GREATER MANCHESTER POLICE

Date: 02/10/2026
Our ref: 01/FOI/26/017573/B

FREEDOM OF INFORMATION REQUEST REFERENCE NO: 01/FOI/26/017573/B

I write in connection with your request for information dated 03/09/2026, received by Greater Manchester Police (GMP) for the following information:

I am writing on behalf of UK Neuro News (UKNN) following Greater Manchester Police's publication on 2 September 2026 concerning the misconduct proceedings arising from racial discrimination against an officer of African heritage in the Bury district.
GMP has confirmed that six serving officers were dismissed without notice, two former officers were found to have committed gross misconduct and would have been dismissed had they remained serving, and a ninth officer received a written warning for misconduct. Eight officers/former officers are to be placed on the College of Policing Barred List.
This email contains two clearly separated sections. Section A is a request for recorded information under the Freedom of Information Act 2000. Section B contains public-interest press/accountability questions and is not intended to be treated as an FOI request. If necessary, please forward Section B to the GMP Media Office and/or the appropriate senior officer for response.
SECTION A — FREEDOM OF INFORMATION ACT 2000
Please provide the following recorded information relating to the investigation and misconduct proceedings concerning [redacted] and the officers identified by GMP as [redacted]

1. A copy of the misconduct panel's full written decision, findings, reasons and sanction/outcome decision, including any public or redacted version held by GMP.
2. A copy of the full schedule of allegations put before the misconduct panel, including the Standards of Professional Behaviour alleged to have been breached by each officer.
3. The date on which each alleged incident took place, or the date range where an exact date is not recorded.
4. The police station, team, unit, shift or other workplace location to which each officer was attached at the relevant time, insofar as disclosure is lawful.

5. The rank held by each officer at the time of the relevant conduct and at the time the investigation commenced.
6. The date on which [redacted] first reported the conduct to GMP, the date the matter was first recorded by Professional Standards, and the date the formal investigation commenced.
7. Please state whether any of the conduct was witnessed by supervisors or managers. If so, provide the number and rank of supervisors/managers who witnessed any relevant incident, without disclosing personal data where an exemption applies.
8. Please provide the number of other officers or staff who witnessed, heard or were present during any of the conduct ultimately found proved by the panel.
9. Please provide copies of any contemporaneous incident reports, internal complaints, Professional Standards referrals, management referrals, conduct notices, severity assessments or terms of reference relating to this case, subject to lawful redaction.
10. Please state whether any officer involved in the case had previously been the subject of any complaint, conduct matter, internal investigation or management action involving race, discrimination, bullying, harassment, inappropriate language, equality and diversity, authority, respect or courtesy before [redacted] complaint. Please provide numbers by officer and outcome category, without identifying complainants or disclosing exempt personal data.
11. Please state whether any of the officers had previously received words of advice, reflective practice, learning, written warnings, final written warnings or other management/disciplinary action concerning the categories in question 10.
12. Please provide the number of complaints and conduct matters recorded by GMP concerning alleged racial discrimination or racist behaviour by GMP officers/staff for each calendar year from 2020 to 2026 to date.
13. For question 12, please provide the number that resulted in: no further action; reflective practice/learning; misconduct meeting; misconduct hearing; misconduct finding; gross misconduct finding; written warning; final written warning; dismissal; resignation/retirement before proceedings concluded; and placement on the Barred List.
14. Please provide the number of complaints or conduct matters from GMP officers or staff alleging racial discrimination, racist behaviour or race-related harassment by fellow GMP officers/staff for each year from 2020 to 2026 to date.
15. Please provide the number of serving GMP officers and staff currently subject to live misconduct investigations involving alleged racial discrimination or racist conduct, broken down by rank where disclosure does not identify individuals.
16. Please provide copies of any equality, diversity, anti-racism, professional standards, workplace conduct, bullying/harassment or 'speak up' policies that applied to Bury district at the time of the conduct and any updated versions introduced since.
17. Please provide copies of any training materials, briefing documents, presentations or mandatory learning packages concerning race discrimination, racist conduct, workplace culture or challenging inappropriate behaviour delivered to Bury district officers from 1 January 2023 to the present.
18. Please provide the dates and descriptions of any additional training, culture interventions, workshops, listening exercises or management actions introduced specifically in Bury district following this complaint or investigation.
19. Please provide copies of any action plan, improvement plan, lessons-learned document, debrief, review, audit or internal report produced as a result of this case.
20. Please state whether GMP conducted, commissioned or holds any culture review, staff survey, equality review, thematic review or Professional Standards intelligence assessment concerning racism or discriminatory behaviour within Bury district between 1 January 2022 and the present. If so, please provide copies or the relevant findings.
21. Please provide any recorded assessment of whether the behaviour identified in this case represented an isolated issue, a team-level cultural problem, a district-level cultural problem or a wider organisational risk.
22. Please provide the number of officers/staff transferred, moved, suspended, placed on restricted duties or otherwise managed as a consequence of this investigation, excluding the final dismissals already publicly confirmed.

23. Please state whether any criminal investigation or referral to the Crown Prosecution Service arose from the conduct examined in the misconduct case, and if so provide the outcome/status to the extent lawfully disclosable.
24. Please state whether the Independent Office for Police Conduct was notified, referred the matter back to GMP, supervised/directed any element, or otherwise had involvement. Please provide the relevant referral date and outcome/status where held.
25. Please provide any correspondence, briefing or report sent to the Chief Constable, Deputy Chief Constable, Assistant Chief Constable, Police and Crime/Deputy Mayor oversight function or other senior governance body specifically concerning the organisational lessons or cultural implications arising from this case, subject to lawful redaction.
26. Please provide the total cost to GMP of the investigation and misconduct hearing if recorded, including external legal/panel costs where available. If no total is held, please provide any component costs that are recorded.
27. Please provide the number of officer/staff hours recorded as spent on the investigation, if held.
28. Please provide the dates on which the six dismissed officers ceased to be serving officers and the dates on which the two former officers left GMP.
29. For the two former officers, please state whether they resigned or retired after being notified that they were under investigation or after receiving a misconduct notice, and provide the relevant dates if recorded.
30. Please provide any published or unpublished data held by GMP showing the ethnicity of its workforce by rank in Bury district and force-wide, using sufficiently broad categories to avoid identifying individuals.
31. Please provide any recorded data on disproportionate grievance, complaint, misconduct, promotion, retention or exit outcomes by ethnicity within GMP for the most recent five years where such data is held.
32. Please provide the current mechanism available to an officer or member of staff who wishes to report racist or discriminatory behaviour by a colleague, including whether anonymous/confidential reporting is available and how those reports are monitored.
33. Please provide the number of internal reports made through any confidential or anonymous 'speak up', ethics, Professional Standards or similar reporting mechanism concerning race/discrimination from 2020 to 2026 to date, together with outcome categories where held.
34. Please provide any recorded lessons learned or recommendations made by the misconduct panel, Professional Standards Directorate or senior management following this case.
35. Please provide any records showing how GMP intends to measure whether the interventions introduced after this case have actually reduced racist or discriminatory behaviour, including KPIs, audits, staff surveys, complaint data or review dates.

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.

However, I am not obliged to supply the information you have requested as exemptions apply.

When refusing to provide such information because an exemption applies, Section 17(1) of the Freedom of Information Act 2000 requires GMP, 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.

Questions 1 - 5 and questions 7-8 and 22 are exempt under **section 21 – Information accessible to applicant by other means**. The response to these questions is available online. Please follow the link below.

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Section 17 of the Freedom of Information Act 2000 requires Greater Manchester Police, when refusing to provide such information (because the 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

In relation to **question 30**, the ***ethnicity of its workforce by rank in Bury district*** has been exempt from disclosure by virtue of the following exemption:

Section 31(1)(a)(b) – Law enforcement

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

Harm

Disclosure of the ethnicity of the workforce broken down by rank within Bury District would reveal detailed staffing information relating to a specific policing area. Due to the relatively small numbers that may exist within particular ranks and demographics, providing this level of granularity could enable individuals to identify, or infer the identity of, members of staff and officers.

Furthermore, the disclosure of workforce composition at this level would reveal information about the deployment and availability of personnel within a specific district, which could expose vulnerabilities and undermine the operational effectiveness of Greater Manchester Police. Knowledge of workforce strengths and composition in local policing areas could be used to build a detailed picture of resourcing across the force, potentially assisting those seeking to exploit perceived weaknesses.

Releasing this information would therefore be likely to prejudice Greater Manchester Police's ability to prevent and detect crime and apprehend offenders, as it would provide insight into the structure and capacity of policing resources within a specific geographical area.

Factors in favour of disclosure

Disclosure of the ethnicity of the workforce by rank within Bury District would promote openness and transparency regarding Greater Manchester Police's workforce composition. It would enable the public to better understand the diversity of the organisation at different levels and assess the extent to which the workforce reflects the communities it serves.

Disclosure would also contribute to informed public debate regarding equality, diversity and inclusion within policing and demonstrate accountability in relation to recruitment, retention and progression opportunities for officers and staff from different ethnic backgrounds.

Factors against disclosure

Disclosure of the requested information would reveal detailed information about the workforce composition and operational capabilities of Greater Manchester Police within a specific area. This could expose vulnerabilities in policing resources and contribute to a broader intelligence picture of how the force is structured and deployed.

Releasing such information would be likely to prejudice the prevention and detection of crime and the apprehension of offenders, as it may assist those intent on criminal activity in identifying perceived weaknesses or lower levels of resource. This could undermine the effectiveness of policing operations and place an additional burden on police resources.

