

Rt Hon Priti Patel,  
Secretary of State for the Home Department  
2 Marsham Street  
London  
SW1P 4DF

24<sup>th</sup> September 2019

Dear Home Secretary

**SUBJECT: HMICFRS / HMIP joint inspection of TACT custody suites in England and Wales.**

I write regarding the recent HMICFRS inspection of Terrorism Act (TACT) custody facilities in England and Wales. Greater Manchester Police (GMP) manages a TACT suite and was one of the five areas involved in the inspection.

The provision of an effective custody process is an important function for the police service and it is imperative that the service is able to provide a safe and respectful custody environment at all times.

This duty of care is emphasised further in the TACT facilities as detainees can be held for up to 14 days, significantly longer than in ordinary police custody suites.

The inspection report commented positively on the operation of the TACT suites, making particular reference to the good treatment of detainees and the ability to attend to any needs. The report also acknowledged the important role undertaken by the Independent Custody Visitors (ICVs). The visitors play a crucial role in providing assurance that detainees are well cared for through visits to the TACT suite to check on welfare. In Greater Manchester these visits are undertaken daily with additional visits to check on the facilities in terms of cleanliness and stock levels of food and other items issued to the detainees.

Our ICVs maintain a close working relationship with Custody staff at Greater Manchester Police and are confident to raise any issues for immediate consideration and remedy. My office also records and monitors the outcomes of the visits and will address any outstanding matters.

The report provides two recommendations that are of direct relevance to Chief Constables. I can respond to those as follows:

***Cause of concern - There was a lack of governance and oversight by senior officers in each of the forces, and the lines of accountability for TACT custody were unclear.***

***Recommendation - Each force should strengthen its governance arrangements with senior officers taking clear accountability for the delivery of TACT custody in their force.***

Greater Manchester Police has introduced quarterly meetings involving Custody, TACT Custody, Training and Safeguarding leads which are chaired by a senior officer. This approach has strengthened

existing partnership working through the provision of reports to strategic leads for Criminal Justice and Counter Terrorism surrounding TACT custody.

This meeting reviews performance, examines case studies to assist with service improvement and commissions debriefs of events to identify best practice and learning. Furthermore, it includes a standing agenda item on vulnerability ranging across the spectrum for children, adults, mental health and learning disabilities and addresses the training needs of officers operating within the suite.

Aligned to this board, a regular communications update is provided to the TACT cadre of accredited Custody Sergeants and custody detention officers, which include legislative changes, processes and TACT custody improvements. To enhance the relationship, accountability and interoperability between TACT and GMP Custody staff there are clear and direct reporting lines into senior officers.

***Cause of concern - Not enough information was collected or monitored at national or force level to show how well custody services were performing and whether the required standards for detainees were met.***

***Recommendation - Each force should gather and monitor comprehensive and accurate information on TACT custody to assess how well the services are performing. Counter Terrorism Policing should develop a performance framework to assess performance at a national level.***

I understand this was a national theme across the TACT suites in England and Wales. Following consultation with regional forces, Greater Manchester Police has developed and implemented a performance framework that is supported by the completion of TACT 5189 forms upon arrest. This framework is monitored continually to ensure the performance of the service is maintained to the required standard.

The report also made a number of areas for improvement. I am aware of the work that is underway to address these areas and have asked that my office continues to liaise with the TACT suite regarding progress.

Yours sincerely



**Baroness Beverley Hughes  
Deputy Mayor of Greater Manchester  
Policing, Crime and Criminal Justice**