the victim. The stronger the overall prosecution, the less likely it is to be challenged, and in the event it is challenged, the prosecution is less likely to need to call the victim to give evidence.

Investigating domestic abuse can be challenging especially in cases where the victims are unsupportive, or in cases involving coercive or controlling behaviour where abuse may be subtle and not immediately obvious.

An [article has been published on the GMP Intranet](#) with helpful prompts to consider when seeking an evidence led prosecution.

Further information can be found in the [College of Policing, Authorised Professional Practice](#).

5. Procedure

Officers and staff should refer to the GMP Domestic Abuse Policy and Procedure for advice around domestic abuse investigations. However, in cases of domestic abuse where the perpetrator and/or victim is employed by the organisation, the additional processes below should be followed.

5.1 Call Handler

In addition to your roles and responsibilities in the DA Policy & Procedure, you should complete the following where you are aware that the perpetrator or victim is employed by GMP or an external force:

- Obtain the name and rank/grade of the officer or staff concerned (victim and/or perpetrator) along with any information about the position they hold, and the district/branch/force where they work.
- Escalate the incident to the Duty Inspector in order that effective oversight, decisions, and referrals can be made.
- Unless there is an immediate risk which necessitates a resource being deployed on a Grade 1 response, liaise with the Duty Inspector to identify an appropriate resource to be deployed.

5.2 Duty Inspector

In addition to your roles and responsibilities in the DA Policy & Procedure, if you are notified of a domestic abuse incident where the perpetrator and/or victim is employed by the organisation, these additional processes should be followed:

- Unless a resource needs to be deployed immediately, consider if the victim is a GMP employee where they work. A victim may not feel comfortable speaking about the domestic abuse they are experiencing to a colleague on the same district where they work. Seek the victim's views on their preference as to who they would like to speak to about the incident. See [Appendix 1](#) for further information on barriers to reporting.
- If the perpetrator works on the same district where the incident has been reported, contact a buddy district to deploy a resource to attend the incident. As far as possible try to ensure that the officer deployed is impartial and has no conflicts with any person involved in the domestic abuse incident.
- Be alert to unconscious bias that may be present when responding to reports of domestic abuse where the victim and/or perpetrator is employed by the organisation - see [Appendix 2](#) for further details.

The below buddy districts are intended as a guide, and it is accepted that there may be instances where you do not use the buddy district below; however the aim is one of

impartiality to ensure there is no conflict of interest between the officer who is responding to any of the individuals involved in the domestic abuse incident.

Buddy Districts

- Bolton (K), City of Manchester North (A1) and Rochdale (P)
 - Bury (N), City of Manchester South (A3) and Tameside (G)
 - City of Manchester Central (A2), Trafford (M) and Wigan (L)
 - Oldham (Q), Salford (F) and Stockport (J)
- Deploy a sergeant (in addition to the constable) to attend all initial reports of police perpetrated domestic abuse to ensure that all primary investigation is completed.
 - You must send details of police perpetrated domestic abuse incidents as soon as possible, but no later than before the end of your tour of duty to:
 - Chief Superintendent for the district
 - Professional Standards Branch - email [REDACTED]
 - The relevant force PSB if not a GMP employee
 - Ensure that investigations are overseen by a more senior officer to the one under investigation and receive regular supervisory input. For example, this will ensure that where investigations are managed by a Constable investigating another Constable, the supervisor can ensure that the investigating officer has the appropriate skills and abilities to manage the investigation.

Offender rank (staff grade)	Oversight by
Constable and/or Sergeant (A-I)	Inspector
Inspector (J-K)	Detective Chief Inspector
Chief Inspector (L+)	Detective Superintendent
Superintendent	Neighbouring Police Force

Decisions not to take any further action should be made by a rank above the officer under investigation. Currently "Police No Further Action" decisions in domestic abuse crimes are made by an Inspector. This will continue to be applied to domestic abuse involving an officer or staff unless the report relates to a more senior rank (see above).

5.3 Police Sergeant

In addition to your roles and responsibilities in the DA Policy & Procedure, if you are notified of a domestic abuse incident where the perpetrator and/or victim is employed by the organisation, these additional processes should be followed:

- Attend incidents of police perpetrated domestic abuse as directed by the Duty Inspector.
- Be alert to unconscious bias that may be present when responding to reports of domestic abuse where the victim and/or perpetrator is employed by the organisation - see [Appendix 2](#) for further details.
- Ensure that when an officer creates a DAB or Crime, that "Personal Profiles" are used when linking victims or perpetrators to events and not the GMP Work Profile. If the victim or perpetrator does not have an iOPS Person Record, one must be created.
- Assess the suitability of resources to investigate the report of domestic abuse. Take into consideration the role/rank of those involved and necessary skills and/or experience.

- Ensure that investigations are not managed on the district where a named perpetrator works and take steps to remedy this, should this occur.
- Offer the victim the opportunity for the crime/safeguarding to be managed/investigated on a different district if the victim is employed by GMP and works on the district where the incident occurred.
- Ensure that every investigation (where the perpetrator is employed by the organisation) has a written declaration on the crime that the investigator is impartial with no conflict of interest. Additionally, any officers supporting the investigation will also document the same as the allocated investigating officer.

