



[REDACTED]
Chief Constable

Ms Joanne Kearsley
HM Senior Coroner, Manchester North
Newgate House
Rochdale
OL16 1AT

16 July 2021

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Dear Ms Kearsley

Re Regulation 28 Report following the inquest into the death of Mrs Zeyna Partington

Thank you for your report dated 25 May 2021 in respect of the tragic death of Mrs Zeyna Partington and pursuant to Regulations 28 and 29 of the Coroners (Investigations) Regulations 2013 and Paragraph 7, Schedule 5 of the Coroners and Justice Act 2009.

Having carefully considered your report and the evidence submitted at the inquest, I make the following observations and recommendations to hopefully address your matters of concern.

1. **There is a lack of knowledge and understanding by GMP Officers as to the different level of ACT markers and the implications the varying levels may have on investigations particularly missing from home investigations.**

The latest guidance governing the application and use of PNC markers is the College of Policing document entitled; ACT and React Reports on PNC. Version 1.6 was published and circulated to forces in March 2021.

From my review, it seems that although a risk assessment process is included in the guidance document, it only includes one broad category of "Vulnerable Missing Person" and therefore could be interpreted that all missing person's vehicles should be afforded a Medium Priority Marker.

The criteria outlined in the guidance for the use of High Priority markers states life must be at risk for them to be applied, but includes very limited examples such as "terrorism". There is no scenario in the guidance that suggests a Low Priority Marker is appropriate for a vulnerable or suicidal missing person.

Similar to you, we share concerns that the way the guidance document is structured could potentially steer an officer only to apply a medium risk marker for every missing person, as opposed to utilising the High Priority marker when appropriate. This has been flagged by our Director of Intelligence who is already in liaison with the College of Policing and national lead for ANPR. Changes have now been agreed to the national guidance document which should alleviate this issue. It is my understanding that this work is very much underway already.

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In addition to the above, internally we are in the process of reviewing and updating the GMP Missing From Home policy. Following your observations and recommendations and the changes to the national guidance, this will be updated to include more specific information on the use of ACT markers. This will include the expedient application of the correct level of marker in circumstances such as this case has highlighted. It will also include guidance on the use and review of markers and highlight expectations on the need for a timely response to activations.

Although the content of the College of Policing guidance document on the use of markers and the Missing From Home policy are known to specific practitioners, the evidence presented at the Inquest into Zeyna Partington's death indicates there is a need to ensure increased awareness of the content across operational staff; specifically uniform frontline officers and staff from the operational communications branch.

This will be addressed by a comprehensive communication plan which highlights the key changes to all relevant policy and guidance documents. Pertinent points will be identified, extracted and communicated to relevant officers and staff. Oversight will be provided via our Organisational Learning Board.

I expect that the updated policies will be through stakeholder consultation, agreed and communicated to all relevant staff by the end of 2021. In the interim, key messages and learning will be cascaded immediately via my Chief Constables' order publication.

2. If the policy is not to place an ACT marker on a vehicle until the missing from home report is completed then this can mean a delay of several hours, particularly as the Court heard, it is often difficult to resource and allocate officers to grade 2 calls within an hour. In this case if the radio operator had not acted outside of policy then the hits on the 8th August in both Rochdale and Derbyshire would not have been known at all.

The updates to the Force Missing From Home policy will ensure that communications branch call takers ask specific and relevant questions in order to obtain early indicators of risk, in addition to identifying early investigative opportunities; such as the ownership and/or use of a vehicle by the missing person.

The policy will be updated to require that a high priority ACT marker must be created as soon as practicable, following the receipt of information that suggests a missing persons' life is at risk and the details of any vehicle being used is confirmed. If that information is available when the first call is received by the Operational Communications Branch, then the expectation will be that the marker is created at that point.

District supervisors managing the missing person investigation locally will also be expected to check that the appropriate marker has been applied for relevant cases. This will also be updated in the Missing From Home policy.

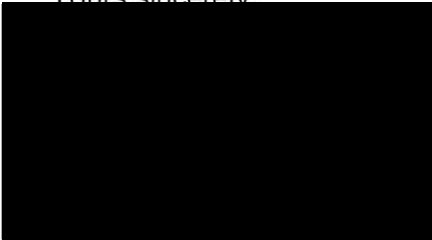
3. Despite a new national system being available this has still not been implemented across all forces meaning a force is not automatically notified if a vehicle with a medium ACT marker hits an ANPR camera nationally.

The National ANPR Data Centre (NADC) is the system that was in use by both GMP and Derbyshire Constabulary at the time Zeyna was reported missing. It is accepted that this system has limitations and is in the process of being reviewed and replaced. Some UK forces have adopted the practice of listing vehicles of interest on the NADC via Clearstone which will then trigger alerts from all cameras nationally and send an automatic response within the system and to a nominated email address back in the originating force. This is something we are currently reviewing with support from experts across the region with a view to including it in our practice and in the updated version of our force ANPR policy.

In relation to a longer term solution, the new National ANPR Service has now been deployed to the majority of the 43 UK forces with the exception of GMP and one other. We are working proactively to make improvements that will enable GMP to connect to the National ANPR Service in the near future. These changes include moving from Windows 7 to Windows 10 and undertaking comprehensive IT capability checks. We have a project team dedicated to this and they are in consultation with the Home Office in order to make progress as soon as possible. Determining an exact timescale for connectivity to the NAS involves a number of factors, several of which are outside of our control.

Please let me know if you have any further questions. To reassure the Force is working hard to ensure that the lessons learnt from Zeyna Partington's sad death do change practice to help us improve the service we give to vulnerable missing people.

Yours sincerely



[Redacted name]

Chief Constable