



Meeting	Policing Performance Committee
Date	11 June 2024
Location	Video Conference
Title of Paper	HMICS Inspections Improvement Plans – Progress Summary for Demand, Custody, Fife and Dumfries & Galloway
Presented By	Angela Wood, Head of Policy, Audit, Risk and Assurance
Recommendation to Members	For Discussion
Appendix Attached	Appendix A: Action Plan - Dumfries and Galloway Custody Inspection

PURPOSE

The purpose of this paper is to provide the Policing Performance Committee with an update of recommendations from HMICS Inspections selected for review.

1 BACKGROUND

1.1 This report provides and update on progress relating to HMICS Assurance and Inspection activity as follows:

Publication	Date	Total Recs	Last Update
Demand Analysis Management	29 July 2021	12	6 December 2023
Custody Inspection – Lanarkshire	20 April 2023	9 + 3 AFDs	First update
Custody Inspection – Tayside	20 July 2023	5 + 5 AFDs	First update
Custody Inspection – Dumfries and Galloway	7 November 2023	6 + 3 AFDs	New Improvement Plan
Custody Inspection – Fife	28 March 2024	10 + 3 AFDs	Progress with Improvement Planning

1.2 All recommendations are allocated a theme at point of recording within our tracking system. This enables us to draw out learning about organisational performance and put in place measures to act on these findings.



Governance - Leadership of decision-making, culture, controls, accountability, oversight and management of performance.

Guidelines - Need for development of strategies, organisational approaches and plans, improvements to written procedures, policies, and guides.

Compliance - To deal with non-compliance of prescribed procedures, rules and standards.

Resources – Right people, right place, with the right skills, tools and resources to support them carry out their duties. Physical and people assets.

Human Error - Where mistakes have occurred.

Better Practice - Opportunities to improve to attain best practice or greater efficiency and effectiveness.

2 PROGRESS WITHIN REPORTING PERIOD

Progress with addressing recommendations is displayed in the graphs below at figures 1 and 2 along with a summary of the key themes within figure 3.

Figure 1

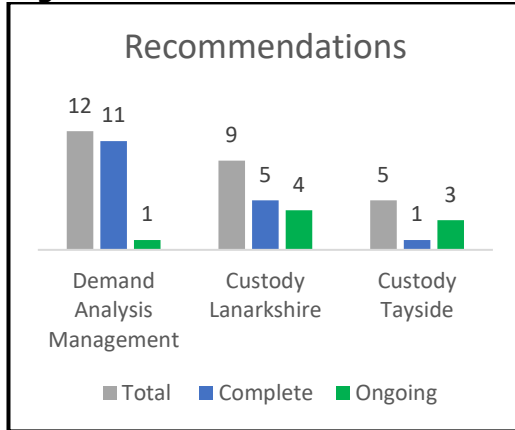


Figure 2

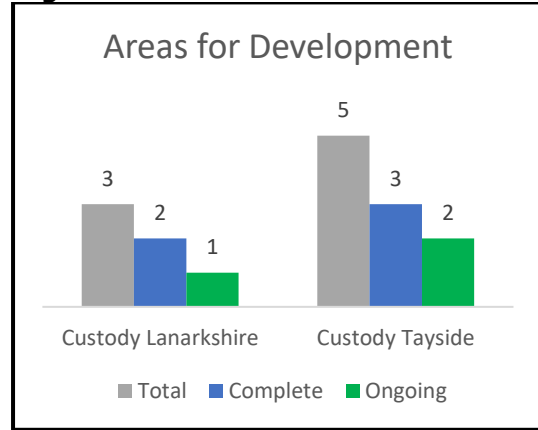


Figure 3 - Themes

Guidelines	Compliance	Resources	Better Practice
<ul style="list-style-type: none"> •Clarity on staff separation of duties and accountabilities •Organisational Design and support for change 	<ul style="list-style-type: none"> •Cleaning standards •Health and safety •Fire Evaluation procedures •Record keeping - custody processes 	<ul style="list-style-type: none"> •Availability of fit for purpose cleaning products •Changes to physical environment, availability of safe storage facilities and CCTV resource 	<ul style="list-style-type: none"> •Performance data to influence change to reduce police demand for partnership work

