

Date: 7th November 2023
Our ref: FOI/23/011607/H

FREEDOM OF INFORMATION REQUEST REFERENCE NO: FOI/23/011607/H

I write in connection with your request for information dated 03/11/2023, received by Greater Manchester Police (GMP) for the following information:

I would like a copy of Greater Manchester police pocket notebook policy which i can not find on the internet.

Result of Searches

Following receipt of your request searches were conducted within Greater Manchester Police (GMP) to locate the requested information and I can confirm the information requested is held by GMP.

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 documents for question 1 & 2 have been made, that information is exempt from disclosure by virtue of the following exemptions:

**Section 40(2)(a) – Personal Information
Section 31(1)(a)(b) – Law Enforcement**

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.

Section 31 is a qualified and prejudice-based exemption and as such, subject to a harm and public interest test

Harm

To provide the redacted information within the attached policy would reveal policing tactics used by Greater Manchester Police. This would give an advantage to that are intent on committing offences and avoid detection. It would also increase the risk of danger towards the public GMP who sworn to protect.

Public Interest Test

Factors Favouring Disclosure

To disclose the redacted information would provide the public with a slightly more in-depth knowledge into how Greater Manchester Police operates. This would enable the populous to take steps to protect themselves against criminal activity and may lead to further information being provided to the force.

Factors Favouring Non-Disclosure

Conversely to the factors in favour of disclosure, to release the redacted information into the public domain would reveal the policing tactics of Greater Manchester Police. This would impact on the force's ability to detect and prevent crime and apprehend and prosecute offenders.

The risk of danger to the public would be increased by revealing such policing tactics into the public domain. The safety of the public we protect is of paramount importance to Greater Manchester Police and we would not wish to jeopardise that safety by releasing exempt information into the public domain.

Balancing Test

The arguments for and against disclosure of information need to weighed against each other. In this case the greatest argument for disclosure is the fact that the populous would be provided with information regarding how the force police operate.

However given that the disclosure would increase the risk of increased crime to and assist those intent on committing crime to avoid detection the balance of disclosure, at this time, weighs on non-disclosure for those particular redacted parts of the policy requested.

This letter acts as a refusal notice for the redacted parts of the attached documents.

Pocket Notebooks, Electronic Notebooks and Daybooks

Procedure

Greater Manchester Police

July 2019

PROCEDURE IMPLEMENTED: March 2018

REVIEW DATE: March 2021

PROCEDURE OWNER: Information Compliance Unit, Information Services Branch

APPROVED BY: Chief Officer Group 27.03.2018

PROTECTIVE MARKING: Not Protectively Marked

IS THE PROCEDURE New Revised

IF REVISED, PLEASE COMPLETE TABLE BELOW

VERSION NO	DATE	SUMMARY OF CHANGES	
1.0	Sep 2009	PNB Policy	
2.0	Jan 2018	Full procedural review comprising addition of Electronic Notebooks. Includes Divisional Administration Unit clarification of issuing, retention and disposal dates.	
2.1	Mar 2018	Amendments and document redrafted/ re-structured	
2.2	July 2019	Terminology updated in preparation for the new iOPS system	

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1. Introduction and Background

This procedure is intended to ensure that all Greater Manchester Police (GMP) officers and staff are aware of their responsibilities regarding use, storage and retention of Pocket Notebooks (PNB), Electronic Notebooks (ENB) and Daybooks. All are accepted methods of recording day-to-day activities, events and associated decision-making processes.

The PNB, ENB and Daybook should be treated as official documents. They are subject to retention and disclosure rules. They must be carried by those who are issued with them at all times when on duty.

During June 2017, ENBs were introduced by GMP via the Optik mobile policing application (App). Those who use the ENB are not additionally required to use a PNB or Daybook.

2. Scope

See Section 3, 'Roles & Responsibilities' for police officers, police staff and special constables.

This procedure is also intended to assist Branch/ Divisional Administration Units and the Organisational Learning and Workforce Development Branch when issuing, storing and disposing of PNBs, ENBs and Daybooks.

