

The Rt Hon Sir Adrian Fulford PC KC
The Inquest Legal Team
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Jason Hogg Chief Constable

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Dear Sir Adrian

Preventing Future Deaths response of the Chief Constable of Thames Valley Police

I write in response to your report under regulation 28 of the Coroners (Investigations) Regulations 2013 dated 20 May 2024 (the PFD report), for which I am grateful. This is a consolidated response which addresses the position both of Thames Valley Police (TVP) as the local force for which I am the chief officer, and of Counter Terrorism Policing South-East (CTPSE), which is one of the regional collaborations within the Counter Terrorism Policing (CTP) network and for which I am the lead chief officer.

The inquests into the deaths of James Furlong, Joseph Ritchie-Bennett and David Wails which you heard between January and April 2024 shone a light on many procedures and practices within both TVP and CTPSE. TVP and CTPSE have taken the time to consider your findings of fact and the PFD report in detail. On behalf of TVP and CTPSE, I wholly accept your findings. They were not easy reading: it is clear that some of the service provided by both CTPSE and TVP fell short – sometimes far short – of expectations.

I am grateful for the opportunity to set out, in response to your concerns in the PFD report, the action that has been taken to date to address the risk of future fatalities, and the action that will be taken in future.

In this response, I address the following topics raised in the PFD report for which you requested a response by CTPSE or TVP:

- The maintenance and dissemination of an adequate intelligence picture by CTPSE;
- Prevent
- MAPPA
- Operation Plato
- Support for the Force Incident Manager (FIM)

While I address these topics separately below, I recognise the substantial overlap between them, and between those areas for which I, as Chief Constable, am responsible, and other linked areas such as Pathfinder which are the responsibility of HM Prison & Probation Service (HMPPS), or national policy on Prevent which falls under the Secretary of State for the Home Department. I ought also to note that CTPSE forms part of a wider network, with national policy and guidance set by Counter Terrorism Policing Headquarters (CTPHQ), which is led by the Commissioner of Police of the Metropolis. As well as taking action as regards CTPSE's activity, CTPSE both implements CTPHQ's policy and guidance and contributes to action being taken as part of national-level projects under CTPHQ's auspices.

As you note in the PFD report, of TVP and CTPSE and CTPHQ, in their written and oral evidence (particularly their statements dated 10 November 2023 and 17 November 2023 respectively), set out many and various steps which have been taken since 2020 to address a number of the issues that became apparent as a result of this attack. I do not wish simply to repeat information of which you are already aware, and so ask that this response be read in conjunction with the evidence you have already received from them.

The maintenance and dissemination of an adequate intelligence picture by CTPSE

The headline point as regards CTPSE's management of intelligence is that a comprehensive review of CTPSE's Fixed Intelligence Management Unit (FIMU) began in March 2024, and will be completed by the end of the year. CTPSE initiated this review (the CTPSE FIMU review) in response to the issues canvassed in these Inquests. It is being carried out by CTPSE's Head of Intelligence, an officer of Detective Superintendent rank.

For context, most of the general intelligence analysis and dissemination within CTPSE takes place within the FIMU. The exceptions are work on specific operations and work on reactive operations (such as following the Forbury Gardens attack).

As well as being a response to these Inquests, the CTPSE FIMU review also reflects national work undertaken by the CTP Intelligence Capability Board (ICB), a national oversight mechanism for intelligence capability run by CTPHQ. In February 2024 a paper was presented to the ICB which identified growing demand on FIMUs across the country, and the need for them to remain focused on their core role of identification and assessment of terrorist risk. Those issues are relevant to the concerns you have raised about how CTPSE can maintain and disseminate an adequate intelligence picture, and so the CTPSE FIMU review will examine them as well as address concerns arising specifically from the Inquests. In the event that there are any national recommendations or direction from the ICB, these will be incorporated into the CTPSE FIMU review.

The CTPSE FIMU review will cover a number of key themes, with an overarching aim of ensuring that the assessment, analysis, and dissemination of intelligence about terrorist risk by the CTPSE FIMU is properly resourced, trained, delivered and monitored.

