



Date: 11/09/2026
Our ref: 01/FOI/26/017147/N

FREEDOM OF INFORMATION REQUEST REFERENCE NO: 01/FOI/26/017147/N

I write in connection with your request for information dated 29/06/2026, received by Greater Manchester Police (GMP) for the following information:

I request the following information:

- 1. The current vulnerability assessment framework used by GMP including any scoring matrix, decision tree, or classification system used in conjunction with it, including any version of the THRIVE model or derivative framework currently in use.*
- 2. All training materials provided to officers on the application of the vulnerability assessment framework, including any materials addressing the distinction between genuine clinical vulnerability and subjective emotional responses to professional interactions.*
- 3. Any audit, review, or evaluation of the framework's effectiveness, accuracy, or consistency of application conducted in the last five years.*
- 4. Any HMICFRS, College of Policing, or Home Office guidance on vulnerability assessment that GMP has adopted or adapted in developing its current framework.*
- 5. Any equality impact assessment conducted on the vulnerability assessment framework to assess whether it produces differential outcomes for complainants or subjects of complaints from different racial or religious backgrounds.*
- 6. Any records of HMICFRS findings or recommendations regarding GMP's vulnerability assessment practices in the last five years.*

I note that GMP may seek to apply the Section 31 law enforcement exemption to some of this information. I put GMP on notice that the public interest in transparency about how a police force makes vulnerability determinations affecting thousands of residents - particularly in connection with employment and welfare decisions about its own officers - will in most cases outweigh any prejudice argument, and that any refusal to disclose must be accompanied by a specific and justifiable public interest balancing exercise.

Result of Searches

Following receipt of your request searches were conducted within Greater Manchester Police to locate information relevant to your request. I can confirm that the information you have requested is held by Greater Manchester Police. However, I am not obliged to supply all 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.

The information requested in questions 4 and 6 is exempt under **Section 21 – Information accessible to applicant by other means**. All records for HMICFRS reports and findings relating to GMP can be found on their publications website, which can be found here: [Greater Manchester Archives - His Majesty's Inspectorate of Constabulary and Fire & Rescue Services](#)

Where redactions occur in the attached Equality Impact Assessment Documents, provide in response to question 5, this is because that information is exempt from disclosure by virtue of **Section 40(2) – Personal Information**.

Section 40(2) represents information that identifies a living individual, to disclose this information would breach the principles of 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.

Both Section 21 and Section 40 are absolute exemptions and there is no requirement to conduct a public interest test for such data.

The remainder of your request is not exempt, and can be answered as follows:

1. Vulnerability is assessed in GMP using the [THRIVE model](#). How GMP apply the thrive model can be found in the attached document.
2. Training provided to officers on the application of the [Vulnerability Assessment Framework \(VAF\)](#) consists of both the dedicated VAF handout and supporting lesson materials relating to vulnerability, communication skills, victim care, safeguarding, forced marriage, female genital mutilation (FGM), and custody and detention. The VAF is taught as a structured approach to assessing vulnerability and risk through consideration of five domains: **Appearance, Behaviour, Communication, Danger and Environment (ABCDE)**. Officers are instructed to consider observable indicators such as physical presentation, emotional state, behaviour, communication style, immediate risks of harm, and environmental factors when assessing vulnerability. The framework is intended to support professional judgement and information gathering rather than replace it.

The College of Policing guidance accompanying the VAF explains that vulnerability assessments should follow a four-stage process: identifying an individual's vulnerabilities, understanding how those vulnerabilities interact with their circumstances to create risk of harm, assessing the level of harm or risk, and taking appropriate safeguarding or investigative action. The guidance adopts the THRIVE

