

## REGULATION 29 RESPONSE TO A REPORT ON ACTION TO PREVENT FUTURE DEATHS

Please do not include any living person names in this document, in accordance with the Chief Coroner's [publication policy PDF](#).

THIS RESPONSE IS BEING SENT TO:

**The Coroner, Emma WHITTING for the Coroner Area Bedfordshire and Luton Coroner Service** in response to a '**REPORT TO PREVENT FUTURE DEATH REGULATION 28**' following an investigation into the death of **Suseel RANA**, and an inquest that concluded on **15 April 2026**.

1.	<b>RESPONDENT</b>  In line with our duty under Regulation 29 of the Coroners (Investigations) Regulations 2013, Chief Constable [REDACTED] and The Rt Hon [REDACTED] MP provides this response within 56 days of the date of the Report to Prevent Future Deaths or any extension granted.
2.	<b>DATE OF RESPONSE</b>  16 June 2026
3.	<b>CONFIRMATION OF CORONER'S MATTERS OF CONCERN</b>  The <b>MATTERS OF CONCERN</b> were identified in the report are as follows:  1) As was highlighted by the DARDR & SAR investigations, all relevant agencies 'worked in silo' rather than holistically and, whilst police responded in line with good practice to the criminal allegations made, this did not, in fact, subdue the Deceased's fear of further domestic abuse. 2) In seeking some reassurance as to her safety, the Deceased had made a Clare's Law application under the Domestic Violence Disclosure Scheme (DVDS) prior to her death; however, this was had not been progressed by Police. 3) The reason for the lack of progression of the Deceased's Clare's Law application appear to have been based on a misunderstanding by the investigating officer that Clare's Law could not be used in respect of a previous partner. 4) Neither the investigating officer nor the supervising officer appeared to recognise that the Deceased's level of anxiety, as indicated by her Clare's Law application, required further safety planning. 5) The lack of progression of the Deceased's Clare's Law application to the actual decision making stage meant that the steps envisaged by the DVDS Guidance, which included a referral to a multi-agency forum (as illustrated by Figure 1 on page 8 of the Guidance), were not taken. Had such steps been taken, it is likely that the Deceased would have been more supported. 6) Whilst paragraph 76 of the DVDS Guidance states: "The police may make the

	<p>decision not to progress the disclosure following the completion of intelligence checks" - it is not currently clear whether the intention of the Guidance is for Police still to proceed to the decision making stage as to whether to make any disclosure or not (which would involve the multi-agency referral referenced above) or, whether, in that situation no further steps at all are required (as occurred in respect of the Deceased's application).</p>
<p>4.</p>	<p><b>DETAILS OF ACTION TAKEN</b>, how has the concern been addressed. [If no action is proposed please explain why here. If you feel that the response should not have been sent to you, please state this].</p> <p><i>Any links to webpages included in the response will not be checked for sensitive information prior to publication, as the information is already online.</i></p> <p>Bedfordshire Police recognise the importance of the Domestic Violence Disclosure Scheme (DVDS) and safeguarding frameworks.</p> <p>Whilst Bedfordshire Police maintain that the applications in this case were progressed in accordance with established policy, we recognise the Coroner's concern and have taken steps to ensure clarity in both the understanding and articulation of the process.</p> <p><b><u>Concern 1</u></b></p> <p><i>In seeking some reassurance as to her safety, the Deceased had made a Clare's Law application under the Domestic Violence Disclosure Scheme ("DVDS") prior to her death; however, this was had not been progressed by Police.</i></p> <p><b>Response</b></p> <p>The Deceased submitted two DVDS applications:</p> <ul style="list-style-type: none"> <li>• One relating to a new developing relationship</li> <li>• One relating to a previous partner</li> </ul> <p>Both applications were accepted, progressed through all relevant stages, subject to intelligence checks and reviewed at supervisory level.</p> <p>Each application reached formal decision-making stage, where a determination of non-disclosure was made. Both decisions were communicated to the Deceased.</p> <p>It is therefore not accepted that the applications were not progressed; rather, they were progressed to conclusion in accordance with policy, resulting in decisions not to disclose.</p>

### **Concern 2**

*The reason for the lack of progression of the Deceased's Clare's Law application appear to have been based on a misunderstanding by the investigating officer that Clare's Law could not be used in respect of a previous partner.*

### **Response**

The DVDS applies to both current and former partners. This is clearly reflected in Bedfordshire Police policy and practice.

