

Mrs J Kearsley  
His Majesty's Senior Coroner  
HM Coroner's Court  
Floor 2&3 Newgate House  
Newgate  
Rochdale  
OL16 1AT

12 March 2025

Ref: [REDACTED]

By email: [REDACTED]

Dear Mrs Kearsley,

## **RESPONSE TO REGULATION 28: REPORT TO PREVENT FUTURE DEATHS**

The College of Policing and the National Police Chief's Council acknowledge the matters of concern raised in the Regulation 28 Report to Prevent Future Deaths dated 14 January 2025, concerning Anugrah Abraham. The suicide of Anu Abraham, a serving student officer on the 'Police Constable Degree Apprenticeship' (PCDA) with West Yorkshire Police, was a tragedy. The inquest has identified important learning for policing in relation to support for new police constable joiners to the service and processes during their probation period.

This joint response addresses the matters of concern directed to the College of Policing (the College) and the National Police Chiefs' Council (NPCC). The Director of the National Police Wellbeing Service (NPWS), Andy Rhodes has also contributed.

- The College was established in 2012 as the professional body for policing in England and Wales, its remit includes supporting professional development; sharing knowledge and good practice; and setting standards to drive consistency in key areas of policing.
- The NPCC brings police forces in the UK together to help the service coordinate operations, reform, improve and provide value for money. As well as leading the national operational implementation of standards and policy, the NPCC works with the College on the joint development of national approaches, for example, through its workforce portfolio.

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- The National Police Wellbeing Service (NPWS) sits within the College and also works closely with the NPCC. It was launched in 2019 to provide support and guidance for police forces across England and Wales to improve and build organisational wellbeing.

As the body responsible for setting standards for police constable initial education, the College provides national programme specifications, curriculum, and associated guidance for four 'police constable entry routes' (PCER). Forces design and deliver local PCER programmes in accordance with our requirements and often (including, for the PCDA) in collaboration with higher education institution (HEI) partners. The national documentation is subject to continual review and updating, including through close engagement with relevant NPCC national policing leads. The College also works with forces and HEIs to support their continual improvement of local PCER programmes.

We accept the Coroner's findings. Our response to this Regulation 28 report describes actions the College and NPCC will undertake to embed learning from your findings, through continuous improvement processes. The response also outlines a range of recent and ongoing nationally led work that relates to enhancing the student officer experience and support. It outlines activity connected with the national optimisation programme for PCER, which launched in April 2023, and which is led by the College and overseen by an NPCC chaired PCER Optimisation Group.

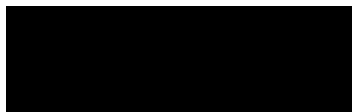
Forces acquire a licence from the College to design and deliver their own local PCDA programmes, in collaboration with HEI partners. The College will be introducing a number of changes to our national programme specification for the PCDA to respond to the inquest learning. The changes will be to strengthen wording and provide extra clarity, creating impetus for collaborations to review their approaches in these areas and make any improvements as required. In all cases the College will:

- apply the changes to the national specifications for all four police constable entry routes (PCDA, the 'degree holder entry programme', the route for holders of a degree in professional policing and the new 'police constable entry programme');
- have changes adopted in the next iteration of the specifications, due for release in April 2025;
- commence review of how forces have responded to the changes in the 2025/26 annual programme monitoring (in particular, the College will request evidence about how collaborations reassure themselves of the quality, consistency and appropriateness of relevant provision and policies through internal review mechanisms);

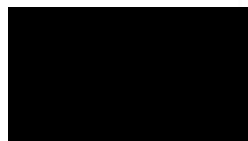
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- use this monitoring as an opportunity to seek out and share promising, innovative practice, to encourage continuous improvement in these critical aspects of programme design, delivery, and review.

Our full response is appended below. If you would like to discuss any of the content or require any further information, the Head of Recruitment and Initial Education at the College is available to assist. [Louise.Meade@College.Police.UK](mailto:Louise.Meade@College.Police.UK)

Yours sincerely



Chief Executive Officer  
College of Policing



**Chair**

**National Police Chiefs' Council**

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## **APPENDIX: Detailed Response**

### **Matter of Concern 1. Provision of Mental Health Nurses**

The Chief Medical Officer of Policing, Professor John Harrison has national oversight of Occupational Health provision within forces. He is aware of the Regulation 28 report and is communicating this concern to all forces through the Occupational Health practitioners' network.

### **Matter of Concern 2. Duty of Care & Organisational Learning**

The Director of the National Police Wellbeing Service provided evidence at the inquest and as the Co-Chair of the NPCC Health & Safety Wellbeing Board initiated a review into national oversight, governance, and assurance. In addition to this, the Board has communicated the areas of concern to all forces so as raise their awareness of the organisational learning outcomes and how these are best adopted and applied within forces.

The Board has national oversight of force activity and will continue to monitor the implementation of the recommendations raised.

