



**HEDDLU GOGLEDD CYMRU**  
Gogledd Cymru diogelach

**NORTH WALES POLICE**  
A safer North Wales

**Gareth Pritchard MA**  
**Dirprwy Brif Gwnstabl / Deputy Chief Constable**

Our ref: DCC/ND/HHCorInqFinal14

21<sup>st</sup> August 2014

Email [REDACTED]

Dear Madam

**Hywel Llewelyn Hughes**

We refer to your Schedule 5, Regulation 28 report to prevent future deaths dated 2 July 2014 and in particular the parts addressed to North Wales Police ("NWP").

We reply as follows:-

a) Snoring

NWP agree that in the light of the evidence/findings arising from this inquest that snoring should be including in the training on positional asphyxia.

Therefore, NWP have:-

- Amended their first aid, personal safety and tassar training materials and training package to add snoring as a symptom of positional asphyxia.
- Added an exercise in which a violent person stops breathing after being dealt with by officers to the tassar and personal safety training to demonstrate the dangers of such medical emergencies.

The NWP amendments on snoring have been recommended to the organisations below to bring about improvement to material/training at a national level for police forces.

- College of Policing
- The National Secretary and Regional Representative for the Self Defence Arrest and Restraint section of the Association of Chief Police Officers ("ACPO")
- The North West Regional Firearms Group

[www.north-wales.police.uk](http://www.north-wales.police.uk)

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## b) Bubble Cars

NWP consider that police officers can effectively monitor detainees irrespective of the issues highlighted over sight and hearing connected to the protective screens in the existing double compartment bubble car or proposed single compartment bubble car when transporting detainees. Monitoring is achievable to acceptable levels if officers pay sufficient attention to the task and abide by their detainee risk assessments and force policies when transporting detainees. However, NWP are considering improvements to assist with monitoring as set out below.

Bubble cars are general purpose police vehicles lawfully modified to utilise a containment cell for prisoners within the vehicle. The protective screen in bubble cars' containment cells (between the detainee and the driver/passenger police officer) are made of polycarbonate not perspex. The protective screens were designed as part of the containment cell arrangement to achieve a sensible balance between health and safety concerns for the police officers and the detainees whilst providing an acceptable capacity for monitoring detainees.

NWP operate in a large rural area, utilising three designated custody suites in convenient locations within their force area. NWP consider bubble cars as a preferable alternative to police vans for transporting detainees for a number of reasons. The force are presently evaluating changing the containment cell from a double one to a single cell, however, a final decision on whether this goes ahead will be dealt with after testing and further consideration is concluded. It is not correct to suggest that the double cell bubble cars are being "phased out".

The screen is not scratch resistant but a sharp instrument would be needed to scratch it. Bubble cars are the subject of a vehicle user check for each day by the police officer utilising the vehicle and a weekly check by a supervising sergeant. The user check includes the protective screen. Defects are reported to fleet services which result in repairs being undertaken in a timely fashion, which include scratches on the protective screen. NWP have assessed the protective screen as adequate to hear a detainee within the containment cell.

The bubble cars used over the years have altered because of fleet services procurement requirements. The latest vehicle being utilised was the Ford Focus, which due to manufacturer redesigns resulted in less cabin space due to the area occupied by the compartment cell. This lack of space resulted in complaints from taller officers that there was insufficient room for the front seats to be put back sufficiently. There was also concern about a number of incidents in which violent detainees had kicked out the rear nearside and offside windows and with drunken detainees slumping across the rear seats, making monitoring more problematical. Accordingly, to assist with these problems, NWP have designed a single cell compartment bubble car in conjunction with the manufacturer and are testing the single cell compartment, which appears so far to present significant improvements to the existing double cell compartment arrangement. It allows better monitoring as the police officer is closer to the detainee from visual and auditory perspectives.

### Proposed auditory Improvements

NWP are considering the following:-

- Scoping an automated intercom solution with a view to identifying an appropriate product to be tested on a demonstrator vehicle for use in the bubble containment cell;
- Undertaking enquiries as to the possibility of having a hole in the protective screen to see if that improves ability to monitor detainees (and does not compromise the integrity of the protective screen or provide health and safety implications for the police officers/detainees).

Finally, the Police and Crime Commissioner ("PCC"), Winston Roddick QC wishes to make it clear that he will scrutinise NWP's response to your report by examining its revised training programme to satisfy himself that the revisions have been adopted and the training is being carried out in accordance with those revisions. He proposes to make unannounced visits to force training sessions to verify their adequacy.

Similarly, the PCC will satisfy himself that NWP's use of the bubble car, whether in a double or single compartment, including any improvements to the polycarbonate screen and/or intercom arrangements, are adequate.

Yours faithfully

A large black rectangular redaction box covering the signature area.

**Deputy Chief Constable**