

OPUS 2

INTERNATIONAL

Inquests arising from the deaths in the Westminster Terror Attack of 22 March
2017

Day 10

September 24, 2018

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1 Monday, 24 September 2018
 2 (9.30 am)
 3 (Proceedings delayed)
 4 (9.43 am)
 5 Submissions by MR HOUGH QC
 6 THE CHIEF CORONER: Good morning, Mr Hough.
 7 MR HOUGH: Good morning, sir.
 8 As you know, the witness scheduled to give evidence
 9 for most or all of today is Commander Usher. By a note
 10 sent to the Inquest team at 8.20 on Friday evening, the
 11 representatives of PC Palmer's siblings and parents
 12 asked for Commander Usher's evidence to be put off
 13 pending further inquiries.
 14 THE CHIEF CORONER: Yes.
 15 MR HOUGH: The note also suggests that consideration is
 16 being given by their team to instructing a firearms or
 17 ballistics expert if Legal Aid funding is forthcoming.
 18 We have had a response from the Metropolitan Police
 19 resisting the application. We have also had a response
 20 this morning from the representatives of PC Palmer's
 21 widow, also saying that Commander Usher's evidence
 22 should be heard today, but unsurprisingly, disputing
 23 some of the substantive arguments being made by the
 24 Metropolitan Police about the facts of the case.
 25 THE CHIEF CORONER: And I think the other point that

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1 Mr Adamson makes at the end of his written document is
 2 that there is the possibility that Commander Usher may
 3 have to be recalled?
 4 MR HOUGH: He does.
 5 Sir, the representatives of PC Palmer's siblings and
 6 parents yesterday also provided an addendum note calling
 7 primarily for a review by you of Sir Jon Murphy's
 8 post-attack report on parliamentary security.
 9 THE CHIEF CORONER: Yes.
 10 MR HOUGH: Sir, I have spoken to Ms Stevens and we are in
 11 agreement that you should hear brief submissions from
 12 me, because we haven't put in a note, and that she can
 13 also be very brief because her note is comprehensive.
 14 THE CHIEF CORONER: Yes, and can I simply say, Mr Hough,
 15 I'm grateful to those who have sent in notes.
 16 I appreciate they came over the weekend, but they were
 17 sent on to me and I have had the chance to read them
 18 over the weekend, so I'm, as it were, familiar with the
 19 issues and the concern expressed in relation to calling
 20 Commander Usher.
 21 MR HOUGH: Yes, sir.
 22 By way of preliminary observation, may I stress that
 23 the Inquest team has shown no lack of interest in or
 24 scrutiny of the issue of Palace security arrangements.
 25 The security-cleared members of your team, counsel and

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1 solicitor, have carried out extensive reviews of the
 2 reports into Palace security. It was we who raised the
 3 issue back in April requiring statements from the MPS
 4 and Parliamentary Authorities on a wide range of issues.
 5 It was you, as Coroner, who set a deadline for provision
 6 of those statements by mid-July. It was me who then
 7 asked two sets of follow-up questions after receiving
 8 Commander Usher's first statement and I hope to
 9 demonstrate in examination of Commander Usher
 10 a continued commitment to detailed scrutiny of this
 11 topic.
 12 We say respectfully that Commander Usher's evidence
 13 today should not be put off for five reasons: first of
 14 all, there is ample material to permit him to be
 15 properly examined on the topics of Palace security,
 16 which includes relevant material from security reviews
 17 going back over 15 years, the last two sets of post
 18 notes for armed officers, the relevant parts of tactical
 19 assessments underpinning them, the evidence of the armed
 20 firearms officers in New Palace Yard on the day, and
 21 from two others who had been AFOs in previous years, the
 22 DPS investigation document and emails expressing
 23 concerns which Commander Usher has exhibited to his
 24 second statement. The questioning of PCs Ashby and
 25 Sanders demonstrates that critical points may be made.

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1 Secondly, proper attention has been given to the
 2 request for further inquiries. The Inquest team gave
 3 a point by point response in particular by letter dated
 4 last Monday, 17th.
 5 Thirdly, many of Ms Stevens' points put as
 6 disclosure requests are, on analysis, questions to be
 7 asked of Commander Usher. Some may be good questions,
 8 but in our submission, the best solution is to call him
 9 and have him answer the relevant questions. It is,
 10 I think, in that spirit that PC Palmer's widow supports
 11 calling him.
 12 Fourth, as your ruling dated 16 September
 13 recognises, a late disruption of the Inquests in this
 14 way causes inconvenience to more than one witness and
 15 more than one interested person.
 16 Fifthly, while we shall continue to engage with all
 17 further requests in a respectful way, it is not ideal
 18 for an application of this kind to be received after
 19 close of business on the last working day before the
 20 witness has to be called.
 21 So dealing with the request for inquiries Ms Stevens
 22 has helpfully distilled them in paragraph 24 of her
 23 Friday note, and for the sake of completeness, let me
 24 deal with them.
 25 First of all post instructions from May 2010 and

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1 supporting tactical assessments. Sir, the two most
2 recent sets of post instructions have been provided, as
3 have relevant parts of the two most recent tactical
4 assessments. The relevant sections of earlier post
5 notes have been disclosed for context going back several
6 years. In our submission, further inquiries in this
7 area aren't required, bearing in mind that this is
8 an inquiry into what happened in March 2017, not
9 an inquiry into historic systems or how they came to
10 change many years ago.

11 Secondly, records of checks of compliance with post
12 notes. We have been told that these don't exist.

13 Thirdly, records of briefings. The MPS have stated
14 that all material in this category have been provided
15 and we have no basis for disbelieving them.

16 Fourthly, consultation about keeping Carriage Gates
17 closed. That topic, sir, is covered in the evidence of
18 Commander Usher and Mr Hepburn and will be dealt with in
19 questions.

20 Fifthly, documents about changes to the ADAM system
21 in recent times. Sir, it's hard to see, we say, this is
22 relevant to the inquiry into the events of March 2017 or
23 how they came to take place.

24 Sixthly, material underpinning the DPS comment that
25 staff considered post notes to be advisory. This has

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1 been answered and, in any event, the Inquests are not
2 an inquiry into the DPS investigation.

3 Seventhly, training material, this has been answered
4 and the questioning of PCs Ashby and Sanders has, in our
5 submission, thrown up no further areas for inquiry.

6 Dealing with yesterday's note, as, sir, we have
7 submitted before, the Inquest team has thoroughly
8 reviewed Sir Jon Murphy's report alongside all the other
9 reviews. It was by reference to that review, amongst
10 other material, that the topic areas document of April
11 was prepared.

12 Sir, in our submission it is not surprising that the
13 relevant gist of material in Commander Usher's statement
14 from reviews comes from pre-attack reviews because that,
15 of course, is what is relevant to deciding if proper
16 decisions were taken at the time.

17 Finally, a few points on expert evidence because the
18 topic has been raised. As we understand it, it's
19 suggested that expert evidence may be relevant to the
20 question of whether PCs Ashby and Sanders, if they'd
21 been in the area of Carriage Gates at 14.40 on 22 March
22 last year, would have successfully shot Khalid Masood
23 before he had inflicted fatal injuries on PC Palmer.