2.1 Closures Within Reporting Period

2.1.1 A summary of the closures and outcomes achieved follows.

Custody Lanarkshire – 5 recommendations proposed for closure, 2 Areas for Development proposed for closure	
Recommendation	What we did and the impact
<p>R4 - Police Scotland should ensure that custody staff receive regular custody update training / awareness raising relating to substance abuse issues, mental health, trauma informed care and undertaking detainee observations.</p> <p>Resources</p>	<p>We have enhanced our training and awareness raising to keep custody staff more regularly updated on key learning activities. We have introduced quarterly Custody Operations Engagement Forums, providing officers and staff an opportunity to meet with senior management, provide suggestions on improvement and developments for the division and for important divisional messaging to be passed on ongoing learning.</p>
<p>R2 - Police Scotland should ensure that a full evacuation of custody centres is undertaken in accordance with fire safety regulations.</p> <p>Compliance</p>	<p>Following benchmarking with the Scottish Prison Service, we now have revised guidance in place for fire evacuations of custody centres. Full evacuations take place using Actors to minimise the risk to those in custody through unnecessary movement, whilst allowing robust testing through simulated scenarios, including those with reduced mobility or hearing impairments. This ensures full compliance with Fire Safety Regulations.</p>
<p>R3 - Police Scotland should ensure that processes for</p>	<p>We continue our efforts to improve the recording of information within the custody environment. We have achieved this via introducing quarterly Custody Operations</p>

<p>recording cell checks are carried out consistently and recorded on the national custody system timeously.</p> <p>Compliance</p>	<p>Engagement Forums. This focuses on key learning and improvement opportunities.</p>
<p>R15 - Police Scotland should ensure that Naloxone is available within custody centres and that it can be administered during times when healthcare professionals are not available.</p> <p>Resources</p>	<p>All police officers within Custody have now completed the Naloxone training and have been issued with kits. Naloxone has been administered by staff within custody on 8 occasions, with a successful outcome on all occasions. Work is ongoing with the trade unions in an effort to also have Naloxone issued to CJPCSOs.</p>
<p>AFDs The custody centres should ensure</p> <ul style="list-style-type: none">- that property management procedures are followed and implemented effectively.- a clear rationale is recorded on the national custody system in support of risk assessments and changes in observation levels.	<ol style="list-style-type: none">1. Property Management - briefings used to communicate responsibilities and checks undertaken to review compliance.2. Risk Assessment recording has been communicated through various briefings.

Custody Tayside – 1 recommendation proposed for closure, 3 Areas for Development proposed for closure	
Recommendation	What we did and the impact
<p>Police Scotland should ensure that clear lines of accountability are defined and stipulated for custody supervisors in the event of an adverse incident resulting in serious harm to a detainee.</p> <p>Guidelines</p> <p>AFDs The custody centre should ensure that</p> <ul style="list-style-type: none"> - property handling guidance and practice is followed to avoid property challenges. - all decisions to issue a detainee with anti-harm clothing are well-evidenced and reflective of risks as well as detainee needs and rights. - staff use other facilities within the station to maintain the integrity of the food preparation 	<p>We have provided clarity to officers/staff on lines of accountability for custody supervisors in the event of an adverse incident resulting in serious harm to a detainee. We have achieved this through developing and publishing protocols outlining responsibilities and SMARTEU facilitated an exercise on our behalf to simulate a death in custody. This allowed officers and staff to practice and further embed their understanding of their roles and responsibilities.</p> <p>Briefing circulated to all staff via the CJSD weekly electronic briefing and reminders provided at the Custody Operations Engagement Forum. Monitoring via Cluster Inspector audits takes place to ensure continued compliance.</p>

area for people in custody.	
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2.2 Ongoing Within Reporting Period

