

ANNUAL REPORT

Custody and Detention Scrutiny Panel

2025-2026



INTRODUCTION FROM THE CHAIRS

Welcome to the second annual report of the Kent Custody and Detention Scrutiny Panel (CDSP), hereafter described as the Panel.

The purpose and membership of the Panel are detailed in Section One, immediately following this Introduction, and in the Appendix.

The report covers the period April 2025 to March 2026. In this year, the Panel has continued, and enhanced, its role and function to comprehensively review the workings of Kent Police custody to facilitate the Police and Crime Commissioner in holding the Chief Constable to account. The Panel has also finalised the thematic review started in the previous year and undertaken a second thematic review. Information on the role of the Panel and the thematic reviews is provided in later sections of this report.

The Panel has refined its data requirements, improving the focus and expanding the scope of the data. Against this background, the Panel has once again not identified any significant issues of concern. Notwithstanding the changes made to the scope and analysis of custody related data, it will continue to develop its working approach to enhance its scrutiny of custody and detention. Thematic reviews will continue to be undertaken, and the Panel will maintain its monitoring of the implementation of recommendations made in reviews.

We are grateful for the support provided to us by the Office of the Kent Police and Crime Commissioner, without which taking forward our work would be more difficult. We also acknowledge the openness of Kent Police in their various inputs to the Panel, and their active and positive participation in the thematic reviews. Input from Independent Custody Visitors has been important, and we thank them for their time and energy in supporting the Panel's work.

JIM WILLIAMSON
Co-chair

DAVID PAUL
Co-chair

SECTION 1

THE PURPOSE OF THE PANEL, AND ITS TERMS OF REFERENCE

The National Police Chiefs' Council, and Association of Police and Crime Commissioners, produced guidance in April 2023 on the formation of CDSPs. They had observed that, other than Independent Custody Visitors, there were few mechanisms that existed for the regular, independent reviews of detainees' treatment and the systems and processes within custody. The aim of CDSPs was therefore to bridge this gap, and allow for more detailed scrutiny of care for detainees, and for a more systemic, longer-term review of practices within the custody environment.

In Kent, the OPCC and Kent Police worked jointly to set up the Panel, and it was agreed that it would be run by the OPCC, and be chaired by the OPCC Chief Executive and an ICV co-ordinator. This would ensure that the Panel was demonstrably independent, and would align with, and support, the Commissioner's role in holding the Chief Constable to account.

The terms of reference, which are reviewed periodically, are attached as an appendix.

SECTION 2

MEMBERSHIP AND MEETING STRUCTURE

As above, it was agreed that the Panel would be co-chaired by the OPCC Chief Executive and an ICV co-ordinator, to both ensure independence and build in a degree of consistency. The previous OPCC Chief Executive also wished to send a clear signal of the importance attached to the Panel by his involvement as co-Chair.

The membership has grown and developed during 25-26, to include new members of OPCC staff, and more ICVs. The current membership is as follows:

Independent members:

- ICV co-Chair (ICV Coordinator)
- Three ICVs (including the other ICV Coordinator)
- Chief Executive of Young Lives Foundation (Appropriate Adult provider)
- Manager of The Appropriate Adult Service
- Chair and Panel member of Kent Police's Independent Advisory Group
- Representative from LDR (NHS service provider within custody for vulnerable detainees)

OPCC members:

- Chief Executive (co-Chair)
- Head of People and Standards
- Performance and Research Analyst
- ICV Manager
- Executive Support & Committee Officer (Minutes and Actions)

Kent Police attendees:

- Head of Custody
- Custody Performance Co-ordinator
- Head of Traffic Processing and Safer Detention
- Det. Superintendent, Criminal Justice
- Superintendent, Strategic Prevention
- Force Mental Health Liaison Inspector

Papers and minutes for meetings can be found [here](#).

SECTION 3

KEY FINDINGS AND AREAS OF DISCUSSION

Key Findings and Themes

Across all meetings, several consistent themes emerged. These included ongoing pressures on custody staffing; delays in prisoner transport and court processes; and issues relating to the accuracy of record-keeping.

Despite these challenges, the panel noted positive standards of detainee care, supported by strong examples of staff professionalism, particularly in high-risk or complex situations such as medical incidents or self-harm interventions.

