

01 October 2018

Dear Sir or Madam,

**Home Office open consultation: Revising PACE Codes C and H**

Members of the Association of Police and Crime Commissioners (APCC) have come together to provide a united response to the Home Office consultation on revisions to the Police and Criminal Evidence Act (PACE) codes C and H.

The Association welcomes the Government's focus on what we consider essential reforms to the PACE codes. These changes will help to ensure that detainees in police custody are treated with dignity and respect, as well as guaranteeing provision of sanitary products in police custody.

Police and Crime Commissioners and other elected local policing bodies have a statutory duty to make arrangements for detainees to be visited by Independent Custody Visitors. It is through such arrangements that our members, strongly supported by the Independent Custody Visiting Association, have been able to monitor detainee wellbeing and come together to help drive moves to improving conditions for individuals in police custody, including female detainees.

In reference to the wording of the draft changes to codes C and H, we would like to work closely with you to clarify that the availability of sanitary products for a menstruating detainee should not be dependent upon any requirement or expectation that a potentially vulnerable individual in police custody proactively requests sanitary protection.

Furthermore, whilst this Home Office consultation is limited to making changes that will affect those in police custody, the APCC would like to take the opportunity to highlight outstanding shortcomings in court custody with regards to treatment of menstruating detainees and the provision of sanitary products. We urge the Government to take appropriate action to ensure standards and provision are on an equal standing regardless of where people are being detained.

We look forward to working with you to refine the wording and to implement these welcome changes, meeting the ambitions of the Government, campaigners and the public to ensure that the dignity and wellbeing of menstruating detainees is protected in custody and across the criminal justice system.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Martyn Underhill'.

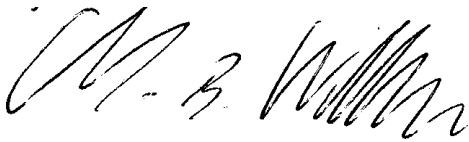
**Martyn Underhill**

**Police and Crime Commissioner for Dorset**  
[martyn.underhill@dorset.pnn.police.uk](mailto:martyn.underhill@dorset.pnn.police.uk)

A handwritten signature in blue ink, appearing to read 'Matthew Scott'.

**Matthew Scott**

**Police and Crime Commissioner for Kent**  
[matthew.scott@pcc.kent.pnn.police.uk](mailto:matthew.scott@pcc.kent.pnn.police.uk)



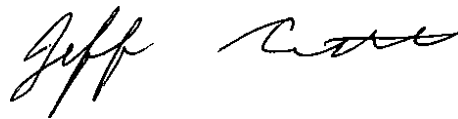
**Mark Burns-Williamson OBE**  
Police and Crime Commissioner for West  
Yorkshire



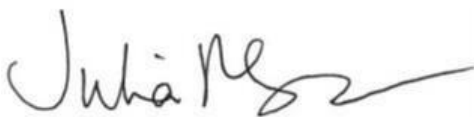
**Roger Hirst**  
Police and Crime Commissioner for Essex



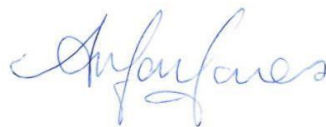
**Martin Surl**  
Police and Crime Commissioner for  
Gloucestershire



**Jeff Cuthbert**  
Police and Crime Commissioner for Gwent



**Julia Mulligan**  
Police and Crime Commissioner for North  
Yorkshire



**Arfon Jones**  
Police and Crime Commissioner for North Wales



**Sue Mountstevens**  
Police and Crime Commissioner for Avon and  
Somerset



**Kathryn Holloway**  
Police and Crime Commissioner for  
Bedfordshire



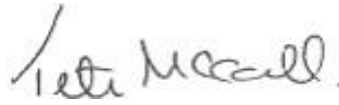
**Jason Ablewhite**  
Police and Crime Commissioner for  
Cambridgeshire



**David Keane**  
Police and Crime Commissioner for Cheshire



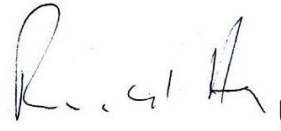
**Barry Coppinger**  
Police and Crime Commissioner for Cleveland



**Peter McCall**  
Police and Crime Commissioner for Cumbria



**Hardyal Dhindsa**  
Police and Crime Commissioner for Derbyshire



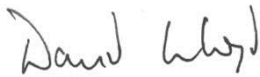
**Ron Hogg**  
Police and Crime Commissioner for Durham



**Dafydd Llywelyn**  
Police and Crime Commissioner for Dyfed-Powys



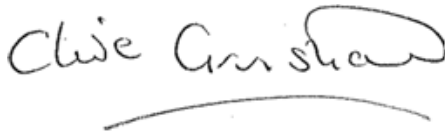
**Beverly Hughes**  
Deputy Mayor for Policing and Crime, Greater Manchester



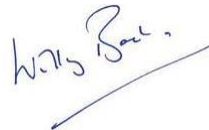
**David Lloyd**  
Police and Crime Commissioner for Hertfordshire



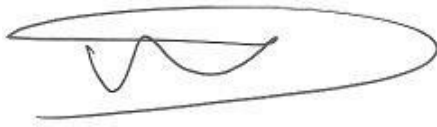
**Keith Hunter**  
Police and Crime Commissioner for Humberside




**Clive Grunshaw**  
Police and Crime Commissioner for Lancashire



**Lord Willy Bach**  
Police and Crime Commissioner for Leicestershire



**Marc Jones**  
Police and Crime Commissioner for Lincolnshire



**Jane Kennedy**  
Police and Crime Commissioner for Merseyside



**Lorne Green**  
Police and Crime Commissioner for Norfolk



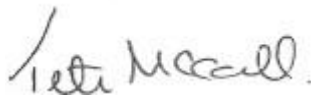
**Stephen Mold**  
Police and Crime Commissioner for  
Northamptonshire



**Paddy Tipping**  
Police and Crime Commissioner for  
Nottinghamshire



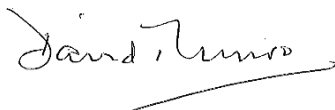
**Alun Michael**  
Police and Crime Commissioner for South Wales



**Dr Alan Billings**  
Police and Crime Commissioner for South  
Yorkshire



**Matthew Ellis**  
Police and Crime Commissioner for  
Staffordshire



**David Munro**  
Police and Crime Commissioner for Surrey



**Katy Bourne**  
Police and Crime Commissioner for Sussex



**Anthony Stansfeld**  
Police and Crime Commissioner for Thames Valley



**Philip Seccombe**  
Police and Crime Commissioner for  
Warwickshire



**John Campion**  
Police and Crime Commissioner for West Mercia



**David Jamieson**  
Police and Crime Commissioner for West  
Midlands



**Angus Macpherson**  
Police and Crime Commissioner for Wiltshire



**Dame Vera Baird QC**  
Police and Crime Commissioner for  
Northumbria