3. Roles & Responsibilities

Police Officer, Police Staff & Special Constable (operational and evidential roles)

Regardless of rank or police staff grade, all officers, staff and special constables who perform either an operational or evidential role must use and maintain either a PNB, ENB or Daybook. This procedure, therefore applies to uniformed, plain clothes and detective officers; police staff (including agency staff and police staff investigators); Police Community Support Officers (PCSOs); Traffic Police Community Support Officers (TPCSOs); and special constabulary officers.

Inspection and Auditing

All police officers, police staff and special constables who are required to use and maintain either a PNB, ENB or Daybook must make it available for inspection or auditing purposes upon request.

Standards of Professional Behaviour and the Code of Ethics

All police officers, police staff and special constables who are required to use and maintain either a PNB, ENB or Daybook must do so in accordance with the Standards of Professional Behaviour and the [Code of Ethics](#). In particular, regarding honesty, integrity, confidentiality, orders/instructions and diligence in the exercise of duties/responsibilities (see section 5).

Police Officers & Police Staff (non-operational/non-evidential roles)

For officers and staff who do not perform either an operational or evidential role, there is no requirement to use and maintain either a PNB, ENB or Daybook. Those officers and staff must confirm with their line manager as to whether or not they fall into the non-operational, non-evidential category.

Chief Officers

Chief Officers are not required to use a PNB or ENB. However they are required to maintain a record of the duties that they undertake, whether in Daybook or electronic format (e.g. iPad or other electronically retained records).

Issuing a PNB

Only a supervisory officer/appointed instructor can issue an officer/member of staff with a new PNB. They must consider each PNB issue request and decide whether or not it is necessary and appropriate.

Any person who issues an officer/member of staff with a PNB must sign an 'Issue Book', recording the date of issue, the collar number and the name of the person to whom the PNB is being issued. The person receiving the PNB must also sign the 'Issue Book' to confirm that they have received the PNB.

Issuing ENBs

The issue of ENBs to all officers and staff is authorised by one of the following:

- GMP Mobile Team;
- Superusers;
- Appointed Administration Unit; or
- Capita (third party company).

They will record that an ENB has been issued, the date and to whom the device was issued.

4. Terms and Definitions

Electronic Notebook (ENB)

Notebook facility within a policing application (App) used on a mobile device issued to certain GMP role profiles including constables and police staff equivalent, detective officers, and Police Community Support Officers (PCSOs). Role profiles issued with ENBs include Authorised Firearms Officers (AFOs), Tactical Aid Unit officers and supervisory officers. Special constables are not routinely issued with mobile devices/ENBs.

ENB entries are searchable on the mobile device up to 60 days after being recorded. Additionally, Optik uploads all ENB entries immediately after they are made and those records are accessible via Optik – desktop.

Knox

Samsung product name for the secure side of GMP mobile phones.

Optik

Mobile policing application (App).

Optik – Desktop

Desktop system enabling access to ENBs for reference and redaction purposes. Entries are stored on Optik – Desktop in accordance with the Management of Police Information (MOPI) and the Criminal Procedure and Investigations Act (CPIA).



Persons issued with an ENB are only entitled to access their own ENB records.

The Professional Standards Branch (PSB) can remotely access all ENBs, without the consent of the person to whom it was issued, if the access is necessary for a policing purpose.

Other units or individuals within the force may need to gain access to ENB records for a legitimate policing or business purpose. There will be no explicit requirement for such persons to seek consent from the originating officer/member of staff. However, there is an expectation that such persons, unless exceptional circumstances apply, can demonstrate that a reasonable effort was made beforehand, to notify the person concerned that access was required and the reason for requiring access.

Daybook

Generally, a book containing handwritten notes or records made/retained by an officer or staff member relevant to their police duties. Whilst not an exhaustive list, examples of 'Daybooks' include:

- **Investigating Officer/Senior Investigating Officer (SIO) Casebooks** – generally used for serious or complex investigations; and
- **Blue, 'Banner' style books** – widely referred to as 'Daybooks', they are often used by uniformed and non-uniformed officers and staff, regardless of rank.

5. Procedure

Recording Procedure

5.1 Use of PNB, ENB or Daybook

All officers and staff who are required to use a PNB, ENB or Daybook must carry the book at all times when on duty. Written entries should be made in black ink. Entries made in error/ necessary corrections must be struck through and initialled by the person responsible for making the entry.

