

| | Areas Of Concern | Recommendations | Current Status | Explanation of status | Estimated Completion Date | Owner |
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| 1 | There was insufficient gathering and monitoring of performance data in key areas that promote the safe and respectful detention of people in custody. The custody records also had insufficient detail to show justification for decision making for each individual | The force should ensure that it strengthens its approach to performance management and that data (including custody throughput, demographics, adverse incidents, strip searching, complaints) are routinely collated and analysed to identify trends, inform organisational learning and improve outcomes for detainees. Decisions recorded about the treatment of detainees should be justified and demonstrate that actions are appropriate to individual circumstances and risk assessments. | In Progress | Data requirements from the HMIC Custody Expectations & the Report on Vulnerability in Police Custody (2015) built into Connect. This will address the current shortfalls in the availability of MI with which to manage performance. Awaiting full implementation of MI requirements by Connect Project. In addition RADAR function is currently being configured to send alerts to Custody Management Team when specific "incidents" occur e.g. Appropriate Adult not present when a juvenile has fingerprints / DNA taken. Custody audits to monitor quality of narrative EDL entries and rationale for decisions. | 01/04/2017 - For the outstanding Connect MI and RADAR alerts. Some RADAR alerts already operating for self-harm / adverse / Use of Force Incidents with a review process by CMIs implemented. Incident Review Template now attached to the Connect record. Recording of decisions by Custody Staff subject of ongoing monitoring via Monthly Custody Audits. | CI Sansbury & Janice Taylor (Connect Manager) re MI / RADAR. CMIs for Custody Record Audits. |
| 2 | Not all detainees were treated with respect and dignity, and their individual or diverse needs were not always met. Despite previous recommendations, detainees using the in-cell toilet could still be viewed on CCTV, which was completely inappropriate. | Immediate action should be taken to obscure the toilet areas in cells with CCTV | Completed | Currently in the process of upgrading all Custody CCTV which will address this issue. Skem, Burnley, Preston & Lancaster now completed. Greenbank scheduled for replacement mid- 2017. Blackpool (Bonny St) not being upgraded due to the new build DHQ & Custody Suite which has now commenced. Immediate basic remedial action has been taken at those sites awaiting the new CCTV system to obscure the toilet areas within cells. | 31/06/2017 for full completion of the install of the new system to provide a permanent solution except Blackpool, which will be addressed upon completion of the new build custody suite. | CI Sansbury & Steve Boulton ICT |
| 3 | All aspects of the use of force lacked governance and effective oversight. The force did not record data on the use of force in custody effectively, use of force forms were not always submitted, and records of force in custody records were poor or absent. there was inadequate managerial scrutiny of use of force incidents, and no routine viewing of CCTV records to assure proportionality or for learning points. Training for staff was inadequate and unapproved equipment was used in the restraint of detainees. handcuffs were used on compliant detainees for too long after their arrival in custody, and force was used often to replace detainees' clothing with anti-rip clothing | Lancashire Police should improve its governance of use of force in custody, including ensuring that: there is effective management oversight of use of force incidents and trends. Staff are adequately trained in appropriate techniques at least annually. Force should always be used at the lowest level, is appropriate for the threat posed, and that only approved equipment is used. All staff involved in incidents must complete a use of force form. handcuffs should be removed from compliant detainees at the earliest opportunity after their arrival in custody. | In Progress | The CONNECT system incorporates Use of Force recording for both force used prior to arrest and whilst in custody. The Use of Force prior to arrest field on Connect currently non-mandatory. RFC currently being progressed to make it mandatory to ensure accuracy of data upon arrival at Custody. In addition Custody Audits by CMIs will include a review of CCTV (once fully installed) in conjunction with the Connect record to monitor compliance with UoF recording. RADAR has now been configured to send UoF alerts to CMIs for review with a review template created which remains attached to the CONNECT record. Removal of handcuffs from compliant DPs to be addressed through one to ones with staff which are now completed, comms and training days. | 01/04/2016 Mandatory UoF Field UoF MI from Connect 01/04/2017 RADAR Config for UoF Completed | Custody - CI Sansbury Force - Insp Andy Moore |