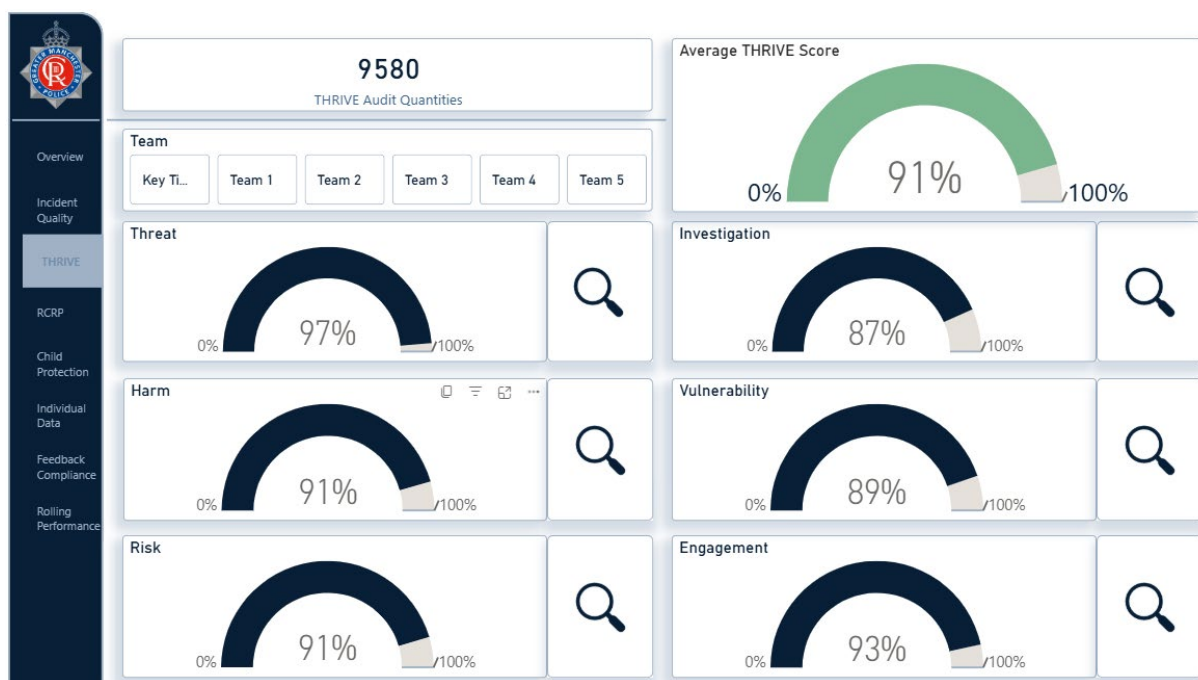
definition of vulnerability and teaches officers that vulnerability may arise from circumstances including mental ill health, physical illness, disability, learning difficulties, reduced mental capacity, neurodivergence, trauma, coercion, exploitation, abuse, homelessness, substance misuse, age-related factors and safeguarding concerns. The training also emphasises the need for continual reassessment of vulnerability and risk during police interactions.

The supporting lesson materials reinforce these principles. Communication Skills training teaches officers how vulnerability may affect a person's communication, behaviour and interaction with authority figures, including the impact of trauma, distress, neurodiversity, cultural factors and communication barriers. Officers are trained in active listening, empathy, procedural justice, de-escalation, rapport building and minimising unconscious bias when assessing individuals and gathering information. Victims and Witnesses, Forced Marriage and Female Genital Mutilation lessons further develop officers' understanding of trauma, coercion, fear of disclosure, safeguarding responsibilities, the impact of abuse and the importance of recognising behavioural indicators of vulnerability. Custody and Detention training addresses the identification and management of vulnerable detainees, including those with mental health difficulties, learning disabilities, substance misuse issues, self-harm risks, medical vulnerabilities and children in custody.

In relation to any distinction between genuine clinical vulnerability and subjective emotional responses to professional interactions, no specific training material, framework, policy document or lesson within the materials reviewed expressly uses those terms or provides a formal methodology for distinguishing between them. The training instead promotes a holistic assessment based on observable indicators, information gathering, professional curiosity and safeguarding principles. Officers are taught not to rely on assumptions, demeanour alone or subjective impressions when assessing vulnerability. The guidance specifically highlights the importance of recognising that trauma may affect emotional presentation, behaviour, communication and memory, and warns against allowing unconscious bias, preconceptions or judgement to influence assessments. Officers are encouraged to explore concerns through communication, evidence gathering and professional judgement, considering both clinical and situational factors when assessing risk and vulnerability.

