

Reporting Concerns

Policy & Procedure

Greater Manchester Police

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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 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 sets out the expected behaviours for police officers and staff. These standards are legally binding (Police Conduct Regulations 2012). The tenth standard sets out that officers should report, challenge or take action when colleagues' behaviour 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 ensure that reported concerns are properly considered and responded to. If the Force is openly seen to tackle the issue of poor standards, this will increase public confidence in GMP.

In return, GMP guarantees to 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.

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 strategy 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 Greater Manchester Police.

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.

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.

Line Manager - 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 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. The DCC is the Force's appropriate authority for misconduct allegations.

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 the PSB is responsible for managing the investigation into the report. PSB are also responsible for providing guidance in relation to this policy and procedure.

The Organisation - It is the responsibility of the organisation to provide a means of reporting the concerns and to ensure these concerns are investigated. The organisation must also give consideration to the welfare and care of the individual making the disclosure where they are identified. This duty of care extends to the person accused of wrongdoing.

Force Standards Board (FSB) – The Force Standards Board will be responsible for the review of this policy and procedure on a regular basis and will update it in line with legislative changes. They will also be responsible for receiving any complaints or representations made by members affected by the decisions taken as a result of 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

Greater Manchester Police recognises there is an unequivocal need of 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 2012 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, Greater Manchester Police 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, Greater Manchester Police 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

Greater Manchester Police 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. Greater Manchester Police gives an unequivocal undertaking that 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 later section entitled '[Supporting the Person Reporting](#)'.

There are several ways in which to report any concerns you have.

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, the Force 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. The Force will maintain the anonymity; however there may be occasions when this becomes impossible in order to resolve the matter. If this occurs the Force will discuss the situation with you and 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. It 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 the Professional Standards Branch.

Reporting to Professional Standards Branch

Reports can be made directly to staff in the Professional Standards Branch (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 there and then.

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.

The PSB has an overt investigation capability and a covert capability. Either the PSB investigations or the Anti-Corruption Unit (ACU) will take your report of concern depending on where you feel comfortable reporting to.

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.

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.

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.

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.

Phone: 0800 555 111

Online: www.crimestoppers-uk.org

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 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.

The Professional Standard Branch 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 Deputy Chief Constable. 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.

It must be remembered that 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.

6. Associated Documents

Professional Standards of Behaviour

PSE Joint Circular 54

[Code of Ethics](#)

GMP Discipline Policy

GMP Fairness at Work Policy

[College of Policing Reporting Concerns](#)

7. Statutory Compliance & Consultation

7.1 Statutory Compliance

7.1.1 Equality Act (2010)

In the application of this policy and procedure, Greater Manchester Police 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 against this the Deputy Chief Constable, in their review of the 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)

Greater Manchester Police 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 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.

For more information on Data Protection you should contact the ICRMU on ext. 61150 or 64297.

7.1.3 Freedom of Information Act (2000)

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

8. Appendices

None.