5.4 Attending/Investigating Officer

In addition to your roles and responsibilities in the DA Policy & Procedure, if you are deployed to attend a domestic abuse incident where the perpetrator and/or victim is employed by the organisation, these additional processes should be followed:

- If you are directed to attend or investigate a domestic abuse incident and you identify a conflict of interest, you should declare this without delay to your line manager who will assess whether you should continue as OIC for the investigation.
- Be alert to unconscious bias that may be present when responding to reports of domestic abuse where the victim and/or perpetrator is employed by the organisation. See [Appendix 2](#) for further details.
- Complete a written declaration on the crime that you, as the investigator, are impartial with no conflict of interest. Any officers supporting the investigation will also document the same as the allocated investigating officer.
- You should inform Professional Standards Branch that a criminal investigation is in progress and inform them of key milestones (e.g., arrest, bail, outcome).
- Provide advice and support to victims who report domestic abuse involving a police officer or police staff member about the misconduct process - see [Appendix 3](#).

5.5 Professional Standards Branch - Investigating Officer

In addition to your roles and responsibilities of managing misconduct investigations, additionally you must take the following action when you receive a report of domestic abuse involving a member of the organisation:

- You must ensure that the PSB record of the incident is correctly flagged as a Domestic Abuse case, as per the definition at Section 4.1.
- Ensure there is no conflict of interest in relation to you overseeing the internal discipline process.
- Upon receipt of information that an officer or staff is named as the perpetrator in a domestic abuse misconduct case, consider whether the victim of the abuse should be given "Interested Party" Status and update the victim as soon as possible with any misconduct information.
- Ensure you maintain close liaison with the OIC for the criminal investigation to ensure that any elements of the criminal investigation that may be relevant for misconduct are captured.

6. Associated Documents

6.1 Legislation

- [Children's Act 1989](#)
- [Civil Protection Act 2007](#)
- [Criminal Justice Act 2003](#)
- [Domestic Abuse Act 2021](#)
- [Domestic Violence, Crime and Victims Act 2004](#)
- [Equality Act 2010](#)
- [Family Law Act 1996](#)
- [Female Genital Mutilation Act 2003](#)
- [Freedom of Information Act 2000](#)
- [Human Rights Act 1998](#)
- [Protection from Harassment Act 1997](#)
- [Serious Crime Act 2015](#)

6.2 GMP Policy and Procedure

- [Adult at Risk Policy and Procedure](#)
- [Body Worn Video Policy and Procedure](#)
- [Domestic Abuse Policy and Procedure](#)
- [Domestic Violence Disclosure Scheme Procedure](#)
- [DVPN/DVPO Procedure](#)
- [Forced Marriage and Honour Based Violence Policy and Procedure](#)
- [Incident Response Policy](#)
- [Stalking and Harassment Policy and Procedure](#)

6.3 Protocols and Procedures

- [Code of Practice for Victims of Crime](#)
- [College of Policing APP - Dealing with police perpetrators of Domestic Abuse](#)
- [CPS and NPCC joint evidence checklist](#)
- [GMP and CPS service level agreement \(SLA\)](#)
- [MARAC Operating Protocol](#)

6.4 Other relevant documents

- [CPS Code](#)
- [ACPO Murder Investigation Manual \(2006\)](#)
- [DPP guidance on charging](#)
- [Victims Code of Practice](#)

7. Statutory Compliance & Consultation

7.1 Statutory Compliance

7.1.1 Equality Act (2010)

GMP's Domestic Abuse in the Workplace Policy has been developed taking cognisance of all groups affected by Domestic Abuse, including those affected in the workplace.

GMP recognise that some members of the community under-report domestic abuse and those employed within a law enforcement agency may have concerns about reporting or disclosing that they are experiencing or displaying abusive behaviour.

There are unique factors in terms of loss of employment, and in particular psychological stressors when considering domestic abuse within policing. This can include feelings that employees who experience abuse should be able to recognise or stop the abuse. Also, responding to, investigating or providing advice to victims in their capacity as a police officer when the officer responding may be experiencing domestic abuse themselves, could lead to psychological effects. Conversely, officers who perpetrate domestic abuse may have an unconscious bias when responding to, investigating or providing advice to people experiencing domestic abuse which may have an indirect effect on the victim. There are also occasions where the victim and perpetrator may work for GMP, and the abuser could be using their position in the organisation to further abuse the victim.

GMP recognise there can be additional barriers to reporting and that officers who respond may have unconscious bias that can have an impact on the investigation. This policy, as far as possible, seeks to ensure that officers are reminded of their obligations under the Code of Ethics and have due regard that those people are treated fairly and with impartiality, especially where there is additional scrutiny and impact on not only the personal life of either party but their employment.

Pregnancy can escalate the risks of domestic abuse. This may coincide with a break away from the workplace for maternity leave. You should keep in regular contact with officers and staff on maternity leave, as per the Maternity Policy.

[The Domestic Abuse Policy and Procedure 2022](#) has recently been revised and includes a specific appendix (Appendix 5) on Risk Factors to consider in domestic abuse. This includes information on specific aspects of protected characteristics in the context of domestic abuse such as age, disability, race and religion, gender and sexual orientation.

7.1.2 The General Data Protection Regulation (GDPR) and Data Protection Act (2018)

Greater Manchester Police has a duty to ensure, so far as is possible, that all staff comply with the provisions of the GDPR and the Data Protection Act 2018, particularly relating to their access to, and dissemination of, a wide variety of personal information.