First, the CTPSE FIMU review will consider the **training** which FIMU assessors receive. They are required to undertake nationally mandated training to ensure that their work is compliant with the National Standards of Intelligence Management (NSIM). Compliance with this requirement is good, with 97.5% of staff in roles where this is a requirement having undergone this training. However, there has been feedback that this training focuses on the mechanics of assessment and does not adequately provide an understanding of the broad underpinning principles for why actions are undertaken. CTPSE has raised this with the CTPHQ Organisational Development Unit (who manage this national course) to ensure that the course remains fit for purpose and incorporates the learning from your findings in this case.

Nationally, the ICB is also reviewing the training and professional standards of certain roles within Intelligence functions, under the leadership of the Head of Intelligence of another CTP region. CTPSE have representation on that group and will ensure that the learning from your findings in this case is reflected in that national review.

Second, your findings highlighted the importance of **clear and timely communications between local police forces and CTPSE**. I acknowledge that, as far as possible, information sharing needs to be based more consistently on an approach of 'dare to share', rather than 'need to know'. This can be challenging, particularly where intelligence is sensitive, requiring 'action on' permissions or agreed forms of words. Nevertheless, the culture must be one that pushes the boundaries where necessary to facilitate the management of risk. CTPSE and the joint Contact Management Department of TVP and Hampshire & Isle of Wight Constabulary have met to discuss how the passage of information between CTPSE and local forces can be enhanced.

One result of these meetings is that CTPSE and the Contact Management Department are to develop training for call handlers to build awareness around the role, capabilities and limitations of CTPSE, including in how to ask CTPSE effective questions about any information shared. There will also be new training for those within the FIMU who take calls from Contact Management.

While the CTPSE FIMU review will determine the detail, one potential option is to incorporate a template that can be added to force command and control systems (Contact Management Platform – CMP in TVP's case). This template would contain basic details such as what was known, what was shared, what was not shared and why, which is intended to assist in providing the clarity needed. This model will, of course, need to be replicated across all the forces that CTPSE serve, and I intend that this work will be carried out at pace.

I would like to emphasise that since 2020, we have already seen a marked improvement in information recorded within CMP logs by CTPSE, and an even greater improvement in recording information and clarifying ownership of work/risk on Niche. This will be the subject of future supervisory audits, a point I will return to below.

The CTPSE FIMU review will also consider how to approach issues of **mental health where it intersects with extremism**. CTPSE's FIMU assessors have all attended awareness sessions for the newly established CTPHQ Clinical Consultancy Service (a national CTPHQ

programme that has replaced the Vulnerability Support Hub about which I know you heard evidence), and are being actively encouraged to refer suitable cases where needed. Much work has been undertaken in this area to reinforce the concept that extremism and mental health are not mutually exclusive. CTP casework (and by definition FIMU assessments) regularly involves cases where both are present. Checking that assessors are not delineating the two will continue through the supervisory frameworks being put in place.

I would add that I recognise that, prior to 2020, FIMUs had a tendency to require evidence of defined ideologies and specific group affiliations (ISIS/AI Qaeda, etc.). In recent years, FIMU assessors and supervisors have become more aware of the terrorist risk arising from or contributed to by individual psychologies, including mental health, or ideology, rather than links to groups. This change in emphasis reflects the network-wide dissemination of CTP learning from the various terrorist attacks in 2017-2020, as well as the changing threat which we continue to confront. As compared with 2020, I am confident that the FIMU do not dismiss threats based on mixed/unclear ideologies or mental health, and do not regard mental health as a mitigating factor for someone becoming a terrorist or holding an extremist ideology.

The CTPSE FIMU review will also consider how the FIMU handles the totality of an intelligence picture. As accepted in his evidence before you, simply adding a new piece of intelligence to a previous assessment is not an effective way to consider the entirety of risk. CTPSE's intention is to free up capacity among assessors to enhance their ability to review all relevant intelligence when considering a case. This may represent something of a culture change which will need to be reinforced through supervisory processes. The demand that this creates will also need to be carefully monitored. There will inevitably be a balance between speed and complete totality of assessment.

Inevitably, IT systems such as the National Common Intelligence Application (NCIA), the platform used by CTP nationwide, have a role to play in how this change of culture is embedded. Whilst NCIA was transformational in bringing all CTP intelligence nationally onto a single system, it does have limitations as regards searching and accessing information, some of which I know were apparent in the evidence you heard. There are also issues around different access control levels for different kinds of users, which the CTPSE FIMU review will consider. Nationally, CTP is already undertaking a significant project to replace NCIA with a new IT platform for intelligence handling. This is expected to be introduced in 2026/27. It will provide FIMU intelligence assessors (and all those in CTP requiring access) with a more intuitive, accessible and user-friendly platform to accelerate and improve assessment of often complex and detailed intelligence. This will address the concern that it is in some situations difficult to get a meaningful summary out of NCIA at pace. This work will also help to address concerns around the sharing of adequate relevant information with partner agencies, including HMPPS and MI5, to assist them in carrying out their functions.

