

Voluntary interviews

Police use of voluntary interview
and the application of the
appropriate adult safeguard in
England and Wales in 2022/23

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December 2023

About the National Appropriate Adult Network

Appropriate adults safeguard the welfare, rights, and effective participation of children and vulnerable adults, whether they are detained or questioned as suspects in criminal or terrorism investigations.

The National Appropriate Adult Network (NAAN) works to create a fairer justice system for children and vulnerable adults by maximising the effectiveness of the appropriate adult safeguard. It is a registered charity with over 100 member organisations. It was established in 1995 by frontline practitioners, Mind, Mencap and Revolving Doors Agency, to develop and share best practice in the AA role. Today, the charity provides an independent centre of expertise, innovation and infrastructure support, to improve policy, commissioning, provision and public understanding.

Visit appropriateadult.org.uk for more information.

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Introduction

Police forces in England and Wales carried out an estimated 145,000 voluntary interviews under caution in 2022/23, of which around one fifth were of children. Only 4.8% of adults attending a voluntary interview were recorded as meeting the criteria for appropriate adult (AA) support – around half the rate in police custody. While custody rightly attracts scrutiny, this report highlights both *why* and *how* a strategic focus should be brought to bear on voluntary interviews. Part 1 presents an analysis of quantitative data provided by police forces. Part 2 sets out the policy and practice challenges from the perspective of local appropriate adult scheme leaders.

This report contributes to [NAAN's key policy priorities](#), including voluntary interviews, the identification of vulnerable suspects, and the treatment of children.

Background

Opportunities

When conducted in adherence with legal and ethical standards, voluntary interviews offer obvious advantages in comparison to police custody for both policing and suspects. They have the potential to support compliance with international human rights standards, domestic legislation and the expectations of courts.

Most obviously, voluntary interviews support the requirement to use detention only where necessary, in line with the *UN Convention on the Rights of the Child* and *Police and Criminal Evidence Act (PACE) 1984 Code G*. This reduces risks and costs for policing, while avoiding the sometimes severe emotional and psychological impact of custody on individuals. In addition, simply being detained in police custody can impede a person's ability to participate effectively in PACE process, including interviews. The risks increase where people have personal characteristics or experiences that make them more vulnerable in that context, and as the duration of detention increases. The practical realities of police detention mean there is limited flexibility to make adjustments. In contrast, voluntary interviews have the potential to better meet the diverse needs of the population (for example in relation to age, mental health, disability, or neurodiversity) in line with *UN Convention of the Rights of Persons with Disabilities* and the *Equality Act 2010*. More effective participation results in more reliable evidence, further contributing to the overall effectiveness and efficiency of the investigative and court processes.

Risks and challenges

However, the implementation of voluntary interviews is not without its risks and challenges – something that NAAN raised eight years ago in the first *There to Help* report (NAAN 2015). Failure to apply safeguards, inadequate risk assessments, and insufficient healthcare support can increase risks, including of false confessions. The threat of arrest may generate pressure to agree to interviews, raising the question of whether they are genuinely voluntary. The lack of separation between officers responsible for interviewing and the application of PACE safeguards, along with the challenge of ensuring proper training for all officers, raises concerns about the integrity of the process. The potential informality, with the risk of being seen as 'just a chat,' blurs the lines between witness and suspect interviews. Logistical challenges, such as the appropriateness of different locations, arranging the presence of lawyers and appropriate adults, and the impact of 'no-shows' on resources, can also act to undermine, rather than achieve, the potential gains¹.

¹ Also see the video presentation [Voluntary Interviews: comments from AA schemes](#) (2017)

A national effort on voluntary interviews

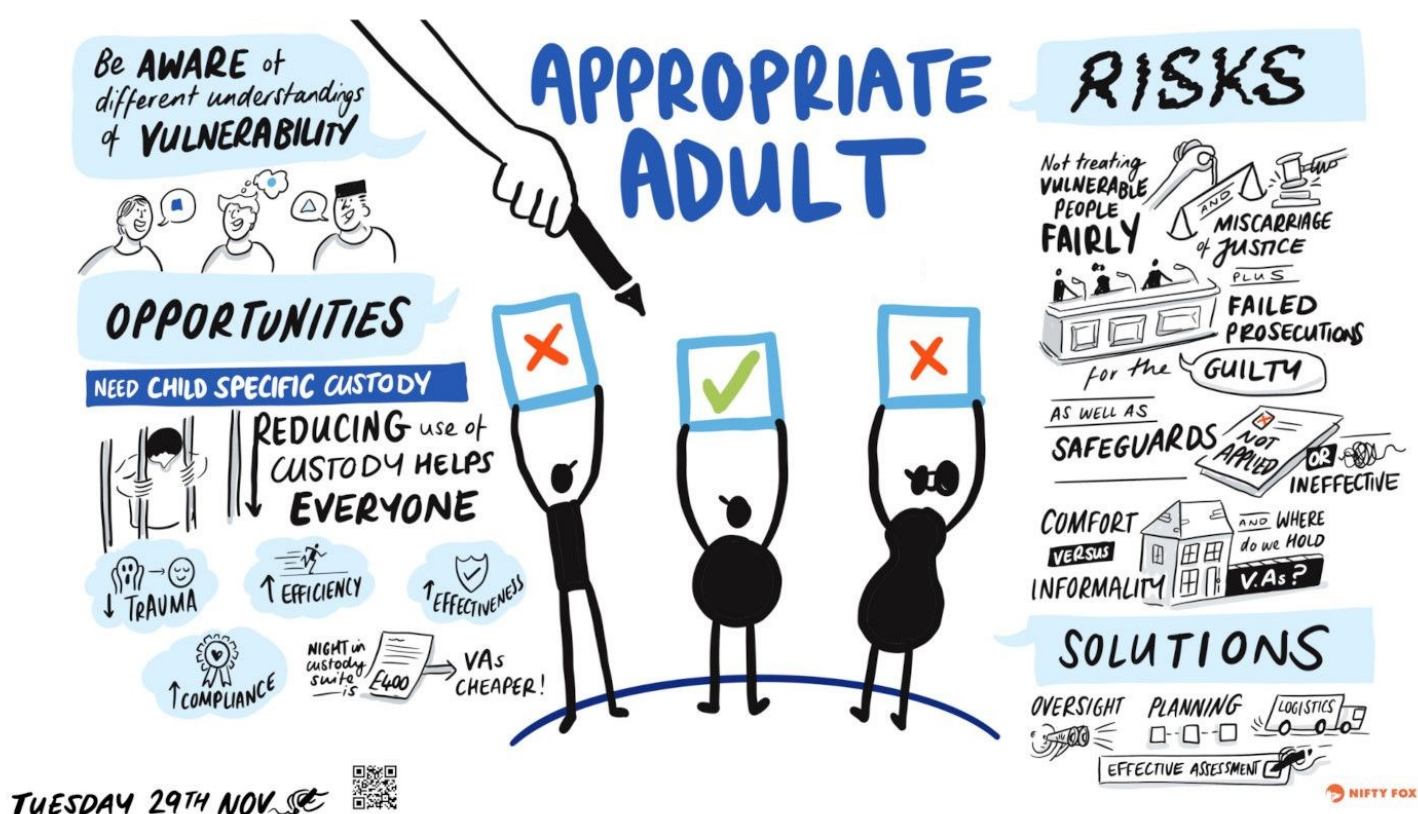
It is critical to ensure that the advantages of voluntary interviews are not overshadowed by the risks and challenges associated with their implementation. To that end, the first and most basic step is understanding what is happening now. This paper aims to contribute to that objective, with an analysis of the use of voluntary interviews and the application of the appropriate adult safeguard.

This is one small part of a shared national effort to drive improvements in voluntary interview practice. NAAN welcomes the Home Office decision to mandate voluntary interview data in its Annual Data Return from 2023. The National Police Chiefs' Council is working on national guidance for forces on voluntary interviews – a project that NAAN has actively supported. NHS England is investing significantly to support and evaluate the impact of Liaison and Diversion assessments prior to voluntary interviews.

There remains more to be done, and this report provides ten recommendations that indicate a path.

Statutory provision of appropriate adults for vulnerable people

From an appropriate adult (AA) perspective, the most critical recommendation is statutory provision for vulnerable adults. NAAN includes almost 100 organisations, most of whom provide locally organised appropriate adult schemes. Those schemes have shown themselves to be committed, flexible and adaptable to change – not least during the Covid pandemic. Volunteers and staff stand ready to support people attending voluntary interviews. A statutory foundation would bring parity of esteem with AA provision for children, which has been a legal duty of local authorities since the Crime and Disorder Act 1998. With it would come clarity, sustainability, accountability, and an assurance that police will be able to comply with this legally mandatory procedural safeguard.