### **Matter of concern 3: imminent adjustments when an officer discloses suicidal thoughts**

The national suicide action plan was launched in July 2024, and this was raised during the inquest in terms of force compliance, line manager guidance and also the proposal to fund national mental health crisis line exclusively for police officers and staff.

The NPCC Health Safety and Wellbeing Board is responsible for supporting forces to fully adopt the action plan. The duty of care to implement the national suicide action plan sits with each employer and a self-assessment review is scheduled for September 2025.

The mental health crisis line will be rolled out nationally from April 2025 with an ambition for all forces to be covered by March 2026. The crisis line will provide managers with a degree of support when faced with an 'imminent' risk because they will be able to promote and signpost staff towards it. However, it is the view of the NPCC Health Safety and Wellbeing Board that, when faced with disclosures of such a serious nature, managers should consider supporting the member of staff to access urgent NHS services via their GP or local mental health crisis services. The NPCC Board will clarify this issue with forces by end April 2025.

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## **Matter of concern 4. Student officer welfare in relation to the Police Constable Degree Apprenticeship (PCDA)**

### **Strengthening language in our national programme specifications**

Sufficient student officer support is one of the eleven core requirements for local PCDA programmes, as set out in the current College of Policing national specification for this police constable entry route. There are requirements for collaborations to support the student officers with their learning and well-being and with managing the challenge of becoming a police officer, while potentially managing wider responsibilities/ issues in their lives. The specification further raises that 'there may be many other ways that student officers need support and forces should endeavour to cater for these.'

In response to this Regulation 28 report, the College will strengthen wording in relation to this core requirement. Amended text will include that student officer support provided by collaborations should account for potential risks to student officer mental health and well-being. Further, where the specification says, 'lack of support in any one area could result in student officers deciding to leave the police service', extra text will be added 'and carries risk in relation to the mental health and well-being of the student officer.'

The College will communicate and follow-up responses to these changes, as described in the letter above, with the broad remit of focusing extra attention on mental health and well-being support.

### **The national optimisation programme for police constable entry routes (PCER)**

As presented in the College evidence during the inquest, a national optimisation programme has been underway for all PCER programmes since April 2023. The programme is led by the College and designed to deliver the objectives of the 'National Police Chiefs' Council' (NPCC) Optimisation Plan released in November 2022. A core objective is 'improved student officer experience, enhancing well-being and retention'. The optimisation programme is drawing on an extensive body of knowledge and learning about how to design and deliver the police constable entry routes. The PCDA was first launched in 2018 and around 18,000 new officers have joined policing through this route since then.

### **Progress to date**

Restructured curricula and new assessment requirements were released for all routes in late 2023 as part of the optimisation programme. These changes to national standards are focused on ensuring local programmes are vocational in nature and able to use best practice to make programmes effective and engaging. This includes an integrated approach, whereby multiple learning outcomes are delivered and assessed collectively, for example, through scenarios and simulations. Such approaches have educational benefits, including providing safe opportunities to develop and practice workplace skills. They also

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create opportunity to streamline programmes and reduce workload demands on new joiners.

For the PCDA and 'degree holder entry programme' it is now explicit that workplace assessment can be credit-bearing towards the linked professional policing qualification, hence reducing the need for additional assessment connected with these programmes.

The optimisation programme also has a range of activity focused on promoting a truly collaborative approach to PCDA and 'degree holder entry programme' design and delivery, between forces and their education partners. A new recruit survey we held in 2021, 2022 and 2023 revealed the programmes could feel disjointed in nature, with insufficient overlap between force and HEI delivered elements. Strong partnership approaches will lead to better student officer experiences.

The revision of the curriculum and assessment requirements at the start of the optimisation programme was a collective endeavour between forces, HEIs and the College. This spirit of joint working has been fostered throughout the optimisation programme, for example with joint national practice sharing events. A new national procurement framework was launched at the start of 2024, for forces to use for contracting HEI initial education partners. Collaborative, optimised practice and strong governance is embedded within contracts as standard, using this framework.

As well as promoting and supporting changes to the design and delivery of local programmes, national optimisation activity has included the launch of the new 'police constable entry programme' (PCEP). This route can be delivered entirely in-house by forces, without external accreditation – hence it offers a joining route for new officers that do not want to study for an academic professional policing qualification. 37 forces are due to be live with the route by the end of financial year 2024/25.

### Upcoming (2025/26)

In October 2024 the Secretary for State for Education approved simplified statutory assessment requirements for the PCDA, to come into effect from 1 April 2025. The PCDA will move to the regulated profession, fully-integrated degree apprenticeship model - the same as the nursing degree apprenticeship. This change frees up more opportunity to adjust assessment methods, again to make them more vocational in nature. Pressure on student officers will be reduced by a change to the 'end-point assessment' (EPA). The EPA will become a final approval process, with all assessment of the student officer having already been completed. It is also explicit (in College supporting guidance for the changed EPA) that forces and their education partners can consider alternatives to the final 10,000 word written dissertation.

