

Greater Manchester Police, Fire and Crime Panel

Date: 10 June 2025

Subject: Priority 1: Closure report on the implementation of the Baird Inquiry recommendations

Report of: Kate Green, Deputy Mayor

For information only

Purpose of Report

This report follows on from the detailed progress report presented to the Police, Crime and Fire Panel on 11 November 2024 on the delivery of the recommendations 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.

It updates the Panel on the discharge of the remaining two Greater Manchester Police recommendations and one GMCA led recommendation as well as progress on the Mayor's additional request for *a presumption against strip search for concealment purposes* and the nationally led recommendations.

Recommendations:

Members are requested to:

1. Note the discharging of the remaining two GMP recommendations and one GMCA recommendation and the closure of the Oversight Board.
2. Note the progress made on the Mayor's additional request for a '*presumption against strip search for concealment purposes*'.
3. Note the engagement with national bodies to progress national recommendations.

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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. A copy of the full report can be found here. <https://www.greatermanchester-ca.gov.uk/media/9861/the-baird-inquiry.pdf>

1.2 Dame Vera made a total of 40 recommendations. 26 recommendations were assigned to Greater Manchester Police, 8 to the Mayor/Deputy Mayor (GMCA) and the remainder to national organisations including the Home Office, the National Police Chiefs' Council and the College of Policing, often working in partnership with Greater Manchester Police.

1.3 In November 2024 the Police, Crime and Fire Panel received a detailed progress report outlining the progress made in the delivery of these recommendations, as overseen by the Mayoral Oversight Group. At that time, 24 out of 26 GMP led recommendations had been discharged by the Mayoral Oversight Group and 7 of the 8 GMCA led recommendations had been discharged. A copy of this progress report can be found here. [\(Public Pack\)Agenda Document for Greater Manchester Police, Fire and Crime Panel, 18/11/2024 14:00](#)

1.4 This report details the delivery of the remaining GMP and GMCA led recommendations and provides an update on the Mayor's additional 'presumption against strip search' as well as progress on national recommendations, some of which are ongoing.

2. Greater Manchester Police (GMP) remaining recommendations

2.1 The two outstanding GMP recommendations (5 and 6 as set out in the Inquiry report) both related to trauma training for officers.

2.2 Good progress has been made by GMP in delivering trauma training. All new recruits are mandatorily trained in Domestic Abuse Matters, Rape and Serious Sexual Assault, the Vulnerability and Risk Programme and ten associated College of Policing training modules that relate to the neuroscience of trauma.

2.3 The majority of GMP Response Officers have already, for example, received Domestic Abuse Matters, Rape and Serious Sexual Assault training. The majority of GMP PPD specialists have been DA Matters trained and/or have received specialist victim focussed public protection training.

2.4 The training of GMP officers is cognisant of the effects of domestic and sexual trauma on survivors so that officers are better equipped to give a good response to sexual and domestic abuse victims and should enable officers and staff to recognise that victims reporting domestic or sexual abuse, facing counter-allegations, or reacting to a poor police response may be revisiting trauma and require care.

2.5 The Deputy Mayor is of the view that GMP have demonstrated ongoing commitment to meeting the requirements of trauma training and that there is a plan in place to increase this over 2025/26 and the recommendations have therefore been discharged.

2.6 Appendix A provides the full list of recommendations delivered.

3. Mayoral request for further assurance that there would be a rebuttable presumption against strip searches for concealment purposes.

3.1 In addition to the Inquiry recommendations, the Mayor requested further assurances regarding GMP's operationalisation of the "*presumption against*

strip searches for concealment.”, i.e. an expectation that strip searches to find concealed items will only take place in GMP, “as a last resort.”

3.2 In summary, GMP have undertaken considerable work to define the different types of strip search and produce and implement clear, fit for purpose guidance for Custody Officers so that it can successfully operationalise the *“presumption against strip searches for concealment”*.

3.3 This includes enhanced GMP compliance testing to ensure that GMP strip searches are only ever undertaken when necessary, and when they are undertaken, they are done with full regard to respecting and preserving the rights, entitlements and dignity of the person being searched.

3.4 GMP is the first force nationally to create strip search definitions and guidance. They will be shared with the Home Office, the National Police Chiefs Counsel (NPCC) and the College of Policing and inform future changes to the PACE Codes of Practice.