Demand Analysis Management – 1 recommendation remains ongoing		
Recommendation	What we are doing	What will it take to complete / what are the challenges?
<p>R7 - Police Scotland should set out a transparent process for the provision of organisational design support including how demand analysis is used to inform decision making concerning officer and staff numbers and calculate the demand and capacity imbalance at an organisational level.</p> <p>Guidelines</p>	<p>Although ongoing, there has been significant progress since our last update. Our Strategic Workforce Plan outlines our commitments to an organisation which is designed to reflect our target operating model and that Services and workforce reflect our design principles & which are affordable and efficient.</p> <p>We established an Organisation Design Board in December 2023, chaired by Chief Digital Information Officer to finalise the current Target Operating Model with ongoing review against organisational context & policy/service decisions.</p>	<p>This has required both strategic and structural changes to take effect before full implementation.</p> <p>We have improved the use of demand analysis in making decisions about staff numbers but one thing that remains outstanding is professional support to division to support organisational development. This has been a repeat recommendations in other publications.</p> <p>Once in place we we will be able to articulate an OD process, show our commitment to equip our staff</p>

	<p>Implementing the SWP will provide a review of Corporate Service Function (DCO) and establish and maintain a baseline establishment for Officer and Staff structures.</p> <p>The P&D People Partner team have undertaken Service Design training and our design principles (Service & Organisational) will be embedded in organisational change approach going forward.</p>	<p>with the training to support change in the workplace and wider organisational development. This will be evidenced through our work to transform the service.</p>
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Custody Lanarkshire		
Recommendation	What we are doing	What will it take to complete / what are the challenges?
<p>R13 - Police Scotland should ensure that safe and lockable storage is available and used consistently for controlled drugs brought in by detainees.</p> <p>Resources</p>	<p>There are some recommendations within the Custody report that require additional storage to be put in place which has been factored into budget considerations for the year ahead.</p>	<p>Once the storage lockers are delivered and in use this will be considered complete. A review across the estate is ongoing to confirm arrangements are sufficient.</p>
<p>R8 - Police Scotland should ensure that</p>	<p>Cleaning standards and ensuring the right cleaning</p>	<p>Standards continue to be monitored</p>

<p>environmental cleaning standards are maintained within medical rooms in line with clinical standards.</p> <p>Compliance</p> <p>R9 - The custody centres should ensure that suitable cleaning products are available within the centres which meet the required health and safety standards for the task.</p> <p>Resources</p>	<p>products were available for the tasks was recommended within the Coatbridge Custody Centre. Reminders to cleaning and janitorial staff have been issued and Cluster Inspectors have this on their list of duties to check and the situation is being monitored to understand if this is an isolated case. Engagement with the cleaning provider is ongoing to establish the correct materials are available for the tasks. This remains ongoing.</p>	<p>through local checks to confirm this is not a widespread issue. Consultation is underway in relation to the availability of products.</p> <p>Originally scheduled for completion in March 2024 these recommendations will require more time to monitor and negotiate with third party providers re any training implications.</p>
<p>R1 NHS Lanarkshire, COMS and Police Scotland should record and monitor patient transfers from custody to hospital and produce management reports on the impact of this to inform service planning and delivery.</p> <p>Better Practice</p>	<p>Shifting Demand - Recording patient transfers to better understand demand for appropriate healthcare provision within Lanarkshire has been collated and is presented within the Custody performance dashboard. The model for Healthcare provision in Lanarkshire is unique and there is currently no support to amend the model.</p>	<p>The means of capturing data was achieved by March 2024 but analysis of this and action by partners will mean this recommendation needs to stay open longer. We have set a revised date of September 2024 and Police Scotland will consider this work complete</p>

	Work is ongoing to liaise with partners and we now have an evidence base that can support ongoing discussions.	when all avenues to escalate and influence a change of practice have been explored.
<p>AFDs</p> <p>The custody centres should improve the display and availability of information regarding services available in the community to support detainees on release.</p> <p>NHS Lanarkshire and Police Scotland should work together to ensure that detainees know how to provide feedback or raise a complaint regarding the healthcare service they received while in custody.</p>	<p>We are reviewing the information available on display within the Custody facilities to determine a standardised approach that provides the maximum benefit to both staff and detainees. Some considerations include, stencilling within cells to communicate key messages/reminder. This is progressing but a final proposal is not yet available.</p> <p>We are reviewing our approach regarding complaints but we do not proactively provide this information. It is still under consideration.</p>	

Custody Tayside		
Recommendation	What we are doing	What will it take to complete / what are the challenges?
R3 - Police Scotland should ensure that the recording of strip	A theme through the inspections to date has been in	We are reviewing our Quality Assurance Framework to