24 Sir, I recognise that Ms Stevens isn't asking you to
25 instruct an expert, but of course, we have given

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1 consideration to the point and, in our submission,
2 expert evidence, whether of a ballistics expert or some
3 other expert, wouldn't assist on this issue. The issue,
4 in our submission, is primarily a factual question or,
5 rather, a series of factual questions for you to
6 consider. Would the officers, or either of them, have
7 moved towards the sound of the crash? If so, would he
8 or they have moved back? Where would they have been
9 when Masood entered? At what level of readiness? Would
10 they have had a clear shot? Would they have taken the
11 shot? Would they have hit the target? Would they have
12 stopped Masood? Would they have done so before the
13 critical stab strike?

14 So in our submission, care should always be taken
15 before introducing expert evidence to answer what are,
16 in truth, questions of fact, and in our submission, that
17 care should be exercised even if the questions of fact
18 may be difficult or speculative questions. We
19 respectfully doubt that somebody trained in ballistics
20 would be able to answer these questions, or even any of
21 them, in a cohesive way so as to provide real assistance
22 to you as the Tribunal.

23 So, sir, in brief those are our submissions. I make
24 them for completeness and, as I say, because we haven't
25 put in a note. It may be that others can largely rely

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1 upon their written material.

2 THE CHIEF CORONER: Thank you very much.

3 Submissions by MS STEVENS

4 MS STEVENS: Sir, thank you. In relation to the note on
5 Friday which was served after close of play.

6 THE CHIEF CORONER: Yes.

7 MS STEVENS: Could I just put that note into its proper
8 context, because that note follows on from a note that
9 was submitted on Monday, 10 September, obviously the
10 first day of the Inquest.

11 THE CHIEF CORONER: Yes.

12 MS STEVENS: It was then followed by a further note on
13 13 September, that being the Wednesday. Then oral
14 submissions were made on Thursday the 14th and,
15 therefore, to put it in its proper context, the family
16 has been raising for some time concerns that disclosure
17 remains outstanding, that witnesses were being called
18 before relevant matters were being known, and of course,
19 an application to adjourn was made.

20 Can we just make clear that we too flag up the
21 spectre of having to recall Commander Usher if matters
22 arise during his evidence or afterwards, and equally,
23 it's right to say that witnesses have been called, such
24 as the police constables on the ground, and then
25 relevant material has been disclosed.

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1 So depending on what comes out through
2 Commander Usher's evidence, there is the prospect of
3 an application that others should be recalled.
4 Dealing with the outstanding matters of disclosure,
5 it's our submission that you cannot effectively question
6 if you do not have all relevant material to use as
7 a basis for the questions.

8 Second of all, you cannot challenge or effectively
9 challenge the answers that you're given if you do not
10 have the relevant material, and therefore, albeit there
11 may be ample material to use to pose questions of
12 Commander Usher, this should be a quest to get to the
13 truth, and a full, fearless investigation does not use
14 as the benchmark: is there ample material. The
15 benchmark should be: has all relevant material been
16 given.

17 The outstanding material that we submit can be seen
18 to still be not properly dealt with is set out at
19 paragraph 24.

20 THE CHIEF CORONER: Yes.

21 MS STEVENS: In terms of 24(a), the full post instructions
22 and tactical planning review, although it's been
23 submitted that this material is not relevant, this
24 material is relied upon by the Metropolitan Police
25 Service to support the contention, it would appear, that

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1 there was no static post, which clearly is contrary to
2 the evidence of the four police constables who have
3 given evidence, and therefore in our submission, it is
4 necessary to receive the core material.

5 Experience has shown in this Inquest, I am afraid,
6 that when such material has been summarised, it has not
7 been summarised properly in that relevant material has
8 not been included.

9 The other material is significant enough in that it
10 includes records of checks by supervisors. Sir, you can
11 see that we ask specifically that a request should be
12 made of duty officers and/or the sergeants undertaking
13 the task, rather than just being provided with
14 an understanding of senior officers.

15 The response which we received on Sunday was that
16 there is no central record of checks. That doesn't mean
17 that there is no record, and therefore, we would still
18 ask that that simple question is posed of the people who
19 would know where the relevant records are.

20 By way of response, in terms of (e) and (f), the
21 ADAM material is relevant, and we don't accept what's
22 just been submitted, that it has no relevance.

23 One of the matters that you are, of course, going to
24 have to grapple with, sir, is whether or not there are
25 systemic failures, whether this is a case that goes

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1 beyond individual culpability, and the reference in the
2 DPS report to others having not registered on the ADAM
3 system to others regularly carrying out the same
4 practice as Police Constables Sanders and Ashby, is in
5 our submission plainly relevant.

6 We cannot address, and the family cannot get
7 answers, to those issues by asking Commander Usher.
8 Commander Usher did not undertake the DPS inquiry, and
9 therefore he is not best placed to answer why it is that
10 the DPS officer was of the view that there were
11 organisational failures that needed to be addressed.

12 The family submit that it is important to get to the
13 bottom of the extent of those problems, not just to
14 obtain answers as to the death of PC Palmer, but also so
15 that there can be proper organisational learning and
16 steps taken to ensure that this never happens again.

17 We have set out in relation to the Sir Jon Murphy
18 review why it is that we submit that this should be
19 reviewed and considered in the proper way, and that's to
20 be found at paragraph 3 of the note dated 23 September.

21 Can we turn briefly to the issue of expert evidence,
22 please. In our submission, this is clearly a relevant
23 issue. That can be seen if one just takes a moment to
24 go back and look at the questions that have been asked
25 by counsel to the Inquest and others of each officer who

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1 was present on the day in question. All of those
2 witnesses have been asked the hypothetical questions as
3 to opportunity to take a shot and whether there was
4 sufficient time to do so.

5 In our submission, those questions should be put not
6 in a hypothetical way, but to an expert in the field.
7 We don't accept at all that those questions could not be
8 put to an expert who has viewed the CCTV, who has
9 attended the scene, and who has read the relevant
10 material, and the family's submission is that if there
11 is to be a full and fearless investigation, that
12 investigation should include expert evidence, and that
13 it would be quite wrong if it were to be suggested at
14 the end of the Inquest, as it was at the beginning, that
15 you are not able to make a decision about that important
16 issue of whether or not it would have made a difference
17 because you don't have the evidence. If the reason you
18 don't have the evidence is that that evidence hasn't
19 been sought, the family's submission is that that
20 wouldn't be a fair approach.

21 Can I just deal with one matter that hasn't been
22 touched on, either in writing during the responses or
23 orally, is the family have made it clear that in their
24 view it would be wrong and inappropriate if anybody
25 sought to ask questions of Commander Usher on this

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1 hypothetical basis. It would be wrong because the
 2 Metropolitan Police Service accepted that they couldn't
 3 ask those questions of Police Constable Sanders.
 4 Police Constable Sanders was, of course, present in the
 5 area but not present at Carriage Gates, and therefore it
 6 wouldn't be appropriate, in our submission, to ask any
 7 such question of Commander Usher, bearing in mind first
 8 of all he wasn't present on the day at all; second of
 9 all -- forgive me -- second of all, he was not working
 10 as an AFO at the Palace of Westminster at the material
 11 time, and it's not known whether he has ever worked in
 12 this location in that role. And, third of all, it would
 13 be hoped that it is beyond contention that
 14 Commander Usher being responsible for the security
 15 system is not independent.

