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RESPONSE TO THE REPORT TO PREVENT FUTURE DEATHS UNDER REGULATION 28 OF THE CORONERS (INVESTIGATIONS)REGULATIONS 2013

CORONER'S REF / INQUEST INTO THE DEATH OF: Chloe Olivia Moffat (d.o.b. 1998 – d.o.d. 20 May 2025)

Thank you for your Regulation 28 Report to Prevent Future Deaths, dated 12 August 2026.

On behalf of HM Treasury, the Cabinet Office and the wider Civil Service, we extend our deepest condolences to Chloe's family, friends and colleagues. Chloe was a valued member of HM Treasury, and her loss has been felt profoundly across the department.

HM Treasury and the Cabinet Office accept the concerns identified in your Report and take them extremely seriously. We are committed to ensuring that the lessons arising from Chloe's death result in meaningful and lasting improvements. HM Treasury has also accepted all the recommendations arising from its independent review, which was shared with you in January as part of the inquest process.

Your Report identifies risks arising where allegations that, if substantiated, could constitute serious or gross misconduct are initially considered through an informal process without the safeguards of a formal disciplinary procedure. HM Treasury has considered these concerns carefully and has taken immediate steps to mitigate the identified risks, including introducing additional safeguards to support employees. While this work introduces some enhancements, much of it is intended to strengthen, clarify and build on the procedures and support already in place.

The Cabinet Office has undertaken an initial review of disciplinary policy and operational practice to address these risks across the wider Civil Service.

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Immediate actions taken in HM Treasury in response to PFD and Independent Review

The inquest identified that the use of informal fact-finding meetings for allegations of potential serious or gross misconduct was not expressly provided for in written policy and lacked clear procedural boundaries. This central concern was consistent with the findings of the earlier independent review, which recognised that line managers and HR had acted with Chloe's wellbeing in mind but identified the same procedural weakness. HM Treasury has accepted the findings in the Report in full. In direct response to the inquest findings, HM Treasury immediately stopped using informal fact-finding meetings for allegations of potential serious or gross misconduct, introduced strengthened procedural and wellbeing safeguards, and issued urgent interim guidance (further detail below) while a full policy review is undertaken.

The actions taken in HM Treasury in response to each of your concerns are set out below:

Formal procedure for serious or gross misconduct

Where allegations may amount to serious or gross misconduct, the matter will proceed directly under the formal disciplinary procedure. Informal fact-finding meetings will not be used in such cases. This ensures that the safeguards within the formal procedure apply from the outset as recommended.

Advance notice of allegations and potential outcomes

Before an employee is asked to respond to allegations of potential serious or gross misconduct, they will receive written details of the allegations and the possible outcomes. The revised guidance expressly requires the line manager to consider the employee's wellbeing from the outset, providing additional sources of support and ensuring they do not receive a formal letter without prior personal notification. Wherever possible, the written notification of allegations will be provided in person. Where this is not possible, the employee will be notified before it is sent and offered a discussion that day.

The notification will set out the provisionally assessed level of misconduct and the corresponding range of possible penalties if the allegations are substantiated. It will make clear that no outcome has been predetermined and that any decision will depend on the facts established through a fair process. Where dismissal is a possible outcome, the employee will be told expressly before the relevant disciplinary meeting. It will also be made clear when dismissal is not a likely outcome. Written notice will be given before any formal meeting, allowing the employee time to seek advice, prepare and arrange representation.

Right to be accompanied

As allegations of potential serious or gross misconduct will proceed directly under the formal procedure, employees will have the right to be accompanied by a trade union representative, colleague or Treasury Supporter. The notice period will provide sufficient time for the employee to seek advice and arrange representation.

Revised guidance emphasises that employee wellbeing is paramount and that appropriate representation, support and procedural safeguards must be available from the outset.

Minor misconduct matters

Cases below serious or gross may continue to be addressed informally where appropriate, in accordance with revised guidance that establishes clearer procedural boundaries and safeguards proportionate to the nature of the concern. These safeguards include reasonable notice and information to prepare, early consideration of wellbeing and vulnerability, access to advice and support, and pausing the meeting if wellbeing concerns arise. Employees may also ask to be accompanied by a colleague for personal support at any disciplinary meeting.