3.5 A copy of the suite of measures available to GMP, so that strip searches for concealment are not resorted to until other options have either been exhausted, or considered but reasonably rejected, are listed in Appendix B along with how GMP will monitor its application.

4. GMCA recommendations

4.1 At the November Police and Crime Panel it was reported that 7 of the 8 recommendations for GMCA will be fully delivered and discharged by early December 2024.

4.2 Six of the 8 GMCA recommendations relate to the establishment of an Independent Scrutiny Panel tasked with the dip sampling of anonymised

arrests at the lower end of criminality and custody practice. The Panel has undertaken induction training and a visit to North Manchester custody suite and is now fully operational. The Panel held its first meeting in March 2025 in which they dip sampled two arrests by GMP. The Panel identified organisational learning and good practice outcomes for GMP in both cases, and their findings have been reported to the Deputy Mayor and Deputy Chief Constable. GMP will continue to drive these improvements forward with continued oversight from the Panel, whose next meeting will take place in June 2025.

- 4.3 GMCA have fully implemented the recommendation for a 'Super Independent Custody Visitor role' to support GMCA's statutory obligations for the Independent Custody Visitor (ICV) Scheme. Improvements are being made throughout this body of work, which include working towards upgrading from Silver to Gold Accreditation within the Independent Custody Visiting Association (ICVA) Quality Assurance Framework, the development, trial and implementation of a new tracker for ICV visit reports to enhance oversight and updates to recruitment material and strategies with a view to more than double the current number of ICVs.
- 4.4 The final area is 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*'. The Deputy Mayor has carefully considered this recommendation, and it will be kept under review. Through work led by the Deputy Mayor and Deputy Chief Constable, evidenced improvement has been made in respect of how complaints are initially dealt with and allocated to officers. At this stage this work needs to be further embedded and sustained. At this stage we don't wish to undermine this improvement by making new process changes, but this work is subject to ongoing progress monitoring through quarterly meetings between the Deputy Mayor, Deputy Chief Constable and their senior staff and

the recommendation will be subject of ongoing consideration through this process

5. National recommendations

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

5.2 The Deputy Mayor has met all of the above national bodies to discuss the recommendations, and the Mayor and Deputy Mayor also met the Home Secretary.

5.3 The Deputy Mayor has taken on the national APCC portfolio lead for custody to ensure links are made into the national recommendations. The work done by GMP is helping to lead the way on **the national definition of strip searches** and we expect these recommendations to come forward earlier than expected.

5.4 GMP continue to input into the national picture and have recently been advising West Yorkshire Police to implement learnings from the Baird Inquiry at their request. Police Scotland have also invited GMP to advise them on how to approach a number of adverse HMICFRS custody reports. We are pleased that GMP are being looked upon to advise other forces.

6. Ongoing assurance work

6.1 Despite this good progress, we are keen to ensure on-going compliance and assurance of all custody work. This includes internally by GMP through compliance, dip-sampling and performance management and externally through the Deputy Mayor's Executive and via the Independent Scrutiny Panel and enhanced Independent Custody Visitor scheme.

6.2 We are also aware that there are outstanding complaints from those that featured in the Baird Inquiry, and these continue to be closely monitored by the Deputy Mayor via the regular complaints review meetings which she has with GMP.

Appendix A: Baird Inquiry Recommendations Grid

Recommendations for Greater Manchester Police			
Ref	Recommendation detail	Status	Action and progress
R1	<p>Refresher Training Voluntary Attendance</p> <p>GMP should refresh officer training on:</p> <p>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"> • In March 2024 GMP launched its new Voluntary Attendance procedure. • The Criminal Justice and Custody Branch have worked with Professional Development and Communications to ensure that the procedure is known, understood, and applied. • 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. • 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. • 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.
R2	<p>Refresher Training National Decision-Making Model</p> <p>GMP should refresh officer training on:</p>	<p>Fully met.</p> <p>Discharged with on-going</p>	<ul style="list-style-type: none"> • The National Decision-Making Model is a thread throughout all training delivered. • It is delivered to new students as a standalone package and all officer training is refreshed annually. • A review of the training took place to strengthen this further following the Inquiry. • Training for student officers on the process of arrests, legal framework and considerations was updated in October 2023 to ensure a greater understanding.