This policy and procedure has been assessed for compliance issues by the Information Compliance and Records Management Unit (ICRMU) and is considered to be compliant with the legislation as there is a clear lawful basis for the processing of personal data and special category data. It should be read in conjunction with GMP's Data Protection Policy and guidance issued on the Data Protection Intranet pages.

7.1.3 Freedom of Information Act (2000)

The Freedom of Information Act 2000 (FOIA) grants a general right of access to all types of recorded information held by public authorities.

As this policy and procedure contains policing methods some parts of it may not be suitable for disclosure. Requests for data will be assessed carefully by the Information Compliance and Records Management Unit (ICRMU) taking into account the harm of disclosure and release into the public domain in consultation with the Policy Owner.

7.2 Consultation

Department	Comments
IT	
Finance	
Human Resources	Wellbeing Co-ordinators - Feedback Provided & incorporated
Training	
Health & Safety	
Information Security	
Information Compliance	Approved October 2021.
Any other relevant operational business area.	PSB - Feedback provided and incorporated Occupational Health & Welfare Unit Districts PPGU - Feedback provided and incorporated Districts - Feedback provided and incorporated Male DA Victim employed by GMP

Appendices

Appendix 1 - Barriers to reporting

Research has highlighted that there can be specific barriers to domestic abuse being reported when an officer or staff is involved, either as a victim or a perpetrator. This can be further compounded when one person is not employed by the organisation.

Remember that domestic abuse is not just intimate partners, but extends to ex-partners and involves intra-familial abuse.

Issues victims may experience when the abuser works for a policing organisation

- Intimidation from the perpetrator to deter them from reporting - infer they would not be believed over a police officer, or member of staff, or someone of a more senior rank.
- A belief that the perpetrator will be "protected" by the organisation - either because they are directly told this by the perpetrator, or they mistakenly believe this will happen.
- A fear that information about the case could be accessed by the perpetrator in normal day to day work activities.
- Increased knowledge of the law and using this knowledge against the victim.
- Using police jargon to confuse and intimidate victims.
- Threats of the impact on the perpetrator's career progression or equally the victim's, especially if there is a rank difference between victim and perpetrator.
- Awareness by the victim that the outcome could lead to dismissal from the organisation. This could come with feelings of responsibility of the loss of a career which may cause financial hardship for the family unit, deterring the victim from reporting.
- Belief that the perpetrator can influence the investigation, either because they are told this or mistakenly think this would be the case.
- A poor experience when incidents reported leading to a loss of confidence in reporting future incidents.
- Social or work connections between perpetrators and investigators.
- Belief that a police officer would be treated favourably and protected, either because they are told this or mistakenly think this to be the case.

Staff and officers, both victims and perpetrators, may:

- Feel uncomfortable about seeking help and advice from their colleagues.
- Be concerned about the implications of people being aware of their personal issues (particularly around seeking early help if they are a perpetrator).
- Feel that as a police officer/staff they should know what to do and may feel foolish that they are experiencing this.
- Not recognise the behaviour as abusive or controlling.
- Have concerns about or have experienced difficulties in the workplace because of making a report. This can occur if there is a rank or grade separation between victim and perpetrator.
- Concerns regarding lack of confidentiality and lack of strict separation between working role and that of a victim of crime.
- Feel pressured into taking action that they do not feel ready to take if they disclose the abuse to a colleague.
- Have concerns about victimisation in the workplace - either by the perpetrator themselves, or work colleagues, who may display open hostility towards the victim,

bullying or victimisation, especially if the perpetrator has been able to portray themselves as the victim in the situation.

- Have concerns around having to work near the perpetrator.
- Have concerns that colleagues could inadvertently access information from IT systems which outline their status as a victim in a domestic abuse crime, which could include sexual abuse.

Appendix 2 - Unconscious biases about police officers or staff and domestic abuse

Unconscious bias is when we make judgments or decisions based on our prior experience, our own personal deep-seated thought patterns, assumptions, or interpretations, and we are not aware that we are doing it.

The ability to categorise people quickly and automatically according to social and other characteristics is something we all do that helps give order to life's complexity. Although we all like to think we are open-minded and objective, research shows consistently across all social groups that this is not the case. We are heavily influenced in ways that are completely hidden from our conscious mind in how we view and evaluate both others and ourselves.

Importantly, we have both a positive bias towards our "in-group", and a negative bias towards an "outgroup". We are familiar with members of our in-group and feel on firm ground when judging their excellence and trustworthiness.

This adds a different dimension to the investigation of fellow police officers or staff when we belong to that same "in-group". We don't expect colleagues to act in this way. Employees of GMP are expected to have high standards of behaviour both in their professional and personal life, so when those standard falls below what we would expect, recognising this and reconciling this with what we expect can be difficult.

Conversely, many victims of domestic abuse who work for a policing organisation, have reported that they felt that they would also be judged by a colleague. Staff who experience abuse themselves believe that they should be able to recognise and resolve the issue as they do for members of the public who report abuse. Conversely, we may have an unconscious bias that reinforces that officers and staff should know what to do, or be able to avoid or leave an abusive situation.

Research has shown that particularly when under time pressure or other stress, that hidden biases automatically come into effect and take control of actions or judgements, this is especially relevant when responding to a conflict situation such as a domestic incident.