<p>searches at Dundee custody centre provides an accurate reflection of practice.</p>	<p>relation to recording information. This is an ongoing area of focus within the division with regular reminders issued and checks being undertaken.</p>	<p>identify the priority areas for improvement and our messaging .</p>
<p>R11 - Police Scotland should review and amend booking-in processes and facilities at Dundee custody centre to improve the efficiency and effectiveness of the process.</p> <p>Guidelines</p>	<p>Work is ongoing with ICT to remove unused applications from the booking in computers in order to speed up processing.</p> <p>An end-to-end review of booking in processes will be conducted at Dundee to establish any other opportunities for improving the efficiency, taking account of the limitations caused by the layout of the facility.</p>	<p>Due June 2024 and ongoing. The wider issues of design of the facilities is outwith the scope of this work.</p>
<p>AFDs The custody centre should ensure that all solicitor consultations and interviews with detainees are recorded accurately on the national custody system.</p> <p>The custody centre should ensure that detainee healthcare interventions are</p>	<p>This forms part of our key messaging around improving record keeping and remains ongoing.</p>	

undertaken confidentially unless a risk assessment indicates otherwise.	
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2.3 New Improvement Plans

2.3.1 Published on 7 November 2023, the Custody Inspection for Dumfries and Galloway provided 6 recommendations for improvement and 3 Areas for Development. In common with other custody inspections, there are themes around compliance – with safety, security, cleaning standards and record keeping. An action plan has been developed and attached at Appendix A.

2.3.2 The Improvement Plan relating to the Custody Inspection for Fife, published 28 March 2024, is not yet available. There are 10 recommendations for Police Scotland to address and 3 Areas for Development. As highlighted in other inspections themes include compliance with record keeping and cleaning standards as well as ensuring appropriate training is provided in both cleaning standards and administering medication. Recommendations within this publication also relate to the physical environment and will be progressed in consultation with our Estates colleagues.

2.4 Themes, Challenges and Wider Context - Custody

2.4.1 The aim of the inspections is to assess the treatment of, and conditions for, individuals detained at custody centres being inspected. When addressing the recommendations we are considering them across the whole of the Custody estate. This ensures we continue to strive for consistency. Improving record keeping is the main theme and our focus is on understanding whether this is isolated to poor record keeping or an indication of wider issues. Maintaining cleaning standards and ensuring staff have the right support, guidance and equipment has emerged as a theme and one which is being closely monitored across all centres.

2.4.2 There has been significant improvement to achieving consistency since Police Scotland formed and staff have had to embrace new processes and technology. As we continually strive for increased efficiency and effectiveness we are mindful of the demands on our people who are working in a challenging environment subject to intense scrutiny. We try to be proportionate in our approach to improvement and prioritise the areas that will achieve the greatest impact through our Divisional messaging so as not to overburden our people.

2.4.3 Understanding of certain areas of the Criminal Justice (Scotland) Act 2016 could be improved across operational policing. This will help investigating officers to understand their responsibilities, when to apply them and to feel supported in making decisions around arrests, disposals and Investigative Liberation.

2.4.4 Criminal Justice Services Division (CJSD) wants to empower all arresting and enquiry officers to be confident when applying the Criminal Justice (Scotland) Act 2016.

2.4.5 There are five areas of focus within this refresh:

- Section 50 Criminal Justice (Scotland) Act 2016 – to avoid holding a person unreasonably or unnecessarily in police custody
- Children in Custody
- Same Circumstances and Exceptional Circumstances
- Investigative Liberation
- Section 14 Criminal Justice (Scotland) Act 2016 - Test

2.4.6 Further work in this area will help support the demand within our Custody centres create capacity for review, reflection and ongoing training.

3. FINANCIAL IMPLICATIONS

3.1 There are no financial implications in this report.

4. PERSONNEL IMPLICATIONS

4.1 There are no personnel implications in this report.

5. LEGAL IMPLICATIONS

5.1 There are no legal implications in this report.

6. REPUTATIONAL IMPLICATIONS

6.1 There are no reputational implications in this report.

7. SOCIAL IMPLICATIONS

7.1 There are no social implications in this report.

8. COMMUNITY IMPACT

8.1 There are no community implications in this report.

9. EQUALITIES IMPLICATIONS

9.1 There are no equality implications in this report.

10. ENVIRONMENT IMPLICATIONS

10.1 There are no environmental implications in this report.

RECOMMENDATIONS

Members are invited to discuss the progress detailed within the report.

