

## Greater Manchester Police, Fire and Crime Panel

Date: 11 November 2024

Subject: Progress report on the implementation of the Baird Inquiry recommendations

Report of: Kate Green, Deputy Mayor

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### Purpose of Report

To provide a progress report to the Police, Fire and Crime Panel on the implementation of the recommendations outlined in the Baird Inquiry report into the treatment of people arrested and taken into police custody in Greater Manchester, with a focus on women and girls.

### Recommendations:

Members are requested to:

1. Note and consider the progress made against the Baird Inquiry recommendations by both Greater Manchester Police and Greater Manchester Combined Authority.
2. Note the engagement with national bodies to progress national recommendations.
3. Note the on-going Mayoral Oversight arrangements in place to ensure that these recommendations are delivered and embedded, and that the resulting improved standards are maintained and built upon.

### Contact Officers

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## 1. Introduction

- 1.1 The Baird Inquiry report was published on 18 July 2024. The independent Inquiry investigated the experience of people arrested and taken into police custody in Greater Manchester with a focus on women and girls. The Mayor commissioned Dame Vera Baird KC to undertake the Inquiry following a Sky News report on 26 July 2023 that reported concerning incidents with regards to three women who were arrested and detained by Greater Manchester Police (GMP).
- 1.2 Since the Sky News report, the Inquiry expanded to include 14 complainants in total, including three males, as well as anonymised contributions from trusted support organisations, and insights from focus groups, independent custody visitors and police officers/staff.
- 1.3 The Inquiry largely examined cases between 2021 and 2023 (though in a few of the cases, more historical incidents going back to 2019 were also referred to).
- 1.4 The resulting report uncovered evidence of poor practice in the areas of arrest, custody, strip-search, domestic abuse handling, and complaints.
- 1.5 A copy of the full report can be found here <https://www.greatermanchester-ca.gov.uk/media/9861/the-baird-inquiry.pdf>

## 2. Recommendations and Mayoral Oversight

- 2.1 Dame Vera made a total of 40 recommendations though some are more directive, and others are listed as discussion points/areas for consideration. Many are linked and for completeness, we list them all as recommendations.
- 2.2 Dame Vera assigns an organisation/body to each of the recommendations and in some cases, there is more than one organisation/body listed. 26 recommendations are assigned to Greater Manchester Police, 8 to the Mayor/Deputy Mayor (GMCA) and the remaining are for national organisations including the Home Office, the National Police Chiefs' Council and the College of Policing, often working in partnership with Greater Manchester Police.
- 2.3 Although Dame Vera assigns responsibility for delivery of the recommendations to these bodies, as the commissioner of the Inquiry, all recommendations are subject to consideration and oversight by the Mayor, who has established a Mayoral

Oversight Board, which includes senior GMP and GMCA representatives, to oversee the delivery of the recommendations.

2.4 Other than one recommendation regarding strip search, Dame Vera does not stipulate a timeframe for delivery of the recommendations. However, most have been expedited, whilst there are a small number (generally national recommendations and those that require significant resources, policy, procedural or culture change) that require a longer implementation timeline.

2.5 Implementation of the recommendations commenced before publication of Dame Vera's report, and they have been taken forward by both GMCA and GMP as a matter of urgency.

2.6 The Panel should note that there are some interdependencies between the recommendations and the HMICFRS report entitled "*Report on an inspection visit to police custody suites in Greater Manchester*" published in February 2023. Treating detainees with dignity, and safeguarding their rights and entitlements were at the heart of the issues of importance identified by HMICFRS

2.7 A programme of reform commenced following this HMICFRS Inspection and GMP have since invested £3,100,000 in custody to ensure significant improvements to the service and to ensure effective strategic, tactical and operational leadership.

2.8 GMP is confident that its ability to take forward the recommendations made in the Baird Inquiry is strengthened by the substantial progress made in respect of the 25 causes of concern (CoC) identified by HMICFRS, associated recommendations and areas for improvement (AFI). Between April and November 2024, HMICFRS removed all but one of the 25 causes of concern. Associated recommendations and areas for improvement have now all been closed.

2.9 During November 2024, GMP intends to offer evidence to HMICFRS that with a view to the final CoC, relating to PACE reviews, being closed.

2.10 A copy of the HMICFRS recommendations relevant to the Baird Inquiry are listed in Appendix A.

### **3. Summary of progress on Baird recommendations: Greater Manchester Police (GMP)**

3.1 **24 out of 26 GMP led recommendations have been discharged by the Mayoral Oversight Board.** Those that have been discharged are because the Deputy

Mayor considers that GMP has taken the necessary action to deliver the recommendations.

3.2 However, it is essential that on-going monitoring and compliance checks are in place to ensure that standards are maintained. This is particularly important in an area such as custody that is a less publicly visible area of policing.

3.3 Following the HMICFRS inspection, GMP created both a Custody Audit and Performance (CAP) Team and a custody performance management infrastructure. Their role is to provide quality assurance, ensuring that the highest standards of dignity, care, safety and associated practice are consistently maintained across every GMP custody site. Their presence is intended to ensure all custody officers and staff fulfil their responsibilities and appropriately meet detainees' needs and support them in doing so.

3.4 The Custody Audit and Performance Team consistently undertake thematic, structured and in-depth reviews of custody activities such as cases where detention is refused; use of force; strip searches/ dignity related matters; the treatment of children, women, and vulnerable persons; and dirty protests. Approximately 150 reviews are proactively undertaken each month, including documentary and CCTV reviews and via random dip sampling. These activities are part of a scrutiny process designed to improve and maintain professional standards and to safeguard the dignity, respect, human rights and entitlements of detainees.

3.5 GMP have also invested in proactive Custody Compliance Officers. Their role is to undertake regular, unannounced visits to custody sites, to test and ensure that detainees are being treated with dignity and respect; and that their rights and entitlements are being safeguarded. Every Compliance Officer visit results in structured findings and an organisational learning report which is shared, so that any issues can be promptly addressed.

3.6 Additionally, GMCA will increase their role in ensuring compliance through the strengthening of the Independent Custody Visitor Scheme and the establishment of an Independent Scrutiny Panel to dip sample key areas. These are outlined below under GMCA led recommendations.

3.7 It is also important to stress that whilst GMP may have taken action to address the recommendations, wider culture and behaviour change does not happen overnight and this will take time. The increase in compliance and dip-sampling should lead to effective organisational learning that in turn will positively impact on culture change. Leadership is key to addressing culture change and we consider that the leadership of custody has been improved and this was also reflected by HMICFRS who, during 2024, closed their cause of concern in this regard.

3.8 The other key ingredient is an effective performance management framework and we can see how data and key indicators are now being monitored more closely at all levels in GMP including at their force wide performance meeting chaired by the Deputy Chief Constable. This performance data is also reported to the Deputy Mayor through the Deputy Mayor's Executive as well as the Mayoral Oversight Board for the Inquiry. Whilst there is some way to go, the Deputy Mayor considers that steps have been taken by GMP to address wider cultural issues and to improve them going forward.

**3.9 In terms of the recommendations that the Deputy Mayor considers GMP have fully met and discharged, these include:** - Refresher training in a number of areas that Dame Vera identified as lacking including: -

- a) the appropriate use of voluntary attendance.
- b) the effective use of the national decision-making model.
- c) the effective use of arrest packs.
- d) refresher training for custody officers.
- e) better understanding of the national Female Offender Strategy.

3.10 In all of these areas GMP have undertaken thorough reviews of the training offer, and whether training has been undertaken to address gaps in knowledge and understanding. For example, GMP identified gaps in student officer training on voluntary attendance, and new materials have been developed and rolled out as a result. Likewise, GMP found that the Female Offender Strategy was not well understood across all officers and action was undertaken to promote this and refresh training. For further details please see the full copy of each recommendation, with a summary of the action taken in the back of this document.