Summary of findings

On the use of voluntary interviews

1. Forces in England and Wales conducted an estimated 145,000 voluntary interviews in 2022/23.
2. The balance between voluntary interviews and arrests varied significantly between forces.
3. Voluntary interviews of children increased versus 2021/22, while remaining static for adults.
4. 1 in 5 voluntary interviews were of children (estimated 27,500 p.a.), compared to 1 in 10 arrests.
5. The ratio of arrests to voluntary interviews was around 2:1 for children and 5:1 for adults.
6. Two forces reported more child voluntary interviews than child arrests.

On recorded need for appropriate adults

7. Only half of forces reported the (legally mandatory) need for an appropriate adult in 100% of their voluntary interviews of children.
8. The reported need for an appropriate adult was 4.8% of adult voluntary interviews, compared to 8.7% in custody, both of which are far below the estimated prevalence of need.
9. The recorded need for an appropriate adult varied between forces, from 0.6% to 11.4%.

On the quality of data

10. The availability of data on volumes, use with children and adults, and recorded need for appropriate adults, is significantly worse for voluntary interviews than police custody.
11. One third (33%) of the 43 police forces in England and Wales were unable to provide data on the number of voluntary interviews (VI) they conducted in 2022/23.
12. Almost two thirds (63%) of the 43 police forces were unable to provide data on whether appropriate adults were required in the voluntary interviews they conducted.
13. The same police IT systems are commonly used by both forces who were and were not able to provide data (see Annex C). The difference appears to be recording practices, development of custom reports, adoption of existing 'bolt-ons', and software versions.

On appropriate adult scheme leaders' concerns

14. There is an inconsistency and lack of clarity in voluntary interview practice.
15. Reliance on investigating officers to identify, understand and address vulnerability is leading to problems with the application of the appropriate adult safeguard.
16. Voluntary interviews of children and vulnerable people should always be pre-planned (never contemporaneous), should normally take place in a police station unless an alternative better serves a person's needs, and be recorded to the same quality as in police custody.
17. When children and vulnerable people are asked to agree to a voluntary interview, they are not always clear what it involves, its legal status, or the consequences of declining or not turning up. In some cases, the wording of invitations is intimidating. It does not always appear to be genuinely voluntary. Independent support, including legal advice, should be available before children and vulnerable people attend.
18. Police do not always communicate cancellations and postponements to AA schemes, which wastes precious resources. There is a lack of information in advance about specific vulnerabilities.

Recommendations

1. **Police forces** which are successfully recording and retrieving voluntary interview data should share information with forces using the same IT systems which are currently unable to do so, in order to improve the quality of data recording and retrieval practices.
2. **Academics** should conduct further research focused on how voluntary interviews are used in practice (including with regard to age, vulnerability, offence type, and location) and the implications for individuals, policing and the justice system.
3. **The College of Policing** should publish detailed, evidence-based, voluntary interview guidance for police forces. This should be shared with all criminal investigatory bodies.
4. **The NPCC** should drive the development of a national evidence-based risk and need assessment, applicable to both custody and voluntary interviews (including PACE vulnerability and fitness to interview screening), along with improvements in information sharing.
5. **The Independent Office for Police Conduct** should review complaints received regarding voluntary interviews and produce an issue of its *Learning the Lessons* publication.
6. **Liaison and diversion** assessments should be available prior to all voluntary interviews in both England and Wales.
7. **Appropriate adult schemes** should be designed and funded to explicitly include provision for voluntary interviews, including pre-interview contact.
8. **The Home Office** should amend PACE Code C to create a supervisory role for voluntary interviews, analogous to the custody officer in its independence from the investigation
9. **The Ministry of Justice** should support 'opt out' legal advice, or mandatory attendance of a legal advisor, for children and vulnerable adults attending voluntary interview.
10. **The Government** should legislate to make appropriate adult provision for vulnerable adults statutory, as it has been since 1998 for children detained or questioned voluntarily.

Part 1: Volumes and vulnerability

Method

On 27th July 2023, the National Appropriate Adult Network (NAAN) requested data on voluntary interviews (VI) for each month between April 2022 to March 2023 inclusive, from all 43 territorial police forces in England and Wales (E&W). In addition, the same data were requested from:

- British Transport Police (BTP)
- Police Service of Northern Ireland (PSNI)

The Freedom of Information Act (FOIA) request is at *Annex A*. In summary, the request included:

- The number voluntary interviews conducted, broken down by child (under 18) or adult (18+)
- The number of voluntary interviews for which the need for an appropriate adult (AA) was recorded, broken down by child (under 18) or adult (18+)

Results

Data availability and quality

Of territorial forces in England and Wales, 29 (67%) provided data for 2022/23 on the total volume of voluntary interviews (VI) they had carried out. 11 (26%) refused the request due to data: not being held, not being retrievable within cost limits, or not being accurate and reliable (Table 1).

Some forces, including the Metropolitan Police, were able to provide volume data but refused the whole request under Section 12 of the FOIA due to being unable to provide AA data (Annex C).

<i>Table 1: Data availability</i>	Eng & Wal	Incl BTP & PSNI
1. All requested data (monthly volumes, AA data, split child & adult)	16	16
2. Monthly volume data for child & adult only (no AA data)	11	11
3. Annual volume data (child & adult combined, no AA data)	2	3
4. Refused	10	11
5. Still awaiting FOIA response after 4 months (at 27.11.23)	4	4
TOTAL	43	45

More police forces were able to provide voluntary interview volume data compared to the statistics collected by the Home Office (2022) for 2021/22², for which only 21 police forces provided data.

The quality of the data remains uncertain. Several forces indicated data were being extracted from live systems designed for policing purposes. Responses indicated both under-recording, and potentially some over-estimation, of voluntary interview volumes. For example, one force stated: *“Please note this data presumes that all voluntary attendees were interviewed and excludes all voluntary interviews which took place at places other than the police station i.e. home or at the road side”*.

The most common IT systems (Athena, Niche, Connect) were represented both by forces which were able to provide all requested data, and forces unable to provide any data (see Annex C).

² This was the first time such statistics had been included in the Home Office’s Annual Data Requirement (ADR) from police forces, albeit as voluntary and “experimental” data. Although fewer forces responded, the ADR request was broader, including data on offence type and location of interview. The relevant [Home Office data for 2022/23](#) is expected to be published in January 2024.

Volume data

Voluntary interviews

29 forces reported 80,426 voluntary interviews (VI) during the financial year 2022/23. Assuming each of the 29 forces made up the same proportion of VI as arrests in that period, the total volume of voluntary interviews in England and Wales was estimated at 145,159, including 27,504 of children.

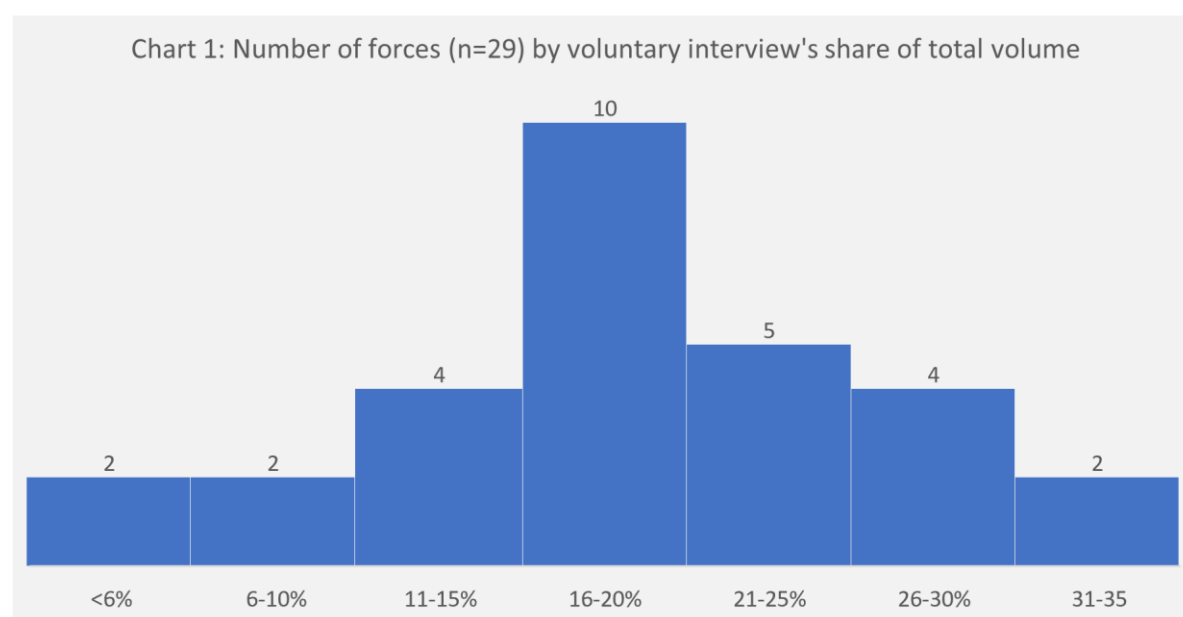
Table 2: Estimated total VI volume for England & Wales	29 force sample			43 territorial forces	
	VI (actual)	Arrests (actual) ³	VI % of arrest + VI	Arrests (actual) ¹	VI (estimated)
Adult	65,129	343,203	16%	617,660	117,212
Children	14,922	32,036	32%	59,049	27,504
Age unknown / aggregated	375	306	55%	552	676
TOTAL	80,426	375,239	18%	677,261	145,159

Voluntary interviews compared to arrests

While arrest remains the primary method for securing interviews, voluntary interview volumes are significant⁴. Table 2 indicates recorded arrests (375,239) were significantly higher than recorded voluntary interviews (80,426) within the 29 forces. Voluntary interviews were found to be 18% of the 'total volume'⁵, compared to 15% in 2021/22 (Home Office 2022)⁶.