16 We would ask for that matter to be dealt with now
 17 rather than having to rise to object if and when people
 18 seek to ask those questions when he is in the witness
 19 box.

20 THE CHIEF CORONER: Mr Adamson, I've got your note; is there
 21 anything you want to say in addition to what's set out
 22 in the note?

23 Submissions by MR ADAMSON

24 MR ADAMSON: In connection with the question of introduction
 25 of an expert.

13

1 THE CHIEF CORONER: Yes.
 2 MR ADAMSON: I'm not in a position to advance submissions on
 3 that point at this stage.
 4 THE CHIEF CORONER: No. It seems to me at the moment
 5 Mr Adamson the principal issue is whether I should
 6 accede to Ms Stevens' request, effectively, to delay the
 7 calling of Commander Usher. That seems to me the point
 8 that I need to determine at this stage. Issues that may
 9 flow from other inquiries in relation to expert evidence
 10 is something that perhaps I can deal with later on, and
 11 in terms of disclosure, to some extent those points go
 12 with the issue over Commander Usher.

13 MR ADAMSON: Yes.

14 THE CHIEF CORONER: So your note very simply makes the point
 15 that you don't ask for a delay: you put down a marker
 16 that there may be a requirement for him to be recalled,
 17 should other matters come to light which you would have
 18 otherwise wanted to explore with him?

19 MR ADAMSON: Absolutely. In my note I set out what
 20 I regarded as the four uncontroversial factual
 21 conclusions which can be derived from the evidence
 22 given.

23 I was troubled by the note that we received
 24 yesterday, which sought, at least on my interpretation
 25 of it, to distance the Metropolitan Police's position

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1 from those four pretty obvious factual conclusions, and
 2 if it is going to be suggested that PC Sanders is wrong,
 3 for example, that 50 to 100 officers did exactly what
 4 they did on the day in the years that pre-dated
 5 22 March 2017, then we do need to know, and it might
 6 become necessary in those circumstances if that point is
 7 to be pursued for other evidence to be called.

8 I have also sympathy with the point made by my
 9 learned friend on behalf of the siblings and parents of
 10 PC Palmer as regards the extent to which Commander Usher
 11 can be used as a vehicle to pontificate on the question
 12 of whether it would have made a difference.

13 THE CHIEF CORONER: Yes.

14 Mr Keith.

15 Submissions by MR KEITH QC

16 MR KEITH: Sir, you return again to the question of
 17 disclosure. There appears to be an ill-hidden
 18 presumption on the part of Ms Stevens that there must be
 19 endless further material without which you cannot
 20 conduct a full and fair inquest. The
 21 Metropolitan Police has responded now repeatedly, often
 22 in response to belated overnight or over the weekend
 23 requests, in detail to a multitude of specific
 24 inquiries, and it is simply wrong to suggest that this
 25 disclosure process can be used to pursue every forensic

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1 issue that my learned friend Ms Stevens would wish to
 2 put to Commander Usher.

3 We responded in writing on 12 September, on
 4 20 September, and again, over the weekend. The
 5 Metropolitan Police is completely aware of its
 6 obligations, and the fact that all her requests have not
 7 been met is not because they are necessarily correct or
 8 that she seeks properly disclosable relevant material,
 9 but because they are irrelevant inquiries, or they are
 10 forensic inquiries.

11 THE CHIEF CORONER: I think Mr Hough has made the point that
 12 some of them, in fact, would be the subject of perfectly
 13 proper questions that could be put to Commander Usher.

14 MR KEITH: Absolutely.

15 THE CHIEF CORONER: They may not trigger disclosure, but
 16 they are forensic points that can be -- he can be asked
 17 about.

18 MR KEITH: The fixed post issue is a classic example because
 19 the Metropolitan Police has disclosed, of course, the
 20 position in relation to the MM1 and the way in which
 21 Messrs Ashby and Sanders were said not to have gone to
 22 the ADAM system which, if they had explored, would have
 23 revealed the post instructions at as March of 2017.

24 But in the course of their evidence, they did both
 25 say that their understanding was that there had

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1 historically been fixed posts and that they had been
2 done away with, and that they were therefore obliged to
3 patrol the whole of New Palace Yard.

4 That is not an issue that goes directly to the
5 question of what they should have been doing on the day
6 because that is determined by the post instructions but
7 we nevertheless —

8 THE CHIEF CORONER: No. That's the task that I have to look
9 at very carefully, as to what was the position
10 on 22 March 2017.

11 MR KEITH: Exactly.

12 THE CHIEF CORONER: The historical position may provide me
13 with some interesting background, it may lead me to
14 certain conclusions, but it seems to me the key question
15 must be where were they required to be on 22 March?

16 MR KEITH: Indeed. That is why we disclosed the substance
17 of the post instructions going back to 2010, and the
18 earlier tactical review of 2014.

19 At the highest, their understanding of the
20 historical position concerning the fixed nature of the
21 post notes is a matter that goes, perhaps, to their
22 credibility, but it goes no further than that.

23 And so, sir, ultimately the position is that the
24 Metropolitan Police will continue to respond to requests
25 for disclosure and inquiries which are made by your

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1 team, and what is absolutely plain is that the further
2 requests, which again have been made at the eleventh
3 hour, don't appear to have found favour with your own
4 counsel.

5 But if they had found favour or if, in the course of
6 Commander Usher's evidence, it appears that there is
7 a requirement for further inquiries to be undertaken or
8 material to be disclosed if the Metropolitan Police has
9 it at all, then of course we will respond as we have
10 done throughout.

11 THE CHIEF CORONER: In a sense, Mr Keith, that's perhaps why
12 you and Mr Adamson say that we should continue to hear
13 from Commander Usher, bearing in mind that the points
14 may arise, either through answers he gives, questions he
15 is asked which, as you say, if they trigger further
16 inquiry, those inquiries may have to be made.

17 MR KEITH: In every forensic process, sir, as you know
18 better than perhaps anybody in this courtroom, one can
19 go on indefinitely exploring whether or not there is
20 material which reflects upon forensic issues which have
21 been raised in open court, and one can go on
22 indefinitely seeking a secondary position or a tertiary
23 position in relation to whether or not an answer given
24 in evidence is correct or may be contrary to something
25 else, but that fact does not render all the new material

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1 relevant.

2 Commander Usher is, in the opinion of your own team,
3 the best placed person to give evidence in relation to
4 the command structure, the events in March 2017, the
5 position concerning the ADAM system, post instructions,
6 and security.

7 And it was he who of course responded to your team's
8 request for witness statements. There has never been
9 a suggestion that anybody else should stand in his place
10 or that he is not a suitable and qualified person to
11 undertake that task.