Furthermore, the safety of both the public and police personnel must be afforded significant weight. Disclosure of detailed staffing information has the potential to compromise operational effectiveness

and provide information of value to those seeking to evade law enforcement activity. Therefore, the public interest is best served by withholding the information.

Balance Test

When balancing the public interest Greater Manchester Police has to consider whether the information should be released into the public domain. Arguments need to be weighed against each other. The most persuasive reason for disclosing the information would be Greater Manchester Police's accountability. This needs to be weighed against the strongest reason for non-disclosure which is the police service is charged with enforcing the law; preventing and detecting crime and protecting the people/communities we serve.

In this case this is the fact that individuals may be placed at risk and the effect it may have on the prevention and detection of crime.

The police will not divulge any information that would place the safety of an individual at risk or undermine law enforcement. Whilst there is a public interest in the transparency of policing, and in this case providing assurance that the police service is appropriately and effectively engaging with the threat posed by criminal activity, there is a very strong public interest in safeguarding the tactical resource capability which could highlight which forces are focussing more on this type of investigation than other force areas.

In accordance with the Act, this letter represents a Refusal Notice for the particular piece of information.

PLEASE NOTE - Where redactions occur, 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 see the remaining responses below.

Question 6.
The first report was made on 06/12/2023, PSD recorded this on 07/12/2023 and formal investigation commenced 07/12/2023.

Question 7.
See exemption above.

Question 8.
See exemption above.

Question 9.
This question is exempted from disclosure under **Section 40(2) Personal Information** –Some information you have requested constitutes personal data of an identifiable living individual/s, and to disclose this information would breach the principles of the General Data Protection Regulation (GDPR) and the Data Protection Act 2018. Personal data is defined by Section 1 of the Data Protection Act 2018 and means data that relates to an individual who can be identified directly or indirectly from that data.

Section 40 is an absolute exemption with no requirement to complete a public interest test.

Question 10.
This question is exempted from disclosure under **Section 40(2) Personal Information** –Some information you have requested constitutes personal data of an identifiable living individual/s, and to

disclose this information would breach the principles of the General Data Protection Regulation (GDPR) and the Data Protection Act 2018. Personal data is defined by Section 1 of the Data Protection Act 2018 and means data that relates to an individual who can be identified directly or indirectly from that data.

Section 40 is an absolute exemption with no requirement to complete a public interest test.

Question 11.
This question is exempted from disclosure under **Section 40(2) Personal Information** –Some information you have requested constitutes personal data of an identifiable living individual/s, and to disclose this information would breach the principles of the General Data Protection Regulation (GDPR) and the Data Protection Act 2018. Personal data is defined by Section 1 of the Data Protection Act 2018 and means data that relates to an individual who can be identified directly or indirectly from that data.

Section 40 is an absolute exemption with no requirement to complete a public interest test.

Question 12.

Cases Received		
Year	Complaints	Conduct
2020	112	11
2021	114	1
2022	120	16
2023	165	22
2024	202	21
2025	261	16
2026	107	10

Question 13.
Each case can contain more than one allegation against more than one subject with more than one outcome, so outcomes are provided at allegation level & therefore do not match the totals in Q12

Year	Dismissed	Learning from Reflection	No Action	Not Proven at Proceedings	Not Resolved - NFA
2020		8	170	2	4
2021		6	165		4
2022	2	3	156		2
2023	2	5	232	2	7
2024		8	249		3
2025	1	2	271		10
2026		1	68		1

Year	Ongoing	Awaiting Misconduct Proceedings	Referral to RPRP	Resolved	Would Have Been Dismissed if still serving
2020			5	3	1
2021	2			2	
2022	25	1	3	9	3
2023	9	17	4	23	
2024	28	6	3	44	2
2025	23	3	5	62	
2026	76	2		15	

Question 14.
Due to some low results, the data has been merged into one total as by providing all this information split by individual years as you have requested would significantly increase the likelihood of identifying the individual(s) concerned, and as such the exemption under S40(2) – Personal Information, would be engaged and result in information being refused. By replacing the data this way, it can be provided in its entirety.

Year	Total Cases
2020 - 2026	**42**

Question 15.
Due to some low results, the data has been merged into one total as by providing all this information split by individual years as you have requested would significantly increase the likelihood of identifying the individual(s) concerned, and as such the exemption under S40(2) – Personal Information, would be engaged and result in information being refused. By replacing the data this way, it can be provided in its entirety.

All **Rank** Below	**Total**
PC – Staff – PS – Insp – D.Supt	**28**

Question 16.
This question is exempt under **Section 21 – Information accessible to applicant by other means**. The response to this request is available online. Please follow the link below.

https://www.gmp.police.uk/SysSiteAssets/foi-media/greater-manchester/policies/gmp-dei-strategy-and-objectives---issue-1---corporate-template.pdf

Please also see the attached the policies named

- **Bullying and harassment policy.**
- **Workforce equality policy.**
- **Reporting concerns policy.**

Question 17.

- Student officers – have a district visit with visits to key communities to understand their culture and diversity.

- Throughout 2025 / 2026 sergeants and inspectors attended a mandatory CPD day where they received the following inputs.
    - Leadership – how to embrace difference and understand / empathise with others
    - Quality, standards and behaviour – expectations of supervisors to challenge inappropriate behaviour and uphold the code of ethics
    - Wellbeing – how to support the welfare of our staff and what is available
- 'Ask the Boss' is held monthly where all staff can anonymously ask the District Commander and the bury senior leadership any questions where actions are taken away and updated on. This has built confidence in SLT to tackle issues and concerns.
- Female listening circles – 3 of these have been held in the last 12 months where women that attended felt supported at Bury and had no concerns to raise. These are now pended for 2027 to continue due to no concerns raised.

Question 18.
Please see the extracts taken from the Bury Delivery plan January 2025 and April 2026.

<u>January 2025</u>

- Bury Focus 2025

Bury Division will continue to build on the progress that was made throughout 2024 and commit to continually improve performance through strong leadership, effective communication and implementation of technological advances. We will create a learning and progressive culture which will result in improvement of our staff feeling valued, motivated and empowered.

Our focus throughout 2025 will be the delivery of this people plan to ensure the communities of Bury have the best possible service from the police.

- Objectives

Our aim is to deliver a people plan that will ensure that we have people to meet the needs of our communities.
There are 3 overarching objectives of this delivery plan
1) To ensure the wellbeing of our staff
2) To deliver quality, standards and behaviours
3) To ensure our people are well equipped to do their roles and that there is strong leadership across the district.

- Ensure the wellbeing of our staff

The wellbeing objectives are linked to the Blue Light Framework and are standardised across GMP.

- To deliver quality, standards and behaviours

The QSB objectives are aligned to
• ensuring professional standards and adhering to the code of ethics
• the Victims and Communities performance framework
• expectations of leadership
The QSB objectives include productivity and the use of technology to improve efficiency across Bury District.

- To ensure our people are well equipped to do their roles and that there is strong leadership across the District

The objectives were mainly derived from the work undertaken by the Diversity, Equality and Inclusion team and Corporate Comms staff engagement team. Bury SLT have worked closely with these teams and HR to produce objectives that will ensure our people are confident and resilient to deal with internal issues to improve the culture of the workplace.

<u>April 2026</u>

- Bury Focus 2026

The findings of the staff engagement survey have been reviewed, and objectives have been added to the Bury delivery objective tracker for implementation on the district.

Bury's focus for 2026 is to continue the implementation of this delivery plan. Currently response and district investigation team aren't at full strength, and this is where officers are feeling fatigue due to high demand. Wit the current resource plan these team should be at full establishment in August 2026.

One of the Op daily investigations are at gross misconduct hearing in August 2026. Senior leadership will be engaging with key stakeholders and the community to provide reassurance to the public that Bury police are professional and committed to building and maintaining public trust and confidence.

The objectives of this plan align to having officers that uphold quality, standards and behaviour, are robust in their management of any form of bullying or abuse and call out any person who displays discriminatory behaviour whether internally or externally

Through the delivery of this plan Bury will have people who are motivated, resilient and robust to challenge. This means we effectively deliver a meaningful service to our communities.

Question 19.
GMP developed a workplace culture intervention and questionnaire focused on psychological safety. The purpose of this work was to assess and promote psychological safety within the workplace. A psychologically safe environment enables staff to seek help, challenge inappropriate behaviour, share ideas and disclose welfare concerns without fear of damaging their reputation or career prospects. The psychological safety work took place during late summer and early autumn 2024. Results and outcomes can be seen in the extracts above in question 18.

Question 20.
No recorded information held that relates to ***racism or discriminatory behaviour within Bury district***

Question 21.
No information held.

Question 22.
See exemption above.
Question 23.
No.

Question 24.
This was referred to IOPC 18/07/24 and referred back to GMP for local investigation.

Question 25.
No information held.

Question 26.
No information held at this current time, however, will be available at a later date.

Question 27.
No information held.

Question 28.
6 dismissed officers on 02/09/26. The two former officers left GMP on 03/08/25 and the 28/09/25.

Question 29.
The officers resigned after being served notice of investigation.

Question 30.

Minority Ethnic Officers by rank	Constable		Sergeant		Inspector		Chief Inspector		Superintendent and above	
	Minority Ethnic	White	Minority Ethnic	White	Minority Ethnic	White	Minority Ethnic	White	Minority Ethnic	White
Total Officers Force wide	659	5403	114	1336	25	398	15	152	8	103

Question 31.

	Total	Minority Ethnic
Data held for the Year to date Leavers only	Leavers	Number
Officer	165	23
Staff	121	12
PCSO	10	X

*X – This represents low figures which could ultimately lead to identification of an induvial, this would be exempt under S40. This way allows for the data to be provided in some form.