| | Areas for Improvement | | | | | |
| 4 | Leadership, Accountability & Partnerships | Lancashire Constabulary should ensure that there are appropriate policies and procedures that cover the whole custody process, which are fully implemented and reviewed regularly. Policies and procedures should be accessible and understood by staff. | In Progress | A range of Standard Operating Procedures (SOPs) are currently being drafted. This is linked to the new Force Intranet Project which will allow us to create a library of SOPs and Useful Documents for Custody staff. There will be a review and version control process built in to ensure they are reviewed at appropriate junctures and kept up to date. Five SOPs already completed re (1) Appropriate Adults for Juveniles. (2) Custody Suite Inspection Regime (3) Clinical Waste (4) Deaths or Near Misses in Custody (5) Handovers. | 31/03/2017 for the main SOPs required with ongoing work to develop further SOPs as and when required. | CI Sansbury & CMIs |

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| 5 | Leadership, Accountability & Partnerships | The force should engage with their counterparts in the local authority to instigate an immediate review of the provision of local authority accommodation for children under section 39 (6) PACE 1984, and monitor performance data to ensure that children are not detained unnecessarily in police cells. | In Progress | Awaiting configuration of Connect to provide RADAR alerts where charged juveniles are held in Custody overnight. Chief Insp Custody now force SPOC under the Children in Custody Concordat that the force has signed up to. This provides partner agencies an identifiable point of contact to raise concerns. A feedback mechanism is already in place between the three Youth Offending Teams (YOTs) who are standing invitees to the Custody Practitioners Group meeting where they can raise any issues / concerns. No such concerns have been raised at the meetings as they felt the provision of LA accommodation for remanded juveniles was more than adequate and that accessing them when required was not problematic. It is however accepted that Management Information on the issue was not available via the old ICT system C3PO and this would be addressed by the introduction of the Connect MI Solution. Meeting held with YOT managers and CANW (PACE Bed Provider) to review currently available data, which does not indicate any concerns re access to PACE beds when required. | 01/04/2017 for RADAR alert re Juveniles detained overnight who are not sent out to a PACE bed. | YOT Managers for LCC and the two Unitary Authorities & Ch Insp Sansbury |
| 6 | Booking in, Individual Needs and Legal Rights | Staff should be trained to recognise and provide for the individual needs of detainees, particularly children, women and detainees with disabilities. | In Progress | We believe that staff generally do identify the individual needs of detainees well as evidenced in the HMIC report at Para 5.10 "we observed that custody staff generally identified detainee risks and vulnerabilities well initially, including those in custody for the first time" Further training on these issues will be incorporated into the 2017 training schedule and is currently being progressed with PPU with dates identified and a training package being developed. | 31/12/2017 | Insp Butterworth /PPU |
| 7 | Booking in, Individual Needs and Legal Rights | Detainees should be booked in promptly on arrival at the custody suite. | Complete | The management of throughput and identification of detainees requiring prioritisation, if any queuing does occur is dealt with by custody staff and officers conveying prisoners to each suite on a case by case basis. A reminder has been sent to all staff (Guidance Note 27). MI which will be available via Connect will be used to monitor performance regarding waiting / booking in times. | N/A | N/A |
| 8 | Booking in, Individual Needs and Legal Rights | Removal of detainees' clothing and footwear should be subject to individual risk assessment | Recommendation Not Adopted | Items necessary for a DPs wellbeing e.g. inhalers, GTN Sprays & reading glasses are currently subject of an individual RA as to retention. Lancashire Constabulary do not feel that adopting an individual RA for the retention of potential ligatures e.g. shoelaces, belts and cords within clothing is a positive step in ensuring detainee safety. Not only do such ligatures pose a potential risk to the DP, which can be mitigated by their removal and the provision of readily available alternative clothing, they also present a risk to staff in the items being used against them offensively. | N/A | CPMG ratification required |