When the incident involves a police colleague, it is likely that you will be very aware of the secondary impact that this incident could have on their professional life. If you add to this situation that you know the person in question, this will add to the stress of the situation.

What can we do about our unconscious bias?

- Don't be defensive - recognise that there is a conflict of interest if there is one.
- Do not rush into your decision making and be vigilant to the fact you may have a bias.
- We can often see the bias in other people rather than ourselves, so if you witness bias in another person, help that person to see it and don't be defensive if it you it is pointed out to.
- Question stereotypes that you might hold about certain groups such as "all police officers are trustworthy".

Appendix 3 - Supporting victims of police perpetrated domestic abuse

- Recognise that for many that initial report of domestic abuse will have been a difficult decision to make, and it may be the only opportunity to engage with the victim. Any loss of confidence at this stage can have longer term implications.
- Victims may require additional reassurances around the transparency of the investigation and confidentiality aspect when the perpetrator works in the organisation. Reassure them of this transparency and what steps have been taken to address this, and address any concerns the victim may have.
- Ensure victims of domestic abuse are offered the same support provision as all other victims; this includes referrals to external agencies including MARAC. There can be a misconception that we are helping victims, especially those employed by the organisation, by keeping them off the radar of other professionals when this is not the case.
- Where both the victim and perpetrator are employed by the organisation, consider how the victim can be supported at work to avoid any undue pressure both at home and at work. Consider if victims work in the same location as the perpetrator what options may be available to reduce conflict in the workplace.
- Robustly manage any "locker room culture" you become aware of that relates to any ongoing investigations. Gossiping, bullying or hostility towards officers and staff that report use should not be tolerated - See [Bullying and Harassment Policy](#).
- Agree how contact is to be made. Especially where the victim works in the organisation. Receiving case updates via work email/mobile may cause undue pressure at work due to the personal nature of them.
- A referral should be discussed with the victim to the Welfare Unit who can support victims of domestic abuse.
- Ensure there is no conflict of interest between officers involved in the investigation and the perpetrator. If this is identified be open with the victim why an OIC may have changed and review the investigation if required.
- If victims are required to attend a police station, consider whether there could be any risk of them seeing either the perpetrator or colleagues and facilitate attendance at another station where possible.
- Do not avoid recording information about the incident on police systems. Misplaced concerns around others accessing this information, can lead to important information to be left of recordable systems. Breaches of GDPR by accessing IT systems by persons not authorised should be dealt with appropriately and robustly.
- Ensure "Personal" and "Work" profiles are used in iOPS. This will mitigate personal information about an employee in their private life being recorded against a "Work Profile" - which should only be used to record events that the officer or staff are linked to when it has occurred in their professional capacity.
- The misconduct process is often misunderstood even by officers and staff, so there will be even less knowledge of this process when the victim does not work for the organisation. A thorough and clear explanation of the misconduct process should be explained to the victim in a timely manner and when they can next expect to be update and what is within the scope of a misconduct investigation and what is not.
- Be mindful of manipulation by perpetrators who may use their knowledge of policing processes to their advantage.

Appendix 4 - Signs of abuse within the workplace

It should be noted that incidences of domestic abuse may affect the work of an officer or member of staff.

Possible signs of domestic abuse include:

- Changes in behaviour including uncharacteristic depression, anxiety, distraction, or problems with concentration.
- Unexplained or uncharacteristic diminished changes in job performance.
- Unexplained or uncharacteristic absenteeism or lateness for work.
- Reluctance to leave work or arriving early.
- Needing regular time off for appointments .
- Inappropriate or excessive clothing.
- Frequent changes in role.
- An unusual number of personal phone calls/text messages, and/or reluctance to converse or respond to phone/text messages.
- Disruptive personal visits to the workplace by a current or former partner or family member.
- Obvious injuries such as bruises, black eyes, broken bones, hearing loss — these can often be attributed to “falls,” or “being clumsy” by victims.
- Isolation: unusually quiet and refraining or withdrawal from social activity.
- Emotional distress or signs of anxiety and fear.
- Not returning from annual leave when expected or not using annual leave.
- Sensitivity about home life or hints of trouble at home.
- Lack of access to money.

What to do if you are concerned about a colleague

You may have concerns about a colleague who could be experiencing domestic abuse, or you believe may be committing domestic abuse. This could be because of something you are told, witness or you identify some of the signs above.

Depending on your role and/or relationship to the individual you may or may not feel confident discussing your concerns with the person directly. We would encourage all members of the organisation to seek support from their line manager if they have concerns about a colleague. You could also use information in this document to provide advice to the person if you feel able to.

If a colleague makes a disclosure that they have committed a crime or been a victim of crime, police officers are duty bound to record a crime if not already recorded.

Appendix 5 - Line Manager Guide to Managing Conversations

Domestic abuse can be a difficult subject to approach. When leading a sensitive conversation, try to create an atmosphere in which the person feels safe and comfortable. Arrange a quiet and private location where you will not be disturbed during the discussion.