Question 32.
See the attached reporting concerns policy.

Question 33.
No information held.

Question 34.
No information held.

Question 35.
No information held.

GREATER MANCHESTER POLICE

Bullying and Harassment

Policy

Version 10

July 2025

DATE THIS VERSION OF THE POLICY IMPLEMENTED: July 2025

DATE NEXT REVIEW IS DUE: July 2027

POLICY & PROCEDURE OWNER: [redacted]

APPROVED BY: [redacted]

GOVERNMENT SECURITY CLASSIFICATION: Official

IS THE POLICY & PROCEDURE NEW OR REVISED: Revised

VERSION NO	DATE	SUMMARY OF CHANGES	AUTHOR(S)	PUBLISHED ON CCOs
Version 1	20.7.12		Policy and People Relations, HR Branch	
Version 2	24.4.13	Removed reference to First Contact Advisor scheme.	Policy and People Relations, HR Branch	
Version 3	19.1.15	Responsibility of Staff section amended to embed the Code of Ethics.	Policy and People Relations, HR Branch	
Version 4	20.7.17	Update to account for change to GMSS and Boroughs to Division	Policy and People Relations, HR Branch	
Version 5	09.10.18	Update to replace reference to Grievance Policy with Fairness at Work Policy	Policy and People Relations, HR Branch	
Version 6	October 2018	Amended to reflect implementation of the GDPR and clarify sharing details with the subject of the grievance and witnesses.	Policy and People Relations Team	
Version 7	April 2020	Updated to be clear of options for reporting. Referencing the Reporting Concerns Policy and Procedure. Amended to be clear that if a FAW complaint highlights a breach of the code of ethics may have taken place or there is potential unlawful discriminatory behaviour this will be referred to PSB for assessment.	Policy and People Relations Team, HR Branch	
Version 8	17 Feb 21	Amended due to review of HR Branch	Strategic Policy & People Relations	

Version 9	July 2023	Updated to include information on the Sexual Harassment in the Workplace Policy and Procedure	Strategic Policy & People Relations	
Version 10	July 2025	Updated as part of review of all HR equality policies and toolkits.	Strategic Policy and People Relations	

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1. Policy Statement

Greater Manchester Police (GMP) are committed to creating a positive working environment. We won't tolerate any form of bullying and harassment, including harassment of our staff by visitors or external parties. Everyone has a right to be treated with respect and dignity and to work in an environment free from bullying and harassment.

We all have a responsibility to make sure that our own conduct doesn't cause offence or misunderstanding in or outside the workplace and when we're policing the community.

We recognise that sometimes it can be difficult for people to come forward if they feel they're being bullied or harassed. We'll take all cases seriously and deal with them in a sensitive and supportive manner.

1.1 Aims

Aims

The aims of this policy are to:

- promote a positive and safe working environment, where all staff are treated with respect and dignity
- make sure all staff are aware of what can be unwelcome or offensive behaviour
- make sure all staff know that we won't tolerate unwelcome and/or offensive behaviour
- explain how complaints can be raised under the Grievance Policy without fear of reprisal or victimisation

2. Scope

This policy applies to all police staff, police officers, special constabulary and volunteers.

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

3. Terms and Definitions

Bullying is offensive, intimidating, malicious or insulting behaviour, an abuse or misuse of power through means that undermine, humiliate, put down or injure the recipient. Bullying may be physical, verbal or non-verbal.

Harassment is defined by law as unwanted conduct related to a relevant protected characteristic, which has the purpose or effect of violating an individual's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for that individual.

Relevant protected characteristics are defined in the Equality Act (2010). These are the grounds upon which harassment is unlawful:

- Age
- Disability
- Gender reassignment
- Race
- Religion or belief
- Sex
- Sexual orientation

Unwanted conduct only needs to be related to the protected characteristic noted above to amount to Harassment under the Equality Act. As such it is not necessary for the victim of the harassment to have the protected characteristic themselves. Equally, witnesses of harassing behaviour may also be subjected to harassment if they are affected by the conduct, despite not being the intended victim of the conduct.

Harassment under the Equality Act does not cover the other protected characteristics, namely maternity and pregnancy, and marriage and civil partnerships. However unwanted conduct related to pregnancy or maternity could amount to harassment related to sex. See the Diversity, Equality and Inclusion in Employment Policy for further information about protected characteristics.

It should be noted that discrimination and harassment claims can arise in connection with fertility treatment. Sex discrimination, pregnancy discrimination and maternity discrimination provisions may apply in relation to a woman undergoing IVF treatment, depending on the stage of the treatment.

Additionally, as an employer GMP has a legal duty to take reasonable steps to prevent sexual harassment of employees. Please see also the Sexual Harassment Policy and Procedure and the Sexual Harassment in the Workplace intranet page.

Bullying and harassment are terms used interchangeably by most people. The difference between bullying and harassment is that harassment is unlawful and is unwanted behaviour relating to a protected characteristic. Neither bullying nor harassment are acceptable behaviour at GMP.

Treating someone with respect and dignity means having a positive attitude towards them, showing consideration and politeness so that they feel valued and have a sense of wellbeing and self-worth.

Bullying can include workplace coercion, where a colleague who is usually, but not always, a line manager, influences the behaviour of those within their power and also psychological manipulation, such as deliberately giving false information to someone.

It should be noted that as well as being covered by the Equality Act 2010 (which links harassment to protected characteristics), harassment is also covered by criminal law, under the Protection from Harassment Act 1997. Harassment under the Protection from

Harassment Act 1997 and Harassment under the Equality Act 2010 are two completely different acts. The criminal acts of harassment under the Protection from Harassment Act have different definitions than the definition under the Equality Act and should not be confused.

The criminal legislation covers a course of conduct which can occur in the workplace, or any location and is not linked to a protected characteristic. Conduct in the workplace can fall under both or one of these laws. Professional Standards Directorate will undertake an assessment regarding which applies and is relevant to the circumstances. Criminal actions carry a higher burden of proof and must meet a higher threshold; but potentially harassment in the workplace could breach criminal law.

Police staff are also protected from suffering a detriment because of trade union membership or activities, part-time employee status or fixed term employee status.

4. Roles & Responsibilities

Responsibility of Strategic Resourcing Branch

The Head of Strategic Resourcing Branch is responsible for developing a Bullying & Harassment Policy which promotes a safe, healthy and fair working environment.

Responsibility of HR Operations Team, People & Development Branch

HR Operations will advise managers on the implementation of the policy and processes to be followed.

Responsibility of managers

Managers are responsible for setting an example in creating a working environment which supports the respect and dignity of all staff. They will protect the wellbeing of staff, including those either directly or indirectly involved in a complaint.

Managers must take reasonable steps to prevent harassment of their staff by colleagues or external parties.

Responsibility of staff

All staff should treat colleagues and others, such as suppliers and members of the public, with respect. You have a personal responsibility to challenge or report inappropriate behaviour, that you believe falls below the expected standards whether directed at yourselves or others. If you cannot challenge a colleague directly, you should report your concerns through a manager or other appropriate reporting channels.

You have a personal responsibility to be aware of the impact of your behaviour and to make sure you do not cause offence to others by your words or actions. You should speak to your

manager about any concerns you have about bullying and harassment, so your manager can address them.

5. Principles

5.1 Unlawfulness

Behaviour doesn't need to be unlawful to fall under this policy. Bullying and harassment are, however, treated very seriously under a variety of UK and European legislation:

- certain types of harassment will amount to unlawful discrimination if they relate to a relevant protected characteristic, for example, sexual, racial, disability, age and homophobic harassment
- harassment of staff by external parties e.g. suppliers or members of the public is unlawful
- not only do we have legal obligations to our employees, but staff also have legal obligations to treat one another with respect
- both GMP and individual staff members can be found liable for harassment, and ordered to pay compensation
- where harassment constitutes a criminal offence, it can result in the perpetrator being liable for criminal prosecution including possible imprisonment and also subject to misconduct proceedings which are determined at a much lower threshold, i.e., the balance of probability
- GMP has a legal duty to take reasonable steps to prevent sexual harassment of staff in the course of their employment.

If you witness any of the unlawful behaviours listed above, then in the first instance you should report this to an immediate line manager who can support and advise on the referral process in conjunction with your district or branch Standards Manager.

You can also report behaviour anonymously on the Police Integrity Line on 0800 111 4444 or policeintegrityline.co.uk.

5.2 Protection from victimisation

We won't tolerate any form of victimisation or retaliation against anyone who in good faith makes or supports a complaint of harassment or bullying. Victimisation of those who make or support such complaints may lead to action under our disciplinary procedures, up to and including dismissal. Please see also the Reporting Concerns Policy and Procedure.

5.3 Counselling

If you feel you've been victimised or harassed you may want to use the counselling services we provide via our Employee Assistance Programme '[redacted]' who can provide advice, information and counselling 365 days a year. Visit the intranet for full details [redacted]

Advice and support is also available from UNISON, GMB, the Police Federation, Superintendents Association and the Staff Support Networks. Please visit the Staff Association and Staff Support Network [redacted] for more information.

For further support you can also speak to the Grievance Manager if appropriate, or for HR assistance you can contact [redacted] guidance and support.

5.4 Mediation

Mediation is available at any step in the procedure, including the informal step. However, both parties must want to participate in the mediation.

It is important to note that some situations aren't appropriate for mediation. If a member of staff has been subject to discrimination, unlawful victimisation or harassment due to a protected characteristic or to bullying, then this is not suitable for mediation and should be reported to the Professional Standards Directorate.