Voluntary interviews compared to arrests by police force

Voluntary interviews made up 18% of total volume (Table 2). This varied between 1% and 31% depending on the force area (median of 19%) and was over 25% in six forces (Charts 1 and 2).



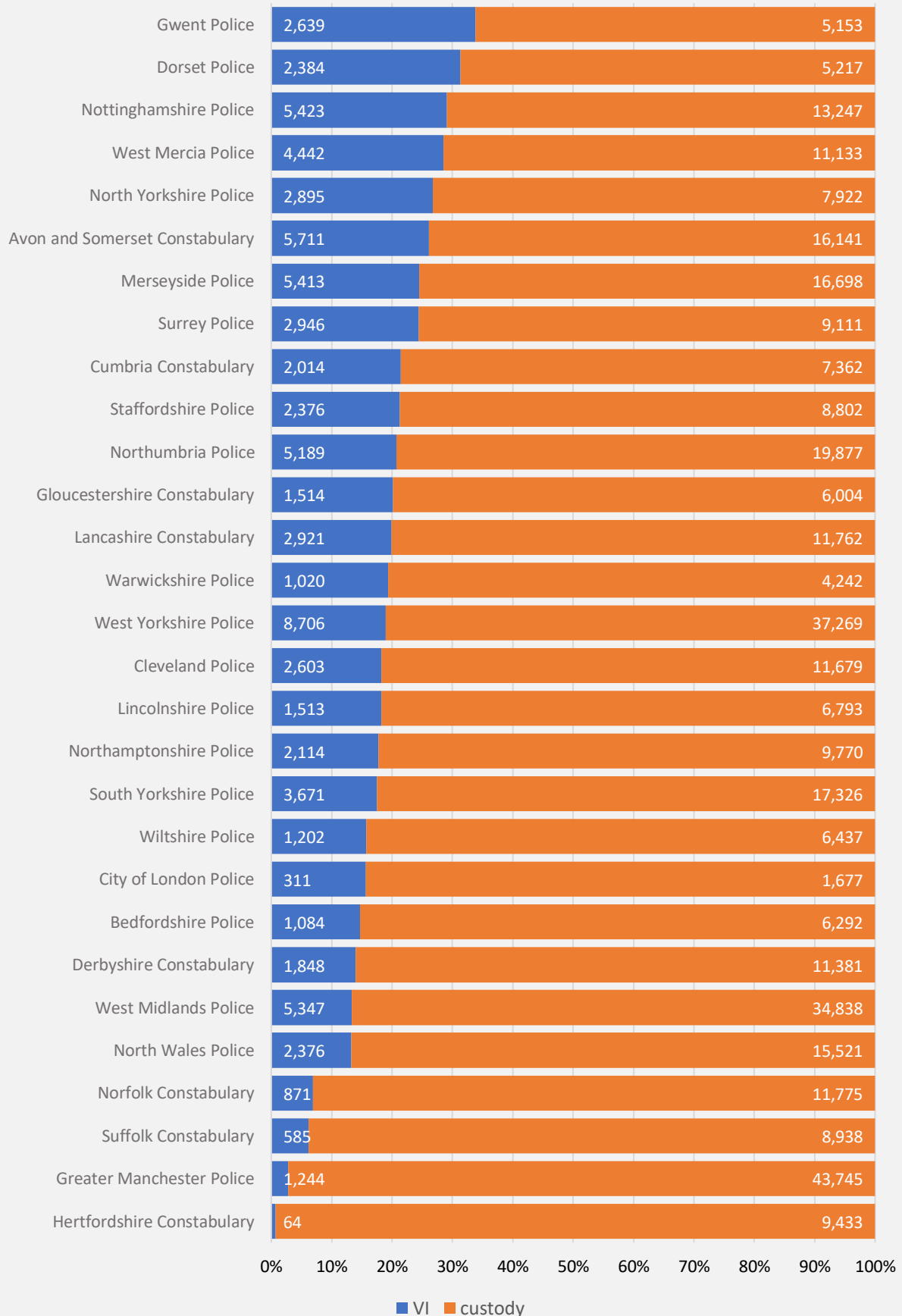
³ Home Office (2023)

⁴ Powers of arrest are used for other reasons than securing an interview, including warrants for arrest issued by courts, breaching of the peace, court orders, or bail conditions (which may or may not lead to an interview)

⁵ 'Total volume' = voluntary interviews + authorised detentions. Unlike authorised detentions, arrest official data are available for all forces. Authorised detentions include non-PACE detentions (e.g. Mental Health Act 1983). In 2021/22, the 26 forces reported 546,170 authorised detentions but only 437,994 arrests.

⁶ 21 forces reported 61,354 voluntary interviews and 341,119 arrests.

Chart 2: Voluntary interview share of of total volume by force area



Voluntary interviews compared to arrests by age group

Table 2 (p.9) shows that the proportional split between voluntary interviews and arrests differs significantly for children and adults. There were just over two child arrests (32,036) for every voluntary interview (14,992), with voluntary interviews therefore making up a third (32%) of total volume for children. However, there were five times as many adult arrests (343,203) as voluntary interviews (65,129), with the latter making up a sixth (16%) of total volume for adults. Notably, this compares to 26% for children, and 14% for 18–20-year-olds in 2021/22 (Home Office 2022⁷), suggesting that the greater tendency towards arrest applies as soon as children turn 18.

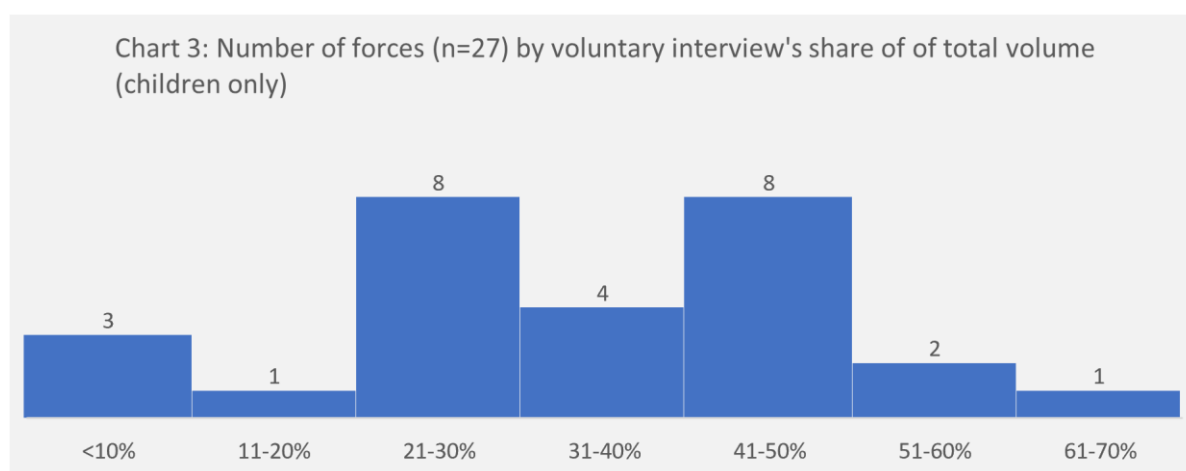
Table 3 shows that four out of five (81%) voluntary interviews were of adults. However, the proportion was lower than for arrests (91%).