The upcoming changes to the PCDA have been widely communicated, including through a briefing to all chief constables, police and crime commissioners, force finance and learning

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and development leads and to HEIs involved in PCER delivery. There was also coverage in the professional policing online press. The College has been promoting and enabling collaborative problem-solving, bringing together forces and university partners to share ideas about how to make the most of the opportunities posed by the new PCDA standard.

Changes allowed under the new apprenticeship standard can be introduced for existing cohorts, where it is manageable to do so. Cohorts undertaking the former EPA already benefit from a reduction in the pass-mark from 50% to 40%, introduced and agreed with the Institute for Apprenticeships and Technical Education (IfATE) in July 2023.

Learner support roles, including tutor constables, are critical to the successful delivery of all PCER programmes. Throughout the optimisation programme there has been activity to promote and support their professional development. Building on this, the College will imminently be releasing a new, extended tutor constable training package which forces will be able to deliver flexibly in-house. The training is designed to align with the new tutor constable standard and curriculum, which the College released in 2024. The training will include content on student officer well-being.

### Continuous improvement

Optimisation programme benefits measurement activity will continue in 2025-26, including work to gather insight into how local PCER programmes have been re-shaped. The College will be embedding new national approaches to promoting continuous improvement of local programmes. The College will be working to identify promising and less promising approaches to design and delivery through its annual monitoring of local PCER programmes and review of national data (for example on retention rates). The College will be supporting forces with their own local evaluation of programmes, encouraging stepped-up approaches that enable deeper insight into student officer experiences, well-being and satisfaction.

### **Matter of concern 5. Sharing of information regarding student officer progress**

The inquest hearing revealed that early concerns regarding Anugrah Abraham's progress on the PCDA programme were not appropriately shared, neither with him nor with all relevant assessors and managers. This is counter to the intentions of core programme requirements set by the College, including core requirement seven concerning student officer support. Forces and education partners are required, for example, to provide guidance to student officers to enable their progression through the programme. This guidance should include regular verbal and/or written assessment feedback to student officers, as well as 'regular opportunities to review their progress and goals to revise their individual learner plan to meet their targets'.

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Core requirement eight concerns programme staffing, including that there is clarity on responsibility and accountability for each role involved in programme development, delivery and maintenance. The College will add extra text to this core requirement, to make a more explicit requirement that there are policies/ processes/ governance in place to ensure appropriate communication and sharing of information between roles. This is particularly important for the PCDA programme, where both forces and education partners, including multiple teams within forces, are involved in delivery, assessment and providing support to student officers.

The College will also adjust core requirement one (programme governance and management) to add a specific expectation that records will be kept and appropriately made available, in relation to how a student officer is progressing and whether they are likely to achieve full operational competence as a police constable.

As well as the imminent new tutor constable training and already released associated standard, the College is developing a new assessor module for its well-established “Training Essentials Programme”. The new assessor module has been piloted in three forces and is undergoing further development, ready for wider use by forces in 2025. This training complements the College assessor standard released last year, and both address the assessor role in providing feedback.

The College is working with forces to develop and launch a new national ‘Professional Development Review (PDR) strategy’ and supporting guidance in 2025. It will be promoting and supporting a consistent approach to PDR within forces. Regular PDR conversations can play an important role in supporting officer wellbeing, motivation, performance, accountability, and career progression. By facilitating one-to-one conversations with managers, they create opportunity to review and reposition goals, resolve challenges/issues, support resilience and discuss continuing learning and development. While not directly raised as a matter of concern the College will, as part of communicating changes to PCER programme specifications, raise the importance of reviewing transition arrangements and guidance for student officers that want to or may benefit from moving to an alternative entry route, including policies and guidance for gaining credits towards an alternative qualification (where relevant).

### **Matter of concern 6. Consideration of regulation 13 processes for PCDA students**

The College will ensure that the response to matter of concern 5 (above), on the sharing of information, will specifically reference the sharing of information about concerns with performance and any associated processes that are commenced. However, regulation 12 and 13 of the Police Regulations 2003 are the responsibility of the Home Office and developing guidance for forces on their use is outside of the remit of the College. The Home Office is cognisant of the need to provide more comprehensive guidance on the use of regulation 13 to assistant forces with its consistent use. This was a finding of the Home Office **review of the process of police officer dismissals** (published in September 2023)



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and the Home Office has given a recommendation to itself to develop the extended guidance.

Changes to the national apprenticeship standard for the PCDA, described under matter of concern 4 (above) are relevant to concerns about regulation 12 and 13 notifications for PCDA student officers. The lowering of the EPA pass-mark from 50% to 40% in July 2023, has directly reduced the risk that student officers could fail their PCDA programme and hence risk a regulation 13 notification because of their academic performance. The additional forthcoming major changes to the EPA, which will come into effect from 1 April 2025, will reduce this risk further. Under the new PCDA apprenticeship standard, all assessments of PCDA student officers will have been completed prior to the EPA. Further, there is extra clarity that collaborations have flexibility around assessment methods used in year three. There are opportunities (supported by the wider optimisation programme work) to streamline processes, reduce workload burden on student officers and spread-out assessments to reduce pressure in the final programme year.