| 9 | Booking in, Individual Needs and Legal Rights | The force should investigate the use of anti-rip clothing and associated use of force. Anti-rip clothing should only be used in exceptional circumstances and as a last resort to protect the detainee from harm, with a recorded rationale based on a risk assessment. The detainees own clothes should be returned to them as soon as possible. | In Progress | Re Use of Force see Point 3 above. Re Use of Anti-Rip clothing the monitoring of rationale for use via Monthly Custody Audits. Issues or re-risk assessment and return of DPs own clothes reiterated through recent Custody Sergeant training days (20th Oct to 28th Nov) as well as explanation of decision to use anti-rip clothing needing to be put on the Custody Record. In addition where force has to be used to remove clothing this is subject to a UoF report within Connect with an associated RADAR alert to the CMI's for review (See point 1 above) | On Going | CMI's for Monthly Checks via Custody Record Audits & Peer reviews. |
| 10 | Booking in, Individual Needs and Legal Rights | All staff should carry anti-ligature knives in the custody suite at all times | Complete | Checks made and all cell keys have a ligature knife attached. All staff issues with ligature knives. | 31/12/2016 | CMI's & Clare Howells G4S |
| 11 | Booking in, Individual Needs and Legal Rights | All custody staff should be involved collectively in the relevant shift handover. | In Progress | Currently differing shift patterns between Constabulary staff and G4S CDOs. Discussions already well underway with G4S to align CDO and PS shifts to provide a more "one team" approach and co-terminus shift handovers for all staff. This change is now subject to staff / union consultation and agreement by G4S Senior Managers. Update 30.1.17 - Agreement now reached with G4S senior Managers to progress staff consultation on aligning shift patterns. Proposed introduction date 17th April 2017. | 17/04/2017 | Clare Howell G4S & Ch Insp Sansbury |
| 12 | Booking in, Individual Needs and Legal Rights | The force should ensure that detainees are able to make a complaint while they are still in custody. | Complete | This has been noted and guidance has been issued to custody staff (Guidance Note 26). PSD also made aware and they are producing posters and leaflets on how to make a complaint. Delayed as we have only just received the IPCC consent to use their logo and agree the leaflet content. Currently with Graphics Dept. Update 05.03.17 - Posters and leaflets now ordered and will be distributed within the next two weeks. | N/A | CMI's |

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| 13 | Safeguarding & Healthcare | Staff should conduct and record daily cell checks, including identification of ligature points. Cells at Burnley should be deep cleaned, and graffiti should be removed across the custody estate to improve the overall environment. | Complete | SOP re Custody Inspection Regime now completed. This outlines roles & responsibilities, fault reporting and cleaning regimes for the suite and medical rooms. The CMI's regularly monitor the completion of such checks and HQ H & S Dept. will monitor the Inspection process on a quarterly basis. Burnley cells now deep cleaned 07/11/16 | N/A | Insp Conrad Tapp |
| 14 | Safeguarding & Healthcare | The force should monitor the number of strip searches to ensure they are carried out with suitable justification and not applied disproportionately to some groups. Strip searches should always be conducted appropriately and with consideration to the detainees dignity. | In Progress | Awaiting configuration of Connect to provide RADAR alerts where strip searches are carried out on juveniles. This will allow for early review of the rationale and appropriateness of the search and compliance against Code C PACE. Strip searches on adults will be monitored via the Monthly Custody Audit regime. Recent instructions issued regarding the use of CCTV monitored cells for strip searches and the requirement to disable the viewing monitor whilst the search takes place. Update 5.3.17 - RADAR alert for Strip Searches of Juveniles now operating and allows for individual case review by supervision. MI Report re Strip Searches overall still awaited. | 01/04/2017 for Strip Search MI report. | PS Entwistle & Janice Taylor (Connect Team) |