3.11 Recommendations that have improved people's **dignity and support in custody**.

The Deputy Mayor is pleased to see: -

- a) the implementation of new information and support links for victims and survivors of domestic and sexual abuse.
- b) support for people self-harming.
- c) the automatic provision of dignity packs that include sanitary provision in cells.
- d) the inclusion of distraction devices.
- e) risk assessments to allow detainees, where practical, to retain some personal property.
- f) the prompt answering of cell buzzers.

3.12 Recommendations for **dedicated female provision** have been delivered including the dedicated Female Welfare Officer role to better respond to the needs of female detainees.

3.13 **GMP have also ended the authorisation of strip searches for welfare purposes**, a crucially important Inquiry recommendation, and have also undertaken steps to ensure strip search is a last resort for concealment, including asking people, and in plain language, to offer up items. The Deputy Mayor is also pleased to see that GMP are now more accurately recording strip searches which will enable the effective monitoring of this going forward.

3.14 It should also be noted that at the launch of the Inquiry report, the Mayor asked for further assurance that the decision to undertaken strip searches for concealment purposes would only be undertaken as a last resort when other practical means were exhausted. This is a request by the Mayor that goes beyond the Inquiry recommendations and is being worked through by the Oversight Board.

3.15 GMP have better and **more considerate treatment of victims of domestic and sexual abuse**. Appropriate training is now a focal point in this regard; and the force monitors compliance, including compliance with the Victims Code.

3.16 Improvements have been made in **responding to Subject Access Requests** which is now at 91% compliance.

3.17 In two recommendations, it has not been practical to fully implement the recommendations in the way that Dame Vera proposes:

- a) In the case of recommendation 10 regarding **female only cells**, GMP have set aside separate cell areas for females, children, and males. Whilst these are reserved for these persons, there may be circumstances where the demand for cells means that designated female cells might have to house males. This has also been made more likely due to the impact of national operations to ease overcrowding in prisons, which has in turn meant offenders have been temporarily housed in police cells when prisons are full (Operation Safeguard).
- b) In respect of recommendation 12, regarding **female officers answering cell buzzers**, GMP cannot guarantee that a Female Welfare Officer will always answer a female cell buzzer. This is because this role is allocated to a Visits Officer at the start of every custody shift and logistical constraints mean that the appointed Visits Officer may not be female. However, the Visits Officer works hand in hand with the appointed Female Welfare Officer, who is expected to attend to all aspects of the practical welfare of female detainees.

3.18 The Deputy Mayor considers GMP have done everything possible to meet these two recommendations and they have both been discharged.

3.19 The two recommendations that are yet to be discharged, but are in progress, relate to trauma training. A full review has been undertaken to identify gaps and improvements to be made in **trauma training** for all officers, which includes Domestic Abuse Matters training and other neuroscience of trauma training. GMP are working closely with the College of Policing on this, and packages are being rolled out, but the training is not fully completed. We hope that all training will be complete and that these remaining recommendations can be discharged in January 2025.

3.20 **A full copy of each recommendation, its status and a summary of the action taken is included in the back of this document.**

## 4. Summary of progress: recommendations for Greater Manchester Combined Authority (GMCA)

4.1 There are 8 recommendations for GMCA. Six of these relate to the establishment of an **Independent Scrutiny Panel** that should be tasked with the dip sampling of anonymised arrests at the lower end of criminality, the reasons underpinning arrests, the recording of strip searches and the wider robustness of custody records.

4.2 GMCA and GMP fully support the establishment of this Independent Panel as a vital means to continue to scrutinise these areas in the longer term, ensuring that standards are maintained following the Inquiry and recent Inspections, and to inform force learning and culture change.

4.3 As the Panel evolves it may also want to dip sample other areas of custody process, procedure or practice as identified by the Mayor/Deputy Mayor.

4.4 Terms of Reference have been drafted for the Panel and members have been recruited, as per Dame Vera's recommendations. These members include victims and criminal justice organisations and those with professional and lived experience of arrest and custody. We are currently working through the data sharing aspects affecting the Panel and members will meet for the first time on 5 December 2024 to receive an induction, including inputs from Dame Vera Baird and the Deputy Mayor. We therefore anticipate that these six recommendations will be discharged by early December 2024.

4.5 Dame Vera also recommended what she terms as a '**Super Independent Custody Visitor role**' that can make unannounced visits to custody suites. The GMCA have recruited to a new post to enable GMCA to have adequate resources to meet this recommendation. This new role will be in place for mid-November 2024 and will provide additional capacity for GMCA officers to undertake comprehensive checks on a random basis across all suites, as well as improve the current Independent Custody Visitor arrangements and feedback loops. In the interim, senior members of the GMCA Safer and Stronger Communities team have visited the GMP North



Manchester Custody Suite to understand the process for custody suite compliance visits. This will be used to inform a new and improved mechanism for independent spot checks/compliance visits by Independent Custody Visitors going forward.

4.6 The final area is not worded as a recommendation as such, but that the Deputy Mayor should '*discuss the introduction of an independent element into police complaints at the lower level by offering a triage service based in her office, as has proved effective in Northumbria*'. Again, this is an important recommendation given that many of those featured in the Inquiry were failed by the complaints system. The Deputy Mayor has considered this recommendation and is currently focussing on how the current GMP complaints system can make the necessary improvements. A final decision will be taken on what model will be adopted in April 2025.

## 5. National recommendations

5.1 Dame Vera acknowledges that some of the observations, conclusions and recommendations relate to matters which are not unique to Greater Manchester and also where national bodies will be required to take responsibility or implement new guidance and legislation.

5.2 Dame Vera therefore included 6 recommendations for national consideration by the Home Office, the National Police Chiefs' Council (NPCC) and the College of Policing.

5.3 The Deputy Mayor has met with all of the above national bodies to discuss the recommendations, and the Mayor and Deputy Mayor also met the Home Secretary. The Deputy Mayor has also taken on the lead Association of Police and Crime Commissioners national role for custody.

5.4 Two recommendations relate to the **national definition of strip searches**. This national work, led by the Home Office, has begun regarding PACE Code A & Code C, exposure of intimate parts (EIP) strip search proposals. It is envisaged that this piece of work is likely to take some time and will not be completed by the Home Office until 2026/7. It therefore may be some time before these national recommendations can be fully discharged.

5.5 Another recommendation relates to the possible **use of airport screening devices** as a tactical option to reduce the use of strip search for concealment. The Deputy Mayor has raised this with the Home Office as significant resources would be required to implement this recommendation across all GM custody suites. We are continuing to explore local and national options, but this is an area that could be prohibitive due to the cost.

5.6 The remaining national recommendations relate to the **lack of a national or local strategic policing response to the criminalisation of victims of violence against women and girls** and points strongly to the cases in the report where victims of domestic abuse were arrested for counter-allegations. This is a complex area that requires national attention, and the Deputy Mayor continues to raise this at a national level as well as asking the Chief Constable of GMP to prioritise how this is managed within the force.

## **6. Oversight of complaints and professional standards issues featured in the Inquiry.**

6.1 Dame Vera's recommendations were drawn from the narratives of the 14 complainants that she featured in the report. These were distressing incidents and although outside of the formal recommendations, the Mayoral Oversight Group has also taken on oversight of the progress made in dealing effectively and expeditiously with these complaints. This is especially important, given that many of those featured in the report felt let down that their complaints had not been dealt with properly by GMP.

6.2 The detail of these complaints cannot be featured in this report, but Professional Standards issues were identified in all 14 cases that feature in the Baird Inquiry, in varying degrees of seriousness. Based on the allegations and findings, these include themes such as: officers taking action that did not appropriately address the context and behaviour of both parties; defaulting to arrest instead of examining reasonable alternative approaches; inadequate poor record keeping and officer incivility.

