

Date: 06/03/2024
Our ref: 01/FOI/24/012111/N

FREEDOM OF INFORMATION REQUEST REFERENCE NO: 01/FOI/24/012111/N

I write in connection with your request for information dated 09/02/2024, received by Greater Manchester Police (GMP) for the following information:

My enquiry concerns the Police SEEN Network a "gender critical" staff network claiming members in police forces throughout the UK.

Please provide:

1. Confirmation of whether your force has formally recognised SEEN as a staff network.
2. Any documents relating to the granting or refusal of such recognition.
3. The approximate number of SEEN members within your force.
4. Confirmation of whether SEEN members are permitted to respond to or investigate allegations of transphobic hate crime.
5. Copies of any policies relating to the above.

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 some of the information you have requested is held by GMP. However, I am not obliged to supply you with all the information as an exemption applies.

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 occur in the attached memorandum of understanding it is because that information you have requested is exempt from disclosure by virtue of the following exemption: **Section 40(2) – 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.

In accordance with the Section 17 of the Freedom of Information Act 2000, this letter acts as a Refusal Notice for those pieces of information.

The rest of the requested information is as follows:

1. SEEN is not an active staff network within GMP.
2. This information is not held by GMP.
3. This information is not held by GMP.
4. This information is not held by GMP.
5. Please see the attached memorandum of understanding.

Memorandum of Understanding (Staff Support Networks)

Version 9

Greater Manchester Police

January 2023



POLICY IMPLEMENTED: 20 August 2012

REVIEW DATE: Jan 2025

POLICY OWNER: Strategic Resourcing Branch

APPROVED BY: [REDACTED]

ASSOCIATED PROCEDURE: Procedure included

PROTECTIVE MARKING: Not Protectively Marked

IS THE POLICY ☐ Revised

IF REVISED, PLEASE COMPLETE TABLE BELOW

VERSION NO	DATE	SUMMARY OF CHANGES	AUTHOR(S)
Version 1	May 2010		Diversity Command, [REDACTED]
Version 1.2	August 2012	Chair has discretion to allocate protected time to Executive Committee/volunteers. Out of date references to now disestablished posts/teams/meetings removed. Updated to reflect the current resources of HR Branch. Written in Plain English. New Force Template used.	Policy and People Relations, HR Branch
Version 1.3	April 2013	Name change of LAGSA to GMP Pride Network	Policy and People Relations, HR Branch
Version 2	August 2013	Amendment to 6.2 Time off for Staff Support Network Business. Updated to reflect that where SSNs attend meetings that support critical business priorities, attendance and participation won't be counted as protected time.	Policy and People Relations, HR Branch
Version 3	Sept 2015	Name change of Christian Police Association to Christian Police Network.	Policy and People Relations, HR Branch
Version 4	June 2016	Amendment to 6.3 to reflect that SSN Chairs are now responsible for approving all expenditure.	Policy and People Relations, HR Branch
Version 5	October 2017	Amendment to 6.2 to remove reference to JNCC preview meeting and add SSN Engagement Forum.	Policy and People Relations, HR Branch
Version 6	July 2019	Name change of National Policing Improvement Agency to the College of Policing. Amendments to clarify levels of SSN membership and time off for SSN business and annual publication of AGM dates in collaboration Addition of Greater Manchester Police Sikh Association to list of recognised SSNs.	Policy and People Relations, HR Branch
Version 7	2 March 2021	Updated due to HR Branch review	Strategic Policy & People Relations

Version 8	June 2022	d/Deaf and Hard of Hearing Support Network added to list of recognised staff support networks. Christian Police Network amended to Christian Police Association.	Strategic Policy & People Relations
Version 9	January 2023	Catholic Police Guild added to list of recognised SSNs and GMB added to list of recognised trade unions. Frequency of SSN Engagement Forums changed from 6-7 weeks to every 2 months. SSNs required to have an effective constitution in place. Job titles updated. Assistant Chief Constable to agree the commissioning of any work to SSNs. Reasonable spend allowed on merchandising Any SSN requests for professional development to be agreed by the Assistant Chief Constable and then to be considered at Revenue Review Group. SSNs are bound by GMP's policies and procedures as well as any national SSN rules.	Strategic Policy & People Relations

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1. Introduction and Background

Statement

Greater Manchester Police (GMP) recognises and values the vital work of the Staff Support Networks. We recognise that they help us to create a fair and inclusive workplace, through their support of staff in under-represented groups throughout the organisation. We equally value the important contribution that the Networks make in establishing strong and positive links with the communities of Greater Manchester, and the impact this can have in raising community confidence in policing.

