

[REDACTED]  
Mr Edward Ramsay  
Assistant Coroner  
Swansea Neath Port Talbot Coroner's Court  
The Guildhall  
Swansea  
SA1 4PE

[REDACTED]  
Deputy Assistant Commissioner  
Metropolitan Police Service  
New Scotland Yard  
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London  
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[REDACTED]

21 April 2023

Dear Mr Ramsay [REDACTED]

I am the Deputy Assistant Commissioner for the Directorate of Professional Standards in the Metropolitan Police Service ("MPS"). On behalf of the Commissioner of Police of the Metropolis, I write to provide the response to the matters of concern addressed to the MPS in your Report to Prevent Future Deaths dated the 13 February 2023.

On behalf of the MPS may I first of all express my sincere condolences to the family and friends of Hannah Warren, our thoughts and sympathies are very much with them.

At the conclusion of the inquest into Hannah's death six matters of concern were raised which are listed below. The matters raised all relate to the missing person investigation and the ACT report process within the ANPR system. Your report identified that whilst locating the car in which Hannah was travelling would have been the most effective way of locating Hannah, the MPS use of ANPR and specifically the ACT report process was insufficient in order to do so. As a result several opportunities to locate Hannah were missed. The cause of these failings appear to be due to a lack of organisational guidance and training around ANPR/ACT report.

This letter seeks to identify the issues arising from each of your concerns, the action being taken to ensure those concerns are addressed in order to prevent future deaths.

#### **The Coroner's "Matters of Concern"**

The Prevention of Future Deaths report dated 13<sup>th</sup> February 2023 records:-

- 1) *The evidence was clear that the most effective means of locating a missing person in Hannah's position was to locate the vehicle in which it was assumed she was travelling.*

- 2) *There was an apparent mismatch between the COMPACT risk assessment for Hannah graded as "medium" and the LOW stop priority instruction on ACT in relation to her vehicle.*
- 3) *The evidence I and the jury heard was that there was no formal guidance, training, or protocols of any kind to assist with the dialogue between these two systems; instead, it was left to local custom and practice as to how to correlate any risk assessment with the priority instruction on the ACT, if at all.*
- 4) *The preponderance of the evidence was that the LOW stop instruction was inappropriate in this case, but I was not directed to any document or guidance that would have assisted those responsible at the time for selecting the correct priority on the ACT.*
- 5) *I have seen no evidence of any formal guidance, training, or protocols as to how these two critically important systems are meant to operate alongside one another safely, or at all.*
- 6) *This appears to be a national issue and is not related solely to the lack of any formal guidance, training, or protocols within the MPS specifically.*

The MPS accepts that it should consider matters (1) to (5), our response to these matters of concern is as follows:

#### **ANPR and ACT reports.**

The Automatic Number Plate Reader (ANPR) system is a national system which is used for a variety of vehicle related functions ranging from the management of car park tariffs to Road Traffic Act compliance. The system allows authorised bodies to retrieve vehicle and owner information from the Driver and Vehicle Licensing Agency (DVLA) for lawful purposes.

Due to its national coverage, the ANPR system has been identified as a vital tool for police services when dealing with both crime and vulnerable persons where a vehicle is involved. The Action Report (ACT) process was developed by Police National Computer (PNC) Services to enable police forces to identify and provide real time location data for those vehicles where the police force requires some form of action to be taken should they come to notice. Adding an ACT report to a vehicle record will trigger the inclusion of that vehicle into the ANPR fast track pool.

#### **When to Use an ACT Report**

An ACT report should be used where it is reasonable and proportionate for that vehicle to be subject of national circulation for the purpose of appropriate action being taken should the vehicle come to notice, or when an intelligence marker normally circulated as an entry on a Vehicle of Interest (VOI) list contains warning signals which may compromise officer safety. There is an expectation when adding an ACT report that some form of action will be taken should the vehicle be sighted. This action may be to 'STOP' the vehicle, 'MONITOR' the movements of the vehicle pending advice or specialist support,

or 'ASSESS' the situation at the time of the sighting and make an informed decision whether to stop the vehicle, or for an alternative response to be taken.

The police force originating the circulation must be prepared to provide assistance should the vehicle be stopped and the requested action taken in another force area. This could potentially be anywhere within England, Wales, Scotland, Northern Ireland, Guernsey, Jersey or the Isle of Man.

