

[REDACTED] (Partner)
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One Bartholomew Close
London
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22 December 2021

[REDACTED]

Dear [REDACTED],

This response is submitted on behalf of the College of Policing ('the College') in reply to the Coroner's Report to Prevent Future Deaths (RPFDF) following the Fishmongers' Hall terror attack inquests.

Firstly, I wish to extend my deepest condolences to the families and friends of those murdered and injured as a result of the terror attack. We also wish to state our appreciation of all of those who contributed to the proceedings. It is incumbent on the College and others in policing to ensure lessons are learned.

Before providing a response to the specific matters of concern (MCs) that include the College, I would like to explain our role and remit in the policing landscape.

Formed on the 1st December 2012, the College is a company limited by guarantee, owned by the Secretary of State for the Home Department, but operating at arm's length from the Home Office.

Our purpose is to connect everyone in policing to reduce crime and keep people safe by setting standards, providing training and sharing good practice. We have five key areas of responsibility, which were set out in the Explanatory Notes to the Anti-Social Behaviour, Crime and Policing Act 2014. These are also included in the Terms of Reference of the Company's Board:

- a. setting standards and developing guidance and policy for policing,
- b. building and developing the research evidence base for policing,

- c. supporting the professional development of police officers and staff,
- d. supporting the police, other law enforcement agencies and those involved in crime reduction to work together, and
- e. identifying and developing the ethics and values of the police.

The College's remit is limited to police officers and staff, other police force employees, and volunteers, such as Special Constables in England and Wales. We work alongside experts from other law enforcement and non-law enforcement agencies to develop expert knowledge that ensures College standards and products, such as Authorised Professional Practice (APP) and training, are well informed, relevant and based on the best available evidence.

Staff also represent the College at various meetings established by the National Police Chiefs' Council, National Crime Agency, Home Office and other bodies. Our role here is to support discussions and identify any work required.

The College does not have an operational policing role.

College Response to the Matters of Concern

The College is named as a joint addressee for the following MCs:

MC10 – *Addressed to the Secretary of State for Justice, the College of Policing, the Chief Constable of West Midlands Police and the Chief Constable of Staffordshire Police: The facts of this case give rise to concern that important decisions on approvals, variations and relaxations in relation to licence conditions may be taken without clearly reasoned discussion and decision-making in MAPPAs panels. This issue could be addressed by requiring MAPPAs minutes to record any discussion or decision on such a matter. In addition, for the benefit of future inquiries and reviews, consideration should be given to having digital audio recordings made of all MAPPAs meetings.*

MC 14 – *Addressed to the Secretary of State for Justice, the College of Policing, the Chief Constable of West Midlands Police and the Chief Constable of Staffordshire Police: This case gives rise to concern that an extremist offender may be permitted to attend an event or venue without there having been proper communication between the probation and police officers responsible for managing the offender and the event organisers and/or venue hosts. Consideration should be given to encouraging such communications within the training and guidance given to probation officers and police responsible for managing extremist offenders.*

MC 17 – *Addressed to the Secretary of State for Justice, the College of Policing, the Chief Constable of West Midlands Police and the Chief Constable of Staffordshire Police: Based on the evidence in this case, there is cause for concern that effective procedures*

are not in place to ensure that all MAPPA meeting attendees receive meeting minutes. Consideration should be given to modifying guidance to ensure that this happens, for example by (a) providing for all MAPPA panel participants to receive minutes by secure email (rather than by having to access an online system); (b) requiring that all acknowledge safe receipt and indicate whether or not they wish to make amendments (to include provision of “nil returns”); and/or (c) requiring attendees at the start of each MAPPA meeting formally to confirm that they have read the minutes of the previous meeting or meetings as appropriate.