Recommendations for Greater Manchester Police			
Ref	Recommendation detail	Status	Action and progress
R1	<p><b>Refresher Training Voluntary Attendance</b></p> <p>GMP should refresh officer training on: The availability and utility of voluntary attendance, given the increased emphasis it is now given in the PACE (Police and Criminal Evidence) codes of practice and the Inquiry’s conclusion that many of these arrests were unnecessary or unlawful. In cases at the lower levels of alleged criminality, the balance should favour avoiding both the risk of poor impact on arrestees and the risk to public confidence from such arrests.</p>	<p>Fully met.</p> <p>Discharged with on-going monitoring and compliance checks required</p>	<ul style="list-style-type: none"> <li>• In March 2024 GMP launched its new Voluntary Attendance procedure.</li> <li>• The Criminal Justice and Custody Branch have worked with Professional Development and Communications to ensure that the procedure is known, understood, and applied.</li> <li>• By June 2024 one day training was delivered to all District and Branch Chief Inspectors to ensure that they appropriately use Voluntary Attendance and Out of Court Resolutions.</li> <li>• Chief Inspectors are now responsible for improving Voluntary Attendance and Out of Court Resolutions and this is now part of local performance management frameworks which is reported up to Chief Officers at the force performance meeting.</li> <li>• Voluntary Attendance is covered in all student officer training and is mentioned on other key courses, but Professional Development have identified that there were still some gaps in Voluntary Attendance training and awareness for student officers. New materials have been created to support with refreshing officers’ knowledge and to improve recording and use.</li> </ul>
R2	<p><b>Refresher Training National Decision-Making Model</b></p> <p>GMP should refresh officer training on: The effective use of the College of Policing National Decision-Making Model in determining whether an arrest is necessary [Code G].</p>	<p>Fully met.</p> <p>Discharged with on-going monitoring and compliance checks required</p>	<ul style="list-style-type: none"> <li>• The National Decision-Making Model is a thread throughout all training delivered.</li> <li>• It is delivered to new students as a standalone package and all officer training is refreshed annually.</li> <li>• A review of the training took place to strengthen this further following the Inquiry.</li> <li>• Training for student officers on the process of arrests, legal framework and considerations was updated in October 2023 to ensure a greater understanding.</li> <li>• In relation the necessity for arrest (Code G) –student officers are provided with in-depth training, and this is also then applied in a scenario-based environment.</li> <li>• Code G is refreshed on a number of courses when officers or staff move into new roles e.g. GMP teaches Custody Sergeants via a National Decision-Making Model continuous professional development package, the purpose being to enhance accuracy and completeness of custody records.</li> </ul>

<p><b>R3</b></p>	<p><b>Arrest packs ease of access</b></p> <p>Arrest packs are an important and widespread efficiency tool but, if unread, they will deliver high numbers of unlawful arrests.</p> <p>They should always be presented in a force template for ease of access.</p>	<p>Fully met.</p> <p>Discharged with on-going monitoring and compliance checks required.</p>	<ul style="list-style-type: none"> <li>• Templates and associated guidance created by GMP named, “<i>Suspect Policy &amp; Procedure document of May 2024</i>” became “<i>live</i>” in July 2024.</li> <li>• GMP have identified that the specifics of an arrest pack are not covered within the training environment. The training focusses on the National Decision-Making Model and Code G.</li> <li>• Arrest packs are mentioned in student officer training and referred to as local policy to support the quick and effective detention/arrest of an individual. Action has been taken to embed this further and will focus on what these are and what is included in one.</li> <li>• Force wide, immediate action has been taken to raise awareness of arrest packs in GMP. Professional Development has created an ‘Arrest’ section on their Learning and Skills Hub and this shared with Districts to communicate with officers. Corporate Communications have also raised the profile and requirements, force wide.</li> </ul>
<p><b>R4</b></p>	<p><b>Quality control of arrest packs</b></p> <p>There is an urgent need for some means of assurance that the arresting officer has read and understood the content of an arrest pack before taking action.</p>	<p>Fully met.</p> <p>Discharged with on-going monitoring and compliance checks required.</p>	<ul style="list-style-type: none"> <li>• A governance and quality control system were devised as a result of this recommendation and a corporate roll out commenced which included a communications plan in July 2024.</li> <li>• See also response to R3.</li> </ul>
<p><b>R5</b></p>	<p><b>Arrests: Trauma training</b></p> <p>GMP training GMP should ensure that all officers are given training to help them to recognise and manage the effects of domestic and sexual trauma on survivors:</p> <ul style="list-style-type: none"> <li>• so that officers are better equipped to give a good response to sexual and domestic abuse victims</li> </ul> <p>[This] first point ought already to be force policy</p>	<p>In progress.</p>	<ul style="list-style-type: none"> <li>• A full review was undertaken to identify gaps and improvements to be made in trauma training for all officers</li> <li>• GMP also engaged the College of Policing on this recommendation to identify several packages that should be nationally delivered to ensure standardised and consistent training products for vulnerability matters. This includes the neuroscience of trauma (trauma informed policing) as well as vulnerability packages on sex work and substance misuse, domestic abuse and hate crime, grooming and homicide, modern slavery, stalking and harassment, child sexual exploitation, radicalisation and hate crime, forced marriage and officer wellbeing. GMP also recently launched the Rape and Serious Sexual Assault College of Policing training</li> <li>• These packages have now been included in the GMP Student Officer pathway and have been rolled out across the force as refresher training for staff which completed in October 2024.</li> <li>• Ahead of the Inquiry publication, a review was undertaken for Custody Officers’ training. This identified 22 GMP Custody Sergeants who had not had Domestic Abuse Matters training. Training of those 22 officers commenced in July 2024 and is scheduled to be completed by January 2025.</li> </ul>

			<ul style="list-style-type: none"> <li>Bespoke Domestic Abuse Matters themed training is being arranged by the Custody Branch training sergeant for delivery to Detention Officers (it was not originally delivered to Detention Officers as they were not regarded as the target audience). Roll out is anticipated to be during 2025.</li> </ul>
<b>R6</b>	<p><b>Arrests: Trauma training</b></p> <p>To avoid victims' arrests by recognising that victims reporting domestic or sexual abuse, facing counter-allegations, or reacting to a poor police response may be revisiting trauma and require care</p>	In progress.	<ul style="list-style-type: none"> <li>See response to R5.</li> </ul>
<b>R7</b>	<p><b>Arrests: Trauma training</b></p> <p>To avoid the escalation of incidents involving abuse survivors through physical contact with male officers. It should, where possible, always be preferable for any necessary physical contact with women to be done by female officers.</p>	<p>Fully met.</p> <p>Discharged with on-going monitoring and compliance checks required.</p>	<ul style="list-style-type: none"> <li>This is covered within all elements of training and is reinforced as per GMP policy around searching of the opposite sex. This is above and beyond national standards.</li> <li>Professional Development will continue to reinforce policy in relation to no searching of the opposite sex, whenever practicable.</li> <li>See also R4 regarding training.</li> </ul>
<b>R8</b>	<p><b>Custody: Support link – women Domestic Abuse and sexual abuse survivors</b></p> <p>There is already a link from custody desks to military veterans' organisations, and GMP should initiate a new link to domestic and sexual abuse charities to offer support for women detainees who are found to be survivors.</p>	<p>Fully met.</p> <p>Discharged with on-going monitoring and compliance checks via GM Victims Services.</p>	<ul style="list-style-type: none"> <li>A corporate poster containing one central link telephone number has been developed in consultation with victim services.</li> <li>There are 10 victim service arrangements across GM, all working different hours between 0700 and 2200 hours. As there is a single contact telephone number and email address Victims Services will then signpost the service user to the appropriate support provider.</li> <li>The posters are prominently displayed in every GMP custody suite.</li> <li>The Female Welfare Officer leaflet has also been updated to align with this.</li> <li>Oversight will be provided by the Victim Services, commissioned by the GMCA to ensure 24-hour capability.</li> </ul>
<b>R9</b>	<p><b>Custody: Support link – women DA and sexual abuse survivors</b></p> <p>The female welfare officer provided by the force for each woman detainee should be responsible for asking the detainee about their need for this support [domestic and sexual abuse survivor support].</p>	<p>Fully met.</p> <p>Discharged with on-going monitoring and compliance</p>	<ul style="list-style-type: none"> <li>GMP assigns Female Welfare Officers to all female detainees.</li> <li>Since July, twice daily Female Welfare Officers' governance meetings take place across all GMP custody sites to ensure female welfare officers have been assigned and to affirm that they understand their role and responsibilities. This includes a standing agenda item to ensure that the Female Welfare Officer has asked/ will ask the detainee as to whether they have any need for this support.</li> </ul>

