



**T/Chief Constable** [REDACTED]  
Avon and Somerset Constabulary, Police and Fire HQ,  
PO Box 37, Valley Road, Portishead, Bristol BS20 8QJ

HM Coroner Fiona King  
County of West Sussex  
C/O Mr Geoff Charnock  
Coroner's Office  
Centenary House  
Durrington Lane  
Worthing  
West Sussex  
BN132PQ

16<sup>th</sup> November 2021

Dear Ms King,

**Chief Constable of Avon and Somerset Constabulary's Response to Regulation 28 Report to Prevent Future Deaths following the Inquest into the death of Hamish Howitt**

1. I write to respond to your Report to prevent other deaths dated 23 September 2021, in accordance with paragraph 7, Schedule 5 of the Coroners and Justice Act 2009, and regulations 28 and 29 of the Coroners (Investigations) Regulations 2013.
2. Avon and Somerset Constabulary take the matters raised in your Report extremely seriously, and careful consideration has been given to your Report and our response to it. I hope that the actions detailed below reflect the Constabulary's commitment to ensuring that all of the matters of concern and risks identified in your Report are effectively addressed.
3. As explained below, we will continue to keep these matters under review, and to work with the College of Policing (CoP) and National Police Chiefs' Council (NPCC) to ensure that any recommended changes to training, policy and guidance are promptly and fully implemented by Avon and Somerset Constabulary.

**Matters of Concern**

4. The matters of concern identified in your Report have been reviewed by relevant Constabulary officers, including the force lead for first-aid training. Officers have also met with representatives of the CoP and the NPCC to discuss these matters.
5. The Constabulary is aware that two police officers encountered Hamish after an altercation on the street involving the group Hamish was with and another group of males. One police officer

gave evidence that he had spoken to Hamish, and noted that it appeared he had been drinking. Hamish informed him that he had been hit to his face. The police officer looked at Hamish's face and could not see any signs of trauma, and Hamish was not advised that he should attend hospital.

6. Consideration has been given to the statement in your Report that "it is highly unlikely that Hamish would have died had he gone to hospital when the police saw him after the incident". The expert medical evidence and your Ruling dated 25 March 2021 following the hearing of expert evidence on 25-26 February 2021, as well as your findings and conclusion following the hearing of 19-23 July 2021 have been re-reviewed. No expert or other medical evidence, or any Ruling, finding or conclusion has been identified which supports this statement, and it has been noted that paragraphs 17 and 18 of your Ruling dated 25 March 2021 determined that no further medical expert evidence would be obtained.
7. Regardless, I share your concern that the effects of alcohol may mask other underlying conditions (in particular head injury), and that police officer first aid training should provide appropriate guidance and / or directives in relation to responding to this.

### **Position in relation to training**

8. Avon and Somerset Constabulary officers are provided with first aid training as part of their initial training. They are then provided with refresher first aid training on an annual basis.
9. The First Aid Learning Programme (FALP) which is used by Avon and Somerset Constabulary to train its officers is licensed by the CoP, and endorsed by the NPCC and the Health and Safety Executive. Avon and Somerset Constabulary is compliant with the CoP's licence, and all frontline response officers receive a minimum of Module 2 first aid training, as recommended by the CoP.
10. The FALP Module 2 training includes a requirement for training on casualty assessment. It does not currently require specific training on managing head injuries.
11. Module 3 and Module 4 of the FALP training (which are provided to certain officers in specialist roles, but are not provided as standard to all frontline officers) does require training on head injuries. All first aid trainers are required to hold a Module 4 qualification.
12. The FALP training does not currently require training on the potential effect of alcohol in masking symptoms of other conditions.

### **Actions following Inquest and Report**

13. Following the hearing of 19-23 July 2021, and prior to receiving your Report, the Constabulary had identified the absence of specific training for frontline officers on head injury as a matter of concern, and this issue was under review, which has continued following receipt of your Report.