There are many ways you can start a conversation and you may wish to tailor your approach appropriately for the individual involved. When starting a conversation, it is crucial to remember the focus needs to be on the employee and it is important to lead with open questions. Be mindful not to make assumptions about how the employee is feeling or imposing your own views. You may feel that you can relate to their situation, but your perspectives and experiences are likely to be very different. Instead, ask the person how they are feeling and what they would like to discuss. This will enable the employee to share as much as they feel comfortable with. Below are some examples of open questions that could help start a conversation:

- I have noticed recently that you are not yourself. Is anything the matter?
- Is everything all right at home?
- How are you doing at the moment? Are there any issues you would like to discuss with me?
- Are there any problems or reasons that may be contributing to your frequent sickness absence/under-performance at work?
- What support do you think might help?
- Many people will dismiss concerns with standard responses such as "I'm fine". Use your professional judgement and curiosity to explore how you might approach managing this conversation.

Whilst every conversation will be different, there are a few points to keep in mind when leading any sensitive conversation:

- Ask open questions
- Listen and empathise
- Remind them you are there for support
- Refer to appropriate help (provide information on appropriate support networks)
- Agree a suitable time and date for a follow up meeting
- Avoid relaying personal opinions or assumption
- Do not attempt to provide a diagnosis

It is important to recognise that your involvement does not end with this meeting. You may have signposted the employee on to further support which is great. However, you should agree to arrange a follow-up meeting to re-visit the discussion and review/re-assess the support required.

Finally, do not forget these meetings need to be kept confidential. Remember to keep all notes/supporting documentation in a secure location.

Appendix 6 - Practical Management Support

The below may provide some practical tips about how an officer or staff experiencing domestic abuse could be supported by GMP whilst at work:

- Divert phone calls/email messages and change a phone extension if a member of staff is receiving harassing calls.
- Agree with the employee what to tell immediate colleagues and how they should respond if the ex/partner telephones or visits the workplace. This could include providing security with a photograph of the abuser and the details of the make, colour, and registration number of the vehicle. This may help to maintain security in the workplace.
- Provide access to supportive literature, i.e., leaflets and posters. Ensure these are placed in discrete locations, for example, putting up posters on the backs of toilet doors.
- Review security provisions, including security codes and reviewing building access.
- Be empathetic and creative in exploring options with staff where it is necessary for them to arrange appointments during the normal working day.
- Consider allocating flexible leave or special leave provisions.
- Temporary or permanent changes to working times, patterns and locations using existing procedures, i.e., flexible working.
- Document the agreed method of alerting security if the perpetrator is known to come to the workplace.
- If the employee is working from home, you may wish to agree a code word to be used if they are in danger during working hours. If they are in immediate danger calling the Police on 999 should be their primary action.
- Advise the employee that silent calls can be made to police by dialling 999 and then 55.
- Offer redeployment or permanent/temporary workplace relocation if appropriate and review lone working arrangements where applicable.
- Keep a clear record of any incidents in the workplace, including persistent phone calls, emails, or visits to the employee by their partner/ex-partner. Details of any witnesses should also be recorded.
- Apply flexibility around the 'Attendance at Work' policy when trigger points have been breached due to sickness related to domestic abuse.
- Offer confidential support via self-referral or management referral to the Welfare Unit who have the skills and experience to offer additional techniques/tools to support wellbeing during this time.
- Welfare Support is also available for those undergoing any investigation – if both parties are employed by GMP this will be managed discretely to ensure confidentiality within the unit.

Sexual Harassment

Policy & Procedure

Greater Manchester Police

June 2023



POLICY & PROCEDURE IMPLEMENTED: 29/06/2023

REVIEW DATE: 29/06/2024

POLICY & PROCEDURE OWNER: [REDACTED]

APPROVED BY: [REDACTED]

GOVERNMENT SECURITY CLASSIFICATION: Official

IS THE POLICY & PROCEDURE NEW OR REVISED? New

VERSION NO.	DATE	SUMMARY OF CHANGES	AUTHOR(S)	PUBLISHED ON CCOs
1.0	May/June 2023	New policy and procedure	[REDACTED] and [REDACTED]	

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1. Policy Statement

Sexual Harassment is unlawful under the Equality Act 2010. Greater Manchester Police (GMP) is committed to providing an inclusive and welcoming working environment. All officers and staff should be free from sexual harassment and victimisation. Everyone within Greater Manchester Police should feel supported, safe, and able to reach their full potential.

The standards of professional behaviour set out the expected behaviours for police officers and staff, and form part of the conditions of service. GMP has a zero-tolerance policy in relation to behaviours that amount to sexual harassment.

The Sexual Harassment Policy has been written in alignment with the National Police Chiefs Council (NPCC) strategy for tackling sexual harassment in the workplace.

1.1 Aims

The purpose of this policy is to:

- Clarify what the organisation defines as sexual harassment.
- Make clear the professional behaviour expected of all: police officers, including members of the Special Constabulary; police staff, including apprentices and agency personnel, volunteers, contractors, workers; and prospective applicants.
- Empower the workforce to raise any allegations or concerns by setting out a clear reporting process.
- Promote reporting mechanisms for sexual harassment in GMP.
- Confirm GMP's offer of support to anyone affected by sexual harassment.
- Make clear the expectation of all members of staff to challenge any form of sexual harassment believed to be happening in GMP to remove it from the workplace.
- To ensure everyone within the organisation knows what support is available in GMP for those affected by sexual harassment.

2. Scope

This policy applies to all members of GMP, which includes police staff, student police officers, police officers, members of the special constabulary, volunteers, apprentices, and contractors. This policy is also extended to include prospective applicants to GMP.