ENB entries are automatically time and date stamped. ENBs can be linked to officers' collar numbers, incidents, operations and crime reports.

Entries must include:

- Day and date across each page (underline each day);
- Time on and off duty (include refreshment times);
- Allocated duties;
- Colleagues in company with;
- Rest days, leave and sickness absence;
- Time of an arrest, offence or incident occurrence;
- Noteworthy occurrences where no other record of police dealings might exist, including taking possession of property/found property;
- Rationale for operational decisions including use of the National Decision Model (NDM);
- Entries not made at the time must be made as soon as practicable after the occurrence, identifying the time and date of the occurrence, the time and date that the record was made (if different) and the reason for any delay in making the record (see section 5.2 Contemporaneous Record Keeping);
- Error corrections struck through with black ink and initialled;
- Loose-leaf notes if made or disclosed (retain as potentially relevant material); and
- Sufficient detail to enable accurate future recollection (notes must be legible).

Relevant entries

Include, but are not restricted to, the following examples:

- First descriptions ([Code D of the Police and Criminal Evidence Act](#)).
- Unsolicited comments or significant statements made by any person suspected of an offence. When a suspect agrees to read records of unsolicited comments or significant statements and sign them as correct, they should be asked to endorse the record with, for example, *'I agree that this is a correct record of what was said'* and add their signature. If the suspect does not agree with the record, the interviewer should record the details of any disagreement and ask the suspect to read these details and sign them to the effect that accurately reflects their disagreement. Time and date such entries [Code C of the Police and Criminal Evidence Act](#).
- Annex D Written Statements Under Caution [Code C of the Police and Criminal Evidence Act](#).
- Interview records – an accurate record must be made of each interview, whether or not the interview takes place at a police station [Code C of the Police and Criminal Evidence Act](#).

5.2 Contemporaneous Record Keeping

A contemporaneous record means a record that was made at the time of an occurrence or at the time when a decision was made. When it is necessary to retrospectively record the details of an occurrence or a decision that was made, the record must make clear that it was not made *'at the time'* of the occurrence or decision. The record should show the time and date of the occurrence/decision and it should also show the time

and date when the record of the occurrence/decision was made. In such circumstances, it is good practice to add a brief additional clarification note as to the reasons for any delay between the time of the occurrence/ decision and the time of the record being made. For example by writing, '*due to competing operational demands... (followed by a brief description of what those competing demands were)*'.

5.3 Conferring

When recording details of less complicated events, it is good practice for individual officers and staff to make their own, independent record of the event.

In more complex cases where two or more officers witness the same incident or are present at the same interview, it is accepted that consultation might take place to ensure that notes are accurate and as comprehensive as possible. If conferring does take place, a clear note to that effect should be added to the PNB, ENB or Daybook of each conferring officer or member of staff.

If one officer or member of staff has no recollection of a point observed or of a remark remembered by a colleague, then they should not incorporate such information into their PNB, ENB or Daybook.

When recording details about the use of force, the person making a record of their use of force should state what their honestly held belief was at the time when force was used. An officer who has used force on any person, should not need to confer with others as to why it was necessary to use force. When force is used on any person, in all cases, a GMP [Use of Force Monitoring Form \(1175\)](#) should be submitted in addition to any notes made.

This procedure does not replace College of Policing Authorised Professional Practice (APP) on conferring or any other aspect of post incident procedures. (Refer to APP, [Armed policing](#), Post-deployment, Post-incident procedures).

5.4 Court – Referral to PNB, ENB and Daybooks

Officers and staff wishing to use or refer to a PNB, ENB or Daybook in a court or tribunal environment, should disclose the content to the Crown Prosecution Service (CPS), Coroner or appropriate authority at the earliest possible opportunity and in any event in a manner that accords with the relevant rules of disclosure. The permission of the court or tribunal should always be sought before referring to a PNB, ENB or Daybook record when giving oral evidence.

5.5 Examination of PNB, ENB and Daybooks

There should be no expectation of privacy regarding the content of any of these books as they are the property of GMP. Supervisory officers are entitled to examine the content of a PNB, ENB or Daybook at any time.

Loss, Leavers and Suspension

5.6 Lost PNB, ENB or Daybook

PNBs, ENBs and Daybooks contain official and sensitive information. Officers and staff must take reasonable steps to ensure their safekeeping and must report a loss of their book at the earliest opportunity.