| 15 | Safeguarding & Healthcare | All detainees held over night, or who require one, should be offered a shower, which they should be able to take in private. | In some circumstances we would be unable to comply fully with this recommendation | Whilst we would aspire to be able to offer every DP held overnight a shower and be in a position to facilitate every request, we would not be able to comply with this recommendation 100% of the time. For example we recently had 22 DPs remanded overnight at Blackburn to appear at court. Even if we conservatively estimated it would take 15 minutes to get each DP out of their cell, into one of the two available showers, out, dried, dressed and back to their cell, this would require approximately 3 hours. To offer and facilitate 22 people getting a shower and to be ready for an 0730 collection by GeoAmey, who are contracted to get all DPs to court by 0930, would mean getting the first DPs up for a shower at approximately 0430 in the morning. This in itself could amount to a breach of PACE by not allowing a DP a period of 8 hours uninterrupted rest. Not all detainees held overnight are remanded and therefore showers should be offered where there is an opportunity, post 0730 when remanded DPs are sent to court or where the DP has been in custody for a protracted period of detention e.g. Immigration Service Detainees. The issue will be monitored via the Monthly Custody Audits but it is simply impracticable for the reasons outlined above to say that the Constabulary will be able to comply with this recommendation fully. However all custody staff reminded that where practicable the offer should be made and facilitated if requested (Guidance Note 21 re-circulated) | Ongoing via Monthly Custody Audits | CMI's |
| 16 | Safeguarding & Healthcare | Sufficient and suitable alternative clothing should always be available in all the custody suites, and replacement footwear should be provided for all detainees whose own footwear is removed. | In Progress | HMIC highlighted that whilst suitable replacement clothing was available at all suites, the range of sizes available did not appear adequate. Review currently ongoing to assess the need for a further range of sizes of replacement clothing including anti-rip Safe Suits. In relation to footwear clear guidance has been issued to staff that DPs are not to move around the custody suite in bare feet and should be offered either their own footwear or alternatives. Any refusal to wear footwear is noted on the custody record. Issue monitored by CMI's, Ch Insp and G4S Contract manager on custody visits and will also be monitored via Monthly Custody Audits involving review of CCTV when online. | 31/03/2017 | Insp Tapp |
| 17 | Safeguarding & Healthcare | All custody suites should facilitate exercise in the open air for detainees | Complete | All custody suites have facilities for open air exercise for detainees. Providing the exercise is dependent upon staffing to facilitate such a request. Monitored via Monthly Custody Audits. | N/A | CMI's |
| 18 | Safeguarding & Healthcare | All suites should have a stock of reading material in a range of languages, easy-read format and suitable for children. | In progress | There is a suitable and varied stock of English literature in all of the custody suites. Enquiries have identified the top 5 languages which would be required and efforts on-going to try and source more diverse written material in those languages. | 31/03/2016 | Insp Butterworth |
| 19 | Safeguarding & Healthcare | Reviews of detention should take place with the Police and Criminal Evidence Act 1984. Code C. | Complete | The issue raised by the HMIC in relation to PACE reviews was informing the DP when a "sleeping" review had taken place. Guidance sent to remind all custody staff of this requirement. In addition Connect is now configured to prompt Sergeants to remind DPs of a sleeping review having occurred. Compliance monitored via Monthly Custody Audits. | N/A | Ch Insp Sansbury |
| 20 | Safeguarding & Healthcare | There should be a policy framework and training on safeguarding vulnerable adults and children to equip custody staff to be effective in identifying and taking the necessary actions to deal with such detainees. | In Progress | Constabulary Safeguarding and Vulnerability strategy under development. Once ratified it will form the basis for training for Custody staff during 2017 training schedule. In addition NHS Criminal Justice Liaison and Diversion teams working within custody now required to see all juveniles, when on duty, to assess for underlying vulnerability. | 31/09/17 for training | Insp Butterworth |

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| 21 | Safeguarding & Healthcare | Appropriate adults should be available to support vulnerable adults and children throughout the custody process, and the force should comply with PACE in taking fingerprints and photographs only when an appropriate adult is present. | In Progress | Guidance issued regarding the taking of fingerprints without the presence of an Appropriate Adult. In addition RADAR alert currently being tested to notify CMI's of non-compliance. Meeting on 7th Dec with Child Action North West and the YOT re AA provision, which has resulted in an AA for Juveniles SOP, which for the first time clearly articulates acceptable timescales for securing AA provision. | 01/04/17 for RADAR alert. SOP now in place. | PS Entwistle & Janice Taylor (Connect Team) |