Areas of Discussion

Custody Operations and External Pressures

A number of panel discussions centred on pressures arising from the wider criminal justice system. Persistent late collections by Serco had a direct impact on custody capacity and detainee experience, including delays to bail and court appearances. These issues were compounded by limited court cell capacity in Kent (28 cells) and reliance on virtual court hearings, which continue to place operational strain on Kent Police.

While mitigation measures were implemented, these structural pressures remain an ongoing risk.

Children and Vulnerable Detainees

Panel discussions regularly highlighted the challenge of securing appropriate accommodation for children denied bail, with local authority capacity continuing to present difficulties. New processes, including additional forms and improved data-sharing arrangements, have been introduced to strengthen partnership working, although these are still developing.

Thematic scrutiny also reviewed the treatment of children in custody (specifically those from an ethnic minority background), finding no significant safeguarding concerns, with evidence of appropriate care planning and justification for detention lengths. However, recording inconsistencies were identified through the review of custody records.

Force Performance and Improvement Activity

Performance monitoring throughout the year focused on dwell times, custody demand, and staffing levels. Following the closure of Maidstone Custody Suite in October 2025, data indicated a slight reduction in dwell times, suggesting improved efficiency despite increased demand at other sites.

The Force implemented a number of improvement initiatives, including:

- Introduction of desktop terminals for the use of LDR staff now installed across all custody suites, to facilitate easier access to information.
- Central Custody staff conducting internal custody inspections, aligned with HMICFRS recommendations, to ensure continuing compliance and improvement.
- Implementation of Operation Nightingale, a pilot programme to support domestic abuse victims through improved injury documentation, enhancing both evidential quality and victim experience.

Additionally, changes to the custody operating model introduced cluster-based staffing arrangements, aimed at improving resilience and flexibility across suites.

SECTION 3

KEY FINDINGS AND AREAS OF DISCUSSION

(cont.)

Staffing Uplift and Resourcing

Staffing remained a key focus throughout the period. While seasonal pressures during summer 2025 created challenges, improvements were anticipated and partially realised following changes to the staffing model.

Key developments included:

- 15 trained custody sergeants became operational
- A revised deployment model for Forensic Health Professionals (FHPs) following the closure of Maidstone Custody, bringing the Force closer to ensuring one per suite.

Despite these improvements, some issues with staffing remained, including a reduction of 10 DDOs and continued reliance on temporary or guest staff from Neighbourhood policing. Work is ongoing to improve long-term staffing stability.

Appropriate Adults (AA) Provision

The provision of Appropriate Adults remained under review, with queries raised in response to data indicating AAs were not present; however custody were able to explain individual cases, which generally related to a child attending to answer bail. The panel recognised that this is often a systemic challenge for both the Force and AA providers, particularly in relation to availability, timeliness, and the responsibility for contacting an AA in the first instance.

Developments during the period included:

- Exploration of remote provision of rights and entitlements via telephone, and consideration of whether to include this in the re-commissioning of the OPCC's AA service;
- Improved data interpretation, clarifying that some apparent gaps related to procedural outcomes (such as bail returns) rather than absence of provision

Further monitoring and evaluation of these approaches is ongoing.

Conferences and External Engagement

APCC Briefing – Home Office Custody Data

The Home Office has identified several key areas requiring improvement:

- Recording of vulnerability and AA provision
- Consistency in ethnicity data
- Capturing of use of force and search data
- Standardisation across forces

Key National Risk Areas (Summary)

- Rising custody demand (+6%)
- Ethnic disproportionality in detention and strip searches
- High rates of overnight detention for children, particularly pre-charge
- Delays and inconsistencies in Appropriate Adult provision
- Continued concerns regarding strip search practices, especially involving children
- Significant proportion of repeat detainees (21%)
- Data quality and recording inconsistencies limiting full oversight

SECTION 4

INDEPENDENT CUSTODY VISITING REPORTS

ICVs made 218 visits from April '25 to March '26, speaking to 724 detainees. They also inspected the conditions in which detainees were held, reviewed custody records and discussed issues with custody staff.