MC 18 – Addressed to the Secretary of State for Justice, the College of Policing, the Chief Constable of West Midlands Police and the Chief Constable of Staffordshire Police: The facts of this case give cause for concern that some members of MAPPA panels responsible for managing extremist offenders may not be aware of important information from the offender’s time in prison. Consideration should be given to (a) ensuring that the latest MAPPA F form from the prison authorities should be circulated with every subsequent set of MAPPA minutes; (b) including a section in MAPPA minutes for key up-to-date intelligence; and (c) including a further section in MAPPA minutes for a summary of the key conclusions of the most recent ERG assessment (including risk factors identified).

MC 19 - Addressed to the Secretary of State for Justice, the Secretary of State for the Home Department, the College of Policing, the Chief Constable of West Midlands Police and the Chief Constable of Staffordshire Police: This case gives cause for concern that counter-terrorism police may be in possession of intelligence or information which may be useful to the management of an offender by the MAPPA panel, but that such intelligence or information may not be brought to the knowledge of or taken into account by MAPPA agencies. This issue should be addressed, preferably by ensuring that a single police officer from any covert investigation (such as the SIO or Deputy SIO) is responsible and accountable for ensuring that intelligence and information is properly shared and taken into account. Consideration should also be given to how intelligence known only to the Security Service may be taken into account for the purposes of MAPPA management.

MC 20 – Addressed to the Secretary of State for Justice, the Secretary of State for the Home Department, the College of Policing, the Chief Constable of West Midlands Police and the Chief Constable of Staffordshire Police and the College of Policing: The facts of this case give cause for concern that security sensitive information may not be properly taken into account in decision-making by MAPPA panels concerning the management of terrorist offenders. Consideration should be given to how the new procedures can best be operated to avoid this problem recurring. This might include a requirement that, wherever possible, the MAPPA Panel Chair (or one Co-Chair) should be a member of

the Core Group. It might also include a requirement for the Core Group to consider what intelligence can be supplied (perhaps in sanitised form) to the broader panel.

MC 21 – *Addressed to the Secretary of State for Justice, the Secretary of State for the Home Department, the College of Policing, the Chief Constable of West Midlands Police and the Chief Constable of Staffordshire Police: The facts of this case give cause for concern that MAPPA panels responsible for managing terrorist offenders may be unaware of the regularity and form of contact with police officers responsible for overt offender management. Consideration should be given to providing guidance that officers with such responsibilities should report to MAPPA panels on the regularity of their meetings with offenders and take account of any recommendations by MAPPA panels.*

In developing our response, we are grateful to the other addressees (and national Counter Terrorism policing) who have shared their responses with us. We note from their responses that these addressees have taken forward, or plan to take forward, substantive work to address the seven MCs listed above.

While we do not currently provide, or have been approached to provide, specific guidance or training on terrorist offender management, we are committed to supporting the other bodies mentioned in the MCs to achieve improvements. We are also concerned not to replicate work that is being done by others in this area. We will continue to work closely, with these bodies to make sure that the College contributes to managing the risks posed by terrorist offenders.

The College also provides broader offender management training products and guidance, for example, on the police role in managing sexual offenders, violent offenders, and potentially dangerous persons (PDPs) as part of major investigation and public protection APP¹.

Additionally, there are learning products available through the 'College Learn' platform that cover:

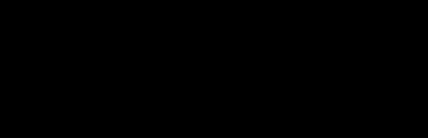
- training and development
- management responsibilities
- multi agency working (MAPPA)
- staff welfare
- managing workload
- ensuring management of sexual offenders and violent offenders (MOSOVO) units are staffed appropriately.


The 'offender management' guidance and products have been developed over a number of years and we will continue to work with partners and stakeholders to ensure they are updated to

¹ Accessible from <https://www.app.college.police.uk/app-content/major-investigation-and-public-protection/?s=>

reflect the changes resulting from this report. We will also monitor future policy and legislative developments to ensure our guidance and products continue to support policing to prevent future deaths.

Yours sincerely

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Chief Constable 
Chief Executive Officer
College of Policing