Where we refer to 'staff' in this policy, it also applies to all the above unless we say otherwise.

3. Roles & Responsibilities

All staff members

All members of the organisation are expected to maintain and adhere to the highest professional standards of behaviour, which includes challenging and reporting improper conduct. All members of the organisation have a responsibility to create and maintain a work environment that is free of harassment and victimisation and to treat our colleagues with dignity and respect.

Individuals are responsible for:

- Being aware of how their behaviour may affect others.
- Treating colleagues with dignity and respect.
- Being an 'upstander' (challenging and doing something) and not a 'bystander' (allowing it to happen) to sexual harassment, including if inappropriate jokes, comments, or gestures are being made.
- Making it clear to others when their behaviour is unacceptable.
- Take positive action to stop sexual harassment and other related disreputable behaviour and giving support to anyone who may have been harassed or affected.
- Reporting sexual harassment to any supervisor, manager, colleague or directly to the Professional Standards Branch (PSB).
- If a complaint of sexual harassment is made, not prejudging, or victimising the complainant or alleged harasser.
- Considering reporting sexual harassment anonymously (see section 5.4)

It is not acceptable to ignore such incidents or refuse to get involved. Failing to challenge or report improper conduct is a breach of the standards of professional behaviour which could constitute misconduct or gross misconduct, resulting in disciplinary action.

Additionally, under duties and responsibilities as defined at schedule 2 of the Police Conduct Regulations 2020, police officers have a responsibility to give appropriate cooperation during investigations, inquiries, and formal proceedings, participating openly and professionally in line with the expectations of a police officer when identified as a witness.

All line managers

Managers have a responsibility to:

- Understand this policy and procedure document and support a zero-tolerance approach to sexual harassment in the workplace.
- Set a good example by their own behaviour.
- Always maintain a supportive working environment.
- Ensure that all members of staff for whom they have line management responsibility know and demonstrate the professional standards of behaviour expected of them.
- Ensure that all members of staff for whom they have line management responsibility are informed of this Sexual Harassment Policy and Procedure document, including those who do not regularly access GMP IT systems.
- Report all complaints and allegations of sexual harassment which are either witnessed by them personally or reported to them. All reports must be referred to PSB.

All members of the organisation:

- are expected to act with self-control and tolerance, treating members of the public and colleagues with respect and courtesy
- should not abuse their powers or authority and respect the rights of all individuals
- are expected to challenge and report improper conduct or behaviour

Everyone has the right to a working environment free from sexual harassment, from others within the service and members of the public. GMP will proactively promote a positive and supportive working environment.

Moreover, GMP expects that all members of the organisation will be an 'upstander' when it comes to sexual misconduct and harassment. Therefore, it is imperative that tangible support is given, to prevent continuation, escalation, isolation, or victimisation.

Professional Standards Branch (PSB)

The force has responsibility to ensure that sexual harassment will not be tolerated in the workplace. All complaints will be taken seriously and will be assessed against the standards of professional behaviour by PSB.

The Force values the actions of people who report concerns under this policy and procedure, and will:

- Consider appointing a welfare officer – you will be consulted in this decision
- Give a positive message to you that you are doing the right thing
- Protect you against further harassment and victimisation and initiate robust action where required
- Provide details of initial support arrangements to the Investigating Officer
- Maintain confidentiality - only those who need to know are made aware of the circumstances

4. Terms and Definitions

Sexual Harassment

The Equality Act 2010 Section (s.) 26 (1-5) provides the legal definition of harassment in the workplace:

Sexual Harassment occurs when a person engages in unwanted conduct of a sexual nature and has the purpose or effect of:

- Violating someone's dignity, or
- Creating an intimidating, hostile, degrading, humiliating or offensive environment for them.

All forms of harassment are prohibited under the Equality Act 2010. S. 26(1).

Anyone can experience sexual harassment in or out of the workplace. Victimisation occurs when a person suffers a detriment because they have done a protected act.

A protected act is:

- a) bringing proceedings under the Equality Act 2010
- b) giving evidence or information in connection with proceedings under this Act
- c) doing any other thing for the purposes of or in connection with this Act
- d) making an allegation (whether or not express) that A or another person has contravened this Act.

(Equality Act 2010, Section 27(1-5))

Sexual harassment can be perpetrated regardless of the individual's gender or sexual orientation. The organisation recognises that women are significantly more likely to experience sexual harassment than men. If sexualised behaviour and sexual objectification of women is perceived to be tolerated in the workplace, it is more likely that sexual harassment will occur.

The organisation also recognises that intersecting protected characteristics can be a factor in relation to sexual harassment. For example, there may be additional vulnerabilities for officers and staff from black, Asian, or other ethnic communities and all other minority groups.

Sexual harassment in the workplace may occur with:

- Someone you work with
- A manager, supervisor, or someone else in a position of authority
- A member of the public or visitor to GMP

Sexual harassment includes a wide range of behaviours including but not limited to:

- Sexual comments or jokes
- Displaying sexually graphic pictures, posters, or photos
- Suggestive looks, staring or leering
- Propositions and sexual advances
- Making promises in return for sexual favours
- Sexual gestures
- Uninvited discussion of one's sex life or inappropriate discussion of sex life
- Sexual posts or comments and direct contact on social media
- Spreading sexual rumours about a person
- Sending sexually explicit emails or any form of instant messaging, including words or images
- Unwelcome touching, hugging, massaging, or kissing
- Any predatory behaviour
- Coercion or other controlling behaviour

Sexual harassment is usually directed at an individual or minority group, but this is not always the case. It may be perpetrated by a single individual, group or team and can extend through a whole section of the organisation. Sometimes there can be a culture of sexual harassment in a workplace that is not specifically aimed at one person. This could include, for example, the sharing of sexual images of colleagues or members of the public.