6. Procedures

Bullying and harassment may be persistent or an isolated incident. Sometimes bullying and harassment can be hard to recognise – they may not be obvious to others. Bullying and harassment can cause many issues for the victim such as anxiety, stress, poor work performance and absenteeism.

Bullying and harassment can be face to face, by email, phone or text. It can be at all levels, for example staff to managers, colleagues to colleagues, managers to staff or in some cases external parties to managers or employees.

6.1 Recognising bullying

Examples of bullying include (but aren't limited to):

- persistent criticism
- shouting or swearing at colleagues in public or private
- deliberate isolation by ignoring or excluding a person
- withholding information or removing areas of responsibility without justification
- spreading malicious rumours
- making inappropriate personal comments
- undermining an individual
- setting unrealistic or unreasonable objectives
- undermining a person's self-respect by condescending, intrusive or threatening treatment that humiliates, intimidates or demeans
- overbearing supervision or other misuse of power or position

Remember that bullying isn't linked to protected characteristics.

6.2 Recognising harassment

Harassment is unwanted conduct which the recipient or others find offensive. The important factor is the impact the behaviour has, not the intention. There may not be an intention to distress or hurt someone but the law recognises that harassment is identified through the perceptions and feelings of the recipient. Behaviour that's acceptable to some people may cause embarrassment, distress, or anxiety to others.

Types of harassment include (but aren't limited to):

- sexual violence which can take many forms and extends beyond rape and physical assault and includes unwanted touching or contact; the use or threat of force; forcing a victim to perform sexual acts; using sex as a tool for harassment, intimidation and coercion; predatory behaviour; spreading sexual rumours; using sexualised language or creating a hostile environment; and using sex as a condition for advancement or continued employment
- verbal conduct such as innuendo, inappropriate jokes or offensive remarks on the grounds of protected characteristics (i.e. age, disability, gender reassignment, race, religion, belief, sex or sexual orientation)
- unwanted non-verbal conduct, including sexually suggestive gestures, staring and leering
- display, storage or circulation of offensive material (including information held on computer)
- conduct that threatens, ridicules, intimidates, abuses, undermines or undervalues an individual because of their protected characteristic
- unwanted sexual attention or advances
- unfair treatment, which might include deliberate exclusion from conversations or events at work, for reasons based on a protected characteristic

Please see also the Sexual Harassment Policy and Procedure.

All forms of harassment which amount to discrimination of any kind must be referred to PSD via your Standards Manager. All such allegations will be subject to an assessment against the Standards of Professional Behaviour. Alternatively, anonymous reporting via the integrity line [redacted] policeintegrityline.co.uk should be considered.

6.3 Banter

Banter is subjective and what some people might consider as joking, or part of their workplace culture is still harassment if it's unwanted and/or it violates someone's dignity or creates an intimidating, hostile, degrading, humiliating or offensive environment for them. Comments related to an employee's protected characteristic are strictly unacceptable in the workplace, as such jokes or "banter" can amount to discrimination or harassment, even one-off incidents.

It's extremely rare for a harassment claim to be rejected on the basis that the comments were "only banter" and it should be noted that an individual's participation in, and apparent acquiescence to, "banter" doesn't necessarily mean that the conduct is welcome.

6.4 What isn't bullying or harassment?

Bullying and harassment should not be confused with legitimate management practices such as providing constructive feedback on an individual's performance or behaviour at work. GMP expects managers to set clear direction and achieve and maintain high standards of professionalism and performance.

6.5 Stopping bullying & harassment

Bullying and harassment are often clear cut but sometimes people are unsure whether or not the way they're being treated is acceptable. If this applies to you, or you're reluctant to make a complaint, you can discuss your concerns in confidence with your manager (or their manager). Alternatively you can contact the trade union, one of the staff associations or support networks, or Greater Manchester Shared Services (**GMSS**). They can provide support and advice and explain GMP's procedures for tackling bullying and harassment and dealing with complaints.

Keep a diary of all incidents, make a note of dates, times, any witnesses and how you felt. Keep copies of any relevant documents and emails. Bullying and harassment often reveal themselves through patterns of behaviour and frequency of incidents.

If you believe you are being bullied or harassed you should take action as quickly as possible. Firstly you need to consider whether you're willing to confront the person or people who are causing you distress. They may be unaware of the impact of their behaviour and willing to change. You should tell the person to stop whatever it is they're doing that is causing you distress. You could ask someone to be present as a witness and to support you.

If you find it difficult to tell the person yourself, you may wish to get someone else – a trade union official or staff association representative, or a colleague – to act on your behalf. Or you could write to the person making it clear what it is you object to in their behaviour. Keep copies of this and any reply.

Whether you approach the person face-to-face or in writing, be positive and calm, firm not aggressive. Stick to the facts and be prepared to describe what happened, even if you find it embarrassing.

If the bullying or harassment continues, you should seek help by making a complaint.

You may want to speak to someone to support you with your complaint. Advice and/or support is available from UNISON, GMB, the Police Federation, Superintendents Association and the Staff Support Networks. Please visit the Staff Association and Staff Support Network intranet page for more information. GMP's employee assistance programme '[redacted]' can provide advice, information and counselling 365 days a year. Visit the intranet for full details [redacted]. You can also contact GMSS for advice.

Some cases of bullying or harassment may amount to a breach of the Standards of Professional Behaviour. In those instances, it wouldn't be appropriate for you to try to resolve the issue yourself and instead you should raise the issue with your line manager (unless inappropriate) and your district or branch's Standards Manager as soon as you can. A referral to PSD will follow, allowing for a formal assessment for misconduct to take place.

6.6 Procedure for making complaints

You can be confident that if you come forward, we'll take your complaint seriously and you won't be victimised for complaining. We'll deal with complaints of bullying or harassment fairly, confidentially and sensitively.

You can raise a complaint about bullying or harassment under the Reporting Concerns Policy and Procedure, the Grievance Policy, or the Sexual Harassment Policy and Procedure. (see relevant policy for full details).

If you raise your complaint under the Grievance Policy and it suggests that a breach of the Standards of Professional Behaviour (SOPB) For Police Officers or Police Staff Standards of Professional Behaviour, may have taken place or it highlights potential unlawful discriminatory behaviour, your complaint will be referred to Professional Standards Directorate. This element of your complaint needs to be assessed by Professional Standards Directorate before it can be progressed. Professional Standards Directorate will assess your complaint and determine the appropriate action to be taken.

You can report sexual harassment to the Professional Standards Directorate, [redacted]

To report anonymously, contact the ACU on [redacted]

You can also report cases of sexual harassment in the workplace to CrimeStoppers via the [redacted].

The Mayor's Office will accept reports of concern. You can report openly or confidentially by e-mail [redacted] post to [redacted]

Further information about sexual harassment in the workplace can be found on the Professional Standards Directorate's [redacted]

6.7 Harassment of others

You can complain of behaviour that you find offensive, even if it doesn't relate to you.

6.8 If you're accused of bullying or harassment

You may be accused of bullying or harassment before a formal complaint has been made. It's very important that you remain calm and listen to the points that are being made. Allow the person to explain how they are feeling and clarify what aspects of your behaviour they feel to be unacceptable. You will need to carefully consider your past behaviour. It's the

effect of that behaviour on others, rather than the intention, which matters in any claim of harassment.

If you accept that your behaviour may have caused offence – apologise as soon as possible. If you believe that your behaviour doesn't amount to bullying or harassment and you're not prepared to alter your behaviour, be aware that the complainant may want to take matters further. They may raise a formal complaint against you under the Reporting Concerns Policy and Procedure, Grievance Policy or the Sexual Harassment Policy and Procedure. (see relevant policy for full details).

We'll examine all accusations thoroughly, without pre-judgement. We recognise that this is likely to be a stressful time for you and that you may need support. We'll keep you informed about progress and timescales. You can speak to the Grievance Manager, or for HR assistance contact GMSS for guidance and support. You can also contact our employee assistance programme 'Health Assured ' who can provide advice, information and counselling 365 days a year. [redacted]

Advice and support is also available from UNISON, GMB, the Police Federation, Superintendents Association and the Staff Support Networks. Please visit the Staff Association and Staff Support Network intranet page for more information.

You'll be provided with as much information about the allegations as is reasonable so you can consider your response. In most cases we'll provide a copy of the complaint and relevant supporting documents. Then we'll invite you to a meeting where you can present your own account of events. Once we've concluded our investigation, we'll explain the outcome and you'll be given a copy of our findings.

If a complaint against you is not upheld, you must continue to treat the complainant as you would any other colleague. Any victimisation of the complainant is a disciplinary offence. We'll arrange a meeting with both parties to discuss how you can work together effectively going forwards. This may be led by an appropriate manager or arranged under the Workplace Mediation Scheme. We'll encourage all parties to develop a healthy and productive working relationship, and will provide support where necessary such as mediation, mentoring or action plans.

If a complaint against you under the Grievance Policy suggests that a breach of the Standards of Professional Behaviour (SOPB) For Police Officers or Police Staff Standards of Professional Behaviour may have taken place or it highlights potential unlawful discriminatory behaviour, the complaint will be referred to Professional Standards Directorate. Professional Standards Directorate will assess the complaint and determine what appropriate action to take.

If Professional Standards Directorate decide that formal disciplinary or misconduct action isn't appropriate, the complaint will be referred back into the grievance process.

[redacted]

[redacted]

[redacted] [redacted]

[redacted]

[redacted] [redacted]
[redacted] [redacted]

[redacted]

[redacted] [redacted]
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[redacted] [redacted]
[redacted] [redacted]

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- [redacted]

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7. Statutory Compliance & Consultation

7.1 Statutory Compliance

7.1.1 Equality Act (2010)

Due regard has been had to the General Equality Duty. The policy aims to create a positive and safe working environment, where all staff are treated with respect and dignity and know how to challenge offensive behaviour, thereby promoting equality. Having a protected characteristic will not impact on a member of staff's eligibility to make a complaint of bullying and harassment. The provisions of this policy don't have a disproportionate impact on any member of staff with a protected characteristic.