The application regarding the former partner was progressed and assessed in line with this framework.

Whilst the recording of the rationale mentioned this being a former partner, the decision not to disclose was based on:

- The absence of relevant disclosable information following intelligence checks;
- and
- Consideration of necessity and proportionality in line with DVDS guidance

The DVDS requires not only the presence of information, but that disclosure is necessary and proportionate to protect the applicant from harm.

Whilst the scheme applies to former relationships, the context of the relationship is a relevant factor when assessing risk and necessity.

The decision reached was therefore considered and proportionate outcome, and not attributable to any misunderstanding of policy.

### **Concern 3**

*Neither the investigating officer nor the supervising officer appeared to recognise that the Deceased's level of anxiety, as indicated by her Clare's Law application, required further safety planning.*

### **Response**

Bedfordshire Police recognise that a DVDS application may indicate vulnerability and requires safeguarding consideration regardless of the disclosure outcome.

Officers and Staff working within Domestic Abuse Investigations Teams are trained and experienced in recognising the impact of anxiety and vulnerability on victims. In this case, the Deceased was already engaged with mental health services, and two Victim Engagements Officers were in regular contact, and additional support options, including counselling referrals were provided.

Officers considered the full safeguarding picture, including the existing multi-agency involvement, professional assessments and ongoing engagement with support services.

The evidence demonstrates the safeguarding measures were in place, actively maintained, and supplemented where appropriate.

#### **Concern 4**

*The lack of progression of the Deceased's Clare's Law application to the actual decision making stage meant that the steps envisaged by the DVDS Guidance, which include a referral to a multi-agency forum (as illustrated by Figure 1 on page 8 of the Guidance), were not taken. Had steps been taken, it is likely that the Deceased would have been more supported.*

#### **Response**

Both DVDS applications were progressed through established processes and subject to supervisory oversight.

The case did not meet the criteria for escalation to MARAC, as it did not reach the threshold for high-risk categorisation under recognised assessment frameworks.

Notwithstanding this, the Deceased was already known to and being supported by Mental Health Services and safeguarding professionals, such as Victim Engagement Officers deployed by Bedfordshire Police.

As such, safeguarding was delivered within an existing multi-agency framework, even in the absence of formal MARAC referral.

#### **Concern 5**

*Whilst paragraph 76 of the DVDS Guidance states: "The police may make the decision not to progress the disclosure following the completion of intelligence checks" – it is not currently clear whether the intention of the Guidance is for Police still to proceed to the decision-making stage as to whether to make any disclosure or not (which would involve the multi-agency referral referenced*

	<p><i>above) or, whether, in that situation no further steps at all are required (as occurred in respect of the Deceased’s application).</i></p> <p><b>Response</b></p> <p>Paragraph 76 of the DVDS Guidance relates to the “right to know” pathway, which differs from the “Right to Ask” process engaged in this case.</p> <p>Regardless of the route:</p> <ul style="list-style-type: none"> <li>• Intelligence checks are completed</li> <li>• A supervisory review is completed</li> <li>• A formal decision is recorded in all cases</li> </ul> <p>In this matter, these steps were followed in full. A decision of non-disclosure does not indicate a lack of progression but rather reflects completion of the DVDS process in line with guidance.</p>
5.	<p><b>DETAILS OF FURTHER ACTION PROPOSED</b>  <i>Any links to webpages included in the response will not be checked for sensitive information prior to publication, as the information is already online.</i></p> <p>Whilst Bedfordshire Police are satisfied that relevant policy and procedures were followed in this case, we recognise the importance of maintaining and reinforcing high standards in safeguarding.</p> <p>We will continue to apply and embed existing guidance and established practices, ensuring that decision-making remains informed, consistent and appropriately focused on the identification and management of risk and vulnerability. This ongoing approach provides assurance that safeguarding considerations remain central to operational practice.</p>
6.	<p><b>SIGNATURE</b></p> 