The Staff Support Networks are independent bodies set up by volunteers from GMP staff to work for the interests of their members and the wider community they reflect. As independent bodies, the Networks are self-governing, with members undertaking much of the work in their own time. GMP recognises and benefits from that independence and we are committed to supporting independence within agreed protocols.

This Memorandum of Understanding (MOU) is the foundation for the working arrangements between GMP and GMP's Staff Support Networks. It defines the relationship between us and the Networks. This MOU sets out the parameters in which business is carried out and makes the obligations for all clear.

We currently recognise and support:

- The Black and Asian Police Association (BAPA)
- The Christian Police Association (CPA) & the Catholic Police Guild (CPG)
- The Disability Support Network (DSN)
- The Jewish Police Association (JPA)
- The GMP Pride Network
- The Muslim Police Association (MPA)
- The Association of Women in Policing (AWP)
- The Greater Manchester Police Sikh Association (GMPSA)
- The d/Deaf and Hard of Hearing Support Network

The above Networks have signed up to this (non-contractual) MOU and commit to fulfilling their responsibilities.

Aims

The aims of this MOU are to:

- Set out our commitment to supporting Staff Support Networks
- Specify the type of support available to Staff Support Networks
- Document the responsibilities of the GMP, Staff Support Networks, managers and Strategic Resourcing Branch in the application of this document

2. Scope

This Memorandum of Understanding applies to Networks, managers and groups wishing to be recognised by GMP as Staff Support Networks.

3. Terms and Definitions

Definition of a Staff Support Network

We define a Staff Support Network as an association of staff from within GMP. Networks have a common cause in challenging under-representation, tackling discrimination, and improving our understanding of a particular community and culture.

The Staff Support Networks make an important contribution to our performance against equality, diversity and community objectives. Networks provide a voice to groups which are:

- Traditionally under-represented within GMP and/or
- Marginalised or disadvantaged in society

The Networks have agreed to work with us to ensure that our policies (both internally and externally), practices and culture are accessible, inclusive and fair. For these reasons the Networks are different to other GMP associations (such as sports and social clubs). The level of support that they receive from GMP reflects this.

The Networks don't exist to negotiate terms and conditions on behalf of their members. Networks are not recognised as formal negotiating bodies. The relationship between GMP and the Networks is entirely separate from that between the GMP and the Federation, the Superintendents Association, GMB and Unison.

We recognise that the Networks play an important role for many staff from minority groups in supporting them through the grievance and disciplinary processes. All staff have a statutory right to be accompanied by a companion at grievance and disciplinary meetings. We welcome the involvement of the Networks in this capacity as outlined in separate policies and within in the ACAS Code of Conduct.

Definition of Staff Support Network Membership

Elected members are those who have been elected to the Executive Committee of a Staff Support Network. In this document they are referred to as Executive Committee members.

Support/Associate/Network members or volunteers are those who have joined a Staff Support Network but do not hold elected office and are not part of the Executive Committee. In this document they are referred to as Support members.

Definition of Staff Support Networks Engagement Forum

This is a meeting chaired by an Assistant Chief Constable or Assistant Chief Officer to which the Chairs of all Staff Support Networks are invited. It takes place every two months and is an online meeting. The purpose of the Forum is for Staff Support Networks to have the opportunity to raise with a member of the Chief Officer Group general concerns, themes or issues affecting officers/staff directly which have come to their attention via their Staff Support Network duties and to discuss how these can be resolved.

4. Roles & Responsibilities

Responsibilities of GMP

GMP will:

- Acknowledge that the work of the Networks benefits staff and GMP in general.
- Respect the Networks as legitimate partners in promoting equality, diversity and positive relationships with communities.
- Work with the Networks to achieve our shared goals.
- Welcome constructive dialogue with Networks and will work with the Networks in a positive way to address any issues raised.
- (On request) provide Networks with information relating to workforce profile
- Respond positively to reasonable requests for other information, business needs permitting.
- Support Network Executive Committee members to develop the skills and knowledge that they require to be effective in their role.
- Consider requests for training relating to the role of Executive Committee member.

