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7 January 2022

Dear Ms Lester

Re: Inquests into the deaths arising from the attack at Fishmongers' Hall on 29 November 2019

Thank you for your letter of 3 November 2021, enclosing the coroner's 'Regulation 28 Report on Action to Prevent Future Deaths' in connection with the above inquests. I now enclose the response on behalf of the University of Cambridge. I also enclose two further documents, as follows:

- The University's new 'Policy and Guidance for staff and students working, managing or engaging with activities involving people who have offended'; and
- The Institute of Criminology's 'Risk Assessment Form for All Activities (including Fieldwork)'.

These documents are both referred to in the University's response and will be refined and enhanced over time.

Yours sincerely,

[REDACTED]
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The Vice-Chancellor

Enclosures



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**INQUESTS INTO THE DEATHS ARISING FROM
THE FISHMONGERS' HALL AND LONDON BRIDGE TERROR ATTACK**

**RESPONSE OF THE UNIVERSITY OF CAMBRIDGE
TO PREVENTION OF FUTURE DEATHS REPORT**

INTRODUCTION

1. This is the response on behalf of the University of Cambridge (“the University”) in relation to the ‘Regulation 28 Report on Action to Prevent Future Deaths’ (“the PFD Report”)¹ made on 3 November 2021 by the coroner in relation to the deaths arising from the attack at Fishmongers’ Hall on 29 November 2019. Recommendations MC1, MC2, MC3 and MC5 in the PFD Report are addressed to the University. This response is structured in five main parts, as follows:
 - (a) Part One: Response to MC1 (formal risk assessments)
 - (b) Part Two: Response to MC2 (informing host venues)
 - (c) Part Three: Response to MC3 (young students and those convicted of serious offences)
 - (d) Part Four: Response to MC5 (engagement with those convicted of offences in the community)
 - (e) Factual Matters

2. In 2021, following the outcomes of reports by other University-commissioned bodies, the University established a Transition Board to consider the future of the Learning Together (“LT”) programme (i.e. the educational initiative based at the University’s Institute of Criminology (“the Institute”) and comprising LT partnerships associated with the University).² In December 2021, the recommendations of the Transition Board went to the General Board (which is the body responsible for the academic and educational policy of the University) and the Council (which is the executive and

¹ Under paragraph 7 of Schedule 5 to the Coroners and Justice Act 2009 and regulations 28 and 29 of the Coroners (Investigations) Regulations 2013

policy-making body of the University and whose members constitute the charity trustees of the University). The recommendations were approved by the General Board and by the Council, including that there now needs to be a “*clear stop*” to the delivery of the LT programme in the University, both within and beyond prisons. The LT programme in the University is therefore at an end.

PART ONE: RESPONSE TO MC1 (FORMAL RISK ASSESSMENTS)

MC1 – Addressed to the University of Cambridge, Learning Together, the Secretary of State for Education and the Office for Students: Significant academic events and courses held outside of university premises should be subject to proper formal risk assessment, especially if they take place in environments with particular risk (such as prisons) and if they are attended by individuals who pose particular risks. It is a matter of concern that there was no such risk assessment for Learning Together events as set out above. The University of Cambridge and those responsible for guidance to UK higher education institutions should consider whether further steps can be taken to encourage the making of such risk assessments.

The University and the issue of risk assessments

3. Prior to 29 November 2019, the University did have in place a requirement for risk assessments to be conducted in relation to events. This was contained within the *University Health and Safety Policy*; its *Guidance on Managing Risks from Travel, Fieldwork and Work Away* (“the Work Away Guidance”), which has been in place since January 2019; and its *Guidance for the organisers of activities: Events, Festivals, Outreach Programmes, School Visits, Public Engagements etc* (“the Events Guidance”), which has been in place since 2017.
4. The University’s aim is to ensure that a formal written risk assessment is always in place for similar activities in the future. Work has been ongoing to advance that aim, notably:
 - (a) In mid-2021, the Health & Safety Executive Committee and the Registry (the Head of the University’s Unified Administrative Service) commissioned a review of the *University Health and Safety Policy* and the underlying relevant procedures and guidance, focussing particularly on event-specific risk assessment and on work with offenders and ex-offenders, whether taking place as part of the LT programme or not. Although taking the view that the University’s overarching health and safety policies and guidance were fit for

purpose, the University took the opportunity to refine and enhance them further to ensure they remain so.