Many areas of good practice were identified, including:

- Named carers being routinely assigned to those who require additional support, including all children and all female detainees, as standard practice. This provides the detainee with a single point of contact for more sensitive matters.
- Significant improvements to feminine hygiene care, including feminine hygiene packs being routinely offered to female detainees, with a wider range of hygiene items available. The addition of 'menopause packs' has been welcomed by ICVs, which will support detainees who enter custody experiencing menopause symptoms.
- The introduction of salt and vinegar crisps, with the strong sharp flavour being identified as having a soothing effect for both menopausal and neurodivergent detainees.
- Detainees being routinely offered distraction items such as books, puzzles and fidget toys, with a good range of items available to support different needs, preferences, languages and age groups.
- Custody staff following alcohol and intoxication protocols well, including appropriate monitoring and risk management of detainees under the influence.
- Staff responding proactively to healthcare needs, including following medical advice, arranging hospital treatment or placing detainees under constant observation, when required.
- Religious needs and dietary requirements being recognised and accommodated, including provision of appropriate meals and access to religious texts or items.



SECTION 4

INDEPENDENT CUSTODY VISITING REPORTS (cont.)

Areas requiring focus included;

- Delays securing Appropriate Adults (AAs) for both children and vulnerable adults, particularly out of hours. In some cases, this extended detention times and prevented detainees from being processed. In rare instances, detainees were bailed due to a lack of AA. This was occasionally identified as an issue with inconsistent record keeping (see point below), with most occasions being a lack of availability from either of the AA Schemes.
- Inconsistent record keeping of actions, including those taken to obtain an AA. On a few occasions, this has led to confusion, delays in obtaining an AA and extended lengths of detention. ICVs suggest that custody invest in tablets to aid custody staff in completing custody records entries as they move around the suite. This recommendation has also been made at the CDSP, through their Thematic Reviews. At present, custody staff take notes on paper to type up when they find the time, contributing to inconsistent record keeping.
- In addition, issues with the recording of Inspector reviews continues to be identified. ICVs note that it is not always clear whether a review has taken place within the required timescales, or whether sleeping detainees have been informed of their review once awake.
- Continued concerns around staffing levels across the county, particularly during busy periods. On occasions, this has delayed booking-in and processing detainees. This also impacted the ability to facilitate several custody visits, with some visits being delayed, abbreviated or aborted due to limited staff availability.
- Occasions during the first half of the year where access to a custody healthcare professional was delayed, particularly where provision is shared across multiple custody suites. However, it should be noted that improvements have been noted over time.
- Stock management being a concern across custody suites, including shortages of clothing and footwear in some sizes, and some food items. It should be noted that a volunteer has been sought to support stock management, allowing custody staff to focus on detainee processing and care.
- Instances of detainees remaining in custody for extended periods due to external factors such as prison lockouts, particularly over weekends.

Custody staff were welcoming, transparent and accommodating towards ICVs during visits, particular during busy periods. ICVs noted staff often approached them with concerns, so that feedback could be made via the OPCC. This demonstrates a good level of trust between ICVs, custody staff and the OPCC.



SECTION 6

SUMMARY OF THEMATIC REVIEWS UNDERTAKEN AND PROGRESS ANY RECOMMENDATIONS MADE

A key function of the Panel is to conduct Thematic Reviews on areas relating to 'custody' identified by the panel as critically relevant. A Thematic Review provides opportunity to gain a deeper understanding of specific areas of custody, identify strengths, areas for development and make recommendations to the panel. The panel is able to conduct these reviews independently from Kent Police.

In 2025-2026, the Panel decided to explore the treatment of children from an ethnic minority background in custody. This decision drew on both the original guidance for CDSPs, which directs that disproportionality should be an area of focus, and recent cases such as that of [Child Q](#).

The terms of reference were:

"A review of the care of child detainees in custody from an ethnic minority background, over the period 2019-20 to the present day.

This will be with the aim of identifying any themes and/or trends within the data (including also custody records); any disproportionality; and any future learning, individual or organisational."

The [review](#) was led by Dr Colin Burton, Chair of the IAG, and Sophie Wallington, Chair of the Medway IAG.