<i>Table 3: Use of VI and arrest by age (29 force sample)</i>	VI volume	Age group % of VI	Arrest volume	Age group % of arrest
Adult	65,129	81%	343,203	91%
Children	14,922	19%	32,036	9%
Age unknown / aggregated	375	0.5%	306	0.1%
TOTAL	80,426	100%	375,239	100%

Conversely children made up a larger proportion of voluntary interviews than arrests. Children had a higher chance than adults of being dealt with via voluntary interview. While 1 in 10 arrests (9%) were of children, 1 in 5 (19%) voluntary interviews were of children in 2022/23 (compared to 17% in 2021/22 according to Home Office (2022)).⁸

Voluntary interviews compared to arrests of children by police force

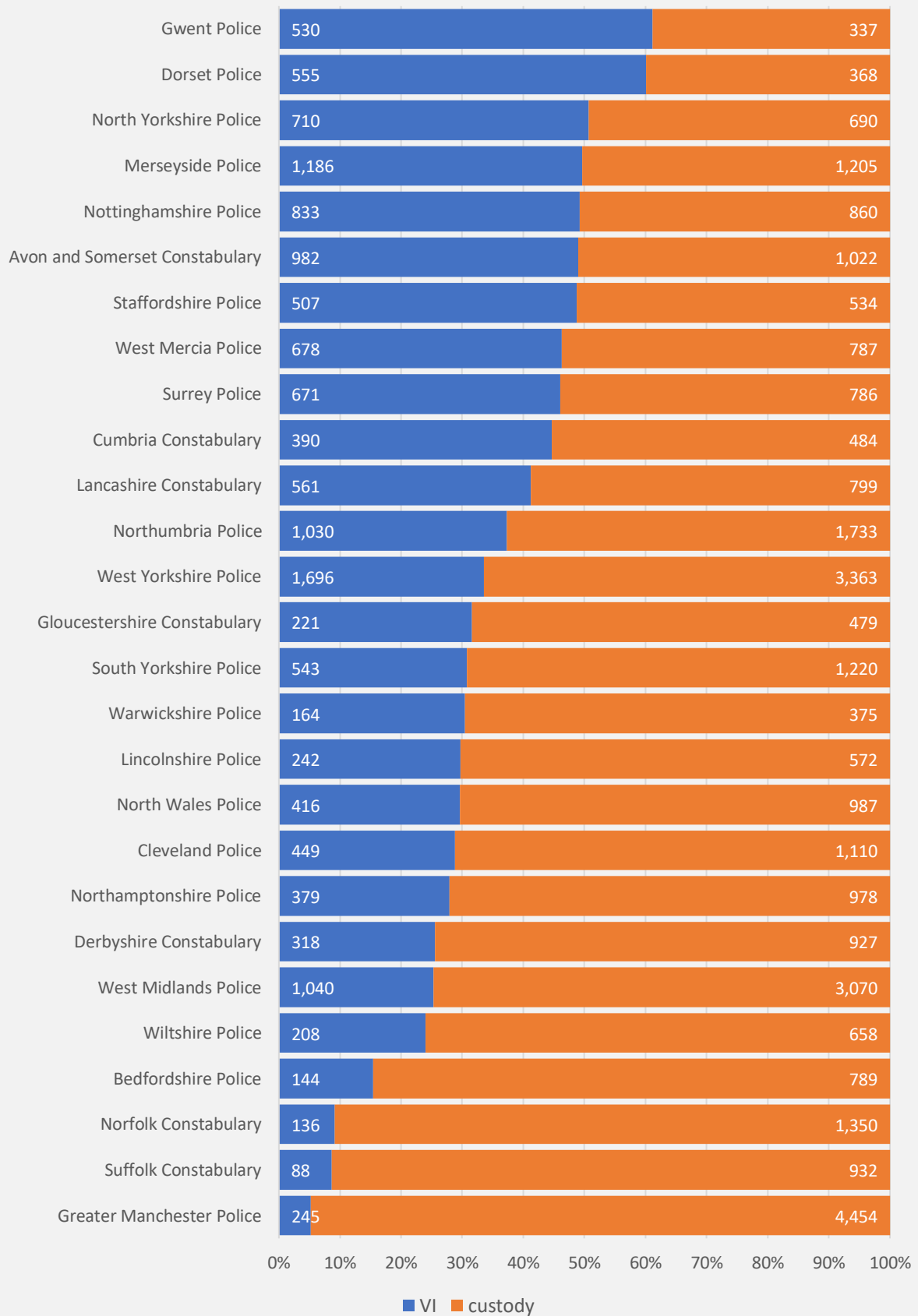
27 forces provided separate data for children (Table 1, p.8). Voluntary interviews made up between 5% and 61% of the reported total volume depending on the force area (median of 32%) (Chart 3). This was significantly higher than with adults. Three forces reported voluntary interviews being over 50% of their total volume, while another three reported figures of less than 10%.



⁷ Sample of 21 forces providing voluntary interview and arrest data broken down by age.

⁸ The Home Office experimental statistics for 2021/11 indicated this percentage varied significantly by offence type. For example, children accounted for 59% of all voluntary interviews for robbery and 46% of all voluntary interviews for possession of weapons (sample of 17 forces providing offence data).

Chart 4: Voluntary interview share of of total volume by force area
(children only)



Voluntary interviews 2022/23 compared to 2021/22 by police force

Table 4 shows the 12 police forces which provided voluntary interview data for 2022/23 to NAAN, and for 2021/22 to the Home Office (2022). Overall, there was an increase in the number of voluntary interviews within these forces. However, this was not uniform:

- Six forces (50% of the sample) increased recorded volumes of voluntary interviews, while the other 6 decreased recorded volumes.
- Voluntary interviews with children increased by a quarter (26%) while those with adults remained effectively static.

Hertfordshire made an outsize contribution to the volume change, potentially indicating unstated data issues in its response for 2022/23. However, removing the force from the analysis does not change the above themes.

Table 4: Change in recorded volume of voluntary interviews 2021/22 to 2022/23

Police force	Child	Adult	Unknown	Total
Avon and Somerset Constabulary	-25	-204	0	-229
Cleveland Police	160	479	-4	635
Dorset Police	203	487	0	690
Hertfordshire Constabulary	-200	-1359	60	-1499
Merseyside Police	939	2996	-6	3929
Norfolk Constabulary	14	-98	0	-84
North Yorkshire Police	155	340	-2	493
Staffordshire Police	64	-933	0	-869
Suffolk Constabulary	-4	42	0	38
Surrey Police	108	78	-42	144
West Midlands Police	179	-332	0	-153
West Yorkshire Police	75	-777	-88	-790
Total	1668	719	-82	2305
<i>% change</i>	<i>+26%</i>	<i>+2%</i>	<i>-56%</i>	<i>+6%</i>

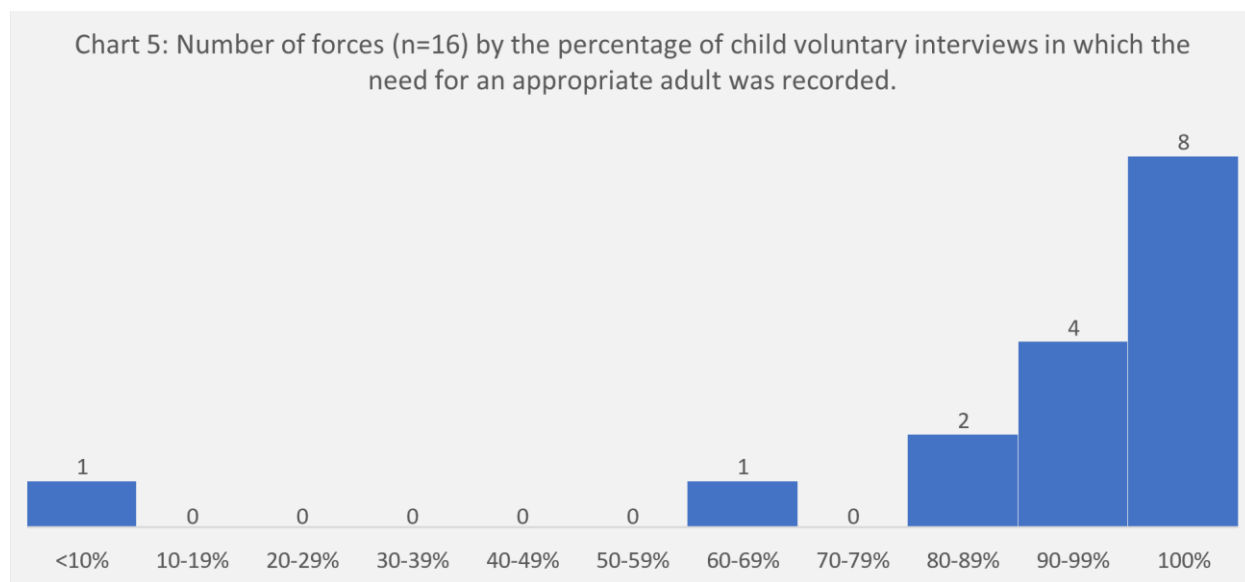
Bath and Dehaghani (2020) estimated the volume of *adult* voluntary interviews across the 43 forces to have been 153,470 in 2018/19. Using the same method, the estimate for 2022/23 is 117,212 (Table 2, p.9), a 24% *decrease* over four years. Bath (2019b) found a high correlation ($r^2=0.84$) between police workforce numbers and arrest volumes. Notably, Home Office (2023) figures show that *arrests* fell year on year between 2006/7 and 2020/21 but began to rise again in 2021/22 and 2022/23. Similar patterns may be emerging in voluntary interview volumes.