Wider safeguards

HM Treasury has also strengthened wider safeguards to deliver a wider culture of duty of care and wellbeing. Wider changes include:

- strengthening specialist casework capacity and establishing clearer escalation routes for sensitive cases to improve oversight and consistency;
- enhancing its wellbeing support offer, including onsite Occupational Health provision, additional referral routes, external therapy providers and access to clinical and trauma-informed care;
- requiring Director-level approval before an employee is suspended, has their duties restricted or has their access revoked;
- ensuring that confidentiality requirements are proportionate and do not prevent employees from seeking trusted support;
- strengthening induction and support for new and early-career staff;
- improving guidance and training for managers handling difficult conversations;
- developing a suicide-prevention framework and enhancing post-incident support, including coaching, suicide first-aid support and Mental Health First Aider debriefs;
- strengthening its response to bereavement, traumatic incidents and concerns about employee wellbeing;
- reporting on progress and sharing learning across the Civil Service to support wider improvements in policy and practice.

Taken together, these measures directly address the concerns identified in the Prevention of Future Deaths Report by ensuring that cases involving potential serious or gross misconduct enter the formal procedure from the outset, and that employees receive advance written notice, clear information about possible outcomes, and the right to be accompanied. They go further to strengthen our wider approach to duty of care at all stages of disciplinary processes.

HM Treasury remains committed to engaging with Chloe’s family as these improvements are implemented and will meet with them again to discuss progress and hear their views.

Civil Service-Wide Review of Discipline Policy and Practice

Alongside the action taken by HM Treasury, the Cabinet Office initiated a two-phased cross-government review, comprising a short-term and a long-term phase which aimed to:

- make an assessment of the nature and extent of any potential issues within the Civil Service;
- identify remedial measures to be taken forward, both in the short term and longer term.

The Cabinet Office conducted the initial stage of the review which focussed on both the Civil Service HR Model Discipline Policy and operational policies and practices across central government departments to:

- identify the presence and extent of informal fact-finding meetings that may be conducted with employees who are the subject of allegations of serious or gross misconduct; and
- consider the safeguards in place during both informal and formal meetings for all cases of misconduct, including serious or gross misconduct.

The Cabinet Office has worked in formal collaboration with the Government Legal Department (GLD). They are also working with the Advisory, Conciliation and Arbitration Service (Acas) to share lessons learnt as part of their wider review of the Discipline and Grievance Code.

While the review across central government departments demonstrated that formal misconduct procedures, largely reserved for serious and gross misconduct, embed the core safeguards identified by the Coroner, practical application and policy interpretation highlighted potential vulnerabilities. There was some evidence of informal fact-finding meetings being held in cases involving allegations of serious or gross misconduct, which could pose risks to employee safeguarding and wellbeing under those circumstances. This reinforced that duty of care, safeguarding and wider wellbeing measures must be embedded throughout every stage of the disciplinary process, both informal or formal.

In response to these findings, the Cabinet Office will provide supplementary guidance to all departments in the short-term targeting areas of potential for risk. This will focus on three key areas with the aim of making sure safeguards are clear and there is recognition of different approaches needed for informal and formal processes:

- initial assessment stage and procedures,
- early informal actions; and
- application of fast-track mechanisms.

In the longer term, over the next 12 months, the Cabinet Office will undertake a wider phase of work examining workplace conflict and resolution across the Civil Service. This initiative will incorporate findings from the internal review and also the wider actions initiated by HM Treasury, as well as focus on:

- adoption and implementation of revised policies and associated practices drawn from best practice across sectors;
- safeguarding, duty of care and wellbeing for all individuals involved in the discipline process;
- building capability and confidence of individuals, at all levels involved in workplace conflict, discipline and resolution; and
- broader government work, including Acas's revised Code of Practice on Disciplinary and Grievance Procedures when it is launched in 2027.

Conclusion

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We trust this response demonstrates to the Coroner that HM Treasury, the Cabinet Office, and the broader Civil Service have taken decisive action to address the concerns raised in the Regulation 28 Report. We remain dedicated to ensuring our workplace policies provide the highest standards of fairness, clarity, and protection for all our employees. Once again, we extend our deepest condolences to Chloe's family, friends and colleagues.

We raise no objections to the Chief Coroner publishing this response in full on the Courts and Tribunals Judiciary website.

Yours sincerely,

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Civil Service Chief Operating Officer &
Cabinet Office Permanent Secretary

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