

KATE GREEN
**DEPUTY MAYOR
OF GREATER
MANCHESTER**

Rt Hon Suella Braverman MP,
Secretary of State for the Home Department
2 Marsham Street
London
SW1P 4DF

Date: March 2023

Dear Home Secretary,

SUBJECT: HMICFRS Inspection of police custody suites in Greater Manchester.

I write in response to the recent HMICFRS inspection of police custody in Greater Manchester.

Police custody provides a fundamental service for front-line policing. The public need to have trust and confidence that the police will manage and treat people appropriately throughout a period of detention in the custody suites. It is important therefore that the police service provide secure and safe facilities where health and wellbeing needs are understood and responded to. Underpinning this, it is important that robust governance and oversight procedures are in place to ensure effective and fair processes are being undertaken, according to national guidance and policy.

I am grateful to HMICFRS for undertaking this inspection and I note the findings of the report, which includes a number of recommendations. I can comment on these as follows:

Recommendation 1 - The force should have comprehensive governance arrangements, with appropriate senior officer involvement, to robustly oversee custody provision. These should identify concerns and establish the improvements needed to address them. They should be supported by comprehensive performance management and quality assurance that makes sure appropriate outcomes for detainees are achieved.

Following the completion of the initial inspection activity in 2022 my officials have liaised closely with senior leaders at Greater Manchester Police (GMP) regarding this matter. I can confirm that significant investment in leadership, at the level of Assistant Chief Constable (ACC), has been put into the Criminal Justice and Custody Branch. In addition, a new Branch Head post has been created at Chief Superintendent level, along with two Superintendents, one responsible for Custody and the other Criminal Justice.

In support of this, a new Branch Performance Framework has now been established, which includes weekly Senior Leadership Team meetings, a monthly Branch Performance Meeting and a Quarterly Performance Review chaired by the ACC. These meetings are provided with a set of performance products to facilitate scrutiny and discussion.

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To support the Branch Performance Framework a Custody Audit and Performance Team has been established to drive performance improvements and to conduct custody audits and inspections.

In addition, a new Custody Strategic Oversight Group has been established, consisting of police and partners to embed the HMICFRS recommendations and to improve overall custody standards in Greater Manchester. I can confirm that officials from my office are regular attendees of that meeting.

I feel it is also important to review what other police force areas are doing and to adopt good practice where it exists. I am therefore pleased to see that GMP has undertaken visits to other force custody departments and has liaised with the National Police Chiefs' Council (NPCC) lead for custody. I am also hopeful that within the coming months GMP will be in a position to take part in peer reviews with other forces to identify aspects of good practice and areas for improvement.

Recommendation 2 - The force should take immediate action to make sure that all custody procedures and practices comply with legislation and guidance.

I am informed that Inspector Police and Criminal Evidence Act 1984 (PACE) review guidance has been published and circulated force-wide to reiterate operational expectations. Dip samples are also routinely conducted to identify issues and to provide feedback to custody and district staff when required and any issues of concern are raised and discussed at the Branch Daily Management Meeting.

In addition, five interim Inspectors have been assigned to custody to enhance PACE requirements and to support this oversight further, Chief Officers have agreed to create a PACE inspector cadre, to assist in providing resilience when required.

A Custody Review had been commissioned which has focussed on reviewing current and expected future detainee demand against custody staffing capacity. This review is due to be completed in Spring 2023 and will inform capacity planning moving forward.

Recommendation 3 - Greater Manchester Police should scrutinise the use of force and restraint in custody to show that when it is used in custody, it is necessary, justified, and proportionate. This scrutiny should be based on accurate information and robust quality assurance.

Following the provision of guidance, including the national decision-making process, to all custody teams, the reporting of Use of Force has improved significantly. Use of Force also features on the Daily Custody Bronze Log, where each incident is audited, with oversight from a senior custody branch representative.

I am also informed that a Custody Independent Advisory Group (IAG) is currently being established consisting of key representatives from partners, charities and the community to hold the branch to account on issues such as Use of Force.

Recommendation 4 - The force should make sure that the dignity of detainees is protected and maintained at all times.

The treatment of detainees is something that has been reviewed in detail, and there is improved performance and a reduction in the use of anti-rip suits. Ongoing Continual Professional Development events as well as the initial custody course have been amended to improve awareness and understanding of when anti-rip suits should be used. This is a matter that is monitored and discussed each day through the Branch Daily Management Meeting.

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Recommendation 5 - The force should take immediate action to mitigate the risk to detainees by making sure there are enough staff to safely manage risks, and that risk management practices are safe, follow Authorised Professional Practice guidance and are consistently carried out to the required standard.

The safe management of detainees in police custody is vital and it is important therefore to ensure the correct levels of staffing within the suites, aligned to known periods of high demand. The use of holding cells and holding areas is now being implemented, which will reduce detainees being held in police vans unnecessarily waiting to be processed.

I understand that observation level cards have now been introduced into all suites, using the Authorised Professional Practice (APP) guidance, for staff to utilise. Action has also been taken in respect of the use of Anti-rip suits and clothing cords, as outlined above.

In addition, the Custody Superintendent is continuing work to review the handover and visits process between shifts, which forms part of the wider Custody Review.

Recommendation 6 - Custody staff should maintain accurate records of all medicines and store medicines brought in with detainees securely.

Following engagement with GMP on this matter, I understand that as part of the management of medicines in custody, a medicine sticker for the detainee's property has now been introduced within GMP custody. This indicates on release medicines are in the safe and will further enhance the management of medicines within the suite.

The report also identified 13 areas for improvement (AFI) for GMP around Leadership, process, safeguarding and healthcare, and transfer and release. My officials will continue to work with the custody branch to ensure each area for improvement is followed through with an appropriate response.

Finally, I note that whilst the Independent Custody Visiting (ICV) scheme was referenced within the report, it is evident that HMICFRS inspectors were not fully aware on the local processes undertaken to raise and respond to any concerns that the volunteers had noted.

I want to provide assurances that processes and systems are in place within my office to manage, record and refer the ICV visits undertaken. This includes any comments and concerns that may have been raised by the visiting volunteers that had not been resolved at the point of visit. Once the visit has been entered onto the case management system the GMCA Volunteers Manager is able to review the visit details and refer any concerns raised to the relevant Custody Inspector to request a follow up response. The custody record will only be considered closed once an adequate resolution has been provided.

ICV feedback is now a standing agenda item for the Custody Strategic Oversight Group to ensure concerns and themes are discussed and considered. In addition, a quarterly report from the Volunteers Manager is provided to senior officials within my office and feeds into our overall scrutiny and accountability process. I would be happy to provide further information on the local ICV process should HMICFRS wish.

Yours sincerely



Kate Green

Deputy Mayor of Greater Manchester

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