For more detailed considerations, please see the Equality Impact Assessment.

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

The policy and procedures are compliant with the Act and Regulation.

7.1.3 Freedom of Information Act (2000)

This policy could be published immediately, should a request be received under the Freedom of Information Act.

7.2 Consultation

Department	Comments
GMB	Detailed consultation has taken place with GMB on all revisions to the policy and their views have taken into account.
UNISON	Detailed consultation has taken place with UNISON on all revisions to the policy and their views have taken into account.
Federation	The Federation have been consulted on the revisions to the policy and provided their comments which have been taken into account.
Superintendents Association	Detailed consultation has taken place with the Superintendents Association on all revisions to the policy and their view have been taken into account.
Staff Support Networks	We have engaged with all of the Staff Support Networks about revisions to the policy. They have provided their comments which have been taken into account.
Legal Services	We have engaged with Legal Services about revisions to the policy. They have provided their comments which have been taken into account.

8. Appendices

None

Reporting Concerns

Policy & Procedure

Greater Manchester Police

July 2021

POLICY & PROCEDURE IMPLEMENTED: July 2021

REVIEW DATE: July 2024

POLICY & PROCEDURE OWNER:

APPROVED BY:

GOVERNMENT SECURITY CLASSIFICATION: Official

IS THE POLICY & PROCEDURE? ☐ New ☑ Revised

IF REVISED, PLEASE COMPLETE TABLE BELOW

VERSION NO	DATE	SUMMARY OF CHANGES	AUTHOR(S)	PUBLISHED ON CCOs
1	Jan 2006	Original policy – 'Supporting staff who make professional standards reports'	Unknown	
2	Jun 2016	Policy transferred to new policy and procedure template and comprehensively revised. College of Policing guidance included and legal advice amendments.		
3	Dec 2016	Document updated following consultation. Approved by Chief Officers'		
3.1	Jan 2017	Anti-Corruption Unit phone number amended		
3.2	May 2019	Terminology updated – replaced 'division' for 'district', 'IPCC' for 'IOPC' and 'OPCC' for 'Mayor's Office'		
3.3	Jul 2021	Legislation updated and removal of reference to Force Standards Board		

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1. Policy Statement

All those who work in policing have a clear responsibility to report concerns and suspected wrongdoing. This includes, but is not limited to, corrupt, dishonest, or unethical behaviour by others in Greater Manchester Police (GMP). The responsibility also includes an obligation to report concerns about health and safety. Any concerns should be reported at the earliest opportunity.

The Standards of Professional Behaviour (Police Conduct Regulations 2020) sets out the expected behaviours for police officers and staff. These standards are legally binding. The tenth standard sets out that officers should report, challenge or take action when the behaviour of colleagues falls below the required standard. This requirement is also fully explained within the Code of Ethics, which applies to police staff as well as police officers.

It is the duty of the Force to provide a means of reporting concerns and to ensure that reported concerns are properly investigated. The Force must also give consideration to the welfare and care of the individual making the disclosure and fully support and protect staff who make reports, by ensuring that they are protected from any detrimental treatment and by providing appropriate facilities throughout the investigation process and thereafter. This duty of care extends to the person accused of wrongdoing. If the Force is openly seen to tackle the issue of poor standards, this will increase public confidence in GMP.

1.1 Aims

This policy and procedure aims to enable all staff to feel a genuine obligation to openness and transparency when reporting concerns about health and safety, dishonesty, wrongdoing, malpractice or breaches of professional standards. It sets out the ways in which concerns can be reported, and the support that GMP will provide to those making the reports.

GMP recognises the need for a positive professional standards policy and procedure that provides:

- clear and effective mechanisms for ‘open’ and ‘confidential’ reporting;
- resolve to effectively deal with all allegations made;
- comprehensive arrangements for supporting staff who in the public interest make such a report; and
- acknowledgement of the potential impact on an individual, district, branch and/or the Force.

2. Scope

This policy and procedure applies to all police officers and police staff, including special constables and those working voluntarily or under contract to GMP.

3. Roles & Responsibilities

All staff - It is the responsibility of all staff to report concerns of wrongdoing. Reports should be made even if there is only a suspicion. If an employee has concerns about health and safety, wrongdoing, malpractice, dishonesty or breaches of professional standards that has

a public interest aspect to it, for example because it threatens third parties or the public generally, then they should use the procedure outlined in this policy and procedure.

All line managers - It is the line manager's responsibility to provide support for the person reporting the concerns. You must ensure any report is dealt with swiftly, with cognisance to the person's reporting wishes and confidentiality. The person reporting has the right to maintain anonymity. Guidance is available from Professional Standards Branch.

Deputy Chief Constable (DCC) – The DCC is the chief officer lead for professional standards and the Force's appropriate authority for misconduct allegations.

Head of Professional Standards Branch (PSB) - Reporting to the DCC, PSB is responsible for delivery of this policy and procedure and setting the standards for professional behaviour in GMP. On receiving a report, PSB is responsible for managing the investigation into the report. PSB is also responsible for providing guidance in relation to this policy and procedure.

4. Terms and Definitions

The duty to report concerns is defined in the following ways:

Code of Ethics: Challenging and reporting improper conduct - I will report, challenge or take action against the conduct of colleagues which has fallen below the standards of professional behaviour.

Standards of Professional Behaviour Police Officers: Police officers report, challenge or take action against the conduct of colleagues which has fallen below the standards of professional behaviour expected.

Standards of Professional Behaviour Police Staff: Challenging and reporting improper conduct. Police staff, whilst at work, report, challenge or take action against the conduct of colleagues which has fallen below the standards of professional behaviour expected.

Open Reporting: Where the person reporting the behaviour is prepared to be identified and will provide evidence of the same.

Confidential Reporting: Where the identity of the person reporting the behaviour is known to the investigators but they do not want this revealing in the investigation and they will not provide evidence to support the investigation.

Anonymous Reporting is where the identity of the person reporting the behaviour is not known.

5. Procedure

GMP recognises that there is an unequivocal need for the organisation to fully support all staff making reports, either directly or by reporting concerns to others who can then take action.

The Police (Conduct) Regulations 2020 state that action should not be taken against an individual for raising a concern provided it is not done falsely or maliciously. Anyone making

a reprisal against a person reporting a concern will be liable for disciplinary action. This policy and procedure expects immediate and positive feedback to be given to the person reporting and that the term 'doing the right thing' will be used.

Where reports are made by staff, either anonymously, or by way of open reporting, GMP will investigate the allegation made, the emphasis being on searching for evidence, which does not rely on the person making that report. If staff use this policy and procedure to raise a concern, GMP will provide reassurance that they will not suffer any form of retribution or detrimental treatment. Any individuals who are found to victimise individuals in this way will be subject to disciplinary action.

5.1 Risk Assessment

GMP recognises the need to risk-assess confidentiality at a very early stage when allegations are made. This is integral to maintaining confidence in this policy and procedure.

Where an investigation commences, arising out of a report, the Investigating Officer will undertake a risk assessment with you. Appropriate support will be discussed with you. The risk assessment will be reviewed on a regular basis and at any point where there is a significant development in the investigation.

5.2 What you can Report

By reports, we mean any disclosure of information which, in the reasonable belief of the worker, is made in the public interest and tends to show one of more of the following:

- that a criminal offence has been committed, is being committed or is likely to be committed;
- that a person has failed, is failing or is likely to fail to comply with any legal obligation to which they are subject; (this includes breaches of the Standards of Professional Behaviour)
- that a miscarriage of justice has occurred, is occurring or is likely to occur;
- that the health or safety of any individual has been, is being or is likely to be endangered;
- that the environment has been, is being or is likely to be damaged, or
- that there has been is being or is likely to be, a deliberate covering up of information in respect of any of the above matters.

These behaviours can be perpetrated by an individual or individuals within our organisation, on or off duty.

5.3 How to Make a Report

5.3.1 Open Reporting

Whilst open reporting is encouraged, reports may be made anonymously or confidentially by any member of staff. However, where a report is made anonymously or confidentially this will be respected.

Although a concern can be raised anonymously, GMP encourages individuals to put their name to their allegation whenever possible. If this is not done, it will be much more difficult for us to protect your position or to give feedback (when appropriate) on the outcome of investigations.

If you make an open report you should be aware that you may be required at a later date to give evidence to support a criminal prosecution and or misconduct proceedings where appropriate. Arrangements for supporting you are covered in a Section 5.4.1.

5.3.2 Internal Reporting

There are a number of ways in which you can make internal reports. These are set out below. It is for you to choose which method is the right one for you.

There are conventional internal routes through which you can report your concerns. By using these established routes the Force will be able to consider the issues raised quickly and take appropriate action. You will also receive updates on a regular basis in relation to any investigation.

When you report a concern, GMP will treat the information confidentially and only share with those who need to know to either investigate the matter or look after your welfare. The intention to share the information will be discussed with you prior to sharing.

If you wish to protect your anonymity this should be raised early with the person to whom you are making the report. Your anonymity will be maintained; however there may be occasions when this becomes impossible in order to resolve the matter. If this occurs, the situation will be discussed with you in order to consider how best to proceed. Wherever possible, the Force will try to identify another means of taking forward your concern where anonymity is an issue. If this proves impossible, this will be discussed with you.