		checks required.	<ul style="list-style-type: none"> <li>• Further steps have been undertaken by the GMP lead for custody to ensure that all officers and staff know their roles and responsibilities and so those who deliberately depart from those responsibilities will face consequences, the most serious being a referral to the Professional Standards Directorate.</li> <li>• Updates have been made to the GMP Female Welfare Officer leaflet, in the form of asking the detainee about their need for domestic and sexual abuse survivor support.</li> </ul>
<b>R10</b>	<p><b>Custody: Separate female cells</b></p> <p>I believe that in some custody suites women's cells are kept separate from those of men, and my recommendation is that this should be the case in all suites</p>	<p>Not practical to fully meet recommendation (due to capacity of cells).</p> <p>Discharged with on-going monitoring and compliance checks required.</p>	<ul style="list-style-type: none"> <li>• From July 2024 every GMP custody suite set aside separate cell areas for females, children, and males.</li> <li>• Those cell areas are reserved for said category of persons, however, if, for example, designated male cell areas become full, then female cell areas might have to house males (all GMP cells are single occupancy).</li> <li>• This is due to demand, i.e. the number of persons arrested versus cell capacity across the GMP custody estate.</li> <li>• As of August 2024, this was made more difficult due to the activation of Operations Safeguard, Early Dawn, and Rotation. Collectively, the impact of those operations has reduced GMP call capacity.</li> <li>• It is for the above reasons that it is not practical to fully meet the recommendation as Dame Vera describes.</li> </ul>
<b>R11</b>	<p><b>Custody: Female Welfare Officer</b></p> <p>Every woman in custody should be allocated a female welfare officer. I know that GMP accepts the wisdom of that practice, but to be effective it must be an explicit policy that there is never a woman detainee in any GMP custody suite who does not have continuous female welfare support throughout.</p>	<p>Fully met.</p> <p>Discharged with on-going monitoring and compliance checks required.</p>	<ul style="list-style-type: none"> <li>• GMP assigns Female Welfare Officers to all female detainees.</li> <li>• Since July 2024, twice daily female welfare governance meetings take place across all custody sites, attended by all on duty Female Welfare Officers and chaired by a senior custody officer to ensure they have been assigned and to affirm that they understand their role and responsibilities.</li> <li>• Note: Following evidence submitted to them by GMP in April 2024, the HMICFRS closed this as an outstanding area for improvement for GMP.</li> </ul>
<b>R12</b>	<p><b>Custody: Female Officer</b></p> <p>All aspects of the practical welfare of the detainee should be that welfare officer's responsibility, including delivery of food and drink, response to the cell buzzer, regular observation checks, asking welfare questions and making any necessary referrals.</p>	<p>Not practical to fully meet recommendation (due logistical constraints).</p> <p>Discharged with on-going monitoring</p>	<ul style="list-style-type: none"> <li>• GMP assigns Female Welfare Officers to all female detainees.</li> <li>• Meeting this recommendation is a GM female welfare officer role requirement, when practicable.</li> <li>• A point to highlight is that it cannot be guaranteed that a Female Welfare Officer will answer a female cell buzzer. A visits officer is allocated at the start of every custody shift. One of their core functions is to answer cell buzzers. Logistical/ other constraints might mean that the appointed visits officer is male. However, the appointed female welfare officer, unless there are exceptional circumstances, is expected to attend to all other aspects of the practical welfare of the detainee.</li> </ul>

		and compliance checks required.	<ul style="list-style-type: none"> <li>• It is for the above reasons that it is not practical to fully meet the recommendation as Dame Vera describes.</li> <li>• Following evidence submitted to them by GMP in April 2024, the HMICFRS closed this as an outstanding area for improvement for GMP.</li> </ul>
R13	<p><b>Custody: Sanitary and hygiene needs</b> Unless there is a risk assessment against it (which seems unlikely) sanitary requisites should be provided automatically in every female cell, including toilet paper, a toothbrush and other hygiene needs</p>	Fully met. Discharged with on-going monitoring and compliance checks required.	<ul style="list-style-type: none"> <li>• GMP now automatically provides dignity packs for female detainees that include towel, soap, blanket, toilet paper, and sanitary products.</li> <li>• Female detainees do not have to ask, they are given these products routinely.</li> <li>• Following evidence submitted to them by GMP in April 2024, the HMICFRS closed this as an outstanding area for improvement for GMP.</li> </ul>
R14	<p><b>Custody: Better risk assessment and more humane and dignified treatment of all detainees: Personal property</b> The psycho-emotional impacts of custody, as set out elsewhere in this report (heavily paraphrasing the work of Professor Skinns) may be reduced or minimised by marginal adjustments to treatment where appropriate. Considerations would be to allow detainees to keep some personal property, which can be a normalising factor, and to provide puzzles, reading material and other distractions to help reduce stress and manage boredom.</p>	Fully met. Discharged with on-going monitoring and compliance checks required.	<ul style="list-style-type: none"> <li>• For every detained person, GMP has introduced distraction devices such as books, fidget spinners, balls, books of worship etc.</li> <li>• Subject to individual risk assessment by the Custody Sergeant, persons detained in GMP custody suites are allowed to retain some personal property.</li> <li>• GMP routinely promotes the provision of distraction devices during training sessions</li> <li>• Following evidence submitted to them by GMP in April 2024, the HMICFRS closed this as an outstanding area for improvement for GMP.</li> </ul>
R15	<p><b>Custody: Better risk assessment and more humane and dignified treatment of all detainees: Non-coercive approach</b> Staff adopting a non-coercive approach would help to mitigate the worry of being totally in police power.</p>	Fully met. Discharged with on-going monitoring and compliance checks required.	<ul style="list-style-type: none"> <li>• Current custom, culture and practice is focussed on treating people with dignity, respect and using effective, patient, communications to avoid conflict.</li> <li>• Every GMP custody strip search that is undertaken is now recorded daily on the 'custody log' and is presented at the custody senior leadership team. Included on the log is, evidence of escalation, which has at its heart the desire for staff not to act coercively.</li> <li>• The GMP Custody Branch compliance function is being sustained and has been enhanced since the Inquiry.</li> <li>• GMP has developed a classroom-based training input for all GMP Detention Officers, Custody Sergeants and Custody Inspectors. The inputs share Inquiry learning points and recommendations, including this one. The inputs will be delivered to officers and</li> </ul>

