

**THE CHIEF CORONER
HHJ LUCRAFT QC**

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

**FURTHER SUBMISSIONS ON BEHALF OF THE WIDOW OF PC KEITH PALMER
IN RELATION TO THE REQUEST TO DISCLOSURE
AND THE TIMING OF THE CALLING OF COMMANDER USHER**

1. The widow of Keith Palmer wishes to press on with the inquest. She does not support the deferral of the calling of Commander Usher. However, we wish to record our concern, in advance of his evidence, as to the most recent submission issued by MPS on Sunday 23 September 2018.
2. We note that MPS agree that PCs Ashby and Sanders were not where they were supposed to be at the time of the attack (paragraph 6 of MPS submission). In our submission dated 20 September 2018 we identified four propositions which, we considered (based on the evidence), were uncontroversial:-
 - (i) AFOs as a matter of routine were not in close proximity of the Carriage Gates,
 - (ii) the requirement for AFOs to be in close proximity to the gates whilst they were open was not known by AFOs,
 - (iii) PC Sanders and Ashby were not as a matter of fact in a position from which they could provide effective assistance at the gate at the time of the attack, and
 - (iv) unarmed officers at the gates were particularly vulnerable in that location.
3. We observe that (i) and (ii) were points of general application and point (iii) related to PCs Ashby and Sanders specifically.
4. Given the above, in our submission, on any view, the system of security was not adequate for the threat level at the time. We note that an attack of the sort that occurred was considered to be highly likely.
5. We are disappointed by the MPS's attempts to refocus responsibility for failures outlined in paragraph 2 above on PCs Ashby and Sanders alone. Its failure to accept any wider responsibility is exemplified by paragraphs 6 & 7 of the MPS's most recent submission.

6. PCs Ross, Glaze and Ashby have all given evidence to the effect that there used to be a fixed post at the gates. Whether that is correct or not, the thrust of their evidence was clear. There was once a time when AFOs were present at the gates to a far greater extent than was the position for the period of (at least) 2 to 3 years prior the attack.
7. The MPS's recent submissions contain no acceptance that there were any systemic failings on its part despite the fact that, over a prolonged period of time, AFOs generally (and not simply PCs Ashby and Sanders) had not complied with the post instructions which pertained to sector 3. The evidence indicates that there would have been opportunities on a daily basis for those responsible for those supervising AFOs to appreciate these failings.
8. The MPS must resist the temptation to duck and weave. As noted in paragraph 6 of the submissions of the family of PC Palmer if there is to be any suggestion that the evidence given by PC Sanders to the effect that between 50-100 AFOs carried out their duties in the same manner as PCs Ashby and Sanders did on 22 March 2017 then further enquiries of the sort that they describe will become necessary (enquiries as to what was known by Sergeants, Duty Officers, Inspectors etc and what briefings were delivered by them).
9. We cannot rule out the necessity for Commander Usher to be recalled.

Dominic Adamson
Temple Garden Chambers
20 September 2018