Publication Title	Detail	Issue	Management Response and Action Plan	Owner	Target	Risk Rating	Audit Theme
Custody D&G (Joint)	R01 Observation Facilities Police Scotland should ensure that detainee observation facilities at the Dumfries custody centre are moved to an appropriate location within the centre.	The CCTV detainee observation facility at Dumfries was not fit for purpose due to its location within the charge bar area. The television monitor, used to observe detainees subject to enhanced observation levels, was located on an adjacent wall directly behind the charge bar workstations. Efforts had clearly been made to obscure third party viewing of the screen by temporarily affixing a makeshift shield, but this was largely ineffective. The proximity to the charge bar and cramped environment for those observing the monitors could result in unnecessary distractions. It is also possible that confidentiality and privacy could be compromised for detainees under observation. As such, alternative arrangements should be made for the location of the observation equipment, ensuring that the facilities for staff undertaking observations are suitable.	Installation of new CCTV is scheduled to take place and as part of this a new dedicated observations room will be created within Dumfries Custody Centre. Evidence required - proof of the works completed and photograph images of the new CCTV observation room.	ACC Criminal Justice	30/09/2024	Medium	Better Practice
Custody D&G (Joint)	R02 Anti Harm Garments Sizing Police Scotland should ensure that sufficient and appropriately sized anti-harm garments are made available to detainees when these are required.	The weekly laundering service is provided by a facilities management company 'Atalian Servest' who subcontract to 'Fishers', a third-party provider. All service delivery issues being experienced by the centres are referred to Atalian Servest who address concerns directly with the provider. As a result of past difficulties concerning the sourcing of variously sized anti-harm garments, the company were only supplying large sizes, which were either ill-fitting or afforded insufficient dignity for smaller detainees, particularly women. This led to decisions being made to place some detainees in standard clothing but under direct observation, which has a disproportionate impact on the detainee and on police resources. Since our onsite inspection took place, we have been advised that progress is being made to address this issue	A new contract has been arranged for anti-harm clothing and this includes provision of a variety of sizes including smaller garments. Evidence required - details of the new contract	ACC Criminal Justice	31/07/2024	High	Compliance
Custody D&G (Joint)	R05 Custody Staff Training and Guidance Police Scotland should ensure that custody staff receive appropriate training and guidance where cleaning is part of their role.	Custody staff at the centres have had no formal infection prevention and control training. There was also no external HSCP oversight of compliance with standards of cleaning. Products meeting guidance standards in the National Infection and Prevention and Control manual were available to custody staff. However, staff could not describe how to use these effectively or in the correct way. This was also the same for contract cleaners at the Dumfries custody centre.	Training and guidance documentation will be obtained from NHS to ensure it meets the clinical requirements for medical facilities within the centre and distributed to both custody staff and contracted cleaners. Evidence required - copies of any training or guidance documentation provided. - Evidence of regular audits and the outcome of these.	ACC Criminal Justice	31/07/2024	Medium	Compliance

