

OS	Recommendation	Current Position	RAG	Any Proposed Action / Notes	Owner	Timescale
2	2.22 There should be clear policies and procedures to meet the specific needs of female and juvenile detainees and those with disabilities, and custody staff should be trained to recognise these differing needs	Following centralisation of Constabulary's Custody Management, policies and procedures being reviewed and updated as necessary - overnight detention of YPs being reviewed		1. Specific policy for juveniles in custody currently being drafted. 2. AVERT pilot at Blackburn to be evaluated and rolled out force wide dealing specifically with needs of female offenders	1. Ella Fossard PPU Insp Chris Saville	1. 31st Oct 14 2. TBC
4	2.24 A programme of regular cell deep cleaning should be implemented and maintained and graffiti removed as soon as is possible.	Cells and facilities checked on daily basis by C/Sgts and on regular basis by management, facilities and H&S/Federation reps for suitability to use. Central "fault reporting" system being developed to provide audit trail of inspections & ability to track remedial work		Full centralised records re inspections/ fault reporting & remedial work to be in place	TN	Dec-14
5	3.13 'Learning the lessons' briefings should be made available in an easily accessible section of the intranet.	Having liaised with PSD both internal and IPCC "Learning the Lessons" bulletins are not routinely placed on the Intranet		"Learning the Lessons" bulletins related to custody will be placed in the C3PO Sharepoint library which is currently being weeded and updated to provide a library of custody specific documentation immediately available to all custody staff and easily maintainable centrally.	DB	Dec-14
6	3.14 Custody record dip-sampling should be carried out consistently across the force.	Process being developed to capture all inspections of Custody – of physical environment, medical facilities & of custody records Dip-sampling will not be "random" but focused on most important risk areas – Risk Assessments being first area to be examined. Process for obtaining appropriate management data reports from C3PO being developed & will shortly be implemented. Shortcomings will be addressed at appropriate level ie policy/procedures; systems; training or individual officers		Fully centralised records in place providing audit trail of what will become "thematic" inspections that are available for review ; comparison; trend analysis & to provide effective management information that can inform and drive improvements	SS / TN	Dec-14
8	4.13 Handovers should include custody detention officers and police custody staff on duty.	All handovers between Custody Officers are formal and recorded (time allocated on shift-pattern) No plans for all CDOs to be included in this but C/Sgts aware that CDOs to be fully aware of positions of detainees at all times		Whilst this is not considered an area of vulnerability the issue of briefing CDOs who work differing shift patterns was raised at the Federation Custody Conference and a review of the CDO briefing process may be required.		

10	4.20 Lancashire Constabulary should collate the use of force and examine it for trends in accordance with the Association of Chief Police Officers policy and National Policing Improvement Agency guidance.	Use of Force outside the Custody Suite is already collated and examined. Use of force within custody is recorded on individual custody records but not on Use of Force forms which would allow for analysis of trends		To define what constitutes "use of force" within the custody suite and comply with existing force policy on completion of use of force forms for collation and analysis	D/ICT & Defensive Tactics	Dec-14
12	4.27 Staff should be familiar with the fire evacuation procedures, which should be regularly practised.	Fire Evacuation procedures already in place but recent changes in divisional and departmental structures are being examined to ensure that existing procedures still appropriate		Fire & other contingency plans to be current, exercised at appropriate intervals and audit incorporated into inspection records	CMI's / Civil Contingencies	Dec-14
14	4.29 The use of the cell call bell should be routinely explained to detainees.	Already done		Consideration is being given to producing a leaflet explaining general custody matters to detainees to be provided along with notice or rights of entitlements, although much of the proposed content has been incorporated into the new Notice of Rights and Entitlements.	DB	1st Nov 14
15	4.35 All detainees should be routinely provided with a pillow, blanket and appropriate replacement clothing (e.g. a track suit) and footwear.	Blankets, clothing & footwear available / provided Pillows not provided		Currently pricing pillows and business case will be submitted to purchase pillows - CPMG Decision may be required	CS	30th Nov 2014
16	4.36 Toilet areas should be obscured on closed-circuit television monitors and detainees	Mixed scope of CCTV footage across estate No plans to change or develop further		CPMG Decision Required	SS	Next CPMG
20	4.40 All female detainees should be offered a hygiene pack on arrival.	Packs available & offered as per detainee advice sheet on booking in		(1) Information sheet on reception under development (see 14 above) (2) Reminder instruction issued to staff 9th Jan 2014	(1) DB (2) SS	(1) Nov 14 (2) 09.01.14
23	4.47 The temperature of microwave meals should be checked and recorded before serving.	Not routinely done		Review of whether this is required from a food preparation / hygiene perspective. Does it form part of the current CDO training and is the equipment to take food temperature currently available to staff	Martin Dodds G4S	30th Nov 2014
26	4.53 Reading materials suitable for a range of detainees, including young people and those whose first language is not English, should be made available.	Reading material available but no policy on what material is available & diversity of same to address different needs		Establish whether SOP is required to provide consistent approach to this issue across all 6 custody sites. However it is impracticable to source or store a range of reading materials in a variety of languages		