			<p>staff during their initial custody training courses and during 6 weekly branch development days.</p> <ul style="list-style-type: none"> <li>• Further, the Custody senior leaders will deliver 1-hour briefings about Inquiry learning and this/ all recommendations from August 2024</li> </ul>
R16	<p><b>Custody: Better risk assessment and more humane and dignified treatment of all detainees: Cell buzzers</b></p> <p>The police should ensure all cell buzzers are answered quickly</p>	<p>Fully met.</p> <p>Discharged with on-going monitoring and compliance checks required.</p>	<ul style="list-style-type: none"> <li>• At the start of every custody shift, a Custody Detention Officer is allocated the role of 'Visits Officer' which includes a requirement to promptly respond to cell buzzers activated by detainees, and to undertake routine and regular visits, recording these on the custody record (note – Female Welfare Officers are always expected to visit female detainees, unless exceptional demand/ circumstance preclude that).</li> <li>• Since November 2023, GMP have employed Custody Compliance Officers who undertake unannounced, regular site visits, including to assess whether cell buzzers are responded to promptly.</li> <li>• If any are not being responded to promptly, feedback is given to the site Custody Inspector who has responsibility to improve this.</li> <li>• Compliance Officers carried out unannounced visits and they reported that cell buzzers being answered promptly by Detention Officers.</li> <li>• Collective findings to date from live time assessments are that cell buzzers have routinely, been answered promptly. There is evidence of a site fault reporting whereby staff find, and report for repair, instances of faulty buzzers.</li> <li>• GMP is re-designing aspects 6 custody suites to ensure that the allocated 'Visits Officer' has a designated workstation co-located next to the cell call system (cost of £180k). Bury and North Manchester already have this capability. The delivery plan is to complete these works at all 6 sites by 2025.</li> </ul>
R17	<p><b>Custody: Custody officer refresher training</b></p> <p>Custody officers should be refreshed in training as to their independent role and their duty to represent the welfare of arrestees. If they are not already apprised of the potential harm that custody can inflict on individuals, that should also be introduced in training/retraining.</p>	<p>Fully met.</p> <p>Discharged with on-going monitoring and compliance checks required.</p>	<ul style="list-style-type: none"> <li>• GMP have developed a classroom-based training input for all GMP Detention Officers, Custody Sergeants and Custody Inspectors. The inputs will share Inquiry learning and recommendations, including this one. The inputs will be delivered to officers and staff during their initial custody training courses and during 6 weekly branch development days and will be completed by November 2024.</li> <li>• Further, the Custody senior leadership team will deliver 1-hour briefings about Inquiry learning and this/ all recommendations from August 2024.</li> </ul> <p>In terms of standard practice:</p> <ul style="list-style-type: none"> <li>• Every GMP Custody Sergeant is mandated to attend a three-week core training course, mentored for one month in an operational custody suite by an experienced Custody Sergeant and complete College of Policing portfolio before they are accredited and can perform the role operationally.</li> <li>• Key elements of the Custody Sergeant's core training are teachings about the requirement to comply with both the PACE Code of Practice, Code C (detention, treatment and questioning of persons by Police Officers); and College of Policing</li> </ul>



			<p>Authorised Professional Practice (APP), "Detention and custody: response, arrest, and detention." The independence of the Custody Officer's role is dealt with in their training.</p> <ul style="list-style-type: none"> <li>• There is a heavy focus on treating people with dignity, respect and using effective, patient, well-being focussed communications to support detainees during their detention periods, and to avoid conflict whenever possible.</li> <li>• The GMP Custody compliance function is being sustained and has been enhanced to ensure that this and other recommendations are monitored</li> <li>• Note: Following evidence submitted to them by GMP in April 2024, the HMICFRS closed this as an outstanding area for improvement for GMP (i.e., the force should make sure that staff understand and follow Authorised Professional Practice guidance (AFI))</li> </ul>
<p><b>R18</b></p>	<p><b>Strip Search: Seizure of clothing for welfare purposes</b></p> <p>PACE S54(4)(a) GMP, within six months, should end the use strip searching/anti-rip clothing for cases where there is a risk of self-harm or to a detainee's welfare and move to a practice based on level 3 observations.</p>	<p>Fully met. Discharged with on-going monitoring and compliance checks required.</p>	<ul style="list-style-type: none"> <li>• Custody Officers are trained and consistently use, less impactful alternatives to removing clothing and using Anti Tear Clothing. For example, the use of Level 3 and Level 4 observations of detainees.</li> <li>• Regular compliance checks are undertaken as part of a continuous, longer-term programme of work designed to drive and improve standards around this/ other recommendation and HMICFRS Causes of Concern and Areas for Improvement.</li> <li>• GMP pro-actively, and randomly review 150 to 200 custody and associated records per month.</li> <li>• That review infrastructure is part of scrutiny process designed to improve safety, professional standards and to safeguard detainees. Reviews are undertaken on a themed basis and include dignity, strip searches, and whether detainees are naked.</li> <li>• If any concerns are identified during dip sampling or reviews, concerns are directly addressed with the Custody Sergeant or staff member, to implement quick time learning to minimise the likelihood of similar future recurrence.</li> <li>• Where any Custody Officer is identified as performing their duties incorrectly, issues are escalated to the branch Chief Inspector who determine an appropriate outcome. Options range from reflective practice learning to formal performance improvement development plans, escalation to the Head of the branch, and referral to the Force Professional Standards Directorate.</li> <li>• From March 2024, GMP stopped using the tactical option of deploying anti-tear clothing in its custody suites. This was following careful assessment and consideration of established health, safety and risk mitigation measures that are now in place across the GMP custody estate, and with the dignity of, and respect for detainees in mind. GMP does not believe there is a current justification (or need) for the use of anti-tear clothing in its custody suites.</li> <li>• GMP is satisfied that there is no current culture, custom or practice of disrespecting the dignity of detainees; or inappropriately removing clothing and leaving detainees naked; or routinely strip-searching; or placing detainees in anti-tear clothing.</li> </ul>

<p><b>R19</b></p>	<p><b>Strip Search: Strip searches for welfare/ risk of self-harm purposes</b></p> <p>GMP should direct its custody staff that strip searches for welfare or risk of self-harm purposes that are carried out in response to an arrestee refusing to answer risk assessment questions at the custody desk should, following the April 2023 update to College of Policing Authorised Professional Practice (APP), stop immediately. APP now provides the guidance: “The use of anti-rip clothing because a detainee is not engaging in risk assessment questions is inappropriate.”</p>	<p>Fully met.</p> <p>Discharged with on-going monitoring and compliance checks required.</p>	<ul style="list-style-type: none"> <li>• GMP Custody Officers have now stopped the authorisation of strip searches for welfare or risk of self-harm purposes.</li> <li>• Custody Officers are trained and conditioned to use, and consistently use, less impactful alternatives to removing clothing and using Anti Tear Clothing. For example, the use of Level 3 and Level 4 observations of detainees.</li> <li>• See response to R18 regular compliance checks undertaken by GMP as part of a continuous, longer-term programme designed to drive and improve standards. Collectively and GMP randomly review 150 to 200 custody/associated records per month.</li> <li>• GMP is satisfied that there is no current culture, custom or practice of disrespecting the dignity of detainees; or inappropriately removing clothing and leaving detainees naked; or routinely strip-searching; or placing detainees in anti-tear clothing.</li> <li>• Note: Following evidence submitted to them by GMP in April 2024, the HMICFRS closed an outstanding cause of concern for GMP which was: <i>The force isn't always maintaining the dignity of detainees when clothing is removed. Detainees are sometimes left naked in their cells and not encouraged to put on replacement clothing.</i></li> </ul>
<p><b>R20</b></p>	<p><b>Risk assessments and support for those at risk of self-harm.</b></p> <p>Where a risk assessment shows a risk of self-harm, there should always be a conversation between custody staff and the arrestee to offer access to a charity such as Samaritans. This is common humanity and helps to fulfil the ambition of the National Police Chiefs’ Council (NPCC) National Strategy for Police Custody (NPCC, 2022): “We aim to ensure that when they leave custody it is in a better condition or circumstances than when they arrive”.</p>	<p>Fully met.</p> <p>Discharged with on-going monitoring compliance checks required.</p>	<ul style="list-style-type: none"> <li>• Every GMP Custody Suite has a healthcare professional, who is not a GMP employee, on duty, 24 hours per day, every day of the year.</li> <li>• Every suite has daily access to the Liaison &amp; Diversion service, an independent service, commissioned by the GMCA.</li> <li>• Whenever a Custody Officer’s risk assessment is undertaken, its findings are documented on the custody record. If that risk assessment leads says that the detained person is at risk of self-harm, the person will automatically be referred to the on-site health care professional for a medical assessment at the earliest opportunity whilst the person is in GMP custody. Health care professionals have access to a 24-hour mental health triage service.</li> <li>• Similarly, detainees risk assessed as being at risk of self-harm, will, by GMP Custody Officers, be referred to the Liaison and Diversion service.</li> <li>• Prior to release from custody, every detainee has a documented pre-release risk assessment, to establish their state of mind and any risk of harm to themselves or the wider community.</li> <li>• GMP Custody Sergeants are trained and aware of their obligations, aligned to Human Rights Act Article 2 (right to life), to do all that they reasonably can to ensure that detained persons are safe whilst in custody, and are at the point of release. If there are doubts, then Custody Sergeants know of the expectation upon them to mitigate any such assessed risk. E.g, contacting a family member to collect the detainee from custody, or taking the person to hospital for a voluntary mental health assessment.</li> <li>• Every detainee who is released from custody is provided with a leaflet that provides information about charities, counsellors, and support platforms.</li> </ul>