- (b) To that end, and with an abundance of caution, the University has sought to enhance its procedures and documents by establishing dedicated new health and safety documentation in the form of a *University of Cambridge Policy and Guidance for staff and students working, managing or engaging with activities involving people who have offended* (“the Working With Offenders Policy”), to address working with ‘People Who Have Offended’. A copy is enclosed and key terms and roles capitalised and in single quotation marks in this subparagraph, sub-paragraphs 4(c) and 4(d), and paragraphs 6, 7, 11, 14 and 17 below are defined there. This new documentation specifically addresses the safety risks which may arise in such circumstances and has been created with specialised input from an external expert organisation, NACRO. The University’s Health & Safety Executive Committee approved the final version of the above documentation on 5 January 2022, and this will be considered by the Council on 24 January 2022 and, once approved, will be implemented as soon as possible. The new documentation will be disseminated by the University’s Safety Office to all ‘Heads of Department’, Departmental Administrators and Departmental Safety Officers, as well as being placed on the University website. The new Working With Offenders Policy applies to all employees, students and anyone else engaged by the University as part of its undertaking to organise, deliver or participate in a ‘Relevant Activity’ that involves ‘People Who Have Offended’. It applies to a diverse range of ‘Relevant Activities’ (e.g. prison visits, conferences and seminars, teaching and rehabilitation workshops or social events). In relation to risk assessment, it makes clear the division of responsibilities between the University, ‘Heads of Department’, ‘Activity Organisers’ and others. It also mandates the preparation of a risk assessment by the ‘Activity Organiser’, which must be submitted to the appropriate ‘Head of Department’. The ‘Head of Department’ must then share the risk assessment with the new ‘Advisory Committee on Working with People who have Offended’ (“ACWPO”) as soon as reasonably practicable and preferably at least 2 to 3 months before the intended date of the ‘Relevant Activity’, bearing in mind that major events or activities where

the risks are high will require more time for consideration than some others. ACWPO advises the 'Head of Department', who makes the ultimate decision whether to approve or decline the proposed activity (or approve it with appropriate control measures). Guidance on possible risks and control measures is included in the Working With Offenders Policy.

- (c) The University will reinforce the new Working With Offenders Policy documentation by providing specific training where appropriate, developed with support from the external expert organisation NACRO. For example, bespoke training will be offered to cover certain identified areas such as the role of ACWPO and the responsibilities of the 'Activity Organiser'. The training will have a particular focus on how to carry out risk assessments both prior to and during a 'Relevant Activity'.
 - (d) The University will shortly be revising its Work Away Guidance and Events Guidance to clarify where additional procedures must be followed when working with 'People Who Have Offended'.
5. The University monitors general compliance with its health and safety policies through a programme of regular audits of departments conducted by the Safety Office. The Safety Office audits specifically consider the systems and procedures in place and whether relevant policies are followed. The Safety Office is also responsible for reviewing and updating health and safety policy documents as and when necessary and disseminating the revised versions throughout the University.
6. In relation to the monitoring of the new Working With Offenders Policy specifically, the policy expressly provides for each 'Relevant Activity' to be reviewed by the 'Activity Organiser' and the Departmental Safety Officer immediately after it has ended, as well as reported to and discussed by the department's safety committee. Any findings that may be of use to the wider University should be communicated by the Departmental Safety Officer to the Safety Office, so that Safety Office staff can take them into account in its reviews and disseminate them where appropriate. The Working With Offenders Policy also contains specific monitoring and review provisions stipulating that the Safety Office will conduct a review of the Working

With Offenders Policy and associated documents one year after implementation (or sooner if necessary); and thereafter every three years (or sooner if necessary).

The Institute and the issue of risk assessments

7. 'Heads of Department' are responsible within their own domain for ensuring that their department complies with the University's health and safety requirements and has effective systems in place for the management of health and safety. Under the *University Health and Safety Policy* they must set out their own organisational arrangements for safety. The Institute draws on the University's policies and guidance and applies them to the specific circumstances of its own work to prepare its own health and safety policies.
8. The Institute has taken further steps to contribute to the aim of ensuring that a formal written risk assessment is always in place for similar activities in the future, notably:
 - (a) The Institute has reviewed, and introduced refinements to, its own policies and procedures to maximise compliance by staff and students. The Institute's review has included further development of its 'Risk Assessment Form for Fieldwork', which has now been renamed 'Risk Assessment Form for All Activities (including Fieldwork)' and now expressly applies to external events of the type held at Fishmongers' Hall. A copy is enclosed.
 - (b) The Institute's Departmental Administrator is currently working on a flow chart to make everything easy to understand in terms of who needs to do risk assessments, for what and when. There is also reference to health and safety and risk assessment requirements on the Institute's 'Desk Card' (which contains key contacts and sources of information together with guidance that: 'when in doubt, ask').
 - (c) The Institute now forwards a list of current officers in the Institute to key offices within the University, including the Safety Office, at the start of every academic year (1 October) to avoid any risk of important health and safety related information failing to be communicated effectively to, and within, the Institute. The Safety Office is introducing an electronic checklist so that

departments have to confirm receipt of such information and the Safety Office will follow up with them if no such confirmation is received.