28	5.10 Senior police officers should engage with the UK Border Agency to ensure that the time spent in police custody by immigration detainees is minimised.	Ch Insp - Custody has close liaison with UKBA and is SPOC for IMB issues raised by Immigration detainees post custody. No issues currently being raised regarding excessive periods of detention of UKBA detainees.		Possibility of "Operation Nexus" being introduced currently being explored. Visit to Merseyside Police in conjunction with UKBA 6.11.14 to progress	SS	
35	6.9 There should be robust infection control procedures for all the clinical rooms, which should be clean and be capable of being used for the taking of forensic samples.	Medical Rooms have just been inspected to identify any remedial work required to bring them up to standards required by NHS for anticipated change in commissioning of custody medical cover Work ongoing to upgrade to appropriate standards		Work ongoing with MEDACS & Estates Dept	TN	Nov-14
37	6.11 Custody staff should have access to a full range of appropriate first-aid and resuscitation equipment that is checked regularly, and records should be kept confirming this.	Already available SOP being developed on what should be available and will be incorporated into inspection checks		Equipment & SOP availability under review	TN	Nov-14
44	6.18 There should be refrigerators for the storage of heat-sensitive clinical products in the clinical rooms, and maximum and minimum temperatures should be recorded daily to ensure that such items are stored within the 2–8°C range.	Refrigerators in place.		Check MEDACS recording practices	TN	w/c 23.9.14
45	6.19 Out-of-date pharmacological reference materials should be discarded and replaced by up-to-date materials.	Ongoing process as part of updating medical rooms to NHS standards		Query - Check with MEDACS that reference material is now internet based and therefore up to date.	TN	Nov-14
47	6.31 Custody staff should have appropriate training to recognise and take appropriate action when a detainee may have mental health problems, and should work effectively with health services staff.	MH training currently in place for Custody Initial Course Multi-agency protocols under development MH professionals currently available in custody suites to address detainees with MH issues – MEDACS assessments available at other times		Constabulary actively working with MH Commissioners to improve procedures to address detainees with MH issues Wave 2 Funding just agreed to provide an All Age 7 day a week CJLT function within custody MH Training will be provided to all custody staff	SS / CMI	Ongoing