An individual can experience sexual harassment from someone of the same or different gender. It is for the victim of any such behaviour to decide whether the behaviour was unacceptable or unwelcome.

Sexual harassment can be an isolated incident. It does not need to be directed at a specific person. It can be seen or heard. Sexual conduct that has been welcomed or tolerated in the past may, over time, become unwanted and, if it continues, becomes harassment.

GMP could be liable for sexual harassment committed by all staff members during their employment/volunteering unless they can show that they took all reasonable steps to prevent that sexual harassment.

'In the course of employment' includes acts committed in any other place where work is conducted such as offsite, at a training course, conference, or external meeting. It might also include other circumstances in which the member of the workforce is not actually working but is an extension of their work, such as at a leaving party or other social event.

5. Procedure

5.1 Taking Action

GMP will ensure that reasonable action is taken to prevent sexual harassment in the workplace. It will ensure that there is support available (see section 5.6 below) for anyone who feels they have had their dignity violated or where an individual(s) has created an intimidating, hostile, degrading, humiliating or offensive environment, whether intended or not.

Reasonable action includes:

- Informing all new starters of the Code of Ethics and standards of professional behaviour
- Delivering training to raise awareness that such behaviour will not be tolerated.
- Providing opportunities for all teams to discuss sexual harassment and the importance of tackling unlawful and discriminatory practices (for example, Listening Circles)
- Ensuring there are clear reporting mechanisms in place for all members of the organisation
- Ensuring all allegations are investigated proportionately and appropriate action taken
- Ensuring support and guidance is available to anyone affected by sexual harassment

5.2 Setting Standards

Standards of professional behaviour are set by the Police (Complaints and Misconduct) Regulations 2020, the Police Staff Council (PSC) Joint Circular 54 (September 2008) and the Code of Ethics 2014.

The Code of Ethics was produced by the College of Policing in 2014 in its role as the professional body for policing. The Code of Ethics 2014 sets out the principles and standards of behaviour expected from anyone that works in policing. Officers are bound by their standards of professional behaviour and police staff are bound by their standards of professional behaviour as detailed above.

For the purposes of this policy and procedure, the following standards of professional behaviour are highlighted:

A breach of the standards of professional behaviour is damaging to public confidence in the police service and its reputation within communities. Public confidence is vital if a police service is to be efficient and effective in properly protecting the public and preventing crime and disorder.

Any breach of any of the standards could potentially lead to disciplinary action, which in serious cases may result in dismissal without notice.

5.3 Training

Continuous professional development and training are crucial to the success of this and any associated policy or procedure on sexual harassment in changing the workplace environment.

There is an expectation that all employees engage in training provided. That be in person or online. Currently inputs are incorporated into ongoing training programmes including PEQF, IPLDP, transferees, special constables, Sergeant's master class. There is a national SHWP E learning package that is to be completed by every member of the organisation.

[Content summary | College Learn \(pnn.police.uk\)](#) and search sexual harassment.

5.4 Clear Reporting Process

Anyone affected, or anyone who becomes aware of sexual harassment in the workplace, has a duty to report all such behaviors. GMP has procedures in place to assess all allegations and investigate. This is also covered under the [GMP Reporting Concerns Policy](#).

GMP will work to reduce the impact of any sexual harassment in the workplace

Investigations into complaints or allegations of sexual harassment may also lead to a criminal investigation being instigated. Where there are concerns that a criminal act has taken place, advice must be taken from PSB.

GMP's aim will be to maintain confidentiality, which will be subject to any requirement to involve external agencies where a criminal offence may have been committed or when maintaining confidentiality would pose a risk to the person making the report, or to others.

All cases of sexual harassment in GMP are dealt with by PSB. Any member of the organisation can make a report of sexual harassment directly to PSB. The following options are available for reporting sexual harassment:

- i. Via a line manager.
- ii. Contacting PSB email [REDACTED]
- iii. Alternatively, you can choose to report confidentially or anonymously to the Anti-Corruption Unit (ACU). Email on [REDACTED] or in the alternative confidential or anonymous reports can be made by calling [REDACTED]
- iv. Anonymously to Crimestoppers via the Police Integrity Line on 0800 111 4444 or through their web-portal by visiting <https://forms.theilne.co.uk/policeintegrityline>
- v. The Mayor's Office will accept reports of concern. You can report openly or confidentially by e-mail [REDACTED], by telephone [REDACTED] or by post to 1st Floor, Churchgate House, 56 Oxford Street, Manchester, M1 6EU.

- vi. The IOPC (Independent Office for Police Conduct) provide a dedicated email address (enquiries@policeconduct.gov.uk) and telephone line (08458 770 061) to report concerns either openly or confidentially that relate to criminal and / or misconduct matters. Alternatively, concerns can be sent by post to Police Conduct, PO Box 473, Sale M33 0BW. The correspondence in the envelope should be marked 'Report line' but do not mark the envelope itself.

