

Serial	Recommendation	HMIP Responsibility Allocation	Response	MPS Allocation of Responsibility	Review Date	Remarks	Outcome
Key Concern	Joint service publication (JSP) (see Appendix II Glossary of terms) 837, which sets out policy and practice on detention matters, was not consistent with the policies and procedures outlined in unit standing orders that offer guidance for custody staff in the SCFs to follow. We were told that an update of the JSP 837 depended on revisions to the Service Custody and Service of Relevant Sentences Rules 2009, a services' statutory instrument, which required legislation. JSP 837 was overdue an update and anomalies in policies and procedures were potentially confusing for staff and detainees.	MOD	<i>This should be fully accepted.</i> On-going work with both HQ PM(A) and DCCL will hopefully see a refresh to the Statutory Instrument 1096/2009 in the coming months. Once the legislative changes have occurred a Pj team will be set up to conduct the review of JSP 837. Noting the key concern is levelled against the MOD DCCLs D&G should be sought.				
Key Concern	Independent service custody visitors should provide regular independent scrutiny and give detainees the opportunity to raise any issues or concerns.	MOD	<i>This should be fully accepted.</i> Noting the key concern is levelled against the MOD DCCL should be engaged for their D&G.				
Key Concern	Conditions at SCF North were cramped and outdated, lacked privacy and were unsuitable. Cellular accommodation and communal facilities at SCF North should be re-developed or replaced in line with other more modern SCF facilities.	MOD	<i>This should be fully accepted.</i> As this has now been elevated to a Key Concern from a recommendation (4.3 2017) as was within the 2017 HMIP Report the infra issues should be addressed as a matter of urgency. There has already been engagement from the judiciary with the JAG requesting a report from Catterick CMCs resident JA that is likely to be submitted from the JAG to the SJEG. The continued support to the SJS in Catterick with a comparable SCF to Bulford is key as these two locales support the remaining CMCs.				
1.11	A new electronic management system should capture accurate and complete data on detainees so that monitoring and analysis are reliable and meaningful.	MOD	<i>This should be fully accepted.</i> Noting the recommendation is levelled against the MOD. Ongoing Pj CASSINGHAM work strands are addressing the MIS delta within SCF Coy with the hopeful delivery of a bespoke custody package.				

2.7	Detainee escort records should be completed comprehensively for all detainees held in service custody.	PM(A)	<i>This should be fully accepted.</i> Current policy and Assurance and Inspection activity already covers DERs, all SCFs will ensure a more detailed and comprehensive DER is compiled to meet this recommendation.				
3.4	All initial interviews should be undertaken in private to enable detainees to disclose any concerns.	PM(A)	<i>This should be fully accepted.</i> Current policy is that all interviews with detainees are held in private, this is entirely linked to the Key Concern over SCF North and the infra restriction faced by the staff.				
3.21	Levels of observation and arrangements for checking detainees should be reviewed to make sure they are proportionate to the risks posed.	PM(A)	<i>This should not be accepted.</i> Noting CO/2IC MPS Regt are working on a submission to HQ PM(A) for a possible reduction of observational levels iaw COPG.				
3.22	Personal items should only be removed following an individual risk assessment showing there are grounds for doing so.	PM(A)	<i>This should be fully accepted.</i> Policy is already in place for individual risk assessments prior to the removal of personal items. Staff refresher training will allow this recommendation to be met.				
3.33	Detainee custody records should include thoroughly completed review documentation and all relevant committal documentation.	PM(A)	<i>This should be fully accepted.</i> Policy is already in place for Detainee Custody Records. Staff refresher training will allow this recommendation to be met.				
3.34	The following should be prominently displayed in all SCFs: •A copy of part 3 of the Service Custody and Service of Relevant Sentence Rules 2009 (which covers the treatment, employment and discipline of a detainee while held in service custody). •A poster advertising the right to legal advice.	PM(A)	<i>This should be fully accepted.</i> Policy is already in place for Part 3 SCRSR to be displayed. Staff refresher training will allow this recommendation to be met.  OC SCF is to seek posters for all SCFs covering <i>legal advice</i> and the <i>duty solicitor scheme</i> .				
3.35	Legal consultations should be undertaken in private.	PM(A)	<i>This should be fully accepted.</i> Links to SCF recommendation 3.4				
3.38	Detainees' complaints should be taken, recorded and dealt with.	PM(A)	<i>This should be fully accepted.</i> Links to the MCTC recommendation 4.24				
4.7	Detainees should be allowed to have furniture and personal possessions in their cell, subject to a risk assessment.	PM(A)	<i>This should be fully accepted.</i> This links to SCF Key Concern and recommendations 3.4 and 3.35 and infra restrictions at SCF North, as well as SCF recommendation 3.22.				