Data on recorded need for an appropriate adult

Children

16 forces in England and Wales provided data on recorded need for AAs, both for children and adults (Table 1, p.8).

The PACE Act 1984 and Codes require an AA for 100% of child interviews. Half (50%) of the 16-force sample reported a 100% rate of need for AAs for children (Chart 5).



While this could indicate some serious PACE breaches, significant issues with data recording and retrieval appear to be a significant cause. For example, while Merseyside Police reported a rate of only 8% over the year, this increased to 91% in the final month of the period due to an IT upgrade:

“In February of this year the Force upgraded the version of Niche. Part of the change included the VA record to replicate elements of a Custody Record. Within the full VA record there are three new elements for officers to complete, the ‘Pre-interview risk assessment’, the ‘Rights & Entitlements’ and ‘Post-interview risk assessment/departure’. In the previous recording of VA⁹ the Rights & Entitlements section didn’t exist for officers to complete, it does now and therefore a spike in data has noted post Feb 23.” – Merseyside Police

Furthermore, Northumbria Police reported a rate of 67%. In response to the request for the name of the record management system from which the data were retrieved, the force did not indicate use of a dedicated data management system for voluntary attendance:

“The data has been taken from a daily download of emails that are received each day relating to the Voluntary Attenders”.

It is not clear whether this is more, or less, accurate than reports from a centralised database.

⁹ VA refers to voluntary attendance. This report uses the term voluntary interview to be inclusive of the possibility that an interview may occur in a person’s home, in which case it is the *police* who are attending.

Vulnerable adults

PACE requires an AA whenever any officer has any reason to suspect that a person of any age may be a vulnerable person, as defined by Code C¹⁰ (Dehaghani and Bath 2019).

No academic studies were available which assessed the actual prevalence of adult suspects who meet the 'PACE vulnerable' definition in PACE Code C (2019), either in custody or voluntary interviews. However, McKinnon and Grubin (2013) found that 39% of adult detentions of adults in the Metropolitan Police Service involved a person with a mental disorder (including mental health and learning disabilities), with 25.6% involving a person with "psychosis, major depression, intellectual disabilities, or who researchers felt lacked capacity to consent".

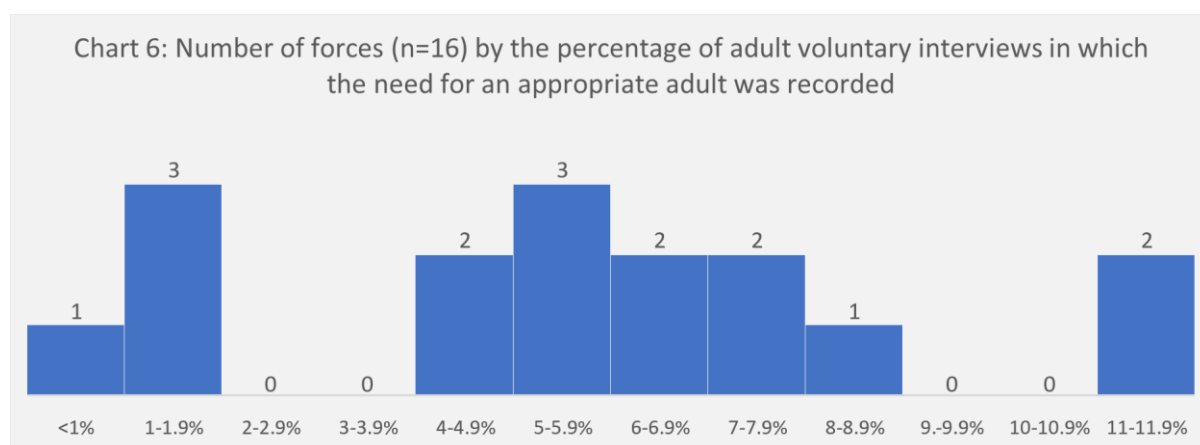
Forces reported that the need for an appropriate adult was recorded in 4.8% of voluntary interviews.

Table 5: Adult VIs with recorded AA need (16 forces)	Voluntary interview		Authorised detention	
	Mean	Range	Mean	Range
2022/23	4.8 %	0.6% - 11.4%	8.7%	0.3% - 21.7%
2018/19 (Bath & Dehaghani 2020)	3.5%	0.1% - 13.5%	6.2%	0.1% - 25.2%

This is significantly lower than the rate recorded in police custody, as reported to NAAN (see Annex B). Possible rationales for the lower recorded rate in voluntary interviews include:

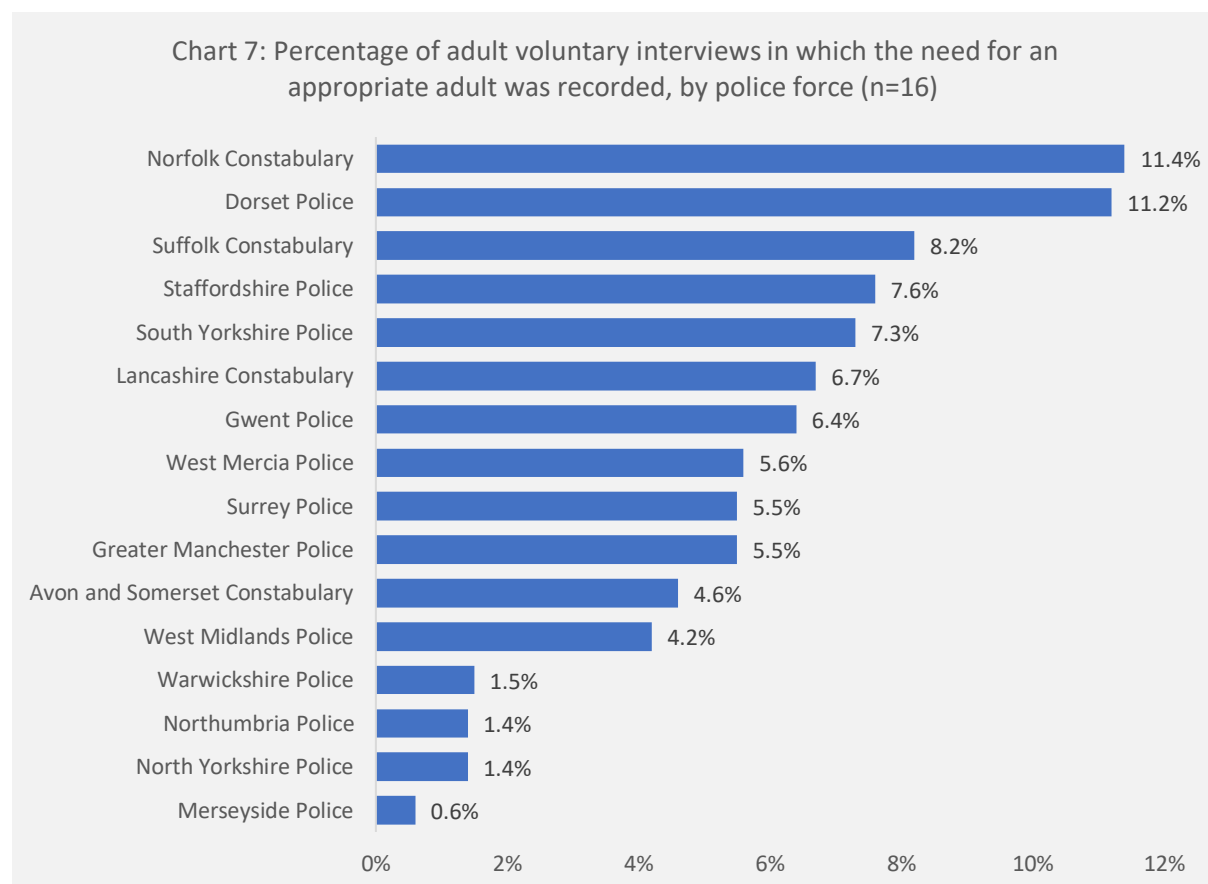
- Poorer data recording due to lack of incentive, requirement or means to record.
- Poorer data due to inability to retrieve reliable data without manual search.
- Lower rates of actual PACE vulnerability in adult suspects attending voluntary interview (although this could equally apply in the opposite direction).
- Poorer identification of PACE vulnerability (i.e. relative lack of tools, training, experience)
- Poorer application of the AA procedural safeguard (e.g. lack of custody officer oversight)
- Poor access to organised AA provision (AA provision is statutory for children but not for vulnerable adults. Recorded AA need is lower where there is poor/no access to AA schemes (Bath 2019). Officers incentivised to use custody due to better actual or perceived access to services in the interests of the suspect, efficiency, PACE compliance, reliability of evidence.

The rate of recorded vulnerability in voluntary interviews was highly variable across police forces, ranging from 0.6% to 11.4% of adult voluntary interviews (Table 5), with a median of 5.6% (Chart 6).