	The effective use of the College of Policing National Decision-Making Model in determining whether an arrest is necessary [Code G].	monitoring and compliance checks required	<ul style="list-style-type: none"> 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. 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.
R3	<p>Arrest packs ease of access</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"> Templates and associated guidance created by GMP named, “<i>Suspect Policy & Procedure document of May 2024</i>” became “live” in July 2024. 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. 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. 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.
R4	<p>Quality control of arrest packs</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"> 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. See also response to R3.
R5	Arrests: Trauma training	Fully met	<ul style="list-style-type: none"> A full review was undertaken to identify gaps and improvements to be made in trauma training for all officers GMP engaged the College of Policing on this recommendation to identify several packages that should be nationally delivered to ensure standardised and consistent

	<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"> • so that officers are better equipped to give a good response to sexual and domestic abuse victims <p>[This] first point ought already to be force policy</p>	<p>Discharged with on-going monitoring and compliance checks required on 07/02/2025</p>	<p>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</p> <ul style="list-style-type: none"> • The majority of GMP Response Officers have already, for example, received Domestic Abuse Matters, Rape and Serious Sexual Assault training. The majority of GMP Public Protection specialists have been DA Matters trained and/ or have received specialist victim focussed • 75% of GMP Response Officers will be trained by the 31st of December 2025; and 90% trained by the 31st of March 2026
R6	<p>Arrests: Trauma training</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>	<p>Fully met</p> <p>Discharged with on-going monitoring and compliance checks required on 07/02/2025</p>	<ul style="list-style-type: none"> • See response to R5.
R7	<p>Arrests: Trauma training</p> <p>To avoid the escalation of incidents involving abuse survivors through physical contact with male officers. It should,</p>	<p>Fully met.</p> <p>Discharged with on-going monitoring</p>	<ul style="list-style-type: none"> • 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. • Professional Development will continue to reinforce policy in relation to no searching of the opposite sex, whenever practicable. • See also R4 regarding training.

	where possible, always be preferable for any necessary physical contact with women to be done by female officers.	and compliance checks required	
R8	<p>Custody: Support link – women Domestic Abuse and sexual abuse survivors</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"> • A corporate poster containing one central link telephone number has been developed in consultation with victim services. • 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. • The posters are prominently displayed in every GMP custody suite. • The Female Welfare Officer leaflet has also been updated to align with this. • Oversight will be provided by the Victim Services, commissioned by the GMCA to ensure 24-hour capability.
R9	<p>Custody: Support link – women DA and sexual abuse survivors</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 checks required</p>	<ul style="list-style-type: none"> • GMP assigns Female Welfare Officers to all female detainees. • 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. • 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. • 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.

R10	<p>Custody: Separate female cells</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"> • From July 2024 every GMP custody suite set aside separate cell areas for females, children, and males. • 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). • This is due to demand, i.e. the number of persons arrested versus cell capacity across the GMP custody estate. • 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. • It is for the above reasons that it is not practical to fully meet the recommendation as Dame Vera describes.
R11	<p>Custody: Female Welfare Officer</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"> • GMP assigns Female Welfare Officers to all female detainees. • 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. • Note: Following evidence submitted to them by GMP in April 2024, the HMICFRS closed this as an outstanding area for improvement for GMP.
R12	<p>Custody: Female Officer</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,</p>	<p>Not practical to fully meet recommendation</p>	<ul style="list-style-type: none"> • GMP assigns Female Welfare Officers to all female detainees. • Meeting this recommendation is a GM female welfare officer role requirement, when practicable.