Publication Title	Detail	Issue	Management Response and Action Plan	Owner	Target	Risk Rating	Audit Theme
Custody D&G (Joint)	R08 Clinical Examination Rooms Dumfries and Galloway HSCP and Police Scotland must ensure the rooms used for clinical examinations are clean and ready for use and maintained at the standard required for forensic examination.	In Dumfries, clinical examinations were carried out in a dedicated medical room. This room had a camera and a notice which stated that detainees could be recorded and monitored. We spoke with custody staff who told us that the camera would be turned off during consultations. Detainees would be risk assessed in order to determine where they would be examined, with clinical examinations being conducted confidentially without a member of custody staff present unless a risk to others had been identified by the risk assessment. The room in use had multiple items on the floor under the examination couch which had created dust on the bottom of equipment. The examination couch had evidence of widespread chlorine residue indicating the correct contact time for cleaning, and disinfecting equipment had not been deployed. This practice can also cause damage to the integrity of the outer layer of the examination couch and risk breach of the inner fabric.	Training and guidance documentation will be obtained from NHS to ensure it meets the clinical requirements for medical facilities within the centre and distributed to both custody staff and contracted cleaners. Evidence required - copies of any training or guidance documentation provided. - Evidence of regular audits and the outcome of these.	ACC Criminal Justice	31/07/2024	High	Compliance
Custody D&G (Joint)	R09 Maintenance of Emergency Equipment Dumfries and Galloway HSCP must work together with Police Scotland to ensure emergency equipment is maintained in accordance with manufacturer's guidelines and ensure that checks are recorded appropriately.	Emergency equipment was available at both sites and was checked weekly by custody staff. Police Scotland staff receive three yearly refresher training in first aid and in the use of emergency equipment. Custody staff were unsure who maintains the emergency equipment.	Emergency equipment is owned and maintained by the NHS. A maintenance schedule and log with be agreed with the local health board and monitored by the custody supervisors for compliance. Evidence required - copies of the agreed maintenance schedule and logs	ACC Criminal Justice	31/07/2024	High	Compliance
Custody D&G (Joint)	R13 Training for Administering Medication Police Scotland should ensure that custody staff are provided with appropriate training in relation to the administration of medication and that this is provided and refreshed in accordance with national guidance and best practice.	Although custody staff receive awareness training as part of their induction on medication administration, this training is not supported by a recognised framework. There was no evidence of refresher training for medication administration. Custody staff who are responsible for the administration of medicine should receive an appropriate level of training. This should be supported by a process that ensures ongoing competence and review of staff knowledge.	A Moodle training package will be created with the assistance of NHS and HIS colleagues, to be completed by all custody officers and staff on an annual basis. Evidence required - copy of the training package - Evidence of completion by custody officers and staff	ACC Criminal Justice	30/06/2024	High	Resources
Custody D&G (Joint)	AFD 1 Secure Loft Hatches The Stranraer custody centre should ensure that loft access hatches in the cell corridors are made secure	At the Stranraer facility, loft hatches located in each of the two cell corridors were not properly secured therefore enabling them to be opened by hand. Owing to their immediate proximity to barred gates, these could be accessed by a reasonably agile, unsecured detainee.	Estates to attend and secure the loft hatches by padlock Evidence required - proof of the works being completed	ACC Criminal Justice	30/06/2024	Advisory	Compliance

Publication Title	Detail	Issue	Management Response and Action Plan	Owner	Target	Risk Rating	Audit Theme
Custody D&G (Joint)	AFD 2 Fire Safety Plans The Stranraer custody centre should ensure that fire safety and evacuation plans reflect the challenges arising from the layout of the custody centre and limited exit routes.	The construction of the Stranraer centre is such that all external doors and windows within the building were secured by fixed steel bars, incapable of permitting egress. The sole emergency exit from the facility was via the charge bar into the connecting corridor, which thereafter leads either into the police station or outside to the rear yard. While, as stated, the custody centre had fire safety procedures in place, it should ensure that evacuation plans reflect the specific challenges arising from the layout of the custody centre and limited exit routes.	Fire evacuation plan to be re-drafted to take into account the specific layout of Stranraer custody centre and to be reviewed by H&S advisor prior to publication. Evidence required - copy of the new fire evacuation plan	ACC Criminal Justice	30/06/2024	Advisory	Compliance
Custody D&G (Joint)	AFD 4 Discontinuation of Medical Equipment The custody centre should ensure that custody staff discontinue the use of medical equipment that they have not been trained to use.	During the inspection of Stranraer custody centre, Inspectors examined onsite equipment for both blood pressure monitoring and blood sugar monitoring. It was not clear how this equipment was being effectively decontaminated or maintained. It was also reported that blood pressure monitoring had been performed by police custody staff at the centre and readings fed back via telephone to the on-call Forensic Physician. Custody staff have had no training in the use of such equipment. We consider this to pose a significant safety risk and highlighted to the custody centre that the practice should not continue. Furthermore, blood pressure monitors were not being regularly calibrated to ensure efficiency.	Briefings and guidance to be circulated to all staff on the use of medical equipment. All medical equipment to be kept in the locked medical room for use and maintenance by NHS only. Evidence required - copies of internal guidance and copies of communication to NHS colleagues.	ACC Criminal Justice	30/06/2024	Advisory	Better Practice