4.8	Detainees should be able to control their lighting.	PM(A)	<i>This should not be accepted.</i> All SCFs accommodation rooms/cells are ligature free in line with COPG policy. Therefore seeing all light switches being external to the commotion rooms/cells. Can be linked to the MCTC recommendation 4.10 and the issue of eyes mask to make the lighting less obtrusive. Fully acknowledging that detainee interaction with SCF staff occurs where main lighting can be switched off at their request substituted by the installed night lights.				
4.13	Rub-down searches should only be undertaken following an individual assessment and when justified by an identified risk.	PM(A)	<i>This should not be accepted.</i> Due to the short term transient nature of the large majority of detainees within the SCF estate precluding the staff to fully know the individuals even after the requisite risk assessments have been completed. Additionally, the SCSRSR allows for staff to conduct searches of detainees as per the Comdts direction, in addition to admission, temp release and final release.				
4.36	The Ministry of Defence should review its out-of-hours' fitness to detain protocols to make sure that when an assessment is requested of non-military medical personnel, they are able to provide a viable response.	MOD	<i>This should be accepted.</i> Noting the recommendation is levelled against the MOD it is suggested that as there is no fit for detention medicals for periods of detention this is only in relation to PSSL and CSSDs arrested by the Service Police whom require medical intervention. Therefore, the review of the relevant MPID should also occur concurrently.				

**Progress on recommendations from the last full inspection report**

Serial	Recommendation	Not Achieved / Partially Achieved	Remarks
2.43	Service staff should complete a detainee escort record following sentence, and this should accompany a detainee to the SCF or Military Corrective Training Centre (MCTC). Custody staff should be trained in the identification, assessment and reduction of risk, and how to evidence and record this in risk documentation.	Partially achieved	Links to SCF recommendation 2.7
4.11	Detainees with disabilities that affect their mobility should not be held in an SCF unless provision can be made to meet their needs.	Partially achieved	The expectation would be that all SCFs have these facilities but they do not. Therefore this links to the Key Concern and SCF North.

4.12	Rub-down searches should only be undertaken when supported by an identified risk.	Not achieved	Links to SCF recommendation 4.13
4.19	Staff should understand the risk categories and observation levels identified in the revised Joint Service Publication (JSP) 837. Detainee assessment records should be updated to reflect the terminology used in the JSP, so that staff can accurately record and follow the observation levels set.	Partially achieved	Links to SCF recommendation 3.21
4.25	Pre-release risk assessments should record all ongoing risk factors and identify how they will be addressed.	Partially achieved	Staff training will address the depth of information across the estate. Noting pre-release risk assessments are not covered within the Key Concerns and Recommendations for the 2021 inspection.
4.29	Detainees residing in the SCF for more than 48 hours should, subject to a risk assessment, be allowed to have furniture and personal possessions in their cell and should be able to control their lighting.	Not achieved	Links to SCF recommendations 3.22, 4.7 and 4.8
4.3	Cellular accommodation and communal facilities at SCF North should be made fit for use.	Not achieved	Now links to Key Concern from latest report
4.46	Signed authorisation of detention and, where applicable, confirmation of delegation of custody powers should be received without significant delay, and copies should be held within the detainee's custody record.	Partially achieved	Links to SCF recommendation 3.33
4.47	Information relating to the detainee should be kept in one contemporaneous custody record.	Not achieved	Links to SCF recommendation 1.11

4.48	Custody staff should ensure that documentation authorising a detainee to be held 'incommunicado' is authorised at an appropriately senior level and specifies the timescale over which it should remain in place.	Partially achieved	Policy and procedure fully covers this area and unsure why it was deemed partially achieved.
4.49	Detainees should have access to a legal adviser facilitated at the earliest opportunity. The reason for any delays should be documented in the detainee custody record.	Partially achieved	Policy and procedure fully covers this area and unsure why it was deemed partially achieved.

Outcome
Achieved
Not achieved
N/A