The CTPSE FIMU review will also consider the level of knowledge of staff in relation to proscribed groups, and how this can be enhanced. Currently, when a group is proscribed, communications are issued centrally from CTPHQ. Those staff in post at that time therefore receive an update, but this does not help individuals who join after the point of proscription. Present thinking is that having more concise guides available could help understanding in this

area. This links to the culture change I described above, which encourages assessors to take a holistic approach to the assessment of intelligence.

Additionally, CTPSE intends within the next four weeks to open discussions with CTPHQ as to how a dedicated database which provides easy, instant access to information on proscribed organisations around the world to inform assessments might be made available. Such databases are available to some of CTP's partner agencies, which it is hoped will provide a model for this development.

The deputy Senior Investigating Officer (SIO) for the original Forbury Gardens investigation (who was also the SIO for Operation Cropland, CTPSE/TVP's response to these Inquests) has, on behalf of CTPHQ, created a learning video presentation on the case which will soon be available online to all staff in the CTP network. The CTPSE FIMU review will also consider how the FIMU can better identify **indicators of an imminent attack**. Since 2021, CTPSE has utilised a set of indicators from the learning from previous attacks, and they are used by FIMU staff. They are also used nationally, and the SIO for Operation Cropland through CTPHQ delivers training nationally using previous cases, including Reading, to increase awareness of these indicators. These indicators are based on a more general approach to using behavioural science and academic support to increase understanding of 1) what indicates someone is mobilising towards violence and 2) what factors make someone more likely to be violent to assist case prioritisation. The idea is to move away from a model that simply identifies explicit threats, to a more holistic approach to the threat.

CTPSE have also piloted the Self-Initiated Terrorist oversight group, which is now led by a Detective Inspector. The point of it is to consider cases such as KS that fall below the threshold for coverage or intervention by MI5, to make sure they are being addressed correctly, to ensure that they sit in the right space for intervention, the cases are escalated quickly where necessary, and to provide staff with a further support in their risk assessment decision making. This approach is being rolled out in other parts of the country but it is most developed in the South East as a direct result of the Forbury Gardens attack.

The CTPSE FIMU review will also examine how actions are monitored and tracked within the FIMU, and how supervisory reviews take place. I am aware that the evidence heard at the Inquests indicated that actions set by or for the CTPSE FIMU were not consistently tracked or followed through. At the end of 2021, 'Management Logs' (MLs) were introduced to CTP FIMUs nationally to provide an easier way for FIMU assessors and supervisors to manage the intelligence development space. 'Open actions' on NCIA can now easily be searched for and managed accordingly. Supervisors carry out weekly checks to review and, if necessary, reallocate actions. FIMU assessors can add auditable entries to the MLs to demonstrate efforts made to complete enquiries. Whilst there is already a high degree of confidence in MLs, the new intelligence handling IT system referred to above should improve this process even further.

Across CTP, supervisory reviews are now carried out on a set percentage of FIMU assessments. It is not possible to review all assessments due to the volume, so a 'dip checking'

regime is in place. National standards now stipulate that 5% of all records are checked but this is subject to review, and is likely to be increased. The checking regime within CTPSE will also be strengthened to include more qualitative assessments, such as whether the totality of intelligence has been assessed and checking the quality of decisions made. Where areas for improvements are identified these will be fed back, either individually or to the entire team. The emphasis will be on continuous learning as opposed to blame and on creating an open culture of reflective practice excellence in decision making.

The key points learnt from the supervisory framework will be incorporated into regular quarterly reporting cycles. This will complement the current CTP Intelligence Capability Assurance Report reporting process that looks at metrics measurable from the NCIA database and is examined at the ICB. The local review process will add qualitative learning that helps to improve decision making as well as ensuring that supervisors are compliant. This qualitative learning will then be disseminated to the ICB to ensure that any applicable lessons are learnt across the whole CTP network.