Kent Police provided the data relating to the detention of every child from a BME background from 2018-19 to the present day; from this, the team identified that they wished to view the custody records where spit guards were used across the entire span of the review; and then from 24-25, the eight records where strip searches were used, and then another 30 records from across the year. These were analysed for any discrepancies and to review the care given.

In addition, ICVs were tasked with asking additional questions of any child during their visits over a quarter, noting their ethnicity, so that comparative data could be drawn.

The team were able to conclude that the issues raised by the Child Q case were not evident in Kent. Recommendations were made concerning improving record keeping; improving the collection of data (by use of electronic recording systems, mirroring a recommendation from the previous thematic review); and more training on the importance of collecting accurate data on ethnicity.

The tracking document for this year's Thematic Review, can be found [here](#). *(please note it includes the actions from the previous Thematic Review).*

SECTION 7

ASSESSMENT OF PROGRESS AND AREAS FOR DEVELOPMENT

The work of the Panel is recognised in the Police and Crime Commissioner's Police and Crime Plan 2025-29: *"Cut Crime; Support Victims; Build Trust"*. One of the key priorities is to *"build trust through integrity"*. The Commissioner has committed to *"continue to provide an Independent Custody Visitor Scheme, with volunteers who visit Kent Police's custody suites, and that their findings are used to maintain standards and improve where necessary"*.

Section One of this report defines the purpose of the Panel, along with its Terms of Reference (ToR) at the Appendix. This sets out the primary objectives of a Police Custody and Detention Scrutiny Panel as being:

"To independently:

- assess and report on detention and custody processes;*
- review and advise on matters of disproportionality; and*
- create an annual report for the public."*

In the 2024-25 Annual Report, the Panel undertook to review its data needs and to develop and refine its function and ways of working, specifically:

- Continue to review and enhance information and data quality
- Further develop its data analysis capability to improve its understanding of the data and, in particular, relating to disproportionality
- Put in place regular reporting mechanisms to monitor the implementation of recommendations made in its meetings and in Thematic Reviews, ensuring that the specific concerns have been addressed
- Ensure that the Panel is aware of forthcoming relevant legislative and policy changes.
- Continue to undertake regular deep-dive Thematic Reviews.

Progress has been made against these undertakings in the last year.

Key areas of change relate to data provision, where data have been increasingly focused on key priorities, whilst simultaneously expanded to enable the panel to have a clearer understanding on the impact of mental health issues in custody, to gain a view of the role and impact of the LDR teams on those detained in custody, as well as comparative data to allow comparisons on a per capita basis with other forces. These data provision changes have, and will continue, to allow the Panel to improve its scrutiny of custody within Kent.

In addition to the data changes outlined above, the membership of the Panel has been enhanced. It has welcomed increased representation from IAG and the ICV scheme, as well as welcoming representation from LDR and Kent Police's Mental Health Team. This extension of membership has enhanced the information available to the Panel and to its analysis of the data provided.

Beyond data provision and analysis, and membership of the Panel, work has been undertaken to put in place mechanisms to monitor progress on the implementation of recommendations made in thematic reviews. Information on reviewing recommendation implementation is detailed at Section Six.

The Panel is of the view that these changes have enhanced its scrutiny of custody in Kent, as well as improving its assistance to the PCC in holding the Chief Constable to account in relation to custody and detention.

Notwithstanding these changes and enhancements to the Panel's work, it will continue to review and assess its information and data needs, as well as looking to further develop its analysis of the data and information provided to enhance its function to hold the force to account in relation to custody and detention.

SECTION 8

ISSUES ON THE HORIZON AND PLANS FOR 2026-2027

For the period following this report, and during 2026 - 2027, the Panel plans to continue its work on:

- Reviewing and further enhancing its information and data supply
- Further developing its data analysis capability to improve its understanding of the information and enhance its understanding of matters relating to proportionality
- Enhancing its mechanisms to monitor the implementation of recommendations made in its Thematic Reviews
- Reviewing, with a view to enhancing, its means to measure the effectiveness of implemented Thematic Review recommendation, and in particular addressing the specific concerns that brought forward the recommendations.

In addition, the Panel will continue to undertake deep-dive Thematic Reviews. The subject of the next thematic review will be decided during 2026 - 2027.