5.5 Misconduct Process

GMP will handle any investigation in a way that is fair, dignified, and sensitive to:

- The person who made the complaint or allegation, including the victim
- Someone who witnessed the behaviour
- Someone who has been accused of sexual harassment

Misconduct investigation regulations will be followed.

5.6 Support and Advice for Individuals

There are many resources available. These include:

- Line Managers
- HR (Human Resources) Specialists and Advisors
- Police Federation, Superintendents Association and Trade Union representatives
- Staff Support Networks
- Equality, Diversity & Inclusion (DEI) Team
- Health and Wellbeing Team
- Health Assured, GMPs employee assistance programme
- Welfare Peer Supporters
- TRIM
- Reporting Concerns [including Whistleblowing] Policy and Procedure

GMP recognises that there is an unequivocal need for the organisation to fully support all staff raising concerns about sexual harassment, either directly or by reporting concerns to others who can then act.

The Force values the actions of people who report concerns under this policy and procedure, and will:

- Consider appointing a welfare officer – you will be consulted in this decision
- Give a positive message to you that you are doing the right thing
- Protect you against further harassment and victimisation and initiate robust action where required
- Provide details of initial support arrangements to the Investigating Officer
- Maintain confidentiality - only those who need to know are made aware of the circumstances

Whilst an investigation is underway, a victim of sexual harassment may be appointed a welfare officer but can also seek representation through the Police Federation or a Union Representative.

A person who is the victim of sexual harassment subject of an investigation by PSB will be provided with regular updates on investigations at intervals agreed with the investigating officer.

6. Associated Documents

This policy should be read in conjunction with the following legislation, statutory guidance, policies, procedure, and other documents, all of which have relevance to dealing with sexual harassment in the workplace:

- [Equality](#) Act 2010
- [Police](#) Reform Act 2002
- Police (Conduct) [Regulations](#) 2020
- Police ([Complaints](#) and Misconduct) Regulations 2020
- [The Independent Police Complaints Commission \(Complaints and Misconduct\) Contractor Regulations](#)
- Home Office [Statutory](#) Guidance on Professional Standards, Performance, and Integrity in Policing
- IOPC Statutory [Guidance](#) on the Police Complaints System
- [Code](#) of Ethics for Policing and standards of professional Behaviour
- [Police Staff](#) Standards of professional behaviour
- [Criminal](#) Procedures and Investigation Act 1996
- Code of Practice to Criminal [Procedures](#) and Investigation Act 1996
- ACAS: Guidance on [Sexual](#) Harassment
- GMP Reporting [Concerns](#) Policy and Procedure
- Whistleblowing: Home [Office](#) Guidance and Code of Practice for Employers
- National Police Chiefs' Council and [College](#) of Policing Appropriate Personal Relationships in the Workplace
- GMP Knowing the Line as to Sexual Harassment [internet](#) landing page
- GMP Sexual Harassment in the Workplace internet [landing](#) page
- [Bullying and Harassment](#) Policy

7. Statutory Compliance & Consultation

7.1 Statutory Compliance

7.1.1 Equality Act (2010)

The sexual harassment policy and procedure will not have any effect on equality for any of the protected characteristics. This policy applies to everyone in the organisation regardless of rank, or role, age, gender, or any other protected characteristic.

Whenever an allegation of sexual harassment is made all parties will be treated with respect and courtesy without prejudice to any subsequent proceedings.

7.1.2 The General Data Protection Regulation (GDPR) and Data Protection Act (2018)

Greater Manchester Police have a duty to ensure, that all staff comply with the provisions of the GDPR and the Data Protection Act 2018, particularly relating to their access to, and dissemination of, a wide variety of personal information and intelligence.

This policy and procedure have been assessed for compliance issues by the Information Compliance and Records Management Unit (ICRMU) and is considered to be compliant with the legislation. It should be read in conjunction with GMP's Data Protection Policy and guidance issued on the Data Protection Intranet pages.



7.1.3 Freedom of Information Act (2000)

This policy and procedure have been assessed by the Information Compliance and Records Management Unit and is deemed to be disclosable under the Freedom of Information Act.

7.2 Consultation

Consultee	Comments
Police Federation [REDACTED]	10 Jan 23. One query in relation to training. Confirmed that there will be a national training product launched via College of Policing e-Learning. This will be released in 2023 via the NPCC for SHWP.
Women's Policing Association [REDACTED]	10 Jan 23. No feedback
Force VAWG (Violence Against Women and Girls) lead [REDACTED]	10 Jan 23. No feedback
[REDACTED]	10 Jan 23. No feedback
[REDACTED]	10 Jan 23. Made suggestions around inclusion of information to support for staff and specifically around

	temporarily moving alleged perpetrators during ongoing investigations. Additions made to the document to enhance it in respect of these points raised.
Unison [REDACTED]	Provided feedback and input through consultation
GMB Union [REDACTED]	Provided feedback and input through consultation
Workforce Development	
Human Resources	
Legal Services	
Information Compliance	
Strategic Resourcing Branch	
Professional Standards Branch	Policy Owner – Internal consultations took place prior to the initial draft version.
PSB [REDACTED]	24 Feb 23 – Considered against the needs of Police Staff

8. Appendices

N/A