Reporting Direct to Line Management

Concerns can be expressed verbally or in written form. This has the advantage of enabling an immediate response, where appropriate, and direct feedback to the individual. It is important that line managers have a clear understanding of their role and responsibilities when presented with this type of information.

Attempts will be made to corroborate any information provided to protect your identity. If this is not possible, any intention to share the information provided will be discussed with you prior to any sharing.

Where the wrongdoing, malpractice or breach of professional standards is believed to involve your line manager, or where, for any reason, you feel it is more appropriate to report it to another manager, this may be done. If there is doubt as to who is an appropriate manager, then report directly to PSB.

Reporting to Professional Standards Branch

Reports can be made directly to staff in PSB. Experienced investigators will ensure that all the relevant information is recorded and you will be supported according to the circumstances. This method of reporting also helps to ensure confidentiality and discretion, and any queries you may have will be answered immediately.

Attempts will be made to corroborate any information provided to protect your identity. If this is not possible, any intention to share the information provided will be discussed with you prior to any sharing.

PSB has both overt and covert investigation capabilities. Either the PSB Investigations Unit or the Anti-Corruption Unit (ACU) will take your report of concern depending on where you feel comfortable reporting to. Contact details are:

PSB:

ACU:

Confidential Telephone Line

There will be occasions when you wish to report concerns about health and safety, wrongdoing, malpractice, dishonesty or breaches of professional standards and you may not wish to speak to someone directly or may wish to remain anonymous, and for that reason the Force has a confidential hotline voicemail service in the Anti-Corruption Unit. The telephone number

This can be used at any time from any external or internal number. The answer phone message will encourage you to leave full details, but will give you the opportunity to remain anonymous should you choose. If you do wish to remain anonymous, then we give you the unreserved guarantee that we will not identify you.

The line can be used for all issues including crime, corruption, serious misconduct and discrimination, as well as less serious matters, which may still require local action.

5.3.3 External Reporting

Options are available to enable you to report concerns safely and openly using internal reporting routes. However, you may feel that it is necessary to consider external options.

GMP does not manage external reporting methods and cannot guarantee anonymity in the event of disclosure by external agents.

The options below should be your first consideration.

The Mayor for Greater Manchester

The Mayor's Office will accept reports of concern if you feel you would rather report to the Mayor. Any concerns in relation to the Chief Constable should be reported to the Mayor's Office either by email: or by telephone: [redacted]. More information is available on the Greater Manchester Combined Authority (GMCA) website.

The Police Federation and Superintendents' Association and Trade Unions

The Force recognises that staff associations and unions play a key role in supporting their members. They are used to dealing with issues in a confidential way and offer independent advice on how to progress a concern and what support is available to the person making the report.

The Independent Office for Police Conduct

You can register concerns directly to the Independent Office for Police Conduct (IOPC) in any circumstances. Concerns can be reported by writing a letter or via the IOPC report line. This process is managed by the IOPC and GMP does not have control of the information or what they do with that information.

The IOPC provide a dedicated phone line and email address for you to report your concerns. This reporting line is aimed at criminal or conduct matters and not for cases that can be dealt with via the Force grievance (Fairness at Work) procedure.

The IOPC cannot investigate a matter referred to them unless it has been formally referred from the Force concerned. You can, therefore, register your concern with the IOPC (IOPC are a 'prescribed person' for the purposes of Public Interest Disclosure Act) but they would need to contact the Force before beginning an investigation.

envelope itself.

There is also a dedicated IOPC report line: (note that this method will reveal an email address as the sender) or telephone:

Crime Stoppers

Crime Stoppers allows you to report concerns to a non-police, confidential hotline. These are then passed to the relevant force's professional standards department for investigation.

Crime Stoppers accepts anonymous referrals and will not ask you for your identity, nor do they trace or record telephone calls. The telephone line is available 24 hours a day, 7 days a week and an operator will answer the call. You can also provide information through this service via an online form.

Telephone: 0800 555 111
Online: www.crimestoppers-uk.org

Crime Stoppers also provides a confidential reporting line for the Force, the Counter Corruption Integrity Line:

Criminal Case Review

The Criminal Case Review Commission (CCRC) is an independent organisation which investigates suspected miscarriages of justice. Its primary role is to investigate where someone is believed to have been wrongly convicted. They will consider reports of concern internally within police forces if this is appropriate.

5.4 How We Will Manage Open Reports

The Force undertakes to respond in a proportionate and appropriate manner, ensuring the person reporting concerns is supported. This support will be on a case by case basis and your requirements will be discussed with you.

5.4.1 Supporting the Person Reporting

Where 'open' reports are received, it is imperative that tangible support is given to you, to prevent isolation or victimisation. Support facilities will be discussed with you and a support plan agreed as required. Development of the support plan will be done by the Investigating Officer, in consultation with you, senior management, staff associations and trade unions if appropriate. All documentation surrounding an 'open' report will carry a protective marking limiting access to those persons who have a legitimate need to see it. Any proposed disclosure will be discussed with you.

The Force values the action of people who report concerns to them 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 harassment and victimisation and initiate robust action where required;
- Provide details of initial support arrangements to the Investigating Officer; and
- Maintain confidentiality - only those who need to know are made aware of the circumstances.

Inclusion Meeting

When an investigation into suspected wrongdoing, malpractice or a breach of professional standards is commenced, as a consequence of you reporting the matter, consideration will be given to convening a meeting between the Investigating Officer and your manager. The purpose of this meeting will be to inform your manager (if appropriate) of the existence of the investigation and determine the appropriate support policies for you. The responsibility for calling a meeting will be that of the Investigating Officer in consultation with you.

Records of the decisions will be kept by the Investigating Officer.

Support from Welfare and Occupational Health Units

This support can be offered throughout the process.

5.4.2 Investigating the Report

GMP is committed to ensuring that the integrity and accuracy of information is fully investigated. In all cases, evidence or other intelligence will be sought at the earliest opportunity. The style of investigation will be discussed and agreed with you. This will always be an important part of the investigation plan.

The responsibility to take whatever immediate action is necessary will be the responsibility of the person receiving the report.

PSB will act as a focal point for reporting. They will:

- Make early contact with you to ensure full understanding of the issue;
- Provide support, guidance and advice at all stages;
- Identify the method to take the issue forward;
- Where a proactive approach is required, conduct covert enquiries;

- Monitor progress of the case from the beginning to end;
- Collate, analyse and disseminate intelligence;
- Ensure compliance with policy;
- Where appropriate, ensure you are kept updated; and
- Where your confidentiality cannot be maintained - by law or if evidence is required - this should be discussed with you to ensure necessary safeguards are in place.

GMP will not be able to inform you of any matters which would infringe any duty of confidentiality owed to others.

Where it is established that reports made in the public interest are not substantiated there will be no blame to you for reporting the allegation. In such cases, our support facilities will continue to be made available to you.

Proven malicious allegations will be considered under the Standards of Professional Behaviour and Discipline Policy.

5.4.3 Consultation and Feedback

When you make a report you will be updated every 28 days, and at significant points in the investigation, by the Investigating Officer on the progress of the investigation. As your needs may change as the investigation progresses, regular reviews should be conducted.

You should be consulted in the following circumstances:

- To discuss any issues with confidentiality;
- To understand the risk around anyone in Force whose knowledge of the allegation or your report could compromise the investigation;
- Where your identity needs to be revealed in order to progress the investigation, and;
- On the conclusion of the investigation.

5.4.4 Person Reporting Implicated in the Misconduct Reported

If you have been involved in the behaviour you are reporting, and your part in it merits criminal or misconduct proceedings, the fact you have reported concerns about the behaviour of others will not stop any disciplinary action against you.

The level of misconduct by you and the level of behaviour you are reporting may be taken into consideration. However, this will be by exception. Where allegations about you include operational honesty and integrity on your part, or involvement in criminal offending, no consideration will be given.

Where you have committed disciplinary matters the following should be considered before progressing with your supporting evidence:

- Is your evidence essential to the case to support a successful prosecution or misconduct enquiry?
- Was your misconduct at the lower level of the scale?
- Have you been honest and provided assistance to the investigation?
- When did you raise the concern? Was it before any action was taken or when confronted with the prospect of an investigation?

We will consider giving limited or defined amnesty from misconduct investigation to staff able to give evidence of criminal activity and serious misconduct. Such cases will be considered on an individual basis after reference to the DCC. In furtherance of those arrangements,

facilities provided in the criminal courts will be considered in suitable cases involving staff who fall within this policy and procedure.

5.5 Anonymous Report

Where you make an anonymous report, the Force will not attempt to trace or identify you.

Where the Force is unable to corroborate an anonymous report, there may be little that can be done to investigate. Any report will, however, be recorded as intelligence and will be available to act as corroboration if a second intelligence strand is received.

7. Statutory Compliance & Consultation

7.1 Statutory Compliance

7.1.1 Equality Act (2010)

In the application of this policy and 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 policy and procedure has been written to protect individuals who make disclosures of wrong doing of others within the organisation.

This document has been considered in the context of the General Equality Duty. The requirement for integrity in individuals employed by GMP applies equally to all staff, whether or not they share protected characteristics.

Monitoring information will be collected under this policy and procedure. We recognise there is potential for disproportionality particularly in relation to ethnicity. To mitigate this, the DCC, in their review of any panel decision, will consider the requirements of the Equality Act 2010.

