

**INQUESTS ARISING FROM THE DEATHS  
IN THE WESTMINSTER TERROR ATTACK OF 22 MARCH 2017**

---

**SUBMISSIONS ON BEHALF OF THE LONDON AMBULANCE SERVICE NHS TRUST  
(LAS)  
FOR PRE-INQUEST HEARING ON 15 JANUARY 2018**

---

References to [p/ ] are to submissions by counsel to the inquests  
dated 4 January 2018.

**Introduction**

1. The LAS is an interested person in relation to each inquest pursuant to s47(2) of the Coroners and Justice Act 2009: see pre-inquest hearing directions dated 19 May 2017.

**Organisation of Inquests**

2. The LAS agrees it is preferable to hear the inquests into the deaths of all the victims, including PC Palmer in one hearing; and then immediately afterwards, to hear the inquest into the death of Khalid Masood (with a jury). The LAS agree with the reasons put forward by counsel to the inquests and considers this to be the most efficient way forward.

**Scope of Inquests**

3. The summary in relation to the scope of inquiry is agreed. The key issue for LAS relates to the care, assistance and treatment given to the victims and Khalid Masood, with no suggestion of inappropriate care, assistance or treatment by the LAS having been made.

**Summoning of Jury / Juries**

4. The LAS agree with the proposals relating to the summoning of a jury, for the same reasons set out at paragraph 2 above.

## **Article 2, EHCR**

5. The LAS agree with counsel to the inquests in this respect, noting that Article 2 is not engaged insofar as the care, treatment and assistance given by the LAS is concerned.

## **Disclosure**

6. The LAS notes that “Confidentiality undertakings were obtained from IPs’: [p/11] and this may be the case for other interested persons but is not for the LAS. The LAS requested the ‘specified form’ required for such undertakings verbally and in writing,<sup>1</sup> but these have not yet been provided. Disclosure as required by the pre-inquest directions dated 19 May 2017 has not therefore taken place.
7. The LAS note the explanation as to why Tier 1 statements have not been disclosed, but it is not clear why the additional classes of documents (NHS witness statements, post-mortem examination reports) have not yet been disclosed. It is hoped they will be disclosed at the earliest opportunity.
8. The LAS are also keen to ensure any draft statements taken by the police from interviews with LAS personnel are disclosed to the LAS prior to any disclosure to interested persons. The LAS has requested confirmation on 19 and 26 May 2017<sup>2</sup>.

## **Witnesses for the Inquests, Video Evidence, Expert Evidence**

9. The LAS agrees with the proposals set out for witnesses, video evidence/visual aids and expert evidence at [p/11-13].

## **Anonymity/Special Measures**

10. The LAS takes a neutral position in respect of the application for anonymity and special measures made by the MPS on behalf of the two armed officers who confronted Khalid Masood.

## **Public Interest Immunity / Security Sensitive Evidence**

11. The LAS does not take issue with the position set out in respect of security sensitive evidence. The provision of such further information by the Secretary of State should however take place promptly, so as to ensure the inquests are ready for hearing in September 2018.

---

<sup>1</sup> see email from Philip Hatherall of Capsticks to Hayley Davies Legal Assistant to Dr Wilcox dated 26 May 2017, 18:31

<sup>2</sup> see email correspondence between Philip Hatherall and Hayley Davis, 19 May 2017, 18:13 – 26 May 2017, 18:31.

## **Venue and Timing of Inquest / Future Case Management**

12. A time estimate for the inquests would be helpful although it is acknowledged this will depend on directions given at the pre inquest hearing.

Philip Hatherall

Capsticks Solicitors LLP

Solicitors for LAS

10 January 2018

Ref PJH/115779