¹⁰ PACE vulnerability has a complex functional definition detailed in PACE Code C, but it often affects people with a mental illness, learning disability, or brain injury, or people who are neurodivergent (e.g. autism, ADHD). For information and free training videos see <https://www.appropriateadult.org.uk/policy/vulnerable-adults>.

Once again, issues with data recording and retrieval are likely a significant contributor to this variance. As in relation to children, at just 0.6% Merseyside Police had the lowest reported percentage over the year (Chart 7) but this increased in the final month of the period to 6.5% with the introduction of a new IT system.



It should be noted that this 16-force sample represents those able to provide *any* data on recorded need for AAs in voluntary interviews within four months of an FOIA request. Even if all outstanding responses are purely due to FOIA backlogs, then at best only 20 of the 43 territorial forces can track the application of the AA procedural safeguard to voluntary interviews.

United Kingdom comparators

British Transport Police (BTP) advised that it has no central system from which the data is retrievable in an automated fashion. As with many of the territorial forces who refused the FOIA request, the information would be recorded on individual occurrence records or casefiles and only retrievable with an extensive manual trawl. BTP noted the added complexity that they may conduct voluntary interviews away from custody, at their own custody facilities (in London), or at custody facilities of other Forces.

Police Service of Northern Ireland (PSNI) advised that 5,967 voluntary interviews were recorded on Niche from April 2022 to March 2023 inclusive. However, assessing whether each applied to an adult or child, and whether an appropriate adult was needed, would require each record to be opened and this information located through manual review, taking over 497 hours. PSNI reported 21,474 arrests under PACE (PSNI (2023)), making voluntary interviews 22% of total volume, slightly higher than England and Wales at 18%.

Part 2: Policy and practice

Method

NAAN conducted a focus group with experienced appropriate adult coordinators in four police force areas. In relation to voluntary interviews, participants were asked to consider:

- the risks and potential opportunities,
- the impact on the objective of the appropriate adult (to safeguard the interests, rights, welfare and entitlements of children and vulnerable adults),
- the practical and logistical challenges of providing an organised appropriate adult service,
- what should be included in national voluntary interview guidance for police.

Contributions were recorded, summarised and organised into themes.

Results

Compliance

Issues

- Police officers may in some cases view arrest as a way to ensure both they and the interviewee receive the necessary support, rather than having to handle everything themselves.
- There is a need to address the lack of clarity among investigating officers regarding their responsibilities in relation to voluntary interviews, which sometimes lead to difficulties and confusion. Proper execution of responsibilities by police officers is required.
- Non-police investigatory bodies, such as the Department for Work and Pensions (DWP), and Health and Safety executive (HSE) use voluntary interviews under caution (sometimes referred to as IUC).¹¹ However, they do not appear to be collecting and publishing data on volumes or safeguards. Their guidance would equally benefit from review.

Solutions

- More detailed, evidence-based, national guidance is needed for police, incorporating all the relevant provisions and principles of the Police and Criminal Evidence Act (PACE), other relevant legislation, codes of practice, and best practice into a single source.
- There should be oversight from a more senior officer, one not involved in the investigation as per the custody sergeant.
- Guidance should be accessible to other crime investigation bodies which operate to PACE and be used by them.

¹¹ In [response to a similar FOIA request](#), the DWP advised NAAN that it “completed around 32,000 investigations” in the year to 31st March 2019, but that information was “not readily available”.

Decision-making process

Issues

- It is unclear in what circumstances voluntary interview is an appropriate approach to take, including in relation to offence types, age and vulnerability.
- The police have a lot of discretion in deciding whether to invite someone to voluntary interview or arrest them.

Solutions

- National guidance should support officers in deciding whether to invite a person to voluntary interview, including criteria for conducting a voluntary interview, relevant questions and contextual factors for officers making this decision to consider.
- The PACE Codes should be reviewed to consider the extent and impact of discretion given to the police, and clarify who should be responsible for making which decisions (e.g. the officer in charge or a supervisor acting as a custody sergeant in effect).

Risk assessment and vulnerability

Issues

- There is a concern that the police often fail to accurately identify vulnerability both in relation to AAs and more widely, resulting in people not receiving the necessary support¹².
- It is unclear what is expected in terms of information sharing between police, liaison and diversion, AA providers, and health and social care; and how consent for sharing personal sensitive information should work in practice.

Solutions

- Ensure all officers understand PACE vulnerability and the appropriate adult requirement.
- Identify responsibility for conducting the various assessments and recording the results (e.g. officer in the case, supervisor, liaison and diversion, healthcare provider).
- Develop a national risk and need assessment tool used to determine PACE vulnerability (need for an AA), safety of suspect (self-harm, suicide), and safety of officers, AAs etc (in context of location, offence, past behaviour).
- Ensure access to NHS liaison and diversion assessments for vulnerable individuals before voluntary interviews and that the results are input into police decision-making.
- Ensure that, where appropriate, there is an assessment of fitness for interview (the mental and physical health of the individual to ensure their well-being and the reliability of the evidence obtained) both before and on the day of the interview, by an appropriately qualified professional.
- Develop joint guidance on information sharing.

¹² In September 2023, the [Independent Office for Police Conduct issued a recommendation to Hampshire Constabulary](#), following a death or serious injury review. The review related to an individual who, having been invited to attend a voluntary interview in relation to an allegation of an historic sexual offence, took their own life prior to the interview taking place. The IOPC stated that “It is possible that a more formal, focused and structured risk assessment process carried out at this time may have alerted officers to an increased risk of self-harm or suicide, which they could have acted upon, with relevant advice or sign-posting”.

Timing

Issues

- Voluntary interview enables police and other partners to arrange adaptations that would be difficult or impossible with the time pressures of custody. Contemporaneous interviews (at the site and time of an incident) would lose the potential benefits of voluntary interview and enhance the risks.

Solutions

- All interviews should be pre-planned (not contemporaneous) to allow sufficient time for preparation and avoid unnecessary time pressures. There were a range of opinions on how much time was needed (3-4 days vs a couple of weeks) depending on what the activities and expectations during that time were.

Location

Issues

- In general, voluntary interviews currently appear to be happening only in police stations¹³. They are currently happening in care homes on rare occasions, at least in some areas.
- While some forces make an effort to conduct voluntary interviews in dedicated interview rooms outside the custody suite to create a less intimidating environment for the interviewees, others use rooms in custody (generating a custody record but not a detention)
- There is concern about conducting voluntary interviews within the custody area due to the potential presence of other individuals, the need to maintain a suitable environment for the interview, and the potential for people to be confused and unclear about their situation.
- It is unclear what the implications are if a suspect refuses to come to a police station but is willing to be interviewed elsewhere. Is this a refusal? Could this lead to arrest? Does that depend on the reasonableness of their suggested location?
- AAs are currently recruited close to custody centres (rather than all police stations) to achieve fast responses. There are additional challenges and costs of coordinating interviews in addition to those at custody centres (e.g. mileage, travel time).

Solutions

- There may be exceptional cases where alternative locations are appropriate due to specific vulnerabilities and circumstances (e.g. the person is a carer and cannot leave the person they care for). Alternative locations were discussed, including neutral ones and homes.
- Non-police locations (e.g. care home, domestic home) require dedicated risk assessments.
- Homes where potential victims and witnesses reside, or which are the site of the alleged offence, should never be used for interviews.
- The key test should be that the environment cannot be confused with detention, is fair (enables effective participation by the suspect), and is safe for all.
- AA schemes need to be properly resourced and think about selection of appropriate adults.

¹³ Home Office (2022) found that location was not known in 49% of voluntary interviews. Of the rest, 94% occurred at a police station and 6% at another location such as a prison or home (sample of 21 forces).

Communication: police and individuals

Issues

- There is a need for clearer communication and education surrounding voluntary interviews, ensuring that individuals fully understand their obligations and the potential consequences of non-attendance.
- There is a lack of a shared understanding of what 'voluntary' means, between children and vulnerable people, police and AAs. This is heavily influenced by how police communicate at the point of invitation, at the start of the interview, and what happens in practice if the person refuses to attend, agrees but does not attend, or attends but decides to leave.
- The police typically invite (and explain details) verbally. This leads to variation and lack of clarity, resulting in confusion and further misunderstanding. Some invitations emphasise the voluntary nature, while others emphasise the negative consequences of not agreeing. There does not seem to be a standardised letter or written document explaining the implications of voluntary interviews.
- In some cases, officers present individuals with a binary choice between participating voluntarily or facing arrest. Some invite letters were deemed threatening and intimidating. This approach can create a sense of unease and instil fear in the individuals being interviewed, which does not align with the intended purpose of voluntary interviews.
- In some cases, children and vulnerable adults interpret 'voluntary' as simply meaning they can decide whether to go, (i.e. with no consequence). This contributes to non-attendance. In practice, although the interviewee is not under arrest, it appears that they are still 'obligated' to attend because, if they choose not to attend, they are often arrested. "In practice is that it does not mean they can choose whether to attend, but rather that they are not under arrest".
- During the interview, officers communicate to individuals that they are free to leave but sometimes emphasize the potential consequences of doing so, implying that they may be arrested anyway. 'Not in so many words they say, "You're free to leave. You know you're not under arrest. But I need to talk to you about it. So, if you go, then chances are I'm just going to have to arrest you anyway". That's how they kind of put it across. And that's how I interpret it as well'.