1.1	There is a coherent problem solving approach to protecting people from harm	Problem Solving is foundation of Constabulary's approach to protecting people from harm, especially those in custody		Current policies and practices are under constant review and modification as required - currently including: (i) C3PO developments to link detainees with PVP database (ii) Better integration of C3PO with medacs records and medical records from previous appearances in custody (iii) Introduction of Mental Health screening tool upon initial detention	SS / CMIs	(i) C3PO link to PVP database now in place (ii) Ongoing (iii) Pilot to introduce PolQuest MH Screening tool to Preston in Spring 2015
1.2	There is a force wide consensus on and understanding of the definition of vulnerability that is consistently reflected in policies, protocols and practice relating to detention and custody, throughout the custody 'pathway'. Policy and strategy decisions reflect all statutory duties relevant to vulnerable detainees.	Following publication of the final report, the Constabulary is now considering the current status and any action needed to address this recommendation.				
1.4	Senior officers are familiar with the force's custody provision, throughput and pressures and take steps to improve services	ACPO chair Custody Policy Management Group & regular County-wide meetings held with divisional SMT reps.		Suite of agreed "Performance" Indicators and management information matrix being developed to better inform service improvements	SS/CMIs	Ongoing
1.6	Effective mechanisms are in place to learn from adverse incidents and to identify and share good practice – within the force, between police forces and with partner agencies including Local Safeguarding Boards (children and adults)	Already in place		Mechanisms under review following centralisation so that corporate arrangements can be put in place of previous divisionally-based arrangements. Use of POLKA requires promoting. Work required to better link workstreams around Protecting Vulnerable People, Safeguarding Boards and Youth Panels / YOT	SS / Div SMTs / CMIs	Ongoing
1.8	Force wide policies and definitions are consistently implemented at an operational level	Rolling programme prioritising areas of highest risk first in place to ensure that corporacy of policies and procedures are implemented across Constabulary at operational level		Ongoing programme to ensure local practices are eradicated eg: (i) C3PO risk assessment completion (ii) CANW / vulnerable persons attendance (iii) Pt IV Bail (iv) Overnight YP PACE accommodation	SS / Div SMT / CMIs	Ongoing
1.10	Custody throughput, outcomes, use of force and adverse incidents are monitored to assess whether there has been unlawful discrimination in the treatment of detainees and to ensure that effective systems are in place to safeguard against any such treatment	Suite of appropriate performance indicators & management information currently under development following implementation of new C3PO system (see Recommendation 10 above)		Discussion with custody management about appropriate data collection & usage including related depts. - divisions, PSD (See Recommendation 10 above)	SS / Div SMT / CMIs ICT Reps	

2.4	Police officers and staff are aware of the Mental Capacity Act and understand how it might apply in their daily work	Staff have awareness of MCA		MH issues inc MCA part of safeguarding / vulnerability training which has either been delivered or will be delivered during upcoming training days around Risk & Vulnerability	SS / CMIs / PPU / Tschool	Ongoing but input concluded by Apr 15
2.7	Police officers and staff understand force policy on voluntary attendance, including expectations of record keeping and safeguards for people with a range of vulnerabilities (such as appropriate adult involvement)	Clear VA policy on the force intranet. ICT supports record keeping for VAs and monitoring by CCD. VAs not currently Risk Assessed upon attendance.		Ever-increasing use of VA across Constabulary - policy under review to ensure still current / appropriate in line with best-practice and update input will be delivered on divisional training days as required. CPMG decision may be required on RA issue	SS / CMIs / Div SMT	2015
3.2	Force wide policies are consistently implemented at an operational level	See 1.8		Work ongoing on force wide SOPs	CMIs and Custody staff	Ongoing
3.5	Detainees are able to provide all personal information in privacy	Provision of information privacy dictated by layout of custody estate. Staff aware to use more private facilities (private rooms) if appropriate		Privacy issue to be factored into any refurbishment or new build of custody facilities.	SS / Estates	Ongoing
3.6	Staff, including non-police staff such as Appropriate Adults, receive specific training on how to appropriately deal with a disclosure of abuse made to them by a detainee	No specific training delivered		This will form part of vulnerability training delivered to C/Sgts / staff as detailed at 21.2 Check with CANW re training for AAs	SS / PPU / CANW	
3.13	Assessment tools are evidence based and appropriate training on their use is provided	Formal risk assessment on C3PO developed with prompts for follow-up action		Mental Health assessment tool to be piloted Spring 2015 & implemented after multi-agency review	SS	Anticipate early 2015
3.18	Handovers involve all custody staff, are conducted in private and result in the effective, accurate sharing of risk information	Formal handovers held out of public view - are always recorded for audit purposes		See 8 (4.13) above		
5.1	Staff demonstrate an understanding of interventions that reduce the risk of disturbed or disruptive behaviour	Following publication of the final report, the Constabulary is now considering the current status and any action needed to address this recommendation.				
5.2	Staff demonstrate awareness of risks associated with particular forms of restraint and of how those risks can be minimised	Following publication of the final report, the Constabulary is now considering the current status and any action needed to address this recommendation.				
5.7	Use of force records include demographic information on age, ethnicity, gender of the detainee	Linked to 10 (4.20) above		Whilst the Use of Force form contains this information, the forms are not routinely completed for use of force within custody but rather recorded on the Custody Record		