	regular observation checks, asking welfare questions and making any necessary referrals.	tion (due logistical constraints). Discharged with on-going monitoring and compliance checks required	<ul style="list-style-type: none"> • 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. • It is for the above reasons that it is not practical to fully meet the recommendation as Dame Vera describes. • Following evidence submitted to them by GMP in April 2024, the HMICFRS closed this as an outstanding area for improvement for GMP.
R13	Custody: Sanitary and hygiene needs 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	Fully met. Discharged with on-going monitoring and compliance checks required	<ul style="list-style-type: none"> • GMP now automatically provides dignity packs for female detainees that include towel, soap, blanket, toilet paper, and sanitary products. • Female detainees do not have to ask, they are given these products routinely. • Following evidence submitted to them by GMP in April 2024, the HMICFRS closed this as an outstanding area for improvement for GMP.
R14	Custody: Better risk assessment and more humane and dignified treatment of all detainees: Personal property 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	Fully met. Discharged with on-going monitoring and compliance	<ul style="list-style-type: none"> • For every detained person, GMP has introduced distraction devices such as books, fidget spinners, balls, books of worship etc. • Subject to individual risk assessment by the Custody Sergeant, persons detained in GMP custody suites are allowed to retain some personal property. • GMP routinely promotes the provision of distraction devices during training sessions • Following evidence submitted to them by GMP in April 2024, the HMICFRS closed this as an outstanding area for improvement for GMP.

	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.	checks required	
R15	<p>Custody: Better risk assessment and more humane and dignified treatment of all detainees: Non-coercive approach</p> <p>Staff adopting a non-coercive approach would help to mitigate the worry of being totally in police power.</p>	<p>Fully met.</p> <p>Discharged with on-going monitoring and compliance checks required</p>	<ul style="list-style-type: none"> • Current custom, culture and practice is focussed on treating people with dignity, respect and using effective, patient, communications to avoid conflict. • 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. • The GMP Custody Branch compliance function is being sustained and has been enhanced since the Inquiry. • 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 staff during their initial custody training courses and during 6 weekly branch development days. • Further, the Custody senior leaders will deliver 1-hour briefings about Inquiry learning and this/ all recommendations from August 2024
R16	<p>Custody: Better risk assessment and more humane and dignified treatment of all detainees: Cell buzzers</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"> • 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). • 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. • If any are not being responded to promptly, feedback is given to the site Custody Inspector who has responsibility to improve this. • Compliance Officers carried out unannounced visits and they reported that cell buzzers being answered promptly by Detention Officers. • 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.

			<ul style="list-style-type: none"> 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.
R17	<p>Custody: Custody officer refresher training</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"> 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. Further, the Custody senior leadership team will deliver 1-hour briefings about Inquiry learning and this/ all recommendations from August 2024. <p>In terms of standard practice:</p> <ul style="list-style-type: none"> 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. 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 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. 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. The GMP Custody compliance function is being sustained and has been enhanced to ensure that this and other recommendations are monitored 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))
R18	<p>Strip Search: Seizure of clothing for welfare purposes</p>	<p>Fully met.</p> <p>Discharged with on-going</p>	<ul style="list-style-type: none"> 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. 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.

	<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>monitoring and compliance checks required</p>	<ul style="list-style-type: none"> • GMP pro-actively, and randomly review 150 to 200 custody and associated records per month. • 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. • 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. • 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. • 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. • 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.
R19	<p>Strip Search: Strip searches for welfare/ risk of self-harm purposes</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</p>	<p>Fully met.</p> <p>Discharged with on-going monitoring and compliance checks required</p>	<ul style="list-style-type: none"> • GMP Custody Officers have now stopped the authorisation of strip searches for welfare or risk of self-harm purposes. • 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. • 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. • 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. • 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>

	guidance: "The use of anti-rip clothing because a detainee is not engaging in risk assessment questions is inappropriate."		
R20	<p>Risk assessments and support for those at risk of self-harm.</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"> • 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. • Every suite has daily access to the Liaison & Diversion service, an independent service, commissioned by the GMCA. • 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. • Similarly, detainees risk assessed as being at risk of self-harm, will, by GMP Custody Officers, be referred to the Liaison and Diversion service. • 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. • 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. • Every detainee who is released from custody is provided with a leaflet that provides information about charities, counsellors, and support platforms. • 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. • 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.