Review of CDSPs

Early in 2026, a proposed review of CDSPs was brought to the APCC's Quarterly Custody meeting. Chief Inspector Parnell, on behalf of the APCC and NPCC had been tasked with undertaking a review of CDSPs across the country, to understand the variance in models and approaches, and begin to establish best practice.

We await the findings of this review, and it will be considered at a CDSP once released, to see if there are further improvements that can be made in Kent.

Changes to Policing and Policing Governance

The Government has announced a number of significant changes to policing in its White Paper, 'From Local to National'.

The key issues are:

- **National Police Service (NPS):** Merging the National Crime Agency (NCA), the College of Policing, and the National Police Chiefs' Council (NPCC) to handle counter-terrorism and serious organized crime.
- **Police Force Mergers:** Setting up an Independent Commission, chaired by Lord Hogan-Howe, to create fewer, larger police forces to replace the current 43-force structure, allowing for faster deployment of technology and standardized responses.
- **Police Governance:** Police and Crime Commissioners (PCCs) will be abolished at the end of their current terms in 2028. Local policing governance will, for non-mayoral authorities, be through a Local Policing Board, made up of elected members from Unitary authorities and led by an appointed full-time Policing and Crime Lead. There will be national arrangements to hold the NPS to account and assist Local Policing Boards in their work.

The draft Bill is yet to be published, and therefore it is unclear at the moment what elements of current OPCC workstreams such as the CDSP will transfer to Local Policing Boards. Kent OPCC has made strong representations to the Home Office and Ministers that functions such as CDSPs should remain embedded in the work of the new Boards.

APPENDIX

TERMS OF REFERENCE

Membership and Meetings

A Custody Detention Scrutiny Panel (CDSP) is made up of a group of local people selected from across the policing area, to represent the local communities in conversations with police officers and staff actively involved in the detention and custody environments.

- Chairs: PCC CEX and ICV
- 2-3 further ICVs from across the region (as required)
- Head of Custody (ex-officio)
- IAG Chair
- 1 IAG representative
- Custody healthcare representative
- LDR representative
- Appropriate adult representative from both Schemes
- Rep from Diversity Team (subject matter expert)

Other representatives, depending on the topics under consideration:

- Representatives from Youth Offending Team, Criminal Justice Liaison and Diversion Service
- NACRO
- Children's social services
- Drug and alcohol services
- Representative from Mental Health charity (e.g. Mind) and Force mental health team
- Senior officer
- Representative from Officer Safety Team

The CDSP will meet quarterly

Overview

The primary objective of a Police Detention Scrutiny Panel is to independently:

- assess and report on detention and custody processes;
- review and advise on matters of disproportionality
- create an annual report for the public.

Information and reporting

A CDSP will be given unprecedented access to material retained by the police in order to objectively and independently review matters of disproportionality and police/detainee behaviour in the context of legislation, guidance, policy and procedure.

- The meeting will consider reports concerning custody that are submitted to the Policing Powers Oversight Board
- CDSP will provide updates to Police Powers Oversight Board and Independent Advisory Group for consideration
- The meeting will consider the information contained within the Home Office Annual Data
- The meeting will consider each ICV quarterly report
- The meeting will consider complaints made about custody in that quarter.

APPENDIX

TERMS OF REFERENCE (cont.)

- Any current strategies or plans relating to custody (e.g. response to HMICFRS reports) will be considered
- To consider thematic areas of risk/matters which would be of concern to the community. This will include data and/or case studies as appropriate, and will include data on protected characteristics to enable discussion of any potential disproportionality:
 - Near misses
 - Use of Force
 - Medication and healthcare
 - Mental health detentions
 - Children in custody
- In addition, ad-hoc adverse incidents
 - A record will be made of each meeting, as per the Guidance Document
 - An annual report will be created to inform the public, including observations and recommendations to PCCs and Chief Officers; and published on the Force and Commissioner's website.

Panel members should sign non-disclosure agreements (where required) to protect the information supplied that is under review. All efforts will be made to anonymise the data considered by the Panel. This is to ensure compliance with GDPR and Data Protection. The Information Asset Owner for each force will need to be satisfied that the force is willing to accept any risks associated with sharing the products necessary for scrutiny to take place.