Responsibilities of Strategic Policy and People Relations, Strategic Resourcing Branch

This Memorandum of Understanding is owned by Strategic Policy and People Relations, Strategic Resourcing Branch.

Strategic Policy and People Relations, Strategic Resourcing Branch will:

- In consultation with Staff Support Networks, regularly review this Memorandum of Understanding to ensure that it is fit for purpose.
- Provide Networks with an amount of protected time for network business (see *Procedures Section* for more information).
- Provide Networks with an annual budget for legitimate business expenses (see *Procedures Section* for more information).
- Ensure that this Memorandum of Understanding is published on the intranet.
- Support managers to understand this document and offer clarity and guidance on the practical implications of application as required.

Responsibilities of Staff Support Networks / Members of Network Executive Committee

- Work in partnership with GMP to promote equality and diversity and to create an inclusive and accessible working environment for all staff.
- Agree the use of protected time with local management prior to the time being taken.
- In any cases of dispute (regarding protected time off, for example) try to resolve the issues locally and informally. Policy and People Relations may be consulted if local resolution has been unsuccessful.
- If Network activity cannot be carried out within protected time, undertake activities in personal time.
- Manage business with due regard to promoting the positive reputation of GMP and building confidence amongst the diverse communities of Greater Manchester.
- In conducting Network business don't do anything that would bring the Service into disrepute.
- Operate within agreed GMP policies and protocols, e.g. the Force Media Policy, Expenses Policy, Procurement Guidelines etc.
- Have an effective staff support network constitution in place covering the terms of membership, the executive committee (including election of the committee), the annual general meeting, finance, code of conduct, how to address internal disputes within the network and any other issues considered appropriate to the network concerned. The Policy and People Relations Team can provide sample constitutions or further advice.
- Add your recognised logo to any correspondence in order to support the clear distinction between GMP and Network business. (GMP stationery may be used provided it is for Staff Support Network business).
- When corresponding, always make it clear that you are writing in your capacity as a member of a Staff Support Network.
- Consider the financial position of the Force and keep spend requests and expenditure proportionate. Make savings wherever possible and commit to the ethos of doing 'more with less.'
- If you perceive that our proposed policies or course of action may have a disproportionate impact on particular groups within the organisation or community challenge the Force (individually or collectively)
- As appropriate, determine how much time/resources (if any) you will give to national networks (see *Principles Section* for more information).

On request:

- Contribute to the development of GMP's Equality and Diversity objectives.
- Provide GMP with constructive feedback to enable organisational learning and development.
- Provide Policy and People Relations with information about Network priorities, objectives and activities.
- Consider required expenditure for each financial year and provide a forecast of planned spend.

Network Executive members are required to make their line manager aware of:

- Their role within their Network
- This document

- Protected time allowed
- Likely abstractions for Network activities

Responsibility of Managers

Be familiar with this document. Support the application of the MOU and allow reasonable time off for network duties in line with the *Procedures Section* of this document.

5. Principles

5.1 National Networks

Many Staff Support Networks are linked to the national diversity networks. In general, our relationship with the national networks is through the local networks. The local networks determine how much time/resources they will give to national issues within the parameters of this Memorandum of Understanding. There are two situations when we may choose to directly resource a national network:

- When a member of GMP staff is elected to national office
- When a national network exists but there is no local network (because of low representation or low confidence in GMP)

Elected to national office

A Chief Officer will decide on a case-by-case basis the level of support we will give depending upon business priorities. Any member of a Network who is considering standing for national office must discuss resourcing with Strategic Policy and People Relations, Strategic Resourcing Branch before they do so.

National network exists but there is no local network

We recognise that for some communities, representation levels in the workforce or confidence levels amongst staff may be too low to enable the formation of a GMP Staff Support Network. We recognise that support for a national network will bring benefits to GMP as well as to individuals from the community in question (the National Trans Police Association is a good example).