Solutions

- National guidance should include a template invitation to voluntary interview. A more considerate approach is needed, regardless of the person's vulnerability. Find a balance between overwhelming information and ensuring adequate understanding for all individuals, including vulnerable populations, to give informed agreement to attend. The invitation should contain clear information and be non-threatening. It should give a clear explanation about what a voluntary interview entails and clarify the consequences of refusing the interview.
- One possibility is 'Something clear and simple, not a complicated letter, something as simple as a leaflet. Postcard size "You are invited for an interview. If you do not attend etc etc...This will happen. This may happen"'.

Issues

- Currently, the first contact between an AA and a child or vulnerable person is typically on arrival at the interview. This can make the role of the AA more challenging and less effective.
- On arrival, the AA engages in conversation, explaining the rules around voluntary interviews and discussing their role and how it affects the individual. This also involves a private consultation under PACE to ensure the individual understands their rights, typically lasting 10-15 minutes. If they have not requested legal advice, this creates a difficult situation. If the AA requests it, this will likely postpone the interview, creating pressure not to do so.
- One case involved a child who was grieving the recent loss of their father during an interview with the police. Prior knowledge would have allowed the AA to better handle the situation.
- This approach to first contact reflects that taken in police custody, but voluntary interviews offer the opportunity of a more effective approach. There is an opportunity to improve the initial engagement between the AA and individual before and during a voluntary interview.
- There was concern about resistance from police and lawyers in relation to pre-interview contact between suspect and (non-family) AAs. A participant recalled a situation in which pre-interview they had asked a child what school they go to, and whether any of their brothers and sisters go there, and the lawyers “turned around and said to me, ‘Can you please not converse with my client’”. However, it was considered that police would not try to bar lawyers from pre-interview contact. And that people with *family* AAs would benefit from pre-interview support. So it would not make sense to try to bar trained AA schemes.

Solutions

- Guidance is needed on how AAs can effectively engage with the individual to establish rapport, build trust, and ensure their rights and well-being are protected during the interview – in the distinct context of voluntary interviews.
- One AA scheme has found that using distinctive identification (i.e. green ‘VOLUNTEER’ lanyards) for AAs has increased engagement. Another suggested providing ‘profiles’ of volunteers or professionals involved in the process to the person in advance, to create a more welcoming and informative environment.
- Communication between the AA service and the person before the day of the interview could have a range of benefits, including:
 - increased attendance rates (because understanding of the potential consequences of non-attendance is improved),
 - increased efficiency on the day (less time spent on the day in consultation, no postponements due to AA requesting legal advice under Code C 6.5A),
 - understanding of, and ability to use, rights in advance (e.g. choosing a lawyer),
 - enhanced effectiveness of the AA role in safeguarding the person’s interests arising from a better understanding of their needs).
- Greater support for sharing relevant contextual information about a child's circumstances, emphasizing the importance of understanding their background. GDPR/sharing of information, privacy and security should be central considerations.

Communication: police and AA schemes

Issues

- Voluntary interviews are by their nature more unpredictable, often resulting in cancellations because of non-attendance by individuals who often do not show up for interviews. However, in some cases, known changes or postponements were not being communicated by police to ensure that appropriate adults did not attend for cancelled interviews. An example was provided where an appropriate adult was attempting to confirm the status of an interview scheduled for that afternoon. Many AA schemes do not have sufficient resources to meet the demand from custody – they cannot afford wasted time.
- An example was provided by one area: Referrals for appropriate adults are made in advance, with a designated time and location. The AA's availability is confirmed, but not sent until the individuals are on-site. The police then page the AA scheme, who are located to enable them to arrive in 10-15 minutes. This time is used for legal consultation. However, issues with this include: most AAs schemes would not be able to arrive within 10-15 minutes; potential for travel disruption; depends on lawyers attending at the arranged time (and so risk cancellation – would they be paid twice?); removes ability for the suspect to have their AA present in the legal consultation (as is their choice under Code C).
- It is helpful for the AA provider to have an indication of the individual's vulnerabilities at referral. Code C requires that police role share their record of any factors that might indicate vulnerability with relevant parties, including AAs. There was concern about the limitations of information provided by the police at referral. Responses often rely on gut feelings or vague reasons, without sufficient effort to understand the real needs of the individual.
- There is a need for better information flows and communication between agencies like adult social care and youth offending teams to enhance support for vulnerable individuals during voluntary interviews. The challenge of obtaining relevant information, especially during late-night or emergency situations, was acknowledged. But voluntary attendance is an opportunity to overcome the limitations in custody.
- AAs schemes reported asking the police about the offence at the referral stage, to ensure they have relevant information. However, there is no pre-disclosure of information, and the AAs often go into the interviews without prior knowledge of the case.

Solutions

- Police forces should consult with AA schemes when developing voluntary interview processes.
- Initial referral processes need to be reviewed, including addressing the streamlining of the process for officers, addressing the mechanics of requesting legal advice and coordinating with appropriate adult services. Could the PACE-IC app be adapted for voluntary attendance?
- There should be enhanced coordination and communication to prevent AAs from attending interviews that have been cancelled or rescheduled, and to keep rotas up to date, and accountability where there is failure to do so.
- There should be an agreed system for information sharing regarding a person's needs, to take advantage of the time available before a voluntary interview.
- Record and monitor the percentage of people who do not turn up for voluntary interviews.

Technology

Issues

- Arrangements and rules for interview recording systems are unclear. A small number of interviews with AAs present have taken place using body-worn cameras (BWV). In these cases, use of BWV was related to failure of other technologies (cloud and disc-based systems were not functioning) at pre-planned rather than contemporaneous interviews. Some participants thought there was little difference between BWV and standard recording if used in most pre-planned interview scenarios (using BWV due to a failure of the planned system would be less disadvantageous to the person than postponing the interview due to technology problems). However, another view was that BWV does not capture everything that is going on in the same way as dedicated systems in police stations (because it is only facing the suspect). There was also a concern that enabling the use of BWV in the case of technology failing or being unavailable would lead to wider use in practice (a 'slippery slope').
- Administrative recording systems (data collection, sharing and monitoring) are poor. There is a need to determine recording methods and systems for voluntary interviews. The absence of a custody record system for voluntary interviews was identified as an area of concern.
- AAs have access to the custody record under PACE to ensure that actions prior to the interview are fair and do not impact negatively on the fairness of the interview. Does there need to be an explicit power for AAs to do this in relation to the voluntary interview equivalent to the custody record?
- Can appropriate adult schemes' existing systems be used for collecting and monitoring data on voluntary interviews? What does the equivalent of a 'PACE form' look like for voluntary interviews?

Solutions

- National guidance needs to cover the use of video and audio recording during voluntary interviews, including considering the appropriateness of BWV and other systems.
- Contemporaneous interviews using BWV should not be allowed.
- Police to develop a robust system for collecting and monitoring data on voluntary interviews, including the involvement of appropriate adults, the outcomes of interviews, non-attendance rates, and any identified issues or concerns.
- Appropriate adult schemes to review current data collection and IT systems to ensure they work effectively for voluntary interviews.

Agreement to be interviewed

Issues

- There does not seem to be a clear requirement about either assessing for, or securing, support for the person at the point of request, rather than the actual interview (both from police and independent support e.g. AA, solicitor, interpreter); nor for resourcing provision.
- It is unclear whether people 'consent' to an interview (as they do to other PACE processes) or 'agree' (as per the wording of PACE); and whether these are the same thing in terms of who needs to give it and whether an AA needs to be present to ensure that this is valid (i.e. requested in a fair manner and fully informed). The role of a child's parents needs to be considered. There are implications around parental agreement or consent for interview of a child where parent is the victim.
- It is unclear whether a person can attach caveats to their agreement to be interviewed. For example, would declining to attend a specific location (e.g. a police station) constitute refusals to agree to an interview? Is there some level of choice to be offered or not?

Solutions

- All suspects should have access to free legal advice at the point they are invited to attend an interview voluntarily. Children and vulnerable adults should also have access to an appropriate adult. These services need to be resourced.
- National guidance should clarify agreement/consent and caveats on matters such as location.