R21	<p>Strip Search: Accurate and comprehensive data about [GMP] use of strip searching</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 (see R4)</p>	<ul style="list-style-type: none"> • GMP are now accurately reporting strip search data. • 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. • Strip search data forms part of monthly branch data returns including performance reviews and at the force's performance meeting. • 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>" • <i>An ICT solution has been found and effective from October 2024 to enable the accurate recording of strip search data</i> • The proposed independent scrutiny panel should also dip sample the accuracy of this recording (see R4)
R22	<p>Government's Female Offender Strategy (MoJ, 2018a)</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"> • GMP have published on the GMP intranet, "<i>The Female Offender Strategy</i>" along with associated guidance • All GMP Custody Sergeants received training regarding the Female Offender Strategy • GMP incorporates the Female Offender Strategy into GMP training • 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 & Development Branch. • It is also covered within other courses such as Crime and Neighbourhoods training. • 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

R23	<p>Detainee must be asked whether they have anything:</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"> • 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). • 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. • 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 • Further, the Custody Senior Leadership Team have delivered 1-hour briefings about Inquiry learning and this/ all recommendations from August 2024
R24	<p>Reasons strip search required must be explained in plain language: 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"> • 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. • 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). • 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. • 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. • 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 • Further, the Custody SLT will deliver 1-hour briefings about Inquiry learning and this/ all recommendations from August 2024

R25	<p>Domestic Abuse: The treatment of victims: - Domestic & sexual abuse (and Victims Code Compliance)</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"> • A full training review was undertaken to identify gaps and improvements to be made. • 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. • 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. • 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. • 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. • On-going monitoring will occur via the Victims Code – to which all forces are accountable.
R26	<p>Subject Access Requests</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"> • GMP accepts that improvements were required. • Additional resources have been identified to help handle increased demand levels with increases in subject access requests following the Inquiry. • Response times have vastly improved, from 47% compliance in June 2022 to 82% in May 2024. • GMP strives for continuous improvement in this area and has a target to reach a 90% compliance rate by the end of 2024.

	Recommendations for the Mayor/Deputy Mayor (GMCA)		
Ref	Recommendation detail	Status	Action and progress
R27	<p>Scrutiny: arrests</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>Fully met.</p> <p>Discharged on 05/12/2024</p>	<ul style="list-style-type: none"> The GMCA has established one arrest and detention scrutiny panel that covers all scrutiny arrangements listed under R27, R28, R29 and R30. The panel may also want to dip sample other areas of custody process, procedure or practice as identified by the Mayor/Deputy Mayor. Terms of Reference approved and complete The Data Privacy Impact Assessment complete Panel recruitment process complete A welcome and induction session for all Panel members took place on 5 December 2024 which will include an input from Dame Vera Baird KC and the Deputy Mayor An induction session and visit to a custody suite is complete. Meetings scheduled for 2025 First Panel to meet and dip sample arrest on 5 March 2025.
R28	<p>Scrutiny: custody officers reasons underpinning arrests</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</p>	<p>Fully met.</p> <p>Discharged on 05/12/2024</p>	<ul style="list-style-type: none"> See response to R27

	that underpin reasons for arrests. This scrutiny is vital for the protection of arrestees		
R29	<p>Scrutiny: accuracy of custody records</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>Fully met.</p> <p>Discharged on 05/12/2024</p>	<ul style="list-style-type: none"> • See response to R27
R30	<p>Scrutiny: dip sample custody records that contain strip searches</p> <p>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.</p>	<p>Fully met.</p> <p>Discharged on 05/12/2024</p>	<ul style="list-style-type: none"> • See response to R27
R31	<p>Scrutiny: information sharing agreements An information-sharing agreement may be necessary, which GMP should be prepared to facilitate.</p>	<p>Fully met.</p> <p>Discharged on 05/12/2024</p>	<ul style="list-style-type: none"> • The development of a Data Privacy Impact Assessment is complete • Data sharing arrangements and data sharing agreements complete • The development of necessary data sharing protocols are complete and ready in advance of first Panel meeting on 5 March 2025.