			<ul style="list-style-type: none"> <li>• GMP have reached out to the Samaritans, Manchester to explore the possibility of establishing a partnership which would see members of the Samaritans visiting GMP custody suites. No response has been received and the GMCA will now write to them to understand if this is possible.</li> <li>• GMP are exploring whether additional questions/ prompts can be programmed to feature during a Custody Officer's risk assessment. The point being to prompt a contact call to the Samaritans immediately from custody, when a risk is identified.</li> </ul>
R21	<p><b>Strip Search: Accurate and comprehensive data about [GMP] use of strip searching</b></p> <p>GMP should collect accurate and comprehensive data about its use of strip searching.</p>	<p>Fully met.</p> <p>Discharged with on-going compliance checks required including via the Independent Scrutiny Panel.</p>	<ul style="list-style-type: none"> <li>• GMP are now accurately reporting strip search data.</li> <li>• Every GMP strip search that is undertaken is now recorded daily on the custody rolling log and is presented and reviewed by custody senior leaders.</li> <li>• Strip search data forms part of monthly branch data returns including performance reviews and at the force's performance meeting.</li> <li>• It should be noted that strip search numbers have increased but this is due to the fact that GMP are now more consistently recording strip search data and applies the wide-reaching PACE definition of a strip search, i.e. "... <i>the removal of more than outer clothing... outer clothing includes shoes and socks.</i>"</li> <li>• <i>An ICT solution has been found and effective from October 2024 to enable the accurate recording of strip search data</i></li> <li>• The proposed independent scrutiny panel should also dip sample the accuracy of this recording (see R4)</li> </ul>
R22	<p><b>Government's Female Offender Strategy (MoJ, 2018a)</b></p> <p>Was accompanied by police guidance on 'managing vulnerability'. Has this been disseminated in GMP? What training was offered and what monitoring has been carried out?</p>	<p>Fully met.</p> <p>Discharged with on-going compliance checks required.</p>	<ul style="list-style-type: none"> <li>• GMP have published on the GMP intranet, "<i>The Female Offender Strategy</i>" along with associated guidance</li> <li>• All GMP Custody Sergeants received training regarding the Female Offender Strategy</li> <li>• GMP incorporates the Female Offender Strategy into GMP training</li> <li>• By way of monitoring – GMP is undertaking ongoing activity led by the VAWG lead to ensure that all District leadership teams continually assure themselves that it is known about and applied operationally. Following a training review for this recommendation, it has been identified that the strategy is covered within one student entry route (Police Constable Entry Programme) but not the PCDA –(Police Constable Degree Apprenticeship) entry route and this will be rectified via a revised training programme led by the GMP People &amp; Development Branch.</li> <li>• It is also covered within other courses such as Crime and Neighbourhoods training.</li> <li>• There is a gap in all officers and staff being aware of this strategy. There is strong awareness of Violence Against Women and Girls Strategy but not specifically the Female Offenders Strategy. A review is being conducted with the Force Lead (VAWG) on how this can be communicated to all officers and staff within GMP</li> </ul>

<p><b>R23</b></p>	<p><b>Detainee must be asked whether they have anything:</b></p> <p>From now on in GMP, if any strip search is contemplated, the detainee must be asked whether they have something with them they know they would not be allowed to keep, to give the detainee the option of offering items up.</p>	<p>Fully met.</p> <p>Discharged with on-going monitoring and compliance checks required</p>	<ul style="list-style-type: none"> <li>• From now on in GMP, if any strip search is contemplated, the detainee must be asked whether they have something with them they know they would not be allowed to keep, to give the detainee the option of offering items up. To that end, every operational GMP custody suite terminal is mandated to display a prompt/ reminder for the Custody Officer, to ask this question(s).</li> <li>• Regular compliance checks are undertaken as part of a continuous, longer-term programme of work designed to drive and improve standards around this/ other recommendation and HMICFRS Causes of Concern and Areas for Improvement.</li> <li>• GMP has developed a classroom-based training input for GMP custody. The inputs will share inquiry learning points and recommendations, including this one. The inputs will be delivered to officers and staff during their initial custody training courses and during 6 weekly branch days. Training input delivery will be completed by the end of November 2024</li> <li>• Further, the Custody Senior Leadership Team have delivered 1-hour briefings about Inquiry learning and this/ all recommendations from August 2024</li> </ul>
<p><b>R24</b></p>	<p><b>Reasons strip search required must be explained in plain language:</b> from now on in GMP, the reasons why any strip search is required must be explained to the detainee by the custody sergeant to the detainee in plain language, relating (a) facts and circumstances justifying it, and (2) why there is no alternative. The custody record should be endorsed accordingly, and the conversations set out in recommendations 3 and 4 must be held on body-worn video (BWV) or cell video, which must be retained.</p>	<p>Fully met.</p> <p>Discharged with on-going monitoring and compliance checks required.</p>	<ul style="list-style-type: none"> <li>• GMP Custody Officers now routinely explain in plain language – and whenever it is practicable do so at the Custody Counter/ so it can be captured on retained audio visual CCTV footage – as to why a strip search (as per the Davies – v – Merseyside Police interpretation) is believed necessary by the Custody Sergeant.</li> <li>• In some, less common, instances, the conversation might end up taking place in the cell, however in the majority of those lesser instances, the arresting or escorting officer will be present and wearing BWV, notwithstanding that the majority of custody cells are CCTV enabled (albeit cell CCTV does not have audio recording capability).</li> <li>• Every detainee who is being considered for a strip search is first asked if they have anything which they wish to handover prior to the search taking place. The fact of such requests must be recorded on the custody record.</li> <li>• Regular compliance checks are undertaken as part of a continuous, longer-term programme of work to drive and improve standards around this/ other recommendations and HMICFRS Causes of Concern and Areas for Improvement.</li> <li>• GMP has developed a classroom-based training input for all GMP custody. The inputs will share inquiry learning points and recommendations, including this one. The inputs will be delivered to officers and staff during their initial custody training courses and during 6 weekly branch CPD days. Training input delivery will be completed by the end of November 2024</li> <li>• Further, the Custody SLT will deliver 1-hour briefings about Inquiry learning and this/ all recommendations from August 2024</li> </ul>