Accordingly, the training materials provided to officers on the application of the Vulnerability Assessment Framework comprise the VAF handout, the College of Policing guidance [Recognising and Responding to Vulnerability-Related Risks](#), and associated training lessons covering communication, safeguarding, victim care, public protection and custody. These materials teach officers how to identify, assess and respond to vulnerability using structured assessment, professional judgement, communication skills, procedural justice and professional curiosity. No separate training material was identified that explicitly distinguishes between "genuine clinical vulnerability" and "subjective emotional responses to professional interactions"; rather, officers are taught to assess all presentations of potential vulnerability through objective observation, information gathering, risk assessment and safeguarding considerations.

3. Below is the THRIVE quality compliance percentages dashboard. Qualitative audits have also been conducted, but this information has not previously been collated to offer any overall assessment of efficacy. We are not required to do this sort of analysis to respond to an FOI request.



4. Exempt under S21, see above.
5. Please see the attached document. Redactions are made under S40, see above.
6. Exempt under S21, see above.

8. Appendices

8.1 Appendix A - THRIVE on a page

District Re-THRIVE Tool - HYPERLINK <http://hqttsharedas04:8080/CIA/DispatchReThriveTool.html>

Dispatch Thrive Tool – HYPERLINK <http://hqttsharedas04:8080/CIA/DispatchThriveTool.html>

THRIVE on a page

This guidance seeks to describe the layout of a THRIVE risk assessment and THRIVE summary. The guidance will explain the “touchpoints” at which a THRIVE risk assessment or THRIVE summary must be appended to an incident, which of the two must be used, and who must complete this. “THINK VICTIM”. Good quality risk assessment drives meaningful action that puts the victim at the heart of what we do.

THRIVE Summary layout

THRIVE 'RISK LEVEL' (LOW / MEDIUM / HIGH)

Rationale for risk level and safeguarding - You need to write a rationale for the risk level based on the possibility or likelihood of something occurring. You should manage and review the expected or forecasted levels of harm to individuals, the public, offenders or property. You should consider a full range of historical, current, potential and foreseeable factors in determining levels of risk. You should also record your safeguarding considerations and what advice you have given the victim, as the better quality safeguarding advice given, the risk may reduce.

Vulnerability - A person is vulnerable if, as a result of their situation or circumstances, they are unable to take care of or protect themselves or others from harm or exploitation. It is vital our staff identify whether our victims, informants or suspects are vulnerable and can explain why they are or why they are not vulnerable.

Touchpoint 1: At Inception

Anyone creating an incident must append a THRIVE risk assessment.

Touchpoint 2: At Regrade

Anyone requesting a regrade (to & from any grade) must append a THRIVE risk assessment.

Touchpoint 3: At Escalation

Dispatch must append a THRIVE risk assessment as per the Incident Escalation Policy and Procedure. If Dispatch supervisors disagree with any of the THRIVE they must append a new THRIVE with their amendments.

Touchpoint 4: At Change in Circumstances

If circumstances change and risk or vulnerability alters but a regrade is not required, a further THRIVE risk assessment will be required.

Touchpoint 5: Closure

Where a practitioner resolves the incident and there will be no further risk management e.g. through a crime event or neighbourhood problem solving, a THRIVE risk assessment is required. Finalising incidents must be completed by supervisors.

THRIVE Risk Assessment

T-Threat – Source of harm / how harm is indicated / circumstances

H-Harm – If situation deteriorates what harm will be caused?