When entering an ACT report, as well as the action required, a risk assessment must be completed which highlights the level of risk or harm to the subject to assist the police force or officer taking action to take the appropriate response. These priority levels are set out in MPS policy (2019) as:

- High Priority – to be used in the most serious of cases and in particular where life is at risk.
- Medium Priority – to be used for major, serious or complex investigations
- Low Priority – to be used for volume crime, priority investigations and road traffic offences where a vehicle and/or the occupants need to be traced.

### **Missing Persons**

The College of Policing Missing Persons Authorised Professional Practice (APP) sets out clear processes and procedures for investigating these cases, risk assessments and risk management processes. The APP gives guidance to police forces regarding the way missing persons are risk assessed, which is High, Medium or Low. This risk assessment must be recorded on the relevant reporting system - the MPS use the Merlin system (Missing Persons & Related Linked Indices). The MPS notes the term COMPACT has been used in the Regulation 28 report, when referring to the missing person risk grading. COMPACT is the missing person reporting system used by South Wales Police.

The College of Policing's APP, provides the following guidance regarding missing person risk assessments:

- High risk - The risk of serious harm to the subject or the public is assessed as very likely.
- Medium risk - The risk of harm to the subject or the public is assessed as likely but not serious.
- Low risk - The risk of harm to the subject or the public is assessed as possible but minimal.

Once the investigating officer completes the risk assessment, it must be confirmed by an officer of at least the rank of Inspector as soon as practicable.

With regard to the circumstances, Hannah Warren was reported missing by her fiancé and flatmate having gone missing from within the MPS. Hannah was graded and confirmed as a medium risk missing person on the MPS Merlin system, this decision has not been questioned in the regulation 28 report. Investigating officers identified that the ANPR system would provide the greatest chance of locating

Hannah. However, when the ACT report was created in relation to Hannah's vehicle it did not appear to reflect the risk grading and/or concerns for Hannah's vulnerability.

Based on the priority definitions, 'Low priority' for a vulnerable missing person would now not be appropriate. The ACT report was also lacking in sufficient detail to direct the identifying police force or officer to take appropriate action. This meant that despite Hannah's vehicle activating a number of ANPR cameras several opportunities to intercept her were missed. The MPS were unable to provide to HM Coroner details of any training in place for Officers surrounding the creation of ACT reports.

### **MPS action**

Following consultation with the College of Policing, it is accepted at the time of Hannah's death in 2016 there was no organisational guidance or training in place for officers around the ACT and REACT (Reaction – once the action has been taken) report process of the ANPR system. Within the MPS, there was no service level agreement (SLA) regarding governance and oversight of the content currently held within the ANPR system.

In November 2022, the College of Policing published the Information and Communications Technology (ICT) learning document "ACT and ReACT reports on PNC". The document is a Home Office approved training tool aimed at frontline officers and supervisors, it details all aspects of the ACT process and responds to the failures and knowledge gaps identified during the inquest into Hannah's death.

The MPS Learning and Development directorate are in the process of adapting this national guidance into a MPS training package, which will be delivered to all frontline officers digitally via the MPS Learning Management System. A key focus of the training will be to identify to all users the importance of ensuring the priority grading, information and request contained within an ACT report accurately reflects the risk presented by the subject or situation, and where this risk is documented (i.e. missing person report or crime report). The user must understand the link between the risk associated to the subject and the priority rating of the ACT report as this is crucial to ensuring that the appropriate response is taken.

The MPS commenced the training design and development in March 2023, it is anticipated the training will take up to 12 months from conception to completion.

In addition to the requirement to train and develop all users of the ANPR system and ACT process, Hannah's death has highlighted the lack of governance and ownership of intelligence submitted in the ACT report process and held within the PNC.



To improve the accuracy of ACT report submissions, risk assessments and to ensure the ongoing management of the information held on the system, the MPS will shortly be introducing a new a Service Level Agreement (SLA). This requires all low and medium priority ACT reports to have been authorised by an officer of at least the rank of inspector prior to submission (currently only high priority reports require a superintendent's authority). In addition, all ACT reports must have nominated contact who is available 24hrs per day and suitably informed to provide updates and direction in the event of an activation. It will be the responsibility of the owning officer to review and remove entries from the system, if they are no longer required. The SLA is awaiting final approval, for publication in May 2023.

Please do not hesitate to contact me should you have any queries.

Yours sincerely,