12 There is plenty of material for him to be asked
13 about, because my learned friends have the tactical
14 reviews from 2014 and 2015, the post instructions in
15 summary — gisted form, I should just interpose there:
16 your own team have the full post instructions but they
17 have plainly taken the view that the substance, the gist
18 of those post instructions was properly set out in our
19 note to you, and there is no foundation for the
20 suggestion made a few moments ago that there are
21 concerns about the way in which material has been
22 gisted, and your team have full post instructions.

23 They have, of course, the evidence of the AFOs, the
24 evidence of the unarmed officers, the MM1, and the
25 material concerning the application of the ADAM system

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1 in their MM1. There is ample material on which they can
2 examine, and absent some new and unexpected avenue
3 appearing during the course of his evidence, nothing
4 further, surely, is required.

5 THE CHIEF CORONER: In relation to Ms Stevens' concern about
6 hypotheticals being put to Commander Usher.

7 MR KEITH: Yes, I fear that her memory may ill serve her
8 because what in fact happened was Messrs Ashby and
9 Sanders both gave evidence about what they might have
10 been able to do had they been in close proximity to
11 Carriage Gates. It was an issue pursued vociferously
12 and repeatedly by her, and ultimately you ruled that
13 when the whole list of factual issues relevant to the
14 threat posed at Carriage Gates, it was put to her
15 repeatedly that you had the point, that of course her
16 examination should continue.

17 I returned to the question of those factual issues
18 that on the basis of the well known maxim that what is
19 sauce for the goose is sauce for the gander. I could
20 not take the matter any further beyond how she had left
21 it in light of your ruling.

22 But at no time did you say that the issue of whether
23 hypothetically they could have taken a shot was in
24 principle irrelevant. What it seems to us your ruling
25 was designed to do was to stop the repetitive putting of

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1 the factual scenarios which form part of the
2 hypothetical situation .
3 We will not return to that issue with
4 Commander Usher, in line with the usual principle ,
5 unless and until it is raised by either your own counsel
6 or by my learned friends as interested persons in these
7 proceedings.
8 THE CHIEF CORONER: Thank you. Thank you very much,
9 Mr Keith.
10 Sorry, the screen is obscuring me.
11 Submissions by MR MOSS
12 MR MOSS: No, not at all. Sir, you have a full day, just so
13 far as Sir Jon Murphy's report is concerned, two brief
14 matters. First, to the extent that my learned friend
15 Ms Stevens' written submissions perhaps demonstrate some
16 underlying scepticism about the real sensitivity of that
17 report, sir, you and your counsel will know that quite
18 apart from anything that's said in the
19 Parliamentary Authorities in the MPS that Sir Jon Murphy
20 himself has asked that the report is not made public
21 because to do so would itself compromise the security of
22 the parliamentary estate. That is Sir Jon's view, sir,
23 as you are aware.
24 Secondly, so as not to detain you longer, if you
25 were minded to take matters in relation to the Murphy

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1 report further, may I simply have an opportunity to
2 address you at greater length at that stage?
3 THE CHIEF CORONER: Certainly.
4 Submissions in reply by MR HOUGH QC
5 MR HOUGH: Sir, may I just say in relation to the
6 questioning of Commander Usher on the hypothetical
7 that's been referred to.
8 THE CHIEF CORONER: Yes.
9 MR HOUGH: I shan't be asking questions of him on that
10 topic, and in those circumstances it seems to me,
11 respectfully, that Ms Stevens has a good point in that
12 regard.
13 THE CHIEF CORONER: Yes.
14 MR HOUGH: Sir, I'm not sure there's anything else that
15 I need to deal with in response before you make your
16 decision.
17 Ruling
18 THE CHIEF CORONER: Mr Hough, it seems to me, as I was
19 saying to Mr Adamson, the key issue for me to determine
20 at this stage is whether I should delay the commencement
21 of Commander Usher's evidence, and in terms of the
22 issues about further inquiry or disclosure, in many ways
23 you, in your earlier submissions, made clear that those
24 had either been dealt with or were irrelevant or they
25 were matters that could be dealt with by proper

22

1 questioning through Commander Usher.
2 Mr Adamson, and indeed Ms Stevens have put down
3 a marker that it may be that Commander Usher has to be
4 recalled, and I think you accept that may be the
5 situation, depending on matters which may arise.
6 MR HOUGH: We will have to see where we go.
7 THE CHIEF CORONER: Yes. My view at the moment is that we
8 should make a start with Commander Usher, and to that
9 extent I'm not going to allow Ms Stevens' application
10 that I do not do so. In relation to the issues of
11 disclosure, I know that you and the rest of the team
12 will look at any request for disclosure and if felt
13 appropriate, no doubt make approaches to Mr Keith and
14 his team for material, and to that extent, should
15 matters arise, I've no doubt that will take its normal
16 course.
17 MR HOUGH: Yes.
18 THE CHIEF CORONER: So my decision is that we -- I am not
19 going to delay the calling of Commander Usher, but
20 I'm accepting the possibility that he may have to be
21 recalled in the course of this Inquest should other
22 matters arise.
23 MR HOUGH: Sir, if Commander Usher could then be brought to
24 the witness box.
25

23

1 COMMANDER ADRIAN USHER (Sworn)
2 Examination by MR HOUGH QC
3 MR HOUGH: Would you please give your full name and rank to
4 the court?
5 A. Adrian Usher, I'm a commander with the
6 Metropolitan Police, sir.
7 THE CHIEF CORONER: Good morning. As with any other
8 witness, if you wish to sit or stand or alternate
9 between the two, please just make yourself comfortable.
10 A. That's very kind, sir.
11 MR HOUGH: Commander Usher, I understand you are from the
12 Specialist Operations Business Group of the
13 Metropolitan Police.
14 A. That's correct.
15 Q. You understand that I will be asking you questions first
16 on behalf of the Coroner and then you will be asked
17 questions by other lawyers?
18 A. Yes.
19 Q. Is it right that your current post is Protection
20 Commander with strategic responsibility for the Royalty
21 and Specialist Protection Command and the Parliamentary
22 and Diplomatic Protection Command?
23 A. That's correct, yes, sir.
24 Q. I understand you've held that post since April 2016?
25 A. Yes.

24

1 Q. You have made a number of statements addressing security
2 at the Palace of Westminster and answering questions
3 from the Inquest team.
4 A. Yes.
5 Q. And I think you understand you are to give evidence on
6 that subject from a command perspective?
7 A. Yes.
8 Q. By way of general background, first of all, is it right
9 that you yourself have had a varied policing career?
10 A. That's correct, sir, yes.
11 Q. Including the security of the Olympic torch, I believe?
12 A. Yes, and the majority of my career has been spent as
13 a detective, but I've served in a variety of roles.
14 Q. Have those roles included serving as an armed officer,
15 an authorised firearms officers, or in some other armed
16 role?
17 A. No.
18 Q. May we take it also that you haven't acted as a firearms
19 commander?
20 A. Yes.
21 Q. First of all, some general matters of parliamentary
22 security, looking at the --
23 A. I'm sorry, sir, I just need to clarify my last answer.
24 I am trained as a strategic firearms commander from
25 a previous role, but I have never acted in that