In such situations we may agree to support the involvement of GMP members of staff in the national network. Individuals who receive such support in these situations will do so on the terms of this Memorandum of Understanding. This will be decided on a case-by-case basis by a Chief Officer

5.2 Consultation

We may choose to consult (hold a meaningful discussion) with Networks regarding policy developments. Usually, we'll consult with Networks when there is a clear equality issue and/or a foreseeable impact on diverse groups. If an agreement can't be reached following meaningful discussion then management reserve the right to implement changes having considered and responded to the views of the Networks.

6. Procedures

6.1 Setting up a new Staff Support Network

As our workforce becomes more diverse other groups of staff from across the diversity spectrum may wish to form a Staff Support Network. We will consider recognising new networks that meet the following criteria:

- The Network intends to promote the interests of a community that has traditionally been disadvantaged in the police service and within society. On the basis of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation
- The Network can demonstrate its capacity to support GMP in achieving its equality and diversity objectives
- The Network has an executive committee elected by its membership
- The Network is willing to operate according to the terms laid out in this Memorandum of Understanding

Any new group that meets the above criteria and wishes to apply for recognition should in the first instance contact the Strategic Policy and People Relations, Strategic Resourcing Branch for an informal discussion. A new group will be required to write a briefing note documenting their priorities, aims and objectives as well as how they meet the above criteria. The decision on recognition will be made by the Head of Strategic Policy & People Relations and a Chief Officer.

6.2 Time off for Staff Support Network Business

We acknowledge that a lot of Staff Support Network business is done on a voluntary basis and that we benefit from the commitment of Network members. We want to enable the Networks to function and therefore will provide elected representatives of the Staff Support Networks with protected time to undertake Network business. (subject to business requirements). This will amount to:

- A **maximum** of 32 hours per month for the Chair of each Staff Support Network to divide between themselves, the Executive Committee members and volunteers. Allocation is at the Chair's discretion. The Chair is responsible for keeping accurate records of how the 32 hours are spent each month. This may not be accrued from one month to the next. Should the Chair be absent on leave or protracted sickness absence the named deputy can oversee the allocation of hours and recording of hours spent.
- A **maximum** of 16 hours per month can be divided by the Chair to elected members for the attendance of meetings. This may not be accrued from one month to the next.
- A **maximum** of 21 hours once a year to be divided amongst the elected members of the Staff Support Network for the purpose of preparing for and holding an Annual General Meeting.

- In addition to the protected time specified above, we will give each Network protected time for one elected member to attend the SSN Engagement Forums (1 hour preparation time plus attendance at the meeting on each occasion).
- Time off to attend a meeting with the relevant Chief Officer lead for your relevant protected characteristic will also be allowed. Meetings are at the request of the Chief Officer lead. This is in addition to the protected time off outlined above.

Any business Networks undertake outside of the provision for protected time outlined above will be done so by Network members in their own time.

Network business

Network business is defined as any business which the Network chooses to undertake or is asked to undertake. It includes (but is not limited to):

- Support for individual members of staff
- Policy consultation
- Training delivery (unless specifically commissioned by GMP)
- Attendance at meetings, conferences or other events

Requests from GMP to undertake work

On occasion, we may wish a particular Staff Support Network to undertake a specific piece of work that supports critical business priorities. For example, attendance at Gold meetings in support of a critical incident or input to training provided by People and Development Branch. In such circumstances attendance and participation it will be in addition to the protected time detailed above.

Any commissioning of work to the Staff Support Networks must be agreed by the Chief Officer overseeing the networks, to ensure that there is sufficient capacity to undertake the work. The Chief Officer will consider the specific time required for the work which is allocated.

Support members

Support members may also be given reasonable duty time to attend SSN meetings or other SSN events, subject to the exigencies of their main duties. Line managers are encouraged to allow this attendance, subject to operational cover.

Support members may attend the Annual General Meeting (AGM) of the support group in duty time, subject to the exigencies of duty.

Support members will only be credited for meetings on a rest day if the meeting is instigated by management. Support members attending meetings on a normal working day will not be credited beyond their usual finish time for that day unless the meeting has been instigated by management.

Requests to attend any SSN meetings or events must be given to the support member's line manager with reasonable notice.