R32	<p>Scrutiny: reporting</p> <p>The panel(s) should report back to the Deputy Mayor at frequent intervals.</p>	<p>Fully met.</p> <p>Discharged on 05/12/2024</p>	<ul style="list-style-type: none"> • See response to R27 • The Terms of Reference includes this reporting arrangement • 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.
R33	<p>Custody: Independent Custody Visitors</p> <p>I fully support the role of independent custody visitors (ICVs) but would welcome consideration of a professional lay presence in custody suites in addition.</p> <p>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.</p>	<p>Fully met.</p> <p>Discharged on 05/12/2024</p>	<ul style="list-style-type: none"> • GMCA have recruited to a new post to enable the GMCA to have adequate resources to meet this recommendation. • This new role started in mid-November 2024 and provides 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.
R34	<p>Complaints</p> <p>The Deputy Mayor for Policing and I will discuss the introduction of an independent</p>	<p>Under review.</p>	<p>The Deputy Mayor has carefully considered this recommendation and it will be kept under review. Through work led by the Deputy Mayor and Deputy Chief Constable, evidenced improvement has been made in respect of how complaints are initially dealt with and allocated to</p>

	element into police complaints at the lower level by offering a triage service based in her office, as has proved effective in Northumbria		officers to look into. At this stage this work needs to be further embedded and sustainability. At this stage we don't wish to undermine this improvement, but this work is subject to ongoing progress monitoring through quarterly meetings between the Deputy Mayor, Deputy Chief Constable and their senior staff and the recommendation will be subject of ongoing consideration through this process.
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National Recommendations: Home Office, NPCC, College of Policing and Greater Manchester Police			
Rec	Recommendation detail	Status	Action and progress
R35	<p>Children in custody: strip searching and Appropriate Adults.</p> <p>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...</p>	<p>GMP aspects discharged.</p> <p>Home Office review is on-going (may not report until 2026/7)</p>	<ul style="list-style-type: none"> National work, led by the Home Office, has begun regarding PACE Code A & 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. It is anticipated that this Home Office review is unlikely to be concluded until 2026/7. <p>In terms of GMP: -</p> <ul style="list-style-type: none"> 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. 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. 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. 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. 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.

R36	<p>Strip search: -</p> <p>The future use of strip searching to look for items – PACE Code C, Annex A, paragraph:</p> <p>Airport screening devices</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>	Dependent on Home Office and resources.	<ul style="list-style-type: none"> • 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. • 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. • 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. • 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.
R37	<p>Develop national definition for Strip search:</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</p>	Home Office review on-going	<ul style="list-style-type: none"> • National work, led by the Home Office, has begun regarding PACE Code A & 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. • GMP have informed the new definitions and it is expected that the Home Office will likely conclude this work earlier than first anticipated.

	<p>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"> • a 'more thorough search' (MTS or partial strip search) where more than the outer layer of clothing is required to be removed • a search that 'exposes intimate parts of the body' (EIP search). <p>GMP should participate in this work and pilot the model proposed in this report to move this urgent agenda forward.</p>		
R38	<p>EIP search: consideration should be given to designating such a search as an 'intimate search':</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</p>	<p>Home Office review on-going and report not expected to report until 2026/7</p>	<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>

	designating such a search as an ‘intimate search’, with equivalent protections for the arrestee. GMP should consider piloting this.		
R39	<p>Domestic Abuse: The lack of a national or local strategic policing response to the criminalisation of victims of violence against women and girls (VAWG)</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>
R40	<p>Domestic Abuse: The lack of a national or local strategic policing response to the criminalisation of victims of violence against women and girls (VAWG)</p>	<p>Raised with Home Office, NPCC and CoP.</p>	<p>The Deputy Mayor has raised this with the relevant national partners.</p> <p>See also GMP response to R5</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.	Next steps still to be confirmed from national partners	
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Appendix B:

Appendix B: Subject: Mayor's presumption against strip searches for concealment

Report author: Detective Chief Superintendent Ryan Davies, Branch Commander, GMP Criminal Justice & Custody Branch

1. Purpose of report

To provide a summary of current legislation and GMP procedure regarding strip searching and, specifically, to brief the Deputy Mayor regarding GMP's operationalisation of the "*presumption against strip searches for concealment*."¹, i.e. an expectation that strip searches to find concealed items will only take place in GMP, "*as a last resort*."²

2. Recommendations

- (i) The Deputy Mayor should accept this report as confirmation that GMP has successfully operationalised the "*presumption against strip searches for concealment*."
- (ii) GMP should continue to monitor and ensure compliance with legislation, policy, procedure, due process, and post inquiry recommendations by quality assuring every GMP strip search that is authorised in GMP custody suites.
- (iii) GMP should continue to ensure compliance testing in respect of every clothing swap recorded in GMP custody suites.
- (iv) GMP should continue to train GMP custody staff to authorise and conduct strip searches in accordance with legislation, policy, procedure, due process, and post inquiry recommendations.
- (v) GMP should continue to address any shortcomings whenever they are identified, via proportionate management feedback, training, reflective practice or misconduct proceedings when appropriate.