25

1 capacity, just to be absolutely clear.
2 Q. That's very helpful. Thank you. Looking at general
3 matters of parliamentary security, which you address in
4 the first few pages of your first statement, is this
5 right: that the Parliamentary and Diplomatic Protection
6 Command has a responsibility to provide protective
7 security for the Palace of Westminster?
8 A. Yes.
9 Q. As well as diplomatic missions in some other iconic
10 places?
11 A. Yes.
12 Q. Is it right that separate from the Metropolitan Police,
13 there is a Parliamentary Security Department, or PSD?
14 A. Yes.
15 Q. A dedicated department headed by a civilian director of
16 security, Mr Hepburn?
17 A. That's correct.
18 Q. Is it right that the Metropolitan Police works together
19 with the PSD on parliamentary security matters?
20 A. It is. The parliamentary security have primacy for the
21 responsibility for security for Parliament, and we work
22 with them and to them on a contracted policing services
23 agreement.
24 Q. I'll ask you about that in a moment. Is it right that
25 the PSD employs the security officers who operate, for

26

1 example, the search and screening functions at the
2 Palace?
3 A. Yes.
4 Q. But that it's police officers from the
5 Metropolitan Police who stand guard at perimeter access
6 points?
7 A. Yes.
8 Q. Now, looking at your first witness statement and
9 paragraphs 3 and 4, can you help us with the strategic
10 aim of parliamentary security outlined in the most
11 recent strategic plan?
12 A. That is to ensure that Parliament is secure, accessible,
13 and able to operate without fear of disruption.
14 Q. You referred a moment ago to protective security being
15 governed by a policing services agreement?
16 A. Yes.
17 Q. I think the version covering the period we're concerned
18 with was signed in March 2016?
19 A. That's right, yes.
20 Q. And what is the annual cost of policing services under
21 that contract?
22 A. £17 million.
23 Q. We know that Metropolitan Police officers working at the
24 Palace include, and included, at the relevant times,
25 both armed and unarmed officers?

27

1 A. That's right, sir, yes.
2 Q. As to the deployment of officers, is that determined or
3 informed by, first of all, a tactical assessment by the
4 Metropolitan Police's armed policing branch, SCO19?
5 A. Yes, it is. It's prepared first by a SECCO, a security
6 coordinator, who if that security coordinator decides
7 that armed police may be an option that are required to
8 provide security they ask the tactical firearms advisor
9 to provide that report.
10 Q. When are those decisions and reviews reviewed, either as
11 a matter of course or in response to specific events?
12 A. Well, they're done annually but they're an iterative
13 process that goes back between the security coordinator,
14 the firearms advisor, and Parliament, so there may be
15 several iterations of that process within a year.
16 Q. Now, turning to the approach you adopt to designing
17 security arrangements, and by you I mean the MPS as
18 an organisation.
19 A. Yes.
20 Q. First of all, is it right that you take account of
21 intelligence received of a range of types and sources?
22 A. Yes, that's correct.
23 Q. So terrorist methods?
24 A. Methodology current, domestic and international.
25 Q. Information from previous incidents?

28

1 A. Indeed.
 2 Q. Learning that you get from testing and exercises at the
 3 Palace?
 4 A. Yes.
 5 Q. And intelligence about specific known threats from
 6 a range of sources?
 7 A. Yes.
 8 Q. You've referred to the work of the security coordinator,
 9 the SECCO?
 10 A. Yes.
 11 Q. Does that involve surveying and understanding the site,
 12 the geographical location of Parliament, to look at the
 13 threats and methods of protection?
 14 A. Yes, that's right.
 15 Q. You've told us that the firearms assessment is prepared
 16 by somebody with appropriate expertise. Would that be
 17 a trained firearms advisor?
 18 A. That's right, yes.
 19 Q. And just for completeness, that assessment would,
 20 I think, include and consider the number of armed
 21 officers?
 22 A. Yes.
 23 Q. What their deployments should be?
 24 A. Yes.
 25 Q. And what equipment they should have?

29

1 A. Yes.
 2 Q. And then, as we have seen, is that assessment work then
 3 translated into post instructions, or post notes, which
 4 describe duties including patrolling and fixed duties
 5 for various posts?
 6 A. Indeed.
 7 Q. And as you've told us, the process of producing the
 8 reviews is iterative because of changes in threats
 9 developing over time. May we take it as a result that
 10 the assessment of the post notes and the production of
 11 the post notes changes from time to time too?
 12 A. Yes, that's right.
 13 Q. Next, looking at paragraphs 11 and 12 of your statement,
 14 is there, as some witnesses have described it, a balance
 15 to be struck between the openness and the security of
 16 Parliament?
 17 A. That's correct. It's a unique operating environment in
 18 which security is one of the features that is desired by
 19 Parliament, and the other is, or amongst others is the
 20 open and in some cases unfettered access to Parliament,
 21 by both members of the public and MPs and Lords.
 22 Q. I believe, for example, that members of the public are
 23 given access to Parliament without special ticketing
 24 arrangements?
 25 A. It's a desire of Parliament to demonstrate its open and

30

1 democratic values that there is a comprehensive visitor
 2 programme that attracts 80,000 visitors a month to
 3 Parliament, and we are part of the security arrangements
 4 that facilitate that happening.
 5 Q. Is there any specific effect of that desire for openness
 6 on security arrangements at Carriage Gates and, in
 7 particular, the position of the gates themselves?
 8 A. There is. It is the desire of Parliament that
 9 Carriage Gates be open as symbolic of an open and
 10 democratic Parliament for the majority of the time which
 11 Parliament is sitting, and we operate within those
 12 parameters.
 13 I can say that the evidence that would strengthen
 14 that belief that the gates should be open is that even
 15 after the terrible attack on 22 March 2017, that in us
 16 attempting to have the gates closed, it was the desire
 17 of Parliament that they be opened again as soon as
 18 possible after the scene of the crime had been cleared,
 19 and indeed that's what happened. It took a further,
 20 from memory, around eight or nine months for us to go to
 21 the appropriate parliamentary authorities to get the
 22 permissions required for the default position of those
 23 gates to be closed.
 24 Q. Thank you. May I now turn to the layout and
 25 characteristics of New Palace Yard, which you cover from

31

1 page 4 of your statement, and may we bring on screen now
 2 a plan of New Palace Yard, {DC7989/80}
 3 We've already heard evidence from DC Overall of SO15
 4 about the layout of New Palace Yard. As you know,
 5 Commander, a square at the north-west corner of the
 6 parliamentary estate, accessed from Parliament Square?
 7 A. Yes.
 8 Q. Giving access to the estate by vehicle, both access to
 9 the underground car park using the ramps, and access to
 10 further parts of the estate through, for example, the
 11 colonnades?
 12 A. Yes.
 13 Q. And do we see, looking at the plan towards the bottom of
 14 the page, that the main visitor access to the
 15 Palace of Westminster is the Cromwell Green search
 16 point, which lies to the south of New Palace Yard, to
 17 the south of this plan?
 18 A. Yes, the entrance to that visitor area lies to the south
 19 of this map. The exit is shown on the map in the
 20 south-west corner.
 21 Q. Yes. We can see a set of barriers similar to queueing
 22 barriers which define the exit route?
 23 A. Yes.
 24 Q. Now, looking at the physical security measures on the
 25 perimeter and within New Palace Yard, leaving that plan