14. The following actions have been taken by the Constabulary:

- i. An internal communications bulletin has been sent to all officers which identified head injuries as a matter of concern, and provided a link to “essential guidance” on head injuries. This was included in the “Must know” section of the bulletin, which all officers are required to read. The linked guidance states that if an officer or staff member has any suspicion, or is told in good faith, that a person may have a head injury, they should treat the person as such in the absence of clear evidence to dispel that suspicion. The guidance makes clear that no visible marking is not an acceptable level of evidence that a head injury has not been sustained. It states that in circumstances involving a potential head injury, medical assistance should be requested and / or facilitated by officers (whilst acknowledging that officers would not in all circumstances have the power to detain or require members of the public to remain and engage with any medical intervention).
- ii. All first aid trainers have been sent the essential guidance on head injuries.
- iii. The lesson plan for Modules 1, 2 and 4 for “Assess a Casualty (Primary and Secondary survey)” has been amended to require this training to provide the same essential guidance on head injuries.
- iv. The Module 3 and 4 first aid training on head injuries has been amended to incorporate the same essential guidance on head injuries.
- v. Avon and Somerset Constabulary officers with responsibility for leading force training in relation to Taser, Personal Safety Training and Public Order training have also been made aware of the Report and of the first aid guidance on head injuries, which have been incorporated into their training programmes.

15. Since receiving your Report, representatives of the Constabulary, including the force lead for first aid training, have met twice with CoP and NPCC representatives to discuss the matters of concern identified and the actions to be taken in response to your Report.

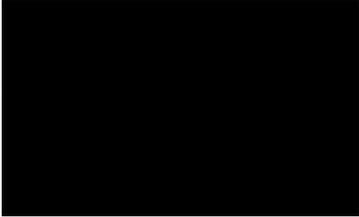
16. The CoP has confirmed that Module 2 FALP training does not currently include the management of head injuries, and that there is no explicit reference in FALP training requirements to the potential impact of alcohol on recognising conditions. The NPCC and CoP have confirmed that:
- i. Your Report will be reviewed by the NPCC First Aid Forum.
  - ii. The CoP is working with clinical leads to review the high level learning outcomes with the aim of placing greater emphasis on the training elements that preserve life, and is presently considering:
    - a. Addressing the issue of acute alcohol intoxication and international overdoses within Module 2.
    - b. Extending the learning in relation to head injuries to Module 2.
  - iii. The matters of concern raised in your report in relation to the impact of alcohol and the assessment of head injuries will be raised formally at the next CoP review meeting, and consideration will be given to whether and how the matters you have identified can be addressed within the scope of the FALP.
17. It is understood that all matters of concern identified at Part 5 of your Report will be reviewed by the NPCC and CoP, including provision of training on head injury, the potential impact of alcohol in masking other underlying conditions, and your recommendations in relation to training material and national policy setting.
18. Avon and Somerset Constabulary will update its training provision immediately on receipt of any updated guidance from the CoP and / or NPCC.
19. A copy of this response, and relevant updated force guidance and training documents, will also be sent to the CoP and the NPCC so that they are aware of all of the changes that have been made internally by Avon and Somerset Constabulary, and can take these into consideration when determining whether any additional national guidance, or amendments to training provision are required.
20. We will continue to keep these matters under review, and will work with the CoP and NPCC to ensure that any recommended changes to training, policy and guidance are promptly and fully implemented by Avon and Somerset Constabulary.

## Summary of Actions Taken and to be Taken

	<b>Action</b>	<b>Person Responsible</b>	<b>Date</b>
1	Circulate memorandum to all officers with guidance to ensure they are aware of the risk of head injury and the requirement that medical assistance is sought (“the essential guidance on head injuries”).	Avon and Somerset Constabulary First Aid Training Lead	Completed 14 October 2021
2	Send the essential guidance on head injuries directly to all first aid trainers.	Avon and Somerset Constabulary First Aid Training Lead	Completed October 2021
3	Add the essential guidance on head injuries to Module 1, 2 and 4 first aid training for assessing a casualty (provided to all frontline officers).	Avon and Somerset Constabulary First Aid Training Lead	Completed October 2021
4	Add the essential guidance on head injuries to Module 3 and 4 first aid training on head injuries.	Avon and Somerset Constabulary First Aid Training Lead	Completed October 2021
5	Training on appropriate response to head injury to be incorporated into Taser, Public Safety and Public Order training.	Leads for Taser, Public Safety and Public Order training.	Completed October 2021
6	NPCC First Aid Forum to review Report.	NPCC	9 December 2021
7	CoP review of training provision with clinical leads, and consideration of amendments to scope of FALP to address matters raised in Report.	CoP	Ongoing
8	Update Avon and Somerset Constabulary first aid training provision / policy / guidance in accordance with NPCC / CoP updated guidance.	Avon and Somerset Constabulary First Aid Training Lead	To be actioned immediately on receipt of any updated CoP FALP training requirements and /

			or CoP / NPCC policy or guidance.
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Yours sincerely,



T/Chief Constable  
Avon and Somerset Constabulary

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