Closely linked to the supervisory review framework will be a reassessment of the measurement of demand and performance in the FIMU. Currently, performance reporting largely focuses on volumes of intelligence documents assessed, their measurable outcomes, and timeliness. While these are important metrics, the scope of performance reporting requires expansion to cover overall FIMU demand and a qualitative assessment of the work being undertaken. The CTPSE FIMU review will consider whether there are further steps, in addition to those described above, that can be taken in this regard.

I would also like to draw to your attention the increased sharing of information between CTPSE's Intelligence function and its Nominal Management Team (NMT), which forms part of its Interventions function. Both the CT Nominal Management (CTNM) Manual of Guidance and the national Prevent process require compliance with the National Standards of Intelligence Management (NSIM) which requires submission of intelligence back into FIMUs as part of the intelligence cycle. This ensures visibility of individuals subject to Prevent or CTNM within the intelligence space.

There are still challenges as regards the sharing of intelligence between FIMUs and CTNM nationally due to the lack of a single national CTP case management system which has resulted in a variety of methods of recording across the country. The Home Office owned Violent Sex Offender Register (ViSOR) provides a partial solution as a national system for recording cases shared with HMPPS. However this system is significantly outdated, not initially designed for CT use, and has access requirements which are not compatible with the majority of the CTP estate. To address this challenge, CTP will be the first adopters of the new Multi-Agency Public Protection System (MAPPS), a replacement for ViSOR, which is expected to be delivered in 2025/26. MAPPS has been designed from commissioning for use in terrorism cases and has modern access requirements compatible with the CTP estate.

There is also a well-defined CTPSE process which ensures that FIMU have visibility into all individuals on NCIA who are within the CTNM cohort. In summary, this process ensures that each new instance of intelligence or enquiry relating to a CTNM subject is drawn immediately

to the attention of CTNM officers. Where necessary, this results in case conferences but either way ensures decision making between FIMUs and CTNM is well coordinated and jointly made. This process has been tested recently with FIMU being alerted to concerns around a CTNM cohort member, swiftly gaining access to the nominal's CTNM record, and putting in place appropriate management plans. This all occurred out of hours and no problems were encountered with accessing the information.

FIMU are also responsible for setting up the flags and markers required for such nominals, plus their closure.

FIMUs also have visibility of the Prevent cohort as they have access to the Prevent Case Management Tracker Enhanced system. All Prevent staff are aware of the necessity and process for submitting intelligence. Regular monthly meetings between FIMU managers and Prevent managers have enhanced CTPSE processes in this area.

After the CTPSE FIMU review has concluded, CTPSE will ask CTPHQ for a **peer review of CTPSE FIMU** to provide external scrutiny and reassurance of effective working.

As I hope is clear from the above, this CTPSE FIMU review is intended to be a wide-ranging and thorough review that covers not only the matters you have raised in the PFD report, but also builds on previous and ongoing work within both CTPSE and nationally. I can assure you that the entire chain of command within CTPSE, from myself down, is committed to implementing any necessary or desirable changes that the CTPSE FIMU review identifies.

Prevent

I acknowledge the concerns you set out regarding Prevent at §§19-21 of your regulation 28 report. The changes made or planned to the FIMU described above clearly interlock with these concerns: for example, ensuring that there is an assessment of the totality of the available evidence of sufficient quality, made available by the FIMU to Prevent staff to ensure that they can make a properly considered assessment of risk. This should ensure that Prevent staff, in future, would be aware of an individual's links to proscribed organisations or other terrorist offenders, where this information is known by CTPSE. To support this, CTPSE has begun to implement access to NCIA (and the associated requirement for Developed Vetting) for some Prevent staff. The Prevent Gateway Team within CTPSE has also, since 2019, been colocated with the FIMU.

To address the weaknesses in **training** in Prevent, it is now a requirement that all CTP Prevent staff undergo a CTPHQ-accredited training pathway. This training aims to build on existing policing expertise, whilst providing additional knowledge, skills, and awareness for the CTP context. The National Interventions Foundation Programme (NIFP) has four online modules, one day face-to-face on the assessment framework and one day face-to-face on welfare/disguised compliance. An interactive exercise will be included in the NIFP but is still under development at the time of writing. While the NIFP and its training courses are signed off/accredited by CTPHQ, there is no official external accreditation for the content of those courses.