- (d) The Institute has introduced a series of facilitated discussions involving all academic and administrative staff and PhD students, with the purpose of embedding the need to consider risk in more detail. Risk assessment has been a frequent topic for discussion over previous months at various internal meetings, and was a major topic of discussion at a recent departmental Away Day (November 2021), involving the Departmental Administrator and all academic staff. Risk assessment matters have also been discussed in the Institute's regular senior management meetings; at regular Staff Forums (termly meetings involving all the Institute's administrative and academic staff); in Training, Support and Development workshops² (fortnightly workshops designed to aid PhD students in the development of their skills and academic careers); and in Ethics workshops³ (for all postgraduate students studying at the Institute). The Course Directors for the part-time Master of Studies courses in the Institute (involving senior criminal justice system practitioners) hold their own sessions on ethics and risk assessment – as preparation for any fieldwork relating to the production of dissertations.
- (e) Like other departments across the University, the Institute continues to review its provision of training and guidance and will do so specifically to take into account the outcome of recent University-wide work, described above. This includes re-consideration of the provision of training concerning health and safety generally and risk assessment in particular, and includes implementation of the new Working With Offenders Policy referred to at subparagraph 4(b) above.

9. The Institute will monitor compliance with the above by supporting the regular audits of departments conducted by the Safety Office, described at paragraphs 5 and 6 above. It will also continue the practice, introduced in 2021, of submitting an annual

² In November 2021, for example, a workshop led by the Director of the Institute addressed 'the emotional labour' of doing a PhD and issues relating to safety and risk assessment were included in this.

³ These workshops include a focus on the principles of ethics, e.g. maleficence, beneficence, consent and confidentiality, and practical exercises to facilitate comprehension of ethical dilemmas. They now include a specific focus on 'risks' in doing research, and the need for risk assessment so as to protect research participants and researchers.

report on policy and practice developments regarding risk assessment to its Committee of Management. This committee is chaired by the Chair of the Faculty of Law and includes academics from within the Institute, academic colleagues from across the University, the current Head of Research for the HM Inspectorate of Probation, a former Director-General of the Prison Service/Head of the National Offender Management Service and a former Chief Inspector of Constabulary.

10. Since the tragic events of 29 November 2019 all courses, events and other meetings organised by the LT programme in the University which bring together University staff, students, former students and visitors with those in prison or under criminal justice supervision in the community were paused. This means that, since the tragedy, the LT programme in the University has not given rise to any of the potential risks referred to in MC1 (formal risk assessments), MC2 (informing host venues), MC3 (young students and those convicted of serious offences) and MC5 (engagement with those convicted of offences in the community). As paragraph 2 above explains, in December 2021 the University's General Board and Council approved a clear stop to the delivery of the LT programme in the University, both within and beyond prisons. The LT programme will not, therefore, continue in the University.

PART TWO: RESPONSE TO MC2 (INFORMING HOST VENUES)

MC2 – Addressed to the University of Cambridge, Learning Together, the Secretary of State for Education and the Office for Students: It is a matter of concern that a major event could be held by a University at a livery company hall in London without clear communication of the fact that it would be attended by serving and recently released serious offenders. Consideration should be given to guidance requiring higher education institutions to inform host venues of high-risk features of events, including for instance the attendance of such persons.

The University and the issue of informing host venues

11. The question of information sharing with host venues has been specifically included in the University and department level reviews of policies and procedures described in Part One above (and will be covered in the forthcoming revisions to the Work Away Guidance and Events Guidance referred to in sub-paragraph 4(d)). The new Working With Offenders Policy referred to in sub-paragraph 4(b) specifically provides that when a 'Relevant Activity' (e.g. an organised event) is taking place away from University premises, information about the attendance of 'People Who Have

Offended' (as defined in the Working With Offenders Policy) must be communicated to the host venue, even where their presence will be known to the venue as a consequence of other communication.

The Institute and the issue of informing host venues

12. The University-wide position is being taken into account by the Institute and other departments across the University as part of their ongoing further reviews.
13. The LT programme in the University was based at the Institute. The University's review of the future of the LT programme in the University expressly included consideration of how, if it continued to be active in the community in some form, information about attendees at LT events should be shared with the venue proprietors. As paragraph 2 above explains, however, the University's General Board and Council have now confirmed that there will be a clear stop to the delivery of the LT programme in the University, both within and beyond prisons.

PART THREE: RESPONSE TO MC3 (YOUNG STUDENTS AND THOSE CONVICTED OF SERIOUS OFFENCES)

MC3 – Addressed to Learning Together and the University of Cambridge: It is a matter of concern that focussed consideration was not given to the risks of serious offenders being placed in close and continuing contact with young students. Consideration should now be given to such risks and targeted means of mitigating them.