4. Background

Section 54(1) of the Police and Criminal Evidence Act (PACE) 1984

PACE Section 54(1) requires Custody Officers to ascertain everything which a person has with them when they are brought to the police station following arrest. Subsection (3), subject to subsection (4), sets out that "*a Custody Officer may seize and retain any such thing or cause it to be seized and retained*".

¹ Mayor Andy Burnham Baird Inquiry progress update media quote of 18.11.2024

² Deputy Mayor Kate Green Baird Inquiry progress update media quote of 18.11.2024

Subsection (4) explains:

“(4) Clothes and personal effects may only be seized if the custody officer

(a) Believes that the person from whom they are seized may use them:

(i) to cause physical injury to himself or any other person”

PACE Code C Annex A, paragraph 10 sets out:

“A strip search may take place only if it is reasonably considered necessary to remove an article which a detainee would not be allowed to keep, and the officer reasonably considers the detainee might have concealed such an article. Strip searches shall not be routinely carried out if there is no reason to reasonably consider that articles are concealed.”

The same code defines a strip search as, *“a search involving the removal of more than outer clothing.”*

As mentioned, PACE legislation is intended to result in a presumption against routinely strip searching for concealment purposes by restricting necessity and authorities to strip search to instances where there are reasonable grounds to consider that a concealed article might be present. According with Annex A, the reason the search was considered necessary must be recorded on the custody record.

5. GMP Operationalisation of the “presumption against strip searches for concealment”

So as to provide GMP Custody Officers with clarity as to the differing types of strip search, GMP – understood to be the first force in the country to do so – has defined and has provided guidance to its Custody Officers as to the different categories of strip search. The guidance is included in GMP Custody Operating Procedure v8.1. It is also incorporated in GMP’s computerised custody system.

Said GMP definitions will be disseminated to the Home Office, to the NPCC Custody Lead, and to the College of Policing for their consideration as to whether to adopt the GMP definitions nationally. Particularly relevant given the pending changes to PACE search terminology. The GMP definitions, set out below, are purposely aligned to terminology used in The Baird Inquiry Report and Recommendations:

“Traditional” strip search – a search involving the removal of more than outer clothing Jacket, Outercoat, Gloves, Shoes, Socks (JOGSS) to find articles the detainee would not be allowed to keep.

More thorough search (MTS) – a search which extends beyond a JOGSS search but does not lead to exposure of intimate parts.

Exposure of intimate parts (EIP) – a search which extends beyond a more thorough search and involves the exposure of intimate parts.

Clothing swap – a clothing swap for the purposes of an investigation (securing & preserving evidence of an offence); or for reasons of hygiene, health or cleanliness. Such clothing removal must be undertaken in a way that remains cognisant of the dignity, sensitivity and vulnerability of the detainee. Any such clothing removal that extends beyond (JOGSS) is to be regarded as a strip search and must be managed in accordance with the requirements applicable to an MTS or EIP search.

Welfare strip search (not permitted in GMP, in line with Baird Inquiry recommendations) – a welfare strip search would involve removing more than just (JOGSS) and may expose intimate parts. Historically conducted when there was a perceived risk of self-harm or if the individual had not engaged with the Custody Officer's risk assessment process. The sole purpose of this type of search was to remove more than JOGSS, not to find hidden items.

GMP officers no longer undertake welfare strip searches. Rather, detained persons who might historically have been made the subject of a welfare strip search, are now made the subject of either Level 3 (CCTV monitored) or Level 4 (direct, in person) observations; the use of Levels 3 and 4 observations according with both College of Policing Authorised Professional Practice (APP), and with HMICFRS requirements. Level 3 and 4 observations are now day to day custom and practice in GMP and form a key ingredient of GMP initial Custody Officer core training and also their continuous professional development (CPD).