In relation to **supervision** and **selection**, within CTPSE both Prevent supervisors (generally at Sergeant rank) and managers (at Inspector and Chief Inspector rank) are now required to be (at least) PIP2 Detectives. This is a change from the previous position, where this was not a requirement for supervisors. This new requirement has two key impacts. First, it ensures a high level of investigative competence and leadership within the team at both supervisory and management levels. Second, it means that all CTPSE recruitment into Prevent is undertaken by accredited detectives, with the requisite experience and an investigative mind-set. While Prevent staff below supervisory/management level are not required to be accredited detectives, those selecting and recruiting them are. That helps to ensure that our selection process for these roles is rigorous, prioritising experienced individuals with the right attitude and approach, who can effectively manage complex cases.

To help put this into context, in 2021 the number of Prevent supervisors in the Reading and Berkshire area increased from one to two, as I understand you heard in the Inquests. At the time, neither was an accredited detective: they have both since been sponsored by CTPSE to complete their PIP2 accreditation. The most recent supervisory appointment to CTPSE's Prevent department was an experienced Detective Sergeant with a background of working in Public Protection.

Additionally, both current Prevent Detective Inspectors within CTPSE have completed the Management of Serious Crime Investigation Development Programme. They have a background in intelligence, and keep this skillset current by supporting the on-call rota for CTPSE's Intelligence department.

Furthermore, we have re-posted managers across our departments – Nominal Management, Prevent, and Intelligence – over recent years. A Detective Chief Inspector from Prevent has moved into the Nominal Management Team; a Detective Inspector from Intelligence has moved to Prevent (as alluded to above); and a Detective Inspector from Prevent has moved the other way, into Intelligence. This deliberate approach fosters the transfer of knowledge and reduces the risk of silos, thereby enhancing overall efficiency and cohesion.

This comprehensive approach ensures that all Prevent officers are well-versed in the latest methodologies and best practices in risk management. Continuous professional development (CPD) events are also accessible and mandated for all staff, ensuring that they remain updated with evolving strategies and maintain high standards of professional competency. These CPD events provide ongoing learning opportunities that reinforce and expand on the foundational training, ensuring that staff are continuously improving their skills and knowledge base.

There has also been substantial recent and ongoing work on **structured assessments within Prevent**. Following a recommendation from the Independent Review of Prevent, CTPHQ and the Home Office's Homeland Security Group (HSG) have been working with HMPPS to develop an upgraded version of the current Prevent risk assessment tools. HMPPS were commissioned to develop the new tool to harness the best practice from the success of their well-known ERG22 CT risk assessment. The new tool has been informed by up-to-date

research and plans for ongoing evaluation and improvement. It consolidates two previous tools into one for a more streamlined user friendly and time efficient process. It directs the focus of the assessment to early closure of referrals that have no terrorism/extremism relevance allowing resources to be focused on those susceptible to becoming terrorists or supporting terrorism.

This new methodology was piloted in two regions (not including CTPSE) between November 2023 and May 2024. Feedback indicates that it has been well received with staff commenting that it has assisted with justification and reinforcement of decisions around whether to progress a case or not. It has improved confidence in closing cases with no terrorism/extremism risk and prevented wasted time. It has focused practitioners to make decisions based on facts rather than preconceptions. It has been peer reviewed by two academic experts, and has had oversight from the Correctional Services Advice and Accreditation Panel who recently signed off on national roll out. The CTP network is currently in the training stages for adoption of this new methodology and are hopeful that it will be launched nationally in September 2024.

The requirement to embed **professional curiosity** more consistently when dealing with potential terrorists is a theme within both Intelligence and Prevent. This is particularly relevant to the phenomenon that is often called 'Disguised Compliance' but is increasingly being referred to by CTP as 'Sincerity of Change'. Training in this area forms part of the initial Prevent 'Conversations' module, which is delivered for Prevent staff by CTPHQ (see above). Additionally, CTPHQ ODU (Operational Development Unit) have recently released a new face-to-face training package entitled 'Interventions Welfare Training', which specifically focuses on Sincerity of Change. All CTPSE Prevent and Nominal Management Team (NMT) staff will be completing this training in 2024, and a request has been made to CTPHQ ODU for further sessions to include FIMU and SERPIT (South East Region Prison Intelligence Team) personnel.