| 22 | Safeguarding & Healthcare | The force should assure itself that alternatives to avoid detaining children in custody overnight before any charges are actively explored so that detention is the last resort | Complete | Linked to Recommendation 7 above. Clear focus has been placed on the issue of the arrest and detention of Children & Young People in police custody. This has resulted in a 67% decrease in the arrests of C & YP. Down from 6398 in 2010 to 2109 in 2015. This is also linked to 2 issues. (1) Better narrative entries on Custody Records to account for the necessity of detaining a C & YP overnight in the absence of a charge. (2) The number of looked after children arrested where returning them to the Childrens Home proves problematic if the offences have been committed there or against staff. Specific RA question within Connect will for the first time identify Looked After Children. Monitoring of juvenile arrests / detentions is part of the thematic that are adopted within the Monthly Custody Record Audits (Nov 16 Thematic is juvenile arrest for the CMI's to QA) | Ongoing monitoring | CMI's |
| 23 | Safeguarding & Healthcare | Detainees should be given clear information on how to make a complaint about health services. | Complete | CRG posters already in all custody clinical rooms. CRG considering providing a leaflet as well to any DP who they assess. Custody staff also in possession of direct incidents & complaints e-mail address for CRG which can be provided to DPs. | N/A | Claire Dixon CRG Healthcare |
| 24 | Safeguarding & Healthcare | All health care professionals should have regular clinical and management supervision and appraisals. | Complete | CRG supply requisite training which is monitored via Contract Review meetings with the Constabulary. | N/A | Claire Dixon CRG Healthcare |
| 25 | Safeguarding & Healthcare | Patient confidentiality should be preserved, except where individual risk assessment indicates this cannot happen. | Complete | Custom & practice had developed of CDOs waiting outside medical assessment rooms, often at request of HCP, sometimes with the door open. Guidance issued to CDOs regarding the need to maintain patient confidentiality and only be near to the Medical Room when the RA dictates. | N/A | N/A |
| 26 | Safeguarding & Healthcare | Clinical areas and practice should comply with NHS equivalent standards for infection control. | In Progress | Newly awarded cleaning contract in July 2016 now outlines the specific cleaning requirements for the clinical assessment rooms. Daily checks incorporated within the newly drafted Inspection SOP which includes a copy of that cleaning spec (see point 6 above re SOPs) Will be monitored via new inspection regime and contract monitoring by Business Support. | Ongoing | Insp Tapp re Inspection SOP / Insp Otter & Shelagh Grundy (Business Support) re thematic responsibility for Medical Assessment Rooms & Clinical Waste (SOP being drafted). Custody staff for daily checks on cleaning compliance. Claire Dixon CRG re monitoring via clinical staff & removal of clinical waste. |
| 27 | Safeguarding & Healthcare | Emergency resuscitation arrangements, including all staff training and equipment, should ensure a prompt and appropriate response in a medical emergency. | In progress | Annual First Aid training is undertaken by all Custody Sergeants and CDOs. Grab bags, Oxygen and de-fibs all available within Custody Suites. Current procurement ongoing to replace all de-fibs for the force with more up to date models. | Ongoing | FRU for arrangement of First Aid Training for Constabulary staff. Clare Howells for G4S CDOs. PC Dale Callaghan for de-fib replacement programme. |
| 28 | Safeguarding & Healthcare | Clinical records and the custody detention record should provide clear and meaningful information to inform the care of detainees in custody, and comply with national and professional standards. | Complete | CONNECT facilitates this requirement and regular DIP sampling corroborates this. In addition CRG have recently changed their clinical assessment tool as a result of feedback form both our and GMP Custody Inspection. | N/A | N/A |
| 29 | Safeguarding & Healthcare | Civilian detention officers should receive training in issuing prescribed medicines to ensure safe practice. | In Progress | The issuing of medication is predominantly carried out by HCP's. However the proposed shift change for CDOs will build in a regular training day. If the shift changed is agreed this training will be provided to CDOs on those days via CRG Healthcare. | 30/04/2017 | Clare Howells G4S & Claire Dixon CRG Healthcare |
| 30 | Safeguarding & Healthcare | Detainees with substance misuse needs should be consistently identified and referred to appropriate agencies to meet their on-going needs. | In Progress | Further work required with CJLD teams to ensure that the identification of substance misuse amongst DPs and that onward referrals are being made to appropriate services. Update 05.03.17 - Meeting arranged with Steve Acton 20th March to discuss appropriate referral pathways. | 28/02/2017 | Steve Acton LCFT & Ch Insp Sansbury |