The University and the issue of young people and those convicted of serious offences

14. The approach to risk assessing situations where young people may associate closely with those convicted of serious offences has been specifically included in the University and department level reviews of policies and procedures described in Part One above (and will be covered in the forthcoming revisions to the Work Away Guidance and Events Guidance referred to in sub-paragraph 4(d)). The new Working With Offenders Policy referred to in sub-paragraph 4(b) above highlights the particular risks around coercive or abusive behaviour that may arise when 'People Who Have Offended' (as defined in the Working With Offenders Policy) are placed in close/continuing contact with young students and emphasises the need for close supervision, mentoring and appropriate support to be provided by experienced staff who are capable of detecting potentially subtle behavioural changes.

The Institute and the issue of young people and those convicted of serious offences

15. The University-wide position is being taken into account by the Institute and other departments across the University as part of their ongoing further reviews. All University students and personnel going into prisons for activities are subject to safety protocols and instruction from the prison. Students at the Institute are told, among other things, that while they are inside they must comply with each and every instruction given to them by prison officers or other prison staff; they must not give out any personal information; and they should not enter a prisoner's cell but must remain within sight of prison officers or other prison staff at all times. The Institute also attends to the emotional needs of students by discussing with them the 'emotional labour' of doing research in prisons or in engaging in other such activities in prisons or with people who remain under formal community supervision. To supplement support for students from the University Counselling Service and from College-Counsellors, the Institute pays for specialist counselling to support the wellbeing and progress of those researching particularly emotionally demanding topics such as child sexual abuse, domestic abuse or drug-related research.

16. The University's review of the future of the LT programme in the University expressly included consideration of whether, if it continued, there should be any exclusion from LT activities of individuals who have been convicted under the Terrorism Act 2000 (TACT offenders) or any other exclusions (e.g. by conviction type, security category etc.). As paragraph 2 above explains, however, the University's General Board and Council have now confirmed that there will be a clear stop to the delivery of the LT programme in the University, both within and beyond prisons.

PART FOUR: RESPONSE TO MC5 (ENGAGEMENT WITH THOSE CONVICTED OF OFFENCES IN THE COMMUNITY)

MC5 – Addressed to the Secretary of State for Justice, the Secretary of State for Education, the Office for Students, the University of Cambridge and Learning Together: Consideration should be given to whether further measures of risk assessment and management can be introduced for any higher education programmes running in prisons which involve continued contact with offenders after their release into the community.

The University and the issue of community interactions with those convicted of offences

17. The approach to risk assessing situations where those convicted of offences may participate in activities in the community has been specifically included in the University and department level reviews of policies and procedures described in Part One above (and will be covered in the forthcoming revisions to the Work Away Guidance and Events Guidance referred to in sub-paragraph 4(d)). The new Working With Offenders Policy referred to in sub-paragraph 4(b) above highlights the particular risks that may arise when engaging with ‘People Who Have Offended’ (as defined in the Working With Offenders Policy) in the community and emphasises the special importance of close supervision, mentoring and appropriate support from experienced staff in that context.

The Institute and the issue of community interactions with those convicted of offences

18. The University-wide position is being taken into account by the Institute and other departments across the University as part of their ongoing further reviews. The Institute continues to review all policies and practices in the light of changes in University policies and guidance. The Institute will not permit its staff and students to organise community engagement activities through the Institute that involve those who have committed serious offences, beyond research initiatives which may involve follow-up research interviews. Such interviews will generally require the express permission of HM Probation Service and any other relevant authorities; will be subject to risk assessment; and will often take place in criminal justice system venues.
19. The University’s review of the future of the LT programme expressly included consideration of whether, if it continued, LT’s activities should be restricted to taking place only in prisons, or whether (and, if so, in what form) LT should also continue in the community. As paragraph 2 above explains, however, the University’s General Board and Council have now confirmed that there will be a clear stop to the delivery of the LT programme in the University, both within and beyond prisons.

FACTUAL MATTERS

20. Paragraph 50 of the PFD Report suggests that the LT programme started at HMP Grendon in 2015 and that it was “*soon afterwards rolled out to HMP Warren Hill*”. The first course at HMP Grendon started in January 2015. The first course at HMP Whitemoor started in January 2017 and the first course at HMP Warren Hill started in November 2018.

CONCLUSION

21. The University is committed to learning from the events of 29 November 2019 in everything it does moving forwards. The work described above demonstrates the University’s commitment to addressing in full the concerns arising from the tragic events at Fishmongers’ Hall.
22. It is clear that projects and programmes that involve students and prisoners learning alongside each other, in a controlled environment, can deliver positive benefits to all involved. A commitment to offenders and former offenders having access to education fits with the University’s mission to contribute to society through the pursuit of education, learning and research at the highest international levels of excellence. The University will reconsider student-prisoner education within prisons if, and when, a suitable new framework for such work is developed by HM Prison Service and/or other relevant authorities.