You have raised a concern about how CTPSE handles **repeat Prevent referrals** in light of the fact that KS was referred to Prevent on four separate occasions between 2017 and 2019. CTP Prevent policy has now been amended to provide additional scrutiny to the cumulative impact of repeat referrals related to the same subject, even if the subject had been closed from Prevent previously at an early juncture without management or interventions. In such cases, Counter Terrorism Case Officers (CTCOs) and their supervisors are now required to obtain the authorisation from a senior officer (Inspector or above) before closing a 'repeat referral' from the case management system. This change is intended to bring added assurance that, in cases where CTP has been notified of a radicalisation risk more than once, greater scrutiny is afforded to the case circumstances and decision making within it. The improvements to supervision and scrutiny within Prevent, set out above, of course also contribute to the effectiveness of this process.

To further enhance support for repeat referrals, CTPHQ has established a case review process for cases where an individual referred to Prevent goes on to commit or attempt to commit high harm offences to establish if all opportunities to protect the public, and safeguard individuals were maximised.

The focus of CTPHQ's process is primarily concerned with risk identification and organisational learning, not on finding fault nor apportioning blame. Where failings of duty or misconduct are identified, these are brought to the attention of the Regional Prevent Coordinator for their consideration and progression.

MAPPA

In addressing your concerns around MAPPA, I hope it will be helpful to outline the position regarding terrorist and terrorist risk offenders, who now fall under Counter Terrorist MAPPA (CT MAPPA), and also regarding non-CT MAPPA offenders.

I should state at this juncture that I am also confident that the changes to intelligence handling and assessment by CTPSE set out above mean that an individual such as KS would now and in future be appropriately identified as being a terrorist risk offender, and so would be subject to the CT MAPPA process.

In relation to **CT MAPPA offenders**, following the 2022 report of the Independent Review of Terrorism Legislation () into MAPPA, a new category for such offenders was created by the Crime, Sentencing & Courts Act 2022. Very considerable work, under Project Semper, has been undertaken to ensure that the new CT MAPPA process is effective. It is also linked to the ongoing development of the CT Nominal Management capacity, and the joinder, through Project Eleos, of CTP's national Nominal Management and Prevent functions into a single Interventions Capability.

The CT MAPPA process ensures that there is a forum where intelligence can be shared appropriately, with input from the right subject matter experts including from CTPSE and HMPPS' National Security Division. Attendance at CT MAPPA meetings from a member of the CT Nominal Management team is mandatory. There is also a route for sensitive information to be shared with MAPPA chairs, via the Joint CT Prison & Probation Hub.

MAPPA training is covered in the CTNM foundation course, with additional specific training for MAPPA chairs. Additionally all staff within the CTP network now have access to a MAPPA awareness video, accessible to all training managers to share across their portfolios and as well as regional Training and Development Coordinators to share across their regions. This will be made mandatory for all CTPSE staff.

I know that these changes were covered extensively in solution of solutions and solutions solutions are vidence to you. By way of an update, in 2024 CTPSE appointed a Detective Chief Inspector into a newly created role to lead its NMT and fulfil the role of Lead Responsible Officer for CT Nominal Management. This involves co-chairing MAPPA Category 4 Level 3 meetings. Category 4 Level 2 meetings are chaired by a CTPSE Detective Inspector, and the number of individuals carrying out this role has been increased to provide additional resilience. All MAPPA chairs or co-chairs have undergone the national training required for the role, which includes training on when MAPPA referrals can be closed.

As regards **non-CT MAPPA**, within the TVP force area this falls to TVP as the local force,

rather than to CTPSE. There are national policies and guidance in respect of which I anticipate the Secretary of State for Justice will respond to you. also covered the changes since 2020 in his witness statement at paragraphs 19-34, but I hope it will assist if I provide some additional detail on the action that has been taken.

In 2022, TVP created a dedicated Management of Sexual or Violent Offenders (MOSOVO) department to ensure there was structured and consistent management of Registered Sex Offenders (RSOs), as well as those being managed under Category 2 or 3 (violent offenders) of MAPPA. MOSOVO received an uplift of staff which created an additional Detective Inspector, one Detective Sergeant and four Constable posts. The sole role for these constable posts is to focus on Category 2 and 3 offenders. These staff are referred to as MAPPA officers. In addition to this uplift to TVP's MAPPA capacity, a further four constable posts have been created for officers are specially trained in digital capability who can, for example, assist with searching for individuals who may be 'wanted'.