32

1 on screen, is it right to say that New Palace Yard is
 2 a major access point to the Palace and, without going
 3 into unnecessary detail, in proximity to some very
 4 significant parts of the estate?
 5 A. Yes, that's true.
 6 Q. Looking at paragraph 27 of your first statement, prior
 7 to March 2017 what were perceived to be the main threats
 8 of attack which would be relevant to the physical
 9 security of New Palace Yard?
 10 A. The number of types of attack that might have been
 11 considered are really bounded only by imagination, and
 12 it's necessary to make a judgment as to what are the
 13 reasonable worst case scenarios most likely to affect
 14 Parliament, and at that time, the marauding terrorist
 15 firearms assault and the vehicle-borne improvised
 16 explosive device, VBIED, were considered, having
 17 assessed all of the intelligence and information from
 18 home and abroad, to be most likely.
 19 Q. So marauding attacks perhaps like that in Mumbai
 20 involving perhaps multiple assailants armed with
 21 a variety of weaponry?
 22 A. That's correct, sir.
 23 Q. We see that the perimeter access point to
 24 New Palace Yard was controlled externally, first of all,
 25 by crowd control barriers?

33

1 A. Yes.
 2 Q. Secondly, by the large vehicle gates -- and we'll deal
 3 with when they were open -- and then to the south of
 4 them, a pedestrian gate.
 5 A. Yes.
 6 Q. Now, dealing with the arrangements for those being open
 7 and closed, is it right to say that the large vehicle
 8 gates for entry, the north gates, were open during the
 9 hours of parliamentary business, but otherwise generally
 10 closed?
 11 A. Yes.
 12 Q. Is it also right that the large vehicle gates for exit,
 13 the south gates, were open at most times?
 14 A. Yes.
 15 Q. And the external crowd control barriers, is it right
 16 that they were very often closed, with officers standing
 17 within them, behind them?
 18 A. Yes.
 19 Q. But they were opened first of all to admit vehicles?
 20 A. Yes.
 21 Q. Secondly, when there was a stream of vehicles, or heavy
 22 traffic through?
 23 A. Yes.
 24 Q. And thirdly, during the eight-minute window for
 25 a division?

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1 A. Yes.
 2 Q. Now, we heard from PC Ross for the lawyers, Day 5,
 3 page 103 -- that the external crowd control barriers
 4 were introduced as a temporary measure, and Mr Hepburn
 5 says the same in his witness statement at paragraph 70?
 6 A. Yes.
 7 Q. To your knowledge, is that right?
 8 A. Yes.
 9 Q. What was the permanent solution to be, if you know the
 10 answer?
 11 A. I know it in as far as it was to be a structural
 12 solution delivered by the Parliament, but further than
 13 that I can't take you.
 14 Q. Within New Palace Yard further in beyond the external
 15 protections, is it right to say that there were various
 16 vehicle entry and exit barriers, vehicle blockers and so
 17 on, to protect against unauthorised access of vehicles?
 18 A. Yes.
 19 Q. And they formed perhaps one line of defence against
 20 vehicle-borne bombs?
 21 A. Yes.
 22 Q. The large vehicle gates we know were replaced after the
 23 attack with gates which were similar in construction,
 24 perhaps a little less ornate?
 25 A. Yes.

35

1 Q. Are you able to help us with what was the reason for
 2 those large vehicle gates being replaced after the
 3 attack?
 4 A. Once we'd arrived at the position that the default
 5 position for the gate should be closed, they were
 6 obviously going to have to be opened and closed several
 7 times during the day. That's something that just wasn't
 8 possible with the old ornate gates and, therefore, the
 9 change was necessary to a lighter-weight metal gate.
 10 Q. Is that because the larger, more ornate gates, were too
 11 heavy to be readily opened and closed repeatedly?
 12 A. And I believe they were fairly aged, and because it was
 13 probably a vicious circle because they were not opened
 14 and closed regularly, that became more difficult.
 15 Q. Now the crowd control barriers being open during a
 16 division: was that a matter about which police had
 17 discretion, or had they effectively received
 18 instructions to ensure that those external barriers were
 19 left open during a division?
 20 A. It was not a matter on which we had discretion. There
 21 was some history, going back to Sessional Orders of
 22 Parliament, that it was understood by Parliament and by
 23 the police that this was one of the parameters within
 24 which we operated during a division, amongst many other
 25 measures that took place in that 8 minutes that the

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1 gates would be open, pedestrian and vehicular.
 2 THE CHIEF CORONER: And I think we have distinguished
 3 between barriers and gates, so if we're dealing with
 4 barriers perhaps we can just keep that term to
 5 distinguish between the large metal gates and the crowd
 6 control or the other movable barriers.
 7 A. Okay, sir, that's helpful.
 8 MR HOUGH: In the event of an apparent threat to
 9 New Palace Yard, did the officers at the gates have
 10 discretion about closing either the external barriers or
 11 the large gates when those would otherwise be open?
 12 A. Yes, they did, and under normal circumstances the
 13 decision to close the gates was regarded as a serious
 14 one that would require reporting to Parliament, and
 15 therefore required an inspector's authority. But in
 16 extremis, and in the case of an obvious threat, any
 17 officer on duty on the gates could shut them without
 18 reference to any other officer.
 19 Q. And I think that discretion was set out in post notes;
 20 is that correct?
 21 A. Yes, that's correct.
 22 Q. Now, in your statement you tell us that in accordance
 23 with that discretion, officers at the gates would be
 24 expected to close them if a violent suspect appeared at
 25 the gates?

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1 A. Yes.
 2 Q. Given that the external gates were old and heavy, and
 3 couldn't readily be opened and closed, was there a real
 4 practical difficulty if a violent suspect appeared
 5 outside in closing them with any speed at all?
 6 A. It would have been impossible, in effect, to close them
 7 very quickly.
 8 Q. Thank you.
 9 May we move on to the police and security personnel
 10 stationed in and around New Palace Yard, which you deal
 11 with from page 9 of your first statement.
 12 Now, on the day of the attack we know that the
 13 following staff were stationed in New Palace Yard.
 14 First of all, two unarmed officers stationed at the
 15 north vehicle gate as a matter of their duty?
 16 A. Yes.
 17 Q. We also know that there were, in fact, three officers
 18 there at the time of the attack: PCs Palmer, Carlisle
 19 and Tipple.
 20 A. Yes.
 21 Q. Are you able to tell us why that was?
 22 A. I believe it was because it was during a changeover
 23 period. So one would --
 24 Q. So one would have been --
 25 A. -- have been a relieving officer.

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1 Q. On stand-by at the time?
 2 A. Yes.
 3 Q. We know that there were two unarmed officers at the
 4 south vehicle gate, PCs Marsh and Glaze?
 5 A. Yes.
 6 Q. And one officer at the Carriage Gates pedestrian
 7 entrance, PC Ross.
 8 A. Yes.
 9 Q. That, is this right, would have been the normal number
 10 of unarmed officers at those gates?
 11 A. Yes.
 12 Q. We also know that there were two armed officers in
 13 New Palace Yard, PCs Ashby and Sanders, at the time of
 14 the attack?
 15 A. Yes.
 16 Q. Each of those armed with a carbine, a Glock pistol, and
 17 a taser?
 18 A. Yes.
 19 Q. Is it right that there would also have been security
 20 officers in the search and screening area?
 21 A. Yes.
 22 Q. But also right that those wouldn't have been in a good
 23 position to provide any protection at the Carriage Gates
 24 area specifically?
 25 A. That's correct.