Failure to take reasonable safekeeping steps and/or failure to report a loss to a supervisory officer at the earliest opportunity might constitute a contravention of the Standards of Professional Behaviour.

Via a supervisor, officers and staff must report the loss of their PNB, ENB or Daybook to the GMP Information Compliance and Records Management Unit (ICRMU), seeking advice as to whether an Information Security Breach Report should also be completed. The ICRMU can be contacted via [REDACTED]

5.7 Suspended Officers and Staff

The [Suspended Officers Guide](#) and Force [Fairness At Work Policy](#) should be read in conjunction with this document. Information for suspended members of police staff can be found at Appendix A within the [Discipline Policy for Police Staff](#).

5.8 Retiring/Resigning Officers and Staff

PNBs, ENBs and Daybooks must not be routinely disposed of or destroyed either before or at the point of retirement/resignation. To routinely dispose of or destroy official records such as these might constitute a criminal and misconduct offence. Section 5.9 to 5.13 of this procedure must always be referred to and complied with before any decisions are made on disposal or destruction criteria.

Retention of PNBs, ENBs and Daybooks

5.9 Retention of Books - Seven Year Review

Records should be reviewed by the creator of the record seven years after the date of completion. If not reviewed by the person who created it, then by a person suitably knowledgeable to do so, for example, the relevant Senior Investigating Officer (SIO). Records marked for seven year retention would ordinarily be destroyed at that point in time, unless there is clear information that continued retention is required.

After seven year review, if further retention is required, the entire record must be retained.

Reasons for retention after the seven year review period include:

- Required for court proceedings, including inquests;
- Management of Police Information (MOPI) Group 1 offence (e.g. murder, serious assault, serious sexual offences);
 - For undetected offences, records should be retained for 100 years;
 - Information gathered about identifiable Group One offenders should be retained until the offender reaches 100 years of age.
- CPIA 1996 – comply with minimum weed date requirements. See [CCO 99/44](#) for further details;
- Unlawful Killing;
- Eminent, notorious offender(s);

- Official Secrets Act offences;
- Unlimited Hospital Order imposed due to an offence;
- Outstanding Arrest Warrant;
- Terrorist activity;
- Public interest case;
- Public inquiry.

If retention for longer than seven years is required, officers should mark the exact date of retention on the front of the book/record, articulating which of the retention reasons are applicable. For example, '*ongoing (name) Public Inquiry*'. Another example would be in the case of MOPI Group 1 offences where there are identified offenders. In those cases, calculate the date of all identified offenders' 100th birthdays. Endorse the 100th birthday dates on the front of the record. Officers should also endorse the front of the record with the words, '*DESTROY AFTER (LONGEST DATE)*'.

5.10 ENB – Retention, Safekeeping and Storage

The officer or member of staff to whom an ENB has been issued is able to set the relevant retention period for records made in their ENB. Similarly, Professional Standards Branch staff and mobile administrators can set retention periods. The default minimum retention period is set at seven years. That can be increased up to a period of 100 years.

ENB safekeeping and storage is the responsibility of the mobile application provider, HCL. All ENB data is stored within the GMP network. It is not allowed to leave the GMP network at any time.

5.11 ENB Repair

ENBs and mobile devices can either be repaired by a Superuser, by contacting Capita

5.12 Government Security Classification (GSC)

The Government Security Classification (GSC) replaced the legacy Government Protective Marking Scheme which comprised markings of UNCLASSIFIED, RESTRICTED, CONFIDENTIAL, SECRET and TOP SECRET.

All content within PNBs, ENBs and Daybooks should be given an appropriate GSC.

Security classifications indicate the sensitivity of information and the need to defend against a broad profile of threats to it. Each classification will attract a level of security controls appropriate for managing the information risks involved.

The three GSC classifications are OFFICIAL, SECRET and TOP SECRET. The classification of OFFICIAL has a handling caveat which is 'OFFICIAL-SENSITIVE' (described later in this section).