R25	<p><b>Domestic Abuse: The treatment of victims: - Domestic &amp; sexual abuse (and Victims Code Compliance)</b></p> <p>In two cases that formed part of The Baird Inquiry, there was a failure to give support to... [two] victims of sexual and domestic abuse that [GMP] is obliged to give under the Victims' Code (MoJ, 2020)... GMP should immediately address its victims' processes to bring them into compliance with the Victims' Code.</p>	<p>Fully met.</p> <p>Discharged with on-going compliance and auditing taking place via the Victims Code.</p>	<ul style="list-style-type: none"> <li>• A full training review was undertaken to identify gaps and improvements to be made.</li> <li>• GMP have commissioned the production of a training video for GMP district and Custody Officers and staff featuring a female adult who is a vulnerable service user who engaged with GMP to share her experience of GM policing, custody and the criminal justice system. The female highlights her experience of being arrested when in fact she was a victim of childhood sexual abuse which includes her poor custody experience and how her original investigation into her sexual abuse allegation was managed. When complete, the video will be integrated into GMP wide training and development for district and Custody Officers.</li> <li>• This has also been developed into a development session for all custody officers and staff delivered by August 2024. Learning points covered included questioning: necessity to arrest; what an investigation outcome is going to be and whether a female accused has dependents/ who is caring for them whilst female in custody as well as exploring, the impact of arrest and enquire as to what support they have in place and progression of referrals into Liaison and Diversion services.</li> <li>• Victims Code training is covered on all student officer training routes. These are standalone lessons focussing on this topic. Further training is provided to supervises on the operational skills course and the importance of this being completed. Training is provided external to the branch by the Victim Services team.</li> <li>• A longer-term review needs to be undertaken in relation to compliance with the Victim's Code. An assessment is underway between on how they can support Districts in relation to compliance.</li> <li>• On-going monitoring will occur via the Victims Code – to which all forces are accountable.</li> </ul>
R26	<p><b>Subject Access Requests</b></p> <p>GMP should respond in a timely and comprehensive way to SARs, reflecting the ICO advice</p>	<p>Fully met.</p> <p>Discharged with on-going monitoring and compliance checks required.</p>	<ul style="list-style-type: none"> <li>• GMP accepts that improvements were required.</li> <li>• Additional resources have been identified to help handle increased demand levels with increases in subject access requests following the Inquiry.</li> <li>• Response times have vastly improved, from 47% compliance in June 2022 to 82% in May 2024.</li> <li>• GMP strives for continuous improvement in this area and has a target to reach a 90% compliance rate by the end of 2024.</li> </ul>

Recommendations for the Mayor/Deputy Mayor (GMCA)			
Ref	Recommendation detail	Status	Action and progress

<p><b>R27</b></p>	<p><b>Scrutiny: arrests</b></p> <p>The Deputy Mayor for Policing and Crime's office should establish a scrutiny panel to review anonymised arrests, at the lower end of criminality, every three months.</p> <p>This panel should draw membership from across criminal justice and the victims' sector and feed back to the senior officer team in GMP and to the Deputy Mayor with any concerns about the necessity and reasonableness of the arrests. GMP should fully participate, and welcome lessons learned.</p>	<p>In progress</p> <p>To be completed by 5 December 2024.</p>	<ul style="list-style-type: none"> <li>• The GMCA will establish one arrest and detention scrutiny panel that covers all scrutiny arrangements listed under R27, R28, R29 and R30.</li> <li>• The panel may also want to dip sample other areas of custody process, procedure or practice as identified by the Mayor/Deputy Mayor.</li> <li>• Terms of Reference have been drafted and commented on by GMP and GMCA including both legal teams.</li> <li>• The Data Privacy Impact Assessment is complete</li> <li>• Panel recruitment process is complete and a welcome and induction session for all Panel members will take place on 5 December 2024 which will include an input from Dame Vera Baird KC and the Deputy Mayor with the first Panel meetings commencing in the new year.</li> </ul>
<p><b>R28</b></p>	<p><b>Scrutiny: custody officers reasons underpinning arrests</b></p> <p>There should be a dip-sampling panel under the auspices of the Deputy Mayor to examine:</p> <p>the quality of interrogation and scrutiny applied by custody officers to the facts that underpin reasons for arrests. This scrutiny is vital for the protection of arrestees</p>	<p>In progress</p> <p>To be completed by 5 December 2024.</p>	<ul style="list-style-type: none"> <li>• See response to R27</li> </ul>
<p><b>R29</b></p>	<p><b>Scrutiny: accuracy of custody records</b></p> <p>There should be a dip-sampling panel under the auspices of the Deputy Mayor to examine:</p> <p>the comprehensiveness and accuracy of custody records, so far as this can be assessed, and their consistency.</p>	<p>In progress</p> <p>To be completed by 5 December 2024.</p>	<ul style="list-style-type: none"> <li>• See response to R27</li> </ul>
<p><b>R30</b></p>	<p><b>Scrutiny: dip sample custody records that contain strip searches</b></p>	<p>In progress</p> <p>To be completed by</p>	<ul style="list-style-type: none"> <li>• See response to R27</li> </ul>

	The Deputy Mayor for Policing and Crime should consider whether her scrutiny panel might dip-sample custody records that contain information about strip searches, to ensure that GMP observes the current rules and what is set out in these recommendations.	5 December 2024.	
<b>R31</b>	<b>Scrutiny: information sharing agreements</b> An information-sharing agreement may be necessary, which GMP should be prepared to facilitate.	In progress To be completed by end of November 2024	<ul style="list-style-type: none"> <li>The development of a Data Privacy Impact Assessment is complete but further work is still underway to consider data sharing arrangements and data sharing agreements</li> <li>The development of necessary data sharing protocols is due to be complete by the end of November 2024 in advance of the Panel meeting for the first time on 5 December 2024.</li> </ul>
<b>R32</b>	<b>Scrutiny: reporting</b> The panel(s) should report back to the Deputy Mayor at frequent intervals.	In progress To be completed by 5 December 2024.	<ul style="list-style-type: none"> <li>See response to R27</li> <li>The Terms of Reference includes this reporting arrangement</li> <li>In addition to reporting to the Deputy Mayor the Panel's findings will be reported to the Chief officers in Greater Manchester Police to ensure force learning is being implemented.</li> </ul>
<b>R33</b>	<b>Custody: Independent Custody Visitors</b> I fully support the role of independent custody visitors (ICVs) but would welcome consideration of a professional lay presence in custody suites in addition. This presence might be a 'super ICV' from the Deputy Mayor's office, with responsibility for all custody suites and operating on a shift system, random check basis or something more comprehensive. Control of custody should remain with the police. But in the custody suite, hidden away, police control is total, and this Inquiry has shown that situation involves clear risks. I invite GMP and the Mayor's office to join me in considering this.	In progress To be completed by the end of November 2024.	<ul style="list-style-type: none"> <li>GMCA have recruited to a new post to enable the GMCA to have adequate resources to meet this recommendation.</li> <li>This new role will be in place for mid-November 2024 and will provide additional capacity to for GMCA offices to undertake comprehensive checks on a random basis across all suites as well as improve the current Independent Custody Visitor arrangements and feedback loops.</li> <li>In the interim, senior Safer and Stronger team officers at the GMCA have visited the GMP North Manchester Custody Suite to understand the process for custody suite compliance visits. This will be used to inform a new and improved mechanism for independent spot checks/compliance visits by ICVS going forward.</li> </ul>

<b>R34</b>	<b>Complaints</b> The Deputy Mayor for Policing and I will discuss the introduction of an independent element into police complaints at the lower level by offering a triage service based in her office, as has proved effective in Northumbria	A decision will be reached on this recommendation by April 2025	<ul style="list-style-type: none"> <li>• The GMCA will monitor the impact of recent improvements until the end of 2024.</li> <li>• The Deputy Mayor will make a decision on how best to respond to this recommendation by April 2025.</li> </ul>
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**National Recommendations: Home Office, NPCC, College of Policing and Greater Manchester Police**