39

1 Q. And looking elsewhere in the square, I think
 2 a doorkeeper at members' entrance?
 3 A. Yes.
 4 Q. Would that person also have been a security officer,
 5 an unarmed civilian?
 6 A. That's right.
 7 Q. Is it right that there were other police security and
 8 doorkeeper posts in various parts of the estate, some of
 9 them relatively close to New Palace Yard?
 10 A. Yes.
 11 Q. But is it also right to say that there were no armed
 12 officers in very close proximity as a matter of course
 13 or instruction?
 14 A. That's correct.
 15 Q. I'm trying to be careful in the way I put it --
 16 A. Yes.
 17 Q. -- so as not to disclose sensitive material.
 18 A. Indeed.
 19 Q. Now, we of course know that armed personal protection
 20 officers came to the scene and shot Masood on the day of
 21 the attack. Is it right in general --
 22 A. I think, just purely as a matter of semantics, were at
 23 the scene.
 24 Q. Yes. They were in the area of New Palace Yard, they
 25 came to the specific scene of the attack when their

40

1 attention was drawn to it.
 2 Is it right to say that as a general matter there
 3 might be armed protection officers close to
 4 New Palace Yard, especially at some times when their
 5 principals happened to be near?
 6 A. Yes.
 7 Q. But is it right to say also that the presence of the
 8 armed protection officers on the day of the attack who
 9 shot Masood was, in a sense, fortuitous?
 10 A. Yes.
 11 Q. Defensive equipment now, please, page 10 of your first
 12 statement. We've heard from the officers, the unarmed
 13 officers deployed to New Palace Yard, that they were
 14 armed with an asp baton, with cuffs and a CS spray?
 15 A. Yes, that's right.
 16 Q. Was that standard equipment for police officers deployed
 17 to the Palace?
 18 A. Yes.
 19 Q. You've told us that armed officers carried, effectively,
 20 the weapons which we've heard PCs Ashby and Sanders
 21 describe for this particular post. Have you yourself
 22 checked that they were carrying the right weapons on the
 23 day?
 24 A. I have, and they were.
 25 Q. We've also heard about officers wearing body armour, and

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1 we'll hear more about that. Is it right to say that
 2 police officers at the Palace generally would wear body
 3 armour?
 4 A. Yes.
 5 Q. And I'll return to the topic of tasers a bit later, if
 6 I may.
 7 May I now ask you about the availability of other
 8 officers around the parliamentary estate. Is it right
 9 that at any one time there were very many unarmed
 10 officers stationed around Parliament?
 11 A. That's correct.
 12 Q. In the event of an attack, for example on
 13 New Palace Yard, would it be possible to deploy some
 14 reserve officers or officers on break to New Palace Yard
 15 without leaving other posts unguarded?
 16 A. That's correct.
 17 Q. Could armed officers be deployed there?
 18 A. Yes.
 19 Q. Without getting into the specifics of the numbers, could
 20 armed officers be deployed in significant numbers?
 21 A. Yes.
 22 Q. Is it also right that a number of armed response
 23 vehicles at any one time are deployed or available for
 24 deployment in the Central London area covering
 25 Westminster?

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1 A. Yes, that's true. And on top of that there is a --
 2 what's referred to as the fast response car, which is
 3 a PaDP car that has armed officers in and covers
 4 Downing Street and the Palace of Westminster, and
 5 I mention this because it was that car that was on scene
 6 within one minute of the attack.
 7 Q. So the PaDP, Parliamentary and Diplomatic Protection
 8 car, containing armed officers you tell us was at the
 9 scene within one minute?
 10 A. I believe so, sir, yes.
 11 Q. Within one minute of what, just to be clear?
 12 A. I believe within one minute of the radio message being
 13 received that there was a problem.
 14 Q. What other armed assets, from outside the estate,
 15 arrived in the following minutes?
 16 A. I am afraid I can't go too far down that. I know that
 17 within ten minutes there were several armed vehicles
 18 present and that, I believe, is evidence of a
 19 significant uplift that had taken place across London in
 20 the previous 24 months.
 21 Q. I think you say in your statement that some other armed
 22 response vehicles arrived in the first five minutes?
 23 A. Yes.
 24 Q. And further ones, along with the Tactical Firearms
 25 Commander, within ten minutes?

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1 A. That's right.
 2 Q. Next, please, training and briefing. You tell us in
 3 your statement that all officers posted to the Palace
 4 were required to complete something called an overt
 5 protection officers course?
 6 A. Yes.
 7 Q. In summary terms, what sort of material would that
 8 course cover?
 9 A. It would include familiarisation with the estate, which
 10 was quite large and complex, and familiarisation with
 11 each of the posts, and that was checked against
 12 essentially a checklist, each officer would have been
 13 taken to every post and through every significant area
 14 of Parliament, and check that they had an understanding
 15 of the geography and topography of the area.
 16 Q. And that was for all officers, armed or unarmed?
 17 A. That's correct, yes.
 18 Q. Would that be in addition to standard officer safety
 19 training?
 20 A. Yes.
 21 Q. Which included self-defence, including defence against
 22 edged weapons, I believe?
 23 A. Yes.
 24 Q. And were officers also trained in emergency life
 25 support?

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1 A. Yes, they were. They were also trained to a higher
 2 standard, what's referred to as the FD13.1 course, which
 3 is a course in giving ballistic first aid.
 4 Q. Now, may we then turn on to the tactical planning
 5 reviews and the post instructions for firearms officers
 6 in the New Palace Yard area?
 7 A. Yes.
 8 Q. Now, you told us that the tactical planning reviews
 9 would be carried out periodically by firearms advisors,
 10 feeding then into the preparation of deployments and
 11 post notes for armed officers?
 12 A. Yes.
 13 Q. If we can bring up on screen {DC8043/1}. Now, this is
 14 the Tactical Planning Review dated November 2014?
 15 A. Yes.
 16 Q. Prepared for the Palace by a firearms advisor, Inspector
 17 Stephenson?
 18 A. Yes.
 19 Q. Could you go to page 2, please {DC8043/2}. Now, we see
 20 here a description of the sector 3 New Palace Yard area:
 21 "Ranger sector 3 — Carriage Gates, New Palace Yard,
 22 Member's Entrance, Cromwell Green public entrance search
 23 arch and river terrace."
 24 A. Yes.
 25 Q. And it states:

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1 "These posts sits within a secure area which borders
 2 the perimeter fenceline ... of the Parliament Square
 3 aspect of the estate. It is a busy vehicular and
 4 pedestrian access (different entrance formats for
 5 pedestrians) and frequent route used by Protected
 6 Persons."
 7 A. Yes.
 8 Q. "Carriage Gate is staffed by X2 AFOs [authorised
 9 firearms officers] and provides a short foot patrol
 10 around New Palace Yard for 1 officer whilst the other
 11 remains at the gates."
 12 A. Yes.
 13 Q. "The officers remain within line of sight."
 14 A. Yes.
 15 Q. Then down to "Recommendation":
 16 "Carriage Gates: This post should be retained.
 17 Consideration should be given to provide a short patrol
 18 into New Palace Yard."
 19 A. Yes.
 20 Q. And then under "Observations":
 21 "Carriage Gates notwithstanding the presence of
 22 alarms, CCTV coverage and security guards,
 23 Carriage Gates is the very public face of British
 24 Parliament providing iconic views of the estate, the
 25 clock tower and the historic Palace. Any committed

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1 intruder could realistically be over the physical
 2 barriers of the vehicle barriers/fence and be directly
 3 into New Palace Yard and subsequently the Palace itself
 4 without being challenged by police if these posts were
 5 not in situ. Therefore this is an essential post to
 6 retain."
 7 A. Yes.
 8 Q. "As the AFOs are situated within a secured fenceline the
 9 ability to challenge, close down and effectively control
 10 a subject outside the fence line possible but issues of
 11 public crowds present challenges. Additionally in the
 12 event of the AFO reacting to a firearms threat at this
 13 location, additional support is likely to be arrive
 14 promptly coming from the nearby Members' entrance. The
 15 provision of a short patrol around New Palace Yard
 16 between the main gate and Members' entrance post would
 17 mitigate vulnerabilities of an intruder climbing the
 18 iron fencing."
 19 A. Yes.
 20 Q. Then over the page, please {DC8043/3}, there's then
 21 recommendation of appropriate weaponry for the post?
 22 A. Yes.
 23 Q. So we can return to the previous page, if we may. This
 24 review appears to suggest that at that
 25 time, November 2014, the deployment was two armed

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1 officers standing at Carriage Gates, but one making
 2 a short foot patrol around New Palace Yard?
 3 A. Yes.
 4 Q. It refers to officers being at a secured fenceline, but
 5 of course, that fenceline wasn't secured during
 6 divisions or when vehicles were arriving or leaving, was
 7 it?
 8 A. Correct.
 9 Q. It suggests that there is nothing wrong with the armed
 10 officers being separated occasionally because it
 11 recognises one of them occasionally going on a patrol?
 12 A. Yes.
 13 Q. And it recognises that one officer will always be at the
 14 gates?
 15 A. Yes. It also emphasises remaining within line of sight
 16 as all firearms tactics are based largely on officers
 17 acting as a pair.
 18 Q. Remaining within sight of each other?
 19 A. Yes.
 20 Q. So just to be clear, when you say "Remaining as a pair
 21 as a matter of standard practice", that wouldn't
 22 necessarily mean joined at the hip?
 23 A. No, as long as they can see each other.
 24 Q. Now, this review didn't say how regular the patrols
 25 should be, it just said a short patrol, something like

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1 this.

2 A. Yes.

3 Q. And it suggests, I think, that one of the purposes of

4 the patrol is to mitigate the risk of an intruder

5 climbing the fencing, for example, on Bridge Street?

6 A. Yes.

7 Q. Can we now go to the post notes, which were based on

8 this review, {WS5103/9}. Now, these are notes

9 dated January 2015, we see in the first column,

10 16 January is the date of last modification, and based

11 on a tactical assessment of October 2014.

12 Now, the information section states, doesn't it,

13 that the primary role and responsibility of the firearms

14 officers in the estate is to protect the people

15 contained within it?

16 A. Yes.

17 Q. Which would, presumably, include parliamentarians,

18 visitors and unarmed officers?

19 A. Indeed.

20 Q. And that must, surely, involve and include preventing

21 an armed attacker gaining access to areas of the Palace

22 where many people work?

23 A. Yes, that would be part of their responsibility, yes.

24 I hesitate only because, of course, depending on the

25 size of that armed assault is whether that would be

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1 prevented or delayed.

2 Q. Now, that's said to be achieved by first of all

3 immediately containing or confronting a deadly threat.

4 A. Yes.

5 Q. And, secondly, providing a visible deterrent?

6 A. Yes.

7 Q. As to the first of those, does that recognise the

8 importance of fast reaction, immediately?

9 A. Yes.

10 Q. And visible deterrent, would that mean the importance of

11 having firearms officers visible from the outside of the

12 estate, notably at the gates?

13 A. Yes.

14 Q. And if we can go to page 10, the Carriage Gates

15 instruction {WS5103/10}, first of all we see it refers

16 to sector 3 as "Carriage Gate"?

17 A. Yes.

18 Q. It identifies two firearms officers there and their

19 weaponry?

20 A. Yes.

21 Q. And then it says this:

22 "Officers are to work together, working within

23 proximity of each other but not specifically as a pair.

24 Officers to be positioned in close proximity to the

25 gates when they are open, but not outside.

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1 "Both officers are to be positioned inline of sight

2 of each other with the ability to respond to

3 Cromwell Green entrance search point."

4 A. Yes.

5 Q. When it says working within proximity but not as a pair,

6 how would you interpret that?

7 A. I would interpret it as -- particularly taking into

8 account the second instruction to be in line of sight of

9 each other is that some movement was possible from both

10 officers, between there and the Cromwell Green entrance,

11 the other main area of threat or vulnerability, but that

12 they should remain in sight of each other, their main

13 focus being the gates.

14 Q. And to be in close proximity to the gates when open,

15 we've heard that the gates would be open essentially all

16 day long?

17 A. Yes -- during business hours, yes.

18 Q. So that would mean to be in close proximity to the gates

19 for the entirety of business hours?

20 A. Yes.

21 Q. And the reference to having the ability to respond to

22 the Cromwell Green search point, we saw that that, so

23 far as it connects with New Palace Yard, is relatively

24 close to the gates?

25 A. I believe it's about 20, 25 yards.

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1 Q. So having the ability to respond to the Cromwell Green

2 entrance search point would still be compatible with

3 standing quite close to the gates?

4 A. Yes.

5 Q. Now, here in these post notes there is no reference to

6 the occasional patrol by one officer, which is referred

7 to in the tactical assessment that we looked at a moment

8 ago?

9 A. That's right.

10 Q. Any explanation for that?

11 A. Well, I believe, as I may have implied in my previous

12 answer, that the note here is slightly ambiguous, in

13 that by saying both officers are to be positioned in

14 line of sight of each other, as I say, that implies some

15 movement. If it was merely a static post to remain by

16 the gates, no movement at all, that would be an

17 unnecessary and redundant instruction, and that the

18 other area of focus to be the Cromwell Green entrance.

19 So I believe whoever constructed this, and I have to

20 be careful because that wasn't me, but was trying to

21 effectively cover off that tactical firearms

22 recommendation that the two places were covered, and

23 indeed the iterative process of these post notes by the

24 end of 2015 has cleared up that ambiguity -- indeed.

25 Q. Well, we'll come to that in a moment. But, just to be

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1 clear, if there was no patrol at all, then there would
 2 be no answer to the threat of somebody climbing the
 3 fence from Bridge Street, would there?
 4 A. Well, there would, in that