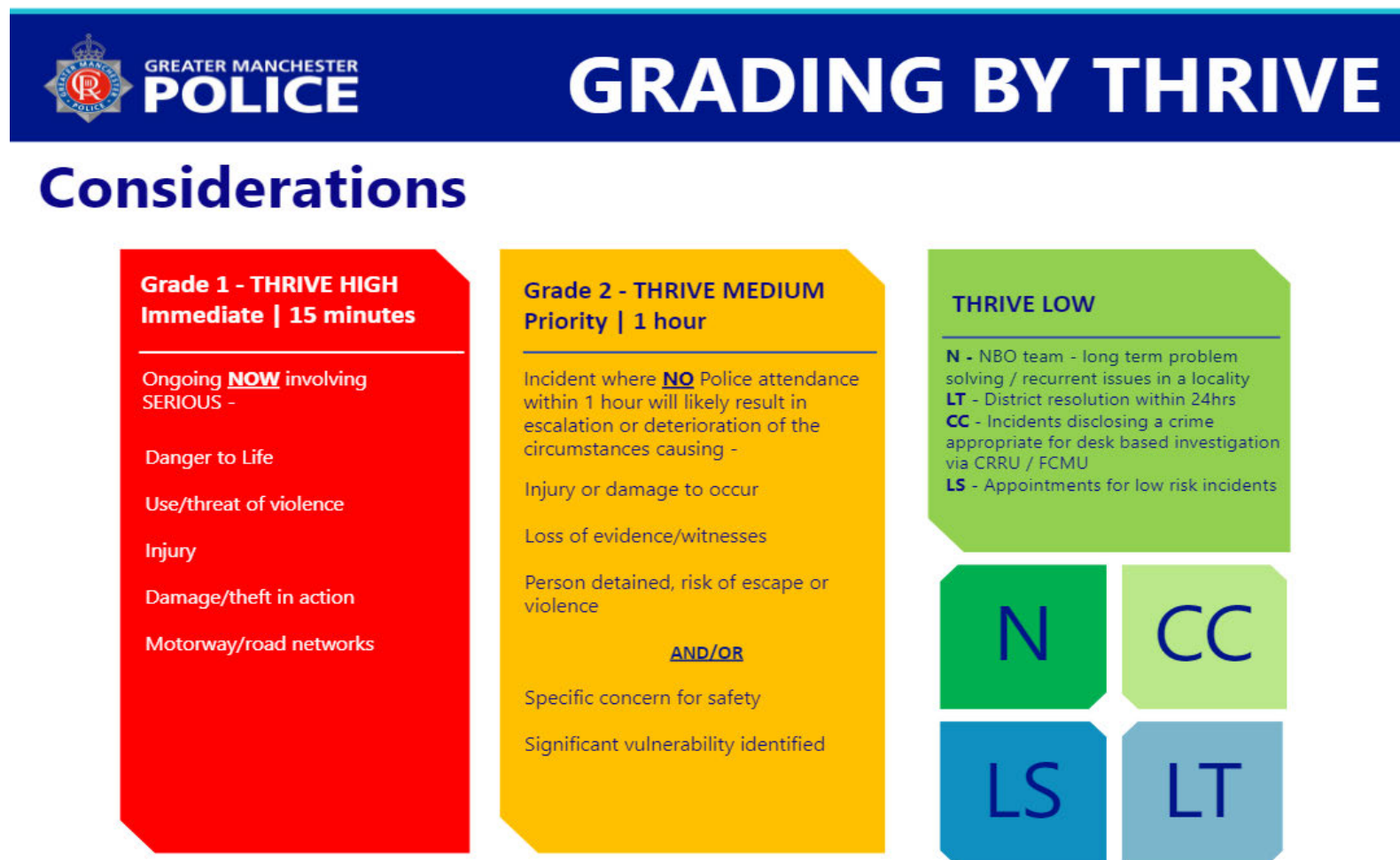
R-Risk – Low, med or high and rationale including safeguarding.

I-Investigation – Grading, evidence retention advice, allocation?

V-Vulnerability – Consider victim or anyone else? Why / why not vul?

E- Engage – NWS / Fire / Other forces (BTP) / GMMHTAS? (CRS) etc.