Rec	Recommendation detail	Status	Action and progress
<b>R35</b>	<b>Children in custody: strip searching and Appropriate Adults.</b> Strip searching of children in custody should never be done if it can be avoided but all of the recommendations set out above should apply, where it is unavoidable. An appropriate adult must always be made available...	GMP aspects discharged. Home Office review is ongoing (may not report until 2026/7)	<ul style="list-style-type: none"> <li>• National work, led by the Home Office, has begun regarding PACE Code A &amp; Code C, exposure of intimate parts (EIP) strip search proposals. NPCC forces were required to feedback to the Home Office and GMP replied positively and supportively.</li> <li>• It is anticipated that this Home Office review is unlikely to be concluded until 2026/7.</li> </ul> <p>In terms of GMP: -</p> <ul style="list-style-type: none"> <li>• GMP are arranging for Appropriate Adults to attend custody as soon as possible so that children and vulnerable adults receive support early on in detention as a priority.</li> <li>• GMP performance is monitored via data collection and has been consistently improving. Latest data sets from Child Action North West shows that during the first quarter of 2024, 98% of Appropriate Adults were at the custody suite within 1 hour, 87% of whom were either on site or in attendance within 30 minutes from the point of the detainee's arrival.</li> <li>• In GMP, an Inspector is required to ratify all more thorough search (MTS)/ EIP/ strip searches of children, before the search takes place, save in the case of an emergency.</li> <li>• In the rolling 12-month period to July 2023, approximately 4,241 males and females including 179 children were strip searched in GMP (525 females). This equates to approximately 12 strip searches per day across GMP.</li> <li>• GMP compliance function has been strengthened and consistently undertakes thematic, structured, and in-depth reviews of custody activities which includes the strip searching and treatment of children.</li> </ul>



<p><b>R36</b></p>	<p><b>Strip search: -</b>  <b>The future use of strip searching to look for items – PACE Code C, Annex A, paragraph:</b>  <b>Airport screening devices</b></p> <p>PACE Code C, Annex A, paragraph 10 GMP, the NPCC and the Home Office should, forthwith, investigate the potential for use of equipment such as airport screening devices to eradicate degrading strip searching from police practice as much as possible. GMP could lead this endeavour.</p>	<p>Dependent on Home Office and resources.</p>	<ul style="list-style-type: none"> <li>• The Deputy Mayor has raised this with the Home Office as significant resources would be required to implement this recommendation across all GM custody suites.</li> <li>• GMP visited HMP Forrest Bank to see if their full body scanners (as used by Airports) could be used and it was assessed that this was not fit for purpose for custody.</li> <li>• A scoping exercise has shown that the cost of each scanner is £190,000 excluding maintenance costs. Work is being undertaken by the Metropolitan police to see if such scanners can be used for custody.</li> <li>• If these scanners are feasible and funding is available nationally, we would look to trial at the Longsight Custody Suite, once refurbished circa August 2025.</li> </ul>
<p><b>R37</b></p>	<p><b>Develop national definition for Strip search:</b></p> <p>The Home Office, the NPCC and the College of Policing should develop a national definition of a strip search, for the purposes of Annex A of Code C, which should specify the definition of outer clothing, removal of which will fall short of a strip search. This work should consider importing the two defined levels of strip search available under stop and search powers for use in custody and should recommend appropriate levels of authorisation required for the use of each type in a custodial setting. As set out in PACE Code A, these are</p> <ul style="list-style-type: none"> <li>• a ‘more thorough search’ (MTS or partial strip search) where more than the outer layer of clothing is required to be removed</li> <li>• a search that ‘exposes intimate parts of the body’ (EIP search).</li> </ul>	<p>Home Office review on-going and report not expected to report until 2026/7.</p>	<ul style="list-style-type: none"> <li>• National work, led by the Home Office, has begun regarding PACE Code A &amp; Code C, exposure of intimate parts (EIP) strip search proposals. NPCC forces were required to feedback to the Home Office and GMP replied positively and supportively.</li> <li>• It is anticipated that this Home Office review is unlikely to be concluded until 2026/7.</li> </ul>

	GMP should participate in this work and pilot the model proposed in this report to move this urgent agenda forward.		
R38	<p><b>EIP search: consideration should be given to designating such a search as an ‘intimate search’:</b></p> <p>in my view, an EIP search involving visually searching inside intimate body parts is no less intrusive than an intimate search that involves touching. An EIP search may require an arrestee to manipulate intimate body parts to assist the search and is profoundly humiliating. Consideration should be given to designating such a search as an ‘intimate search’, with equivalent protections for the arrestee. GMP should consider piloting this.</p>	Home Office review on-going and report not expected to report until 2026/7.	<p>See response to R36</p> <p>GMP search authorisation levels – unless or until national change is made, then in GMP, an exposure of intimate parts (EIP) strip search will remain within the authority level of a GMP Custody Sergeant. However, in GMP, an Inspector is required to ratify all strip searches of children, before the search takes place, save in the case of an emergency.</p>
R39	<p><b>Domestic Abuse: The lack of a national or local strategic policing response to the criminalisation of victims of violence against women and girls (VAWG)</b></p> <p>Has to be addressed by focusing on women and girls holistically as victims, suspects and witnesses, and ending the ‘silo’ approach of imperfectly considering victims as a separate category. This should include:</p> <p>a commitment to improve police training and accountability for its treatment of women, and girls</p>	<p>Raised with Home Office, NPCC and CoP.</p> <p>Next steps still to be confirmed from national partners.</p>	<p>The Deputy Mayor has raised this with the Home Office who made reference to NRCS counting rules and provision for counter allegations, i.e., “joining the dots.”</p> <p>See also, the GMP responses to: R5, R6, R7and R22</p>

<b>R40</b>	<p><b>Domestic Abuse: The lack of a national or local strategic policing response to the criminalisation of victims of violence against women and girls (VAWG)</b></p> <p>(2) significantly improved understanding of domestic abuse and other forms of VAWG and how this can lead to victims being accused of offending. This work should be done in close partnership with women's specialist services, who are likely to seize the chance to assist in response to commitment from the police, and it must include increased investment.</p>	<p>Raised with Home Office, NPCC and CoP.</p> <p>Next steps still to be confirmed from national partners</p>	<p>The Deputy Mayor has raised this with the relevant national partners.</p> <p>See also GMP response to R5</p>
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**Appendix A: HMICFRS recommendations from the inspection of GMP Custody Suites, February 2023**

Five key HMICFRS assessment areas were:

1. Leadership, accountability, and collaboration with partners
2. Pre-custody (first point of contact)
3. In the custody suite (booking-in, individual needs and legal rights)
4. In the custody cell (safeguarding and healthcare)
5. Release and transfer from custody

Summarised (i) to (x) below, the now closed CoC and AFI bearing similarity to The Baird Inquiry Report were:

- (i) Leadership for GMP custody provision was not strong enough to make sure the service was provided well and achieved appropriate outcomes for detainees.
- (ii) Staff should understand and follow Authorised Professional Practice guidance.
- (iii) GMP should improve the safety and environment of the custody suites including keeping all cells clean to the required standard. The force should better manage risk; and should always assure detainee safety.
- (iv) GMP should strengthen its approach to meeting the diverse and individual needs of detainees; and should improve the way in which it cares for detainees.
- (v) GMP should improve its approach to detainees rights and entitlements; arranging for appropriate adults to attend custody as soon as possible so that children and vulnerable adults receive support early on in detention; and maintaining the dignity of detainees when clothing is removed
- (vi) GMP governance and oversight regarding in custody use of force was not good enough.
- (vii) GMP should promote alternatives to arrest and ensure that frontline officers use those alternatives appropriately to divert children and vulnerable people away from custody; and should strengthen its approach to caring for children in custody.
- (viii) Custody officers should be confident in refusing detention when appropriate to do so, or when there are other ways of dealing with the investigation.
- (ix) The force should deal with detainees promptly and minimise the time they spend in custody.
- (x) GMP should make sure detainees are aware they can, and are able to, make a complaint, should they wish to do so.