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

GMP has a duty to ensure, so far as is possible, that all staff comply with the provisions of the GDPR and 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 has 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 has 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

Department	Comments
Police Federation	Presented to the Police Federation three times, no changes requested.
Police Superintendents Association	Satisfied with the revised document, no changes requested.
Unison	Changes to format and wording
Police Support networks	No changes requested
Human Resources	Minor changes
Legal Services	Changes proposed to content agreed prior to circulation
Professional Standards Branch	Owner

8. Appendices

None

GREATER MANCHESTER POLICE

Workforce Equality

Policy

Version 9

September 2026

DATE THIS VERSION OF THE POLICY IMPLEMENTED: 2026

DATE NEXT REVIEW IS DUE: 2028

POLICY & PROCEDURE OWNER: [redacted]

APPROVED BY: [redacted]

GOVERNMENT SECURITY CLASSIFICATION: Official

IS THE POLICY & PROCEDURE NEW OR REVISED: Revised

VERSION NO	DATE	SUMMARY OF CHANGES	AUTHOR(S)	PUBLISHED ON CCOs
Version 1	14.3.08	Equality in Employment Policy	[redacted]	
Version 2	20.7.12	Rewritten in Plain English using the new Force template. Management guidance removed and separate Management Toolkits created. All elements of diversity brought together in this policy. This policy replaces the Equality in Employment Policy, Employment of People with Disabilities Policy, Gender Reassignment Policy Statement and Religion at Work Policy Statement, all of which will be withdrawn on publication of version 2. All key rights and principles previously agreed remain.	Policy and People Relations, HR Branch	
Version 3	25.4.13	Removed reference to First Contact Advisor following the withdrawal of the scheme.	Policy and People Relations, HR Branch	
Version 4	19.1.14	Roles and Responsibilities for Staff and Conduct section amended to embed the Code of Ethics	Policy and People Relations, HR Branch	
Version 5	March 2017	Updated in line with GMSS	Policy & People Relations Unit	
Version 6	October 2018	Replace reference to Grievance Policy with Fairness at Work Policy	Policy and People Relations Unit	
Version 7	October 2018	Amended to reflect implementation of the GDPR	Policy and People Relations Team	
Version 8	23 Feb 2021	Updated due to HR Branch review	Strategic Policy and People Relations	
Version 9	Sept 2026	Updated as part of review of all HR equality policies and toolkits. Name changed to Workforce Equality Policy.	Strategic Policy and People Relations, People Branch	

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1. Policy Statement

Greater Manchester Police (GMP) is committed to providing equality of opportunity in employment. In line with our legal responsibilities, we will treat staff and applicants professionally, fairly and consistently. We will not tolerate discrimination in any form and we will actively work to make sure our organisational culture encourages, supports and develops all staff to reach their potential.

We are committed to promoting the three aims of the Public Sector Equality Duty, as set out in the Equality Act 2010. Namely, to have due regard to the need to eliminate unlawful discrimination, to advance equality of opportunity and to foster good relations.

We are also committed to making sure that no group or person receives less favourable treatment because of their differences or their 'protected characteristics'. The protected characteristics are defined in the Equality Act 2010 as:

- age
- disability
- gender reassignment
- marriage and civil partnership
- pregnancy and maternity
- race
- religion or belief
- sex
- sexual orientation

We are committed to being inclusive, open and fair. We will aim to make available the same opportunities, facilities, career prospects and training to all staff.

It should be noted that there is no hierarchy of equality or protected characteristics. No equality strand takes precedence over another when dealing with issues that involve different equality characteristics.

1.1 Aims

The aims of this policy are to:

- promote a positive working environment where all staff are treated with dignity and respect;
- set out our commitment to equality in all areas of employment; and
- explain which policies you can use if you consider there has been a breach of this policy

2. Scope

This policy applies to all aspects of employment for example; recruitment and selection, promotion, one to ones and Professional Development Reviews, training, terms and conditions of employment, grievance, disciplinary procedures, dismissals, resignations and redundancy.

The principles set out in this policy apply in the workplace and in some circumstances outside the workplace in a work-related context, such as when you are on a business trip or at a work-related social event.

This policy applies to all police staff and police officers (this includes learners or apprentices), Special Constabulary officers and volunteers, (including police cadets).

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

3. Terms and Definitions

Protected characteristics
There are nine protected characteristics defined by the Equality Act (2010): age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion and belief, sex and sexual orientation. These are the grounds upon which discrimination is unlawful.

Age
Refers to people of a particular age or those within a range of ages.

Age equality does not necessarily mean identical treatment. Unlike other 'protected characteristics', differential treatment of age groups is allowed where it can be shown that there is a reason for the treatment and the reason is proportionate and not discriminatory.

Disability
Equality legislation defines a disability as a physical or mental impairment, which has a substantial and long-term adverse effect on their ability to carry out normal day-to-day activities, therefore affecting their 'ability to participate fully and effectively in working life on an equal basis with other workers'. Long term means that the condition has lasted or is likely to last for at least 12 months.

Gender reassignment or transition
A person who is proposing to undergo, is undergoing, or has undergone a process (or part of a process) to change their gender. Medical treatment is not required in order to be protected.

Marriage and civil partnership
Marriage describes two people who agree to a formal union to recognise their relationship by law. Civil partnership is a legally recognised union with rights similar to those of marriage, created originally for same-sex couples where they were not legally allowed to marry but open to heterosexual couples too since 2019. Civil partners are treated the same as married couples on all legal matters.

Pregnancy and maternity
This covers both pregnancy (which includes pregnancy-related illness and pregnancy loss) and staff on maternity leave, or who have the right to take maternity leave.

Race
Race refers to a group of people defined by their colour, nationality (including citizenship), ethnic or national origins.

Religion and belief
Religion means that you belong to an organised religion such as Christianity, Sikhism, or Islam. There is no list of “agreed” religions however the religion must have a clear structure and belief system.

Belief means any religious or philosophical belief that is genuinely held and is more than an opinion or viewpoint. The belief must relate to a weighty and substantial aspect of human life and behaviour and be one that is worthy of respect in a democratic society. It must not be incompatible with human dignity and not in conflict with the fundamental rights of others. Again, there is no list of “agreed” beliefs.

A lack of religion and belief is covered by equality legislation.

Sex
Refers to whether a person is male or female.

For women, protection due to sex extends to pregnancy, maternity and breastfeeding.

Sexual orientation
Refers to whether a person’s sexual preference is towards people:

- of the opposite sex (heterosexual or straight)
- of their own sex (homosexual or a gay man or lesbian /gay woman)
- or either sex (bisexual or ‘bi’).

Carer
A carer is someone, who without payment provides help and support to a partner, child, relative, friend or neighbour, who could not manage without their help. This could be due to age, physical or mental illness, addiction or disability.

A carer is protected from discrimination or harassment because of their caring responsibilities. This is because carers are counted as being associated with someone who is already protected by the law because of their age or disability.

4. Roles & Responsibilities

Responsibility of People Branch

The Head of People Policy, Reward & Change is responsible for developing a Workforce Equality Policy which supports equality of opportunity and is consistent with our values.

People Branch staff will advise managers on the processes to be followed and support managers to comply with our duties under equality legislation. People Branch staff will consider GMP's Public Sector Equality Duties when advising managers, creating policy or managing change.

Responsibility of Managers

Managers must: -

- not discriminate against staff, applicants, visitors or former staff as outlined in the conduct section of this policy.
- treat staff fairly, and with respect and consideration.
- ensure the working environment is free from discrimination.
- respect and maintain confidentiality as appropriate.
- seek HR advice from their local People Hub when dealing with cases.
- complete any mandatory training on the Equality Act and ensure that all staff do so too.

Responsibility of Staff

All staff have a personal responsibility for the practical application of this policy. You must: -

- uphold the law regarding human rights and equality;
- treat all colleagues, staff, applicants, visitors or former staff fairly and with respect;
- treat all colleagues, staff, applicants, visitors or former staff impartially;
- not discriminate against others as outlined in the conduct section of this policy; and
- take appropriate action in accordance with the Code of Ethics and Professional Standards of Behaviour, if, in the course of your duties you witness discrimination, harassment or victimisation of a colleague due to their protected

characteristic. You can either challenge the behaviour, or report it - to a line manager, the local Standards Manager, or anonymously via the [redacted]

If you are new to GMP, make sure you complete the mandatory training on the Equality Act 2010 as part of the induction process.

Speak to your manager if you have any questions about equality.

GMP as an employer has responsibilities and duties under the Equality Act and these apply to everyone in the organisation. It is your duty to become familiar with your responsibilities under this policy and the Equality Act.

5. Principles

5.1 Conduct

You should act with fairness and impartiality and not discriminate against anybody because of their protected characteristics. Discrimination may take the following forms and is not permitted in GMP:

Direct discrimination means treating someone less favourably because of their protected characteristic.

Discrimination by perception
This includes treating someone less favourably because you mistakenly believe that they have a protected characteristic.

Associative discrimination
An individual can be discriminated against because they are associated with another person who has a protected characteristic. Less favourable treatment because of this is known as ‘associative discrimination’.

Indirect discrimination means treating people in the same way but in a way which adversely affects those with a protected characteristic.

If the possibility of indirect discrimination relating to a provision, criterion or practice is identified for one protected group, it is important to also check whether any employees without the relevant protected characteristic could be similarly disadvantaged.

Discrimination arising from disability means discriminating because of something that results from a disability, not because of the disability itself.

For this type of discrimination, the law applies if someone is treated 'unfavourably' or put at a disadvantage. It does not need a comparison with how other people are treated. It does not apply if the person or organisation treating the person unfavourably did not know, and could not reasonably have known, about the disability.

Sometimes there can be 'objective justification' for discrimination arising from disability. This is where an employer has a genuine need to make a decision that leads to lawful discrimination, for example, for legitimate operational reasons or requirements.