8.2 Appendix B - Grading by THRIVE Considerations



PLEASE FOLLOW MINIMUM STANDARDS AT ALL TIMES

Equality Impact Assessment

Incident Response Policy & Procedure

**Greater Manchester Police
2026**

Equality Impact Assessment (EIA) for Strategies, Policies and Procedures

Before completing this form, you may find it useful to refer to the College of Policing guidance on Equality Impact Assessments. This can be found [here](#) and [here](#).

The aim of an equality impact assessment (EIA) (or an updated EIA) is to enable the consideration of the equality implications of your strategy, policy or procedure on those groups detailed below, to consider if there are ways to proactively advance equality and consider how adverse risks could be eliminated. The EIA must be completed regardless of whether the policy may appear neutral in its effect.

1. EIA Version Control			
Version no.	Date	Author	Comments
1			Revised

2. Policy Details	
Name of the strategy, policy or procedure being assessed, and a brief overview of its aims and objectives	Incident Response Policy and Procedure
Is it new or existing?	Existing
Policy owner (role, branch/district)	, Force Contact, Crime and Operations
EIA carried out by (role, branch/district)	Branch Head(s), FCCO / Response Policing Lead
Date of completion	11/12/25

3. Evidence Gathering and Engagement
a. What evidence has been used for this assessment? For example, national statistics, demographic data, research statistics Force wide engagement relating to the proposal of a dedicated Neighbourhood incident queue which has now been accepted incorporated into the IR policy. Improves public trust and confidence in policing and transparency for audit purposes. HMRCFRS – value for money dashboards / MSG comparisons National statistics – call handling targets, attendance time targets IOPC case studies – missed safeguarding opportunities IOPC case studies – Mental Health & Policing

b. Who have you **engaged and consulted with** as part of your assessment? For example, community groups, Independent Advisory Groups, staff associations/networks.

Engaged or consulted with: Unison, GMB, Superintendent's Association, Police Federation, Disability Support Network (DSN), National Christian Police Association, GMP Pride Network, d/Deaf and Hard of Hearing Support Group, Association of Women in Policing (AWP), Black & Asian Police Association (BAPA), Catholic Police Guild, Jewish Police Association (JPA), Muslim Police Association (MPA), Sikh Police Association, HR Branch, Corporate Comms, IT, FCIR (Corp Development), Health & Safety Manager, Organisational Learning Hub, Professional Standards Directorate. For Data Protection/Freedom of Information review.

4. Impact on different groups of the public and/or officers and staff

Specific groups to consider ¹	Potential impact on this group and actions taken to mitigate impact and advance equality, diversity, and inclusion
Age People of different ages	Research indicates that younger people are statistically less likely to contact the police compared to adults. However, the updated policy is designed to apply equally to all age groups and does not create barriers based on age. Impact: No adverse impact identified. The policy ensures fair and consistent application regardless of age.
Disability Disabled people, including those with mental health issues.	Greater Manchester Police acknowledges that some individuals with disabilities, including those with mental health conditions, may experience challenges in communicating the details of an incident to call handlers. Any potential impact is minimised through mitigation measures. FCCO staff receive comprehensive training on accessibility issues, including mental health awareness, and apply the principles of the Right Care Right Person (RCRP) policy when considering the most appropriate response for individuals with mental health needs. The policy also ensures multiple accessible reporting routes are available, including online forms, live chat, text messaging, telephone, and in-person reporting, to promote inclusivity for all users. GMP operates the Visual Impairment Protocol (VIP) , which helps safeguard visually impaired members of the community who need to confirm if a person at their door is a police officer. While most people can rely on an officer's uniform or collar number, blind and visually impaired individuals often cannot. The VIP allows them to call the non-emergency line to confirm that an officer has been deployed to their address, ensuring reassurance and safety.
Gender reassignment Trans and non-binary people	The updated incident response policy does not disproportionately disadvantage any specific group, including trans and non-binary individuals. While the policy does not make specific reference to this group, it has been considered, and no adverse impact has been identified.

¹ All of the terms in bold is the terminology used in the [Equality Act 2010](#).