6. Governance

To ensure compliance with legislation, policy, procedure, due process, and post inquiry recommendations, the GMP Custody Audit and Performance (CAP) Team now routinely reviews, and quality assures (QA) every GMP strip search (and clothing swap) that is authorised and undertaken in GMP custody suites. Those reviews and QA checks include checks to ensure that the grounds for the search have been accurately and sufficiently recorded on the custody record.

5.1 How is GMP monitored regarding its application of the presumption against strip search?

- (i) A Custody Officer can only authorise searches to the extent they consider necessary (PACE, Annex A 4.1).
- (ii) The very thorough and dogged GMP Custody Audit & Compliance (CAP) Team reviews every strip search in GMP and maintains a record of said reviews. Reviews include reviewing the grounds for search and the extent of the search. Where grounds and extent are not properly recorded, feedback is provided to the officer's line manager for appropriate action (either advice, formal performance improvement or contemplated misconduct proceedings).

GMP is open to and welcomes any and all GMCA scrutiny of those processes and/ or the review data.

- (iii) The Independent Scrutiny Panel could focus on strip searching by GMP at the second Panel sitting of 2025, the first sitting being reserved for scrutiny of GMP arrest decisions; and The Panel Terms of Reference (ToR) explicitly make provision for scrutiny of strip searches undertaken in GMP.

5.2 What suite of measures are available to GMP, so strip searches for concealment are not resorted to, until other options have either been exhausted, or considered but reasonably rejected?

- (i) All GMP detainees are subject to a Section 54 PACE search, except where the custody officer deems it unnecessary. Use of a hand-held metal detecting wand and a wall mounted “Cellsense” pole (an £8,000 a piece upright full-height metal detecting device similar to a knife arch) are mandated for use in every GMP custody suite whenever practicable, i.e. unless a detainee is so violent that it is not practicable to do use them.
- (ii) Following publication of The Baird Inquiry Report and recommendations, GMP custody IT systems were upgraded so that whenever a search is required by a GMP Custody Officer, the IT system named “PoliceWorks”, routinely prompts the Custody Officer (on every occasion) to specifically ask the detainee questions preferred by Dame Vera Baird, to please surrender any items they would not be allowed to keep.
- (iii) Airport screening devices – GMP has directly engaged with the Metropolitan Police Service (MPS) because they have been trialling airport style body scanners. Following extensive MPS research, they have found that the purchase and use of said scanners has yielded beneficial results. A MPS working party has submitted a business case for their installation at specific custody suites in the London area. The business case is awaiting final assessment by the MPS Chief Officer Group (COG). A decision was anticipated in the Autumn of 2024, however to date, the project awaits final approval. GMP continues to liaise closely with its MPS counterparts on the matter. The GMP CAP Team intends to report the outcome to DCS Davies, as soon as a MPS decision has been made. The cost per scanner is upwards of £200,000 to purchase, plus significantly costly annual maintenance fees. GMP Chief Officer plans to date have been to await the MPS outcome, and, in the first instance, thereafter, propose to trial such a scanner at Longsight when the Longsight Custody Suite is near future refurbished.

If it is identified that the authorisation and/or recording of a strip search falls short of the required standard, the relevant Custody Officer’s line managing Inspector is briefed and

proportionate action is taken by means of either management feedback, further training, reflective practice or misconduct proceedings when appropriate.

6. Conclusion

By defining operational definitions for differing types of strip search; and through the production and implementation of clear, fit for purpose guidance for Custody Officers, GMP has successfully operationalised the “*presumption against strip searches for concealment*”, meaning that there can be confidence, enhanced via a structured and robust GMP compliance testing regime, that in GMP, strip searches are only ever undertaken when necessary, and when they are undertaken, they are done with full regard to respecting and preserving the rights, entitlements and dignity of the person being searched.

For the reasons outlined in this report, GMP custody service provision has sincerely met and continues to meet, on a daily basis, the operational requirement of both the Greater Manchester Mayor and the Deputy Mayor that culture, custom and practice in GMP is one of a “*presumption against strip searches for concealment*.”, meaning that strip searches to find concealed items are only used in GMP, “*as a last resort*”.

GMP is understood to be the first force nationally to create strip search definitions and guidance. They will be shared with the Home Office, the National Police Chiefs Counsel (NPCC) and the College of Policing. Pursuant to supporting and informing near future changes to the PACE Codes of Practice.