Failure to make reasonable adjustments is a type of discrimination. It can happen when an employer does not make reasonable adjustments for someone who needs them. Adjustments are changes an employer makes to remove or reduce a disadvantage related to someone's disability. Employers must make reasonable adjustments by law. What is reasonable depends on each situation.

Harassment is unwanted conduct related to a relevant protected characteristic, which has the purpose or effect of violating an individual’s dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for that individual. Harassment may also be of a sexual nature. More information is available in the [redacted]

Victimisation means to treat someone less favourably because they have asserted their right not to be discriminated against.

Appropriate Language

The language you use should not:

- discriminate;
- cause offence or make colleagues feel uncomfortable;
- exclude colleagues;
- display prejudice or
- reinforce stereotypes.

If you are unsure if a particular word is acceptable then you should use an alternative word that you know is acceptable.

You should be mindful of the impact of your language on others.

If you hear language that you find unacceptable, we encourage you to:

- discuss the matter with the individual; and
- explain why you feel the language is unacceptable

Alternatively, discuss concerns with your manager or with those listed in the 'Support and advice' section of this policy.

Making a complaint about policy breaches

We take complaints about discriminatory language, unlawful discrimination, bullying, harassment and victimisation very seriously.

There are a number of ways you can make a complaint: -

- You can tell your manager, as soon as possible, if you have any issues or concerns regarding breaches to this policy (or any other policy). They can speak to the local Standards Manager who will consider whether a referral should be made to the Professional Standards Directorate. If you feel you cannot speak to your immediate line manager, please speak to their line manager.
- You can also submit a complaint using the Grievance Policy. However, it is important to note that some complaints are not appropriate for informal resolution. If you have been subject to unlawful victimisation or harassment due to a protected characteristic, then this is not suitable for informal resolution and should be reported to the Professional Standards Directorate.
- [redacted]

Disciplinary action

Anyone who breaches this policy or the Bullying and Harassment Policy may be subject to misconduct or disciplinary procedures which could result in dismissal. Serious breaches of this policy and serious incidents of bullying and harassment may be treated as gross misconduct. Unwarranted allegations that are not made in good faith may also be considered as a disciplinary matter.

Differing views

Staff may have their own personal views about protected characteristics such as sex and gender, or religion. All religions and beliefs are protected under the Equality Act, as long as they meet the definition above.

Staff are entitled to hold an opinion, based on their religion and/or belief but must not express it at work, or when connected with work, in a way that amounts to unacceptable behaviour or harassment.

5.2 Support and advice

The paragraph above "Making a complaint about policy breaches" details how you can address any concerns you may have about breaches to this policy. You may also wish to contact the following for further advice, guidance or support:

- Greater Manchester Shared Services (GMSS) for HR advice;
- your local People Hub;
- your trade union, i.e. UNISON or GMB;
- The Police Federation; or
- The Superintendents' Association,

who can advise you about the options that are available to you.

You could also seek support from one of GMP's staff support networks. Staff support networks are independent groups set up by GMP staff, for GMP staff. They are run by volunteers and are designed to provide platforms for employees to connect, share experiences and support one another. The networks are formed around shared interests, experiences, or common backgrounds and aim to foster a sense of community within the organisation. We recognise the following Staff Support Networks:

- Association for Women in Policing (AWP)
- Black and Asian Police Association (BAPA)
- Catholic Police Guild (CPG)
- Christian Police Association (CPA)
- d/Deaf and Hard of Hearing Association
- Disability Support Network (DSN)
- Jewish Police Association (JPA)
- Muslim Police Association (MPA)
- Pride – LGBT Staff Support Network
- Sikh Police Association (SPA)

Mediation

Mediation is a voluntary, confidential, structured meeting between two parties in conflict or a group in conflict. The meeting is led by a trained mediator and is an opportunity to discuss issues affecting working relationships openly.

You can use the GMP Mediation Academy as a way to resolve conflict or rebuild damaged working relationships. Mediation enables you to directly address issues with a colleague or colleagues and helps you to agree the best way forward to resolve the problem. For further guidance on mediation please contact the Policy and People Relations Team [redacted]

It is important to note that some situations are not appropriate for mediation. If a member of staff has been subject to unlawful victimisation or harassment due to a protected characteristic, then this is not suitable for mediation and should be reported to the Professional Standards Directorate.

6. Procedures

6.1 Related HR Equality Policies and Toolkits

Disability and reasonable adjustments

We are committed to supporting staff with disabilities to start work and stay in work. We will work with you to understand the impact your impairment has on you and any barriers you may face and will consider adjustments which remove or reduce any disadvantage related to your disability. We will then make any reasonable adjustments in line with the legal duty under the Equality Act.

[redacted]

Gender re-assignment, trans and non-binary status

We are committed to ensuring that transgender and non-binary staff are treated with dignity and respect and are not disadvantaged in the workplace. We welcome and support transgender and non-binary staff so that they feel that they belong at GMP.

The Gender Recognition Act (2004) prohibits disclosure of the fact that someone has applied for a Gender Recognition Certificate or disclosure of someone's gender prior to the acquisition of the Gender Recognition Certificate. Disclosure of information may constitute a criminal offence. Unlawful disclosure applies to direct word of mouth as well as to uncontrolled access to paper or computer files.

Please refer to the [redacted] for further information.

Religion and belief

GMP is committed to a diverse and inclusive working environment, where we support staff of all religions and beliefs, and also staff who do not follow a religion and/or belief. We also acknowledge that there is diversity within religions and that individuals may choose to observe their particular religion and/or belief in different ways.

We will carefully consider all requests for time off and/or changes to working patterns during religious festivals or for religious observance. Additionally,

constables and sergeants can apply to substitute a statutory public holiday for an alternative date, this could be used for example to take leave for religious festivals more appropriate to the officer, although 25th December cannot be substituted in this way.

Please see the Religion and Belief Management Toolkit and the Police Officer Nomination of Public Holidays Policy for more information.

We support staff observing their faith at work through their dress, but we have a responsibility to always consider health and safety implications. Wherever possible we will consider and support requests to vary the uniform standards for a reason relating to your religion and/or faith.

Please see the Diversity in Dress section of Uniform Policy and Dress Standards Policy.

Pregnancy, maternity and fertility treatment

We have separate policies and procedures which cover maternity leave and pregnancy loss, neonatal care leave and a Fertility Treatment Management Toolkit. These are available on People Pages.

Sex discrimination and maternity discrimination provisions may apply in relation to a woman undergoing fertility treatment, depending on the stage of the treatment.

6.2 Equality impact on other aspects of employment

Grievance

Complaints can be made through the Grievance Policy. If you bring a grievance in good faith (or assist a colleague to do so) under this policy or another, you will not suffer any adverse treatment for exercising your right. If your protected characteristic makes it difficult for you attend grievance meetings or participate in the process, we will consider making adjustments to enable you to raise your complaint. Please tell your grievance/appeal manager if you have any issues and where possible they will be flexible.

Terms of employment, pay and benefits

Terms and conditions of employment including pay and benefits are determined without reference to your protected characteristic(s). When considering terms and conditions of employment we will ensure that no staff are discriminated against, either directly or indirectly.

Flexible working & working hours

We will make decisions about working hours, flexible working, hybrid working and time off on a case-by-case basis. We will consider the reasons for your application and the impact that granting your request would have on our core business. We will

not refuse a request for flexible working because of your protected characteristic(s). Please see the Flexible Working Policy and Hybrid Working Policy for more information.

Recruitment and promotion

We will make recruitment and promotion decisions based on the candidate who is most qualified and suitable for the job. This means we will select the person based on whether they have the skills, experience, qualifications and knowledge determined by the job description and the person specification.

If you apply for a police staff role, you will be guaranteed an interview if you have declared a disability and your application shows that you meet the essential requirements of the person specification. GMP is proud to be a Disability Confident employer.

Redundancy – Police Staff Only

We will not select staff for redundancy based on their protected characteristic(s). If we have to select staff for redundancy we will ensure we have a number of separate criteria to reduce the risk of a discriminatory impact. Please see the Redundancy Policy and/or Redeployment Procedure for more information.

Retirement

We have separate policies and procedures which cover retirement for both police officers and police staff.

We will not make any assumptions about your retirement plans because of your age. You can discuss any retirement plans with your manager; this is not usually something your line manager will raise with you. We will continue to invest in your development irrespective of your age. You can discuss training needs with your manager during monthly one-to-one meetings or in your Professional Development Review.

Training and development

Irrespective of your protected characteristic, everyone will have the same access to training and development opportunities. We will consider any requests for reasonable adjustments to enable you to attend a training course on a case-by-case basis.

6.3 Workforce data

We will monitor workforce data on protected characteristics to assess whether the makeup of the workforce reflects the communities of Greater Manchester that we serve. We set objectives to ensure that we work towards being more representative. Monitoring is a way of us checking that staff with protected characteristics are being treated equally. Following monitoring, we may consider if additional steps to improve

representation are appropriate. Any data will be processed in line with the Data Protection Act (2018) & GDPR.

We encourage all staff to share information with us regarding any protected characteristics they have.



Legislation:

- Data Protection Act 2018
- GDPR
- Equality Act 2010
- Gender Recognition Act 2004

8. Statutory Compliance & Consultation

8.1 Freedom of Information Act (2000), Data Protection Act (2018) & GDPR

The policy and is compliant with the Acts and can be published immediately on request.

8.2 Equality Act 2010

This policy is written with the intention of having a positive effect on equality and is compliant with the Equality 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.

[redacted].

8.3 [redacted]

[redacted]	[redacted]
[redacted]	[redacted]
[redacted]	[redacted]
[redacted]	[redacted]
[redacted]	[redacted]