

Security Classification/FOI 2000	Official
██████████	████████████████████
██████████	██████████
Force/organisation	Merseyside Police
NPCC Coordination Committee	Violence and Public Protection
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Date created	13.07.2021



Mr Nicholas Moss QC  
Assistant Coroner  
Cambridgeshire and Peterborough Coronial Services  
Lawrence Court  
Princes Street  
Huntingdon  
PE29 3PA

Date 13<sup>th</sup> July 2021

Dear Mr Moss,

**RE: REGULATION 28 REPORT RELATING TO THE INQUESTS INTO THE DEATHS OF SAMANTHA GOULD AND CHRISTINE GOULD**

I write in formal response to the Regulation 28 Prevention of Future Deaths Report dated 28<sup>th</sup> May 2021, in respect of the inquests of twin sisters Samantha and Christine Gould. By way of introduction, I am ██████████, Deputy Chief Constable of Merseyside and the recently appointed National Police Chiefs' Council Lead for Child Protection, Abuse and Investigation, having taken over the portfolio from Chief Constable ██████████. I recognise that the parents of Samantha and Christine will be keen to understand the actions taken in response to the Regulation 28 Report and at this point, I wish to place on record my sincere condolences to the parents in respect of the tragic loss of both of their daughters.

With the assistance of Chief Superintendent ██████████ from Cambridgeshire and my Staff Officer, Detective Inspector ██████████, I have received a detailed briefing in relation to the case and studied the Regulation 28 Report closely. Please find below full details of the actions that I have commissioned to respond to the specific points raised within the report. I have worked closely with colleagues from the College of Policing to review the current Authorised Professional Practice (APP) in the context of the points arising from these inquests and it is evident that the inquests have identified a gap in the current APP. APP is national guidance that applies to every UK Police Force and underpins the National Policing curriculum for police investigative learning and development. To that end, I have agreed with the College of Policing an immediate addition to the relevant APP. Appropriate cross reference to this new content will be added to other areas of guidance as these are refreshed. This has also been brought to the attention of the NPCC interviewing lead who will raise the issue with Ministry of Justice for inclusion in the ABE guidance

I have included a copy of the agreed amendment below which will provide clarity and direction to investigating officers should this situation arise:



**Witness reluctance to attend an interview or provide a statement**

*A victim/witness may be reluctant to attend an interview or provide a statement. Where this happens, investigators should sensitively try to establish why they are reluctant and, where possible, take steps to mitigate these reasons and provide reassurance. This may include explaining the investigative process and the offences under investigation and emphasising that, if at any time they change their mind, they should contact the officer in the case or named contact. It may also be appropriate to sensitively explain the impact that not attending an interview or providing a statement may have on the wider investigation. This may include not being able to proceed with the investigation or court proceedings.*

*The investigating officer should agree a contact strategy with the victim/witness, or their nominated representative, to provide updates on the investigation and ongoing reassurance. Where appropriate, the victim/witness should be offered the opportunity to reconsider their decision not to provide an account and/or statement. They should not be put under any pressure to do so.*

*The investigating officer should make a record of the reasons why the victim/witness is reluctant, and any mitigating action. They should also record all contact with the victim/witness and the content of any discussions.*

I am also personally writing to the Chair of every Local Safeguarding Children Partnership to highlight this change and seek their support in sharing it with all relevant board members. This will support improved awareness across all agencies that the option and opportunity for a victim to re-engage with an investigation remains open to them at any point, in particular where there is a material change in circumstances, including their health.

I trust that the above actions respond in full to the matters of concern raised within the Regulation 28 Report and you are reassured in relation to the steps I have taken, such that they cover the totality of the identified concerns and address the identified learning.

In the event you wish to discuss this further or should you require any further information then please do not hesitate to contact me through my Staff Officer, details below.

Yours Sincerely



██████████  
NPCC Lead Child Protection and Abuse Investigations  
Deputy Chief Constable, Merseyside Police  
██████████

D/Insp ██████████  
Staff Officer to Deputy Chief Constable ██████████  
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