Attendance by a support member during duty time at any external support group meetings or events such as conferences, seminars, or regional or national meetings

can only be approved in advance by Strategic Policy and People Relations, Strategic Resourcing Branch.

6.3 Annual General Meetings

Support Staff Networks are required to set their Annual General Meetings in consultation and co-ordination with each other at the beginning of the year, so that they are distributed across the year. Once agreed, the dates are to be supplied collectively to Strategic Policy and People Relations, Strategic Resourcing Branch by the end of January each year.

GMP will then publish internally the collective Annual General Meetings dates for all Staff Support Networks and encourage staff to attend and line managers to plan to release staff, in accordance with this Memorandum of Understanding i.e. subject to the exigencies of the service.

6.4 Funding and budgets

GMP will provide each recognised Staff Support Network with an annual budget for legitimate business expenses. These may include:

- Stationery, postage and publicity costs
- Conference fees
- Purchasing relevant publications
- Mobile phone costs
- Reasonable spend on merchandising e.g. pens with logos
- Reasonable travel and accommodation expenses incurred by representatives of the Staff Support Networks in the course of their duties;
- Costs relating to the organisation of an Annual General Meeting

Funds provided must not be used for any of the following purposes, without the prior written agreement of Strategic Policy and People Relations, Strategic Resourcing Branch:

- Any purchase that constitutes a form of remuneration or bonus
- The purchase of any gift
- The procurement of any professional services (including legal advice)

Any requests for professional development for Staff Support Network Chairs or Deputies, such as external courses, will need to be considered first by a chief officer. An application will then need to be made to the Revenue Review Group (RRG) for the funding.

Strategic Policy and People Relations, Strategic Resourcing Branch will determine the Network budget before the beginning of the financial year as part of the Force budgeting process. The amount available to each Network may vary from year to year, depending on:

- The number of Staff Support Networks
- GMP's equality and diversity priorities
- the overall financial position of GMP
- Previous Network spend
- Requests from Networks

Finance Branch will maintain records of Network expenditure

Occasionally, we may commission a particular Staff Support Network to undertake a specific piece of work. In these cases, costs would not be funded from the budget allocated Network budget. It would be agreed in the commissioning of the work and therefore funded from the budget of the relevant business area.

Any funds provided to the Staff Support Networks by GMP are done so without any legal obligation.

Funding from other organisations

Networks may seek funding from other organisations (within Force guidelines). Notify Strategic Policy and People Relations, Strategic Resourcing Branch of any successful funding bids.

6.5 Dispute Resolution

It is the role of the Networks to constructively challenge GMP. We are committed to achieving positive outcomes wherever possible. However, it is inevitable that not all issues will be resolved to the satisfaction of all parties, on every occasion.

This Memorandum of Understanding doesn't replace any of the agreed mechanisms for dispute resolution used within GMP. Individuals who feel that they are being treated unfairly should use the Fairness at Work Policy.

Should any of the parties to this Memorandum of Understanding perceive that it is not being upheld they should refer the matter to the Strategic Policy and People Relations, Strategic Resourcing Branch.

Each Staff Support Network's individual constitution should set out how internal disputes will be addressed within the network. In addition, Staff Support Networks are bound by GMP's policies and procedures as well as any national Staff Support Networks rules.

7. Associated Documents

GMP Policies:

- Fairness at Work Policy
- Discipline Policy
- Force Media Policy
- Expenses Policy
- Procurement Guidelines
- Diversity and Equality in Employment Policy

8. Consultation & Statutory Compliance

8.1 Consultation

Department	Comments
Staff Support Networks	The Staff Support Networks have been consulted on the revisions to the Policy and provided their comments which have been taken into account.
Diversity, Equality and Inclusion Team	The Diversity, Equality and Inclusion Team has been consulted and their views taken into account.

8.2 Freedom of Information Act (2000) & Data Protection Act (2018)

The policy and procedures are compliant with the Acts.

8.3 Equality Act 2010

This policy is written with the intention of having a positive effect on diversity and equality and is compliant with the Act. The main intentions of this policy are to:

- Eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under the 2010 Act;
- Advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;
- Foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

9. Appendices

None