5.8	Staff demonstrate awareness of the specific considerations to be made in any restraint of children	Following publication of the final report, the Constabulary is now considering the current status and any action needed to address this recommendation.				
5.9	Use of force when associated with provision of healthcare	Following publication of the final report, the Constabulary is now considering the current status and any action needed to address this recommendation.				
5.10	Is consistent with Department of Health guidance on positive and proactive care	Following publication of the final report, the Constabulary is now considering the current status and any action needed to address this recommendation.				
11.8	There is a clear protocol for handling interviews during the night, based on consideration of the best interests of the detainee	No protocol currently in place		Partially covered within the Custody Operating Model but may require further clarification with SMTs in BCUs.		
13.1	Detainees are able to provide all personal information in privacy	See 3.5 above				
15.3	Information about vulnerability and risk is acted on through the court process and transferred to relevant staff	PER system in use - in cases of particular risk / vulnerability, courts briefed by C/Sgts		Further proposals to include RA or other vulnerability information on MG6 for info of court and CPS in order to highlight issues related to bail, prolonged adjournments etc.		
20.3	Detainees are made aware of how to access harm minimisation supplies on release	Following publication of the final report, the Constabulary is now considering the current status and any action needed to address this recommendation.		??		
21.1	The liaison and diversion scheme is available to children and adults	Scemes already in place & under continuing development with LCFT. However this is not currently an all age service. See 47 (6.31 above re Wave 2 funding for All Age service		Schemes and processes not as developed as Constabulary would wish but restrained by availability of LCFT staff - process to expand this are is subject of ongoing negotiations	SS / CMI's	Ongoing
21.2	Custody staff receive regular training on mental health and learning disability issues, their identification and how to support detainees who are experiencing problems	Training package covering all aspects of vulnerability in course of being developed (children / young persons / safeguarding / mental health) as part of ongoing professional development for custody officers following centralisation		C/Sgts shift rota incorporates training day every 10 weeks. Safeguarding / vulnerability issues main focus of next series of training days commencing Nov 14	SS / CMI's	Ongoing Continuous Professional Development

21.3	There are protocols between the police service and local providers of NHS mental health services to support timely access to specialist assessment and care as required. This includes access to local child and adolescent mental health services	Current protocols available covering S136 LCFT MH Staff embedded in custody suites No specific provision for child and adolescent services reflecting the cover provided by NHS in the County		MH service provision in custody currently part of review to improve in accordance with Crisis Care Concordat Ongoing liaison between police and LCFT & commissioners in this area	SS	Ongoing
1	DRI and Custody Officers lack of understanding of roles & responsibilities under the Custody Operating Model			1. Pertinent sections of the operating model to be highlighted with all DRIs via Divisional SMTs 2. Full Operating Model to be re-circulated to all Custody 3. CMI's to liaise with DRIs within their BCU for 1 to 1 inputOfficers	1. SS 2. SS 3. CMI's	1 & 2 Completed. 3 Ongoing
3	Clarification on the proposals for an H/G Div RMU or potentially one single force RMU and the timescales for implementation (if agreed) to provide a longer term solution to duty planning issues	Carolyn Ewen contacted to update on the current position.		Awaiting forcewide decisions on the future model for RMUs. In the interim see point 2 above.	SS	Ongoing force wide review
4	Lack of pro-active involvement of FICs in managing custody out of office hours			Ch Insp Sansbury to conduct 1 to 1 inputs with FICs as to expectations re custody out of hours.	SS	1 to 1s to be completed before 30th Nov 2014
5	Review of current shift pattern to ensure maximum efficiency and resourcing to demand.	(i) Report re potential adjustment to the current late shift start time submitted to Ch Supt McMahon for consideration and discussion. (ii) Feedback being sought from staff during Custody Training days over the next 10 weeks to gain an operational perspective on adjustment to shift times to better utilise resources.		Report submitted to ACC Jacques. Updated report based upon feedback from custody training days to be provided to ACC Jacques for consideration at Shift Governance Board.		October (Final training day)