- The OFFICIAL classification covers the majority of Public Sector business, including most policy development, service delivery, legal advice, personal data, contracts, statistics, case files, and administrative data.
- The SECRET classification concentrates security resources on particularly sensitive defence, diplomatic and other assets that require protection against heightened threats.
- The TOP SECRET classification will continue to provide extremely high levels of protection for exceptionally sensitive assets.

The GSC does not have categories such as 'Unclassified' or 'NOT PROTECTIVELY MARKED'. Any information that is created, processed, generated, stored or shared within (or on behalf of) Her Majesty's Government and the police has a default minimum classification of OFFICIAL.

OFFICIAL SENSITIVE - Caveat

In some instances OFFICIAL information will be in the higher risk category without meeting the criteria for classification as SECRET. For example, if the disclosure/ loss of information could reasonably be expected to significantly threaten safety or significantly compromise an investigation, or where the 'Need to Know' principle must be enforced, then the OFFICIAL-SENSITIVE (OS) *caveat* must be used and *Handling Rules* must be annotated, for example by endorsing information as 'OFFICIAL SENSITIVE – For addressee only'.

The use of OFFICIAL-SENSITIVE should be used by exception; and in limited circumstances where there is a clear and justifiable requirement to reinforce the 'Need to Know' principle; and where a compromise or loss could have damaging consequences for an individual (or group of individuals), an organisation; or for GMP.

5.13 Branch/Divisional Administration Units and Organisational Learning Workforce Development Branch

This procedure is also intended to assist Divisional/Branch Administration Units (DAUs/BAUs) and the Organisational Learning and Workforce Development Branch (OLWD). They have responsibilities for the issue, storage and disposal of PNBs, ENBs and Daybooks, including;

- Secure storage of new/yet to be allocated PNBs within the DAU/BAU;
- Recording/issuing new PNBs to supervisors/instructors for issue to officers/staff;
- Securely recording and storing any returned PNBs/Daybooks (used or unused);
- Ensuring all PNBs/Daybooks have been endorsed with a retention period by the person returning it (books that are not so endorsed must not be accepted);
- Ensuring that all returned PNBs/Daybooks are stored in the DAU/BAU for a minimum period of seven years;
- Indexing/ cataloguing all retained PNBs/Daybooks in an orderly manner that supports straightforward future retrieval;
- Ensuring that the details of PNBs/Daybooks required for storage beyond a seven year period are entered onto the ██████████ property system before being placed in a banner type box which, when full, should be sent to 'Deepstore';

- Arranging destruction of PNBs/Daybooks when the agreed retention date has expired and then updating relevant storage records accordingly.

5.14 Deepstore

Where there is a requirement to retain PNBs or Daybooks beyond a seven year period, or if a BAU/DAU does not have the capacity to store PNBs and Daybooks locally, they should be transferred to the Deepstore facility.

PNBs or Daybooks with similar retention dates should be boxed together as far as is possible to simplify any future retrieval process. Where a storage box contains books with multiple retention periods, the longest retention date should be clearly written on the outside of the box when the box is full; and a record of that fact should be kept by the relevant administration unit. This will enable the administration unit to more easily retrieve and/ or dispose of or destroy relevant books when the longest retention date is reached.

The relevant BAU/DAU is responsible for ensuring that details of PNBs/Daybooks, which necessitate deep storage, are entered onto the [REDACTED] property system before being sent to 'Deepstore'. Items held in Deepstore remain the responsibility of the administration unit that submitted them, including making the necessary arrangements for review, retention or retrieval.

For further guidance on retention and procedures, please contact either the GMP Information Compliance Unit, [REDACTED] or the Professional Standards Branch [REDACTED].

6. Associated Documents

Any associated documents are referenced within this procedure.

7. Statutory Compliance & Consultation

7.1 Statutory Compliance

7.1.1 Equality Act (2010)

In the application of this procedure, GMP will not discriminate against any person on any grounds, including the nine protected characteristics as defined in the Equality Duty, Section 149, and in addition politics, opinion, property, or any other status, defined in the Human Rights Act 1998, Article 14.

This document has been considered in the context of the General Equality Duty.

7.1.2 Data Protection Act (1998)

Greater Manchester Police has a duty to ensure, so far as is possible, that all staff comply with the provisions of the Data Protection Act 1998, particularly relating to their access to, and dissemination of, a wide variety of personal information and intelligence.