Most of TVP's MAPPA work relates to the management of RSOs, of whom there are more than 1,000 in the TVP area. These fall within Category 1 of MAPPA. The overwhelming majority of them are managed at Level 1.

There are currently 90 Category 2 or 3 offenders managed within the Thames Valley area (although eighteen of those live outside of TVP). Of the 90, 66 are Level 2 and 24 are Level 3. All bar two of the 90 are Probation-led, with TVP providing Probation with support in risk management.

The MAPPA officers, alongside appropriate supervisors (Detective Sergeant for Level 2, and Detective Inspector for Level 3) represent TVP at all Level 2 and Level 3 MAPPA meetings for Category 2 or 3 offenders. They work with Probation and other partners in supporting the risk management of that individual, including preparing trigger plans; advising on tactics and options available; engaging with and briefing the local police area; identifying cases/individuals that are suitable for MAPPA or should be considered for escalation to a higher MAPPA level. If an individual is police-led, then they will always be Category 3 and it is now well-understood that they therefore will always be at least under Level 2 MAPPA management. This will ensure there are regular MAPPA meetings with an appropriate Chair and multi-agency panel risk management.

In terms of oversight, supervising Sergeants direct the work of the MAPPA officers through review meetings, and there are weekly meetings between Detective Inspectors and supervisors, and a monthly review by the Detective Chief Inspector for offender management. There is then a reporting and governance chain through the Head of Public Protection and Safeguarding (a Detective Chief Superintendent) to the ACC for Crime. This governance and supervision structure is supported by a data dashboard, the Managed Offender Review Framework (MORF) that enables a current and accurate assessment of performance, the identification and escalation of individuals where additional intervention is required, and focus on areas of challenge that need to be prioritised. This has facilitated a much stronger organisational grip on TVP's management of sexual or violent offenders. For example, the MORF is used to prompt risk level reviews for those managed by TVP at MAPPA Level 1. This framework enables a current and accurate assessment of performance and demand of not

only the management of Registered Sex Offenders in Category 1, but also those being managed under Category 2 or 3. In addition to the MORF, there is a weekly management meeting, whereby any new information or intelligence received by TVP in the previous week is assessed. This is in addition to the 'notify if' flags that are applied to all Category 2 or 3 offenders, which I address below.

In May 2023, HM Inspectorate of Constabulary and Fire & Rescue Services (HMICFRS) conducted a National Child Protection Inspection for the Thames Valley area. The subsequent report commented that in 'Cases assessed involving sex offender management in which children have been assessed as at risk from the person being managed' there was 'very good liaison and information exchange with the probation service, including holding joint police and probation meetings with the registered sex offender' (pages 14 & 15). It also concluded on page 45 that:

'The quality of work with partner organisations to reduce risk from registered sex offenders is good. [...] In our case audits we found very good liaison and information exchange with probation officers from the National Probation Service, who manage offenders subject to court-imposed licence restrictions.'

While this aspect of the inspection predominantly focused on TVP's management of RSOs managed in Category 1, Category 2 and 3 MAPPA cases make use of the same information sharing processes with Probation and other partner organisations.

You have already referred in the PFD report to changes such as notification flags on Niche to provide MAPPA with relevant information. I would like to expand on this change since 2019-2020. The automatic 'notify if' marker for managed offenders notifies officers dealing with an individual that they are a managed offender, and directs them to the MOSOVO team, but also provides a notification to the MOSOVO offender manager whenever new information is added about that individual. It therefore provides assurance in two ways, to help MOSOVO offender managers to promptly make any necessary re-assessment threat, harm and risk, and to assist them in recording and sharing that information appropriately.

While I acknowledge that there is always scope for better joint working, and close liaison with HMPPS as regards both CT MAPPA and non-CT MAPPA, I am confident that the position as regards MAPPA in the TVP force area is far better than it was in 2019-2020.

Operation Plato and Force Incident Managers

You have also raised concerns over the declaration of Operation Plato, and the demands on Force Incident Managers (FIMs). Both of these matters fall primarily to TVP, as the local force.

The current version of the Operation Plato guidance is clear that a Tactical Firearms Commander (TFC) based in a force control room is responsible for the formal declaration of Operation Plato.