Marriage and civil partnership A person has the protected characteristic of marriage and civil partnership if the person is married or is a civil partner.	The updated incident response policy does not disproportionately disadvantage any member of the public who is married or in a civil partnership. All members of the public, as well as any police officer or police staff involved in contact, will be treated with compassion and respect throughout the process.
Pregnancy and maternity	Greater Manchester Police acknowledges that any pregnant person contacting the service may have specific welfare requirements. This consideration is highlighted within the College of Policing Authorised Professional Practice (APP), which Greater Manchester Police complies with in the management of incidents.
Race People from minority ethnic backgrounds and communities	This policy does not disproportionately disadvantage any member of the public from minority ethnic backgrounds or communities. Greater Manchester is home to a diverse population, and we recognise that there may be instances where a person does not speak English as their first language. To ensure fair and effective policing, GMP is committed to making services accessible to everyone, regardless of language or communication needs. Telephone interpretation services, including options for remote video and face-to-face interpretation, are available to support professionalism, impartiality, and cultural sensitivity.
Religion or belief People with different religions and/or beliefs	Greater Manchester Police ensures that the updated incident response policy does not disproportionately disadvantage any member of the public on the basis of their religion or beliefs.
Sex Both men and women	Women's Aid highlighted that women's confidence in the police is "at an all-time low," with many avoiding reporting abuse due to fears about how they will be treated and concerns about victim-blaming. The Baird Inquiry findings further show that some women felt degraded or retraumatised by their interactions with GMP, reinforcing this lack of trust. Greater Manchester Police ensures that the policy does not disproportionately disadvantage any specific group, regardless of gender.
Sexual orientation LGBTQ+ people	We know from surveys those who identify with the LGBTQ+ community have the lowest levels of trust and confidence in the police and we are working hard to build those relationships and change this. Greater Manchester Police ensures that the updated incident response policy does not disproportionately disadvantage any member of the public, including LGBTQ+ individuals. All callers will be treated with compassion, respect, and fairness throughout their interaction with the service.

Other groups Not defined as protected characteristics, but who may be impacted by your policy (e.g., travelling/gypsy community, ex-armed forces, people from lower socio-economic backgrounds, carers etc.)	GMP also has dedicated protocols to guide how we interact with and support specific communities. For example, under the <i>Forcer protocol</i> for missing veterans, Safe and Found Online provides an opportunity for professional carers, family members, and friends to complete a form recording vital information about the veteran in case they go missing. This approach reflects GMP's commitment to tailored support and safeguarding for vulnerable individuals.
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5. Action Planning

Complete this section if the EIA has identified additional steps that need to be taken to address adverse outcomes for particular groups (either by way of eliminating or minimising this risk), or to collect additional evidence to inform the EIA.

Issue Identified	Planned Action	Lead and Timeframe

6. Outcome of EIA

An EIA has been undertaken on this policy as part of the requirements under the PSED. The policy will be submitted to Chief Officers on the following basis (please tick one box):

	Approve – no change	Your analysis demonstrates that the policy is robust, and the evidence shows no potential for discrimination and that you have taken all appropriate opportunities to advance equality and foster good relations between groups.
	Amend the policy	This involves taking steps to remove barriers or to better advance equality. It can mean introducing measures to mitigate the potential effect. This should be done before the policy is implemented. Where this cannot happen the action plan must outline how you are going to achieve this
	Continue with the policy	This means adopting your proposals, despite any adverse effect or missed opportunities to advance equality, provided you have satisfied yourself that it does not unlawfully discriminate. In cases where you believe discrimination is not unlawful because it is objectively justified, it is particularly important that you record what the objective justification is for continuing the policy, and how you reached this decision.

	Stop and remove the policy	If there are adverse effects that are not justified and cannot be mitigated, you will want to consider stopping the policy altogether. If a policy shows unlawful discrimination, it <i>must</i> be removed or changed.
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7. Monitoring and Review
How will you monitor the impact of your policy/process once it has been put into effect?
Sign off from Head of Department or Service: [REDACTED], Force Contact, Crime and Operations 16/12/25
Review Date (must match next review date of the policy): 17 th March 2028