Legal support

Issues

- It is critically important that children and vulnerable adults have legal support during interviews to safeguard their rights and interests. AAs are also 'vulnerable' to increased risks in interviews without solicitors present. Many AA schemes have a policy of not attending without a solicitor. Police acceptance for this approach (which relies on Code C 6.5A) can vary. This approach is sometimes simpler when supporting children, than with adults due to supporting self-determination. Some AA schemes say that if an adult is insistent they will not have a lawyer, a staff member rather than a volunteer would be sent.
- Is the legal advice system set up (in terms of availability and accessibility) to provide support at the point of request to attend a voluntary interview? Is the legal advice system set up to support interviews in any location, or with short notice? It was reported that solicitors can only be requested 72 hours in advance. The difficulties arising from this requirement were acknowledged, as it limits the ability to make arrangements earlier or in case of unforeseen circumstances. The 72-hour rule was presumed to be in place to avoid frequent rescheduling due to illness or other factors. The origin of the 72-hour rule was not definitively identified, but it was suggested that it likely came from the DSCC (Defence Solicitor Call Centre).

Solutions

- There should be 'opt-out', or even mandatory, attendance of a solicitor or legal representative for children and vulnerable adults at voluntary interviews.
- There should be a review of the legal aid police station advice contract specification to ensure provision and resourcing is appropriate to deliver advice for voluntary interviews at all locations.

Conclusion

Voluntary interviews make up a significant proportion of police interviews under caution in England and Wales. This is particularly true for children, amongst whom its use appears to be growing. Adults who meet the PACE vulnerability criteria appear to be less likely to be identified by police as needing an appropriate adult, than if they had been arrested and detained in custody.

Many forces do not have the necessary IT and operational procedures to provide basic data on voluntary interviews. This is a barrier to public scrutiny and confidence, and strategic and operational improvement. There are simple opportunities for forces to improve. The most popular police IT systems are capable of providing the information on volumes and appropriate adult need. However, some forces may not be using the full functionality or do not have access to relevant 'bolt-ons' or modules available for those systems. The process of requesting data for this research has led some forces to identify gaps in their recording and retrieval systems and to create or adopt new reports in order to be able to provide data. It may be that conversations between forces using the same IT systems can quickly yield access to the necessary functionality.

For some forces, data issues are linked to the issue of location. Cumbria Constabulary noted that their data "would exclude all voluntary interviews which took place at places other than the police station". In refusing the request, Essex Police helpfully explained that *"Voluntary Interviews are no longer conducted in Custody and as such are not recorded on our Athena Crime Recording System. There is a new system (AXON) where this information is now logged but it is still in development with minimal amounts of information in a readily extractable format. At present we cannot split between Adult and Child, which is still very much in development"*.

As a result of the concerns about data, it is appropriate have some caution regarding conclusions drawn from it. However, based on what is available, while most voluntary interviews are with adults, children made up a much larger proportion of voluntary interviews than arrests. This suggests police lean more towards using this approach with children. Further work is required to understand the effect of the (on average) less serious offences for which children are investigated. With the volume of child arrests being more than double than that of child voluntary interviews, there may be an opportunity to decrease the use of custody for children further.

The balance between the arrest and voluntary interview approaches appears to vary significantly between forces. While each force is independent, and local factors will always play a part, forces can review the available data on voluntary interviews and reflect on their own systems and practices. There is a lack of detailed national guidance on voluntary interviews. The NPCC is currently leading a working group to develop such guidance; publication via the College of Policing's Authorised Professional Practice (APP) platform would support the reach and impact of this guidance.

The available data suggest that the volume of voluntary interviews may have decreased over several years, before increasing again (particularly for children), as has been seen in relation to arrests. Changes to the police workforce, via retirement and the officer uplift may be having an effect. It remains important that voluntary interviews and PACE vulnerability form part of core training.

There is strong evidence that the identification of vulnerability and the application of mandatory procedural safeguards is poorer in voluntary interviews than in custody. This supports national and local considerations around PACE vulnerability and appropriate adults including: the development of police, healthcare, and Liaison and Diversion assessments before voluntary interviews; inclusion of voluntary interviews in the development or commissioning of appropriate adult schemes; and the need for legislate for statutory AA provision for vulnerable adults, as exists for children.

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Annexes

A: FOI request (voluntary interview)

I would be grateful if you could provide the following information relating to voluntary interviews (also known as voluntary attendance or 'caution plus 3') and appropriate adults by your police force.

For each of the individual 12 months from April 2022 to March 2023 inclusive:

- 1. The total number of voluntary interviews of all adult suspects (aged 18 or over) for that month.*
- 2. The total number of voluntary interviews of adult suspects (aged 18 or over), in which the need for an appropriate adult (under PACE Code C) was recorded in that month.*
- 3. The total number of voluntary interviews of child suspects (aged 17 or under) for that month*
- 4. The total number of voluntary interviews of child suspects (aged 17 or under), in which the need for an appropriate adult (under PACE Code C) was recorded in that month.*
- 5. The name of the record management system(s) from which the above was retrieved.*

View all responses to this FOI at https://www.whatdotheyknow.com/info_request_batch/3740

B: FOI request (custody)

The National Appropriate Adult Network also submitted the following FOIA request to all forces.

I would be grateful if you could provide the following information relating to the use of police custody by your police force.

For each of the individual 15 months from January 2022 to March 2023 inclusive:

- 1. The total number of authorised detentions of adult suspects (aged 18 or over) for that month; and*
- 2. The total number of authorised detentions of adult suspects (aged 18 or over) in which the need for an appropriate adult (under PACE Code C) was recorded in that month.*

View all responses to this FOI at https://www.whatdotheyknow.com/info_request_batch/3551

View results for the custody FOI using the NAAN interactive Vulnerability Identification Tracker at <https://www.appropriateadult.org.uk/policy/vulnerable-adults/identification/tracker>.

C: Force IT systems and responses

Police Force	IT system	Response	Notes (MT = manual trawl)
Avon and Somerset Constabulary	Niche	Successful	Not applicable
Bedfordshire Police	Athena	Volume only	No searchable flag for AA
British Transport Police	Niche	Refused	No central system / automated
Cambridgeshire Constabulary	Athena	Refused	Not centrally recorded (MT)
Cheshire Constabulary	Niche	Refused	MT
City of London Police	Niche	Combined volume	MT
Cleveland Police	Niche/TPAM	Volume only	Data on need for AA not recorded
Cumbria Constabulary	PoliceWorks	Volume only	Volume excludes outside police
Derbyshire Constabulary	Niche	Volume only	AA information cannot be
Devon and Cornwall Constabulary	Niche	Refused	New system. Not retrievable after
Dorset Police	Niche	Successful	Not applicable
Durham Constabulary	PoliceWorks	Refused	MT
Dyfed-Powys Police	Niche	Awaiting response	Difficulties w/request + staffing
Essex Police	Athena	Refused	No central log. Not readily
Gloucestershire Constabulary	Niche	Volume only	No retrievable AA data. MT
Greater Manchester Police	PoliceWorks	Successful	Not applicable
Gwent Police	Niche	Successful	Not applicable
Hampshire and Isle of Wight Constabulary	Niche	Refused	Not in retrievable format. MT
Hertfordshire Constabulary	Athena	Combined volume	Count of VI risk assessment. No
Humberside Police	Connect	Awaiting response	No response. Assumed FOI backlog
Kent Police	Athena/Frevvo	Refused	Some info is free text on Athena.
Lancashire Constabulary	Connect	Successful	Not applicable
Leicestershire Police	Niche	Refused	Voluntary is a non-mandatory field
Lincolnshire Police	Niche	Volume only	AA data often not recorded
Merseyside Police	Niche	Successful	Only final month is reliable.
Metropolitan Police Service (MPS)	CRIS/Connect	Refused	Volume is available. AA data = MT
Norfolk Constabulary	Athena	Successful	Only VI managed by custody
North Wales Police	Niche	Volume only	Data set up for policing purposes.
North Yorkshire Police	Niche	Successful	Not applicable
Northamptonshire Police	Niche	Volume only	AA for VI not in searchable field
Northumbria Police	Connect/Email	Successful	From daily download of emails re:
Nottinghamshire Police	Niche	Volume only	AA data = MT.
PSNI	Niche	Combined volume	MT to determine child/adult and AA
South Wales Police	Niche	Awaiting response	High volume and backlog of FOI
South Yorkshire Police	Connect	Successful	Not applicable
Staffordshire Police	Niche	Successful	Not applicable
Suffolk Constabulary	Athena	Successful	Only VI managed by custody
Surrey Police	Niche	Successful	Not applicable
Sussex Police	Niche	Awaiting response	FOI request backlog
Thames Valley Police	Niche	Refused	No VI field. Recorded in occurrence
Warwickshire Police	Athena	Successful	Not applicable
West Mercia Police	Athena/VABS	Successful	Not applicable
West Midlands Police	Connect/QLIK	Successful	Not applicable
West Yorkshire Police	Niche	Volume only	AA data = MT
Wiltshire Police	Niche	Volume only	No explanation provided