All FIMs are accredited Initial Tactical Firearms Commanders (ITFC) both occupationally and

operationally. Prior to commencing the role, any officer who wishes to become a FIM must attend and pass a national ITFC course. This is a residential course consisting of both classroom learning and scenario-based assessments. One of the scenarios covers the declaration of Operation Plato and how to respond to a rapidly unfolding Marauding Terrorist Attack (MTA). If the course is successfully passed, then the FIM is considered occupationally competent.

Once in role the FIM undergoes a period of mentoring, which on average is 3 months. They are allocated a mentor, who will ensure the FIM reaches operational competency. This not only covers firearms command but any other incidents/tasks that the FIM would be responsible for during their duty. FIMs are required to present evidence in a portfolio to show their operational competence. This evidence is reviewed and signed off by the Superintendent for firearms and Assistant Chief Constable for the Joint Operations Unit. To maintain operational competence all FIMs are required to attend two command-training days per year. For the 2023-24 training year one of the training packages was a table-top exercise based on an Operation Plato scenario at Blenheim Palace, Oxfordshire. The training was attended by Police, Fire and Ambulance service. It covered Joint Operating Principles for the Emergency Services and was structured around a series of paper feeds detailing an MTA. The issue of identifying an Operation Plato incident and the declaration of Operation Plato were specifically covered within this training package.

Every FIM must attend an ITFC reaccreditation course every five years. This must be passed to maintain competence. This course covers the declaration of Operation Plato and includes a MTA scenario in the final assessment.

In October 2023 all FIMs attended multi-agency training in response of the release of an updated Operation Plato policy. A training package is being developed to capture any new FIMs who have joined since this training.

Following the internal reviews of the response to the deaths that were the subject of these inquests, and the national learning from the Manchester Arena Inquiry, a number of amendments have been made to the TVP Operation Plato plan. You have referred to some of these in your report, but they include setting out clearly that only the FIM (as an ITFC) or another TFC could call Operation Plato, revisions to where the Plato control room would be situated (so that it corresponded to where the FIM was based, rather than being a pre-set location), the implementation of a 'hot line' to the Strategic Firearms Commander, the creation of Bronze Supervisor and FIM staff officer roles once Plato is declared, the allocation of an additional assistant to the FIM, and the implementation of the Emergency Services Inter Control Talkgroup. Each of these is intended to contribute to relieving the pressure on a FIM as and when Operation Plato is called.

I agree with your view that these arrangements need to be stress-tested, and am pleased to say that this is well in hand. On 24 April 2024 TVP, in conjunction with other agencies, undertook Exercise Pinnacle at Legoland Windsor in conjunction with a variety of other agencies. This tested the initial operational response to an MTA with a specific focus on the Operation Plato plan and control room communications in the immediate stages of such an

incident. As well as the operational staff on the ground, over 100 volunteers were employed to act as members of the public suffering from various injuries.

Exercise Pinnacle included the setting up of a dedicated Control Room, with the aim of stress testing the initial actions of the TVP Plato plan. This focused on the communication element with the aim of testing the effectiveness of the information flow and joint emergency service working.

The scenario was initially led by Fire and Rescue as an emergency response to a report of a fire at the entrance to Legoland. It then developed into an MTA, with reports of subjects attacking members of the public with bladed weapons. This triggered an unarmed, and then armed, response based on information provided to the Control Room.

Twenty-four pre-written calls were introduced at specific points during the operation, with the purpose of testing the communication flow of information from call to FIM to operational staff on the ground. Initial informal feedback has acknowledged the effectiveness of the Plato plan and that it appears fit for purpose.

A formal multi-agency debrief from this exercise took place on 18th June 2024, and the learning from it will be incorporated into further revisions to the Plato policy, which will be tested again in future in the same manner.

Publication

I acknowledge that this response will be sent to the Chief Coroner and other Interested Persons, and that you may send it to any other person who you believe may find it useful or of interest. I have no representations to make regarding publication of this response.

Conclusion

I would like to again express my gratitude for the opportunity to respond to your PFD report, and for the care and attention which you brought to the inquests. TVP and CTPSE remain committed to a close relationship with the families of Joseph Ritchie-Bennett, David Wails and James Furlong, who have made clear their wish to be kept up to date on the changes and reforms we are implementing as a result of the Inquests. In the same spirit, I would be very happy to meet with you to discuss any of the matters covered in your findings, the PFD report, or this response, if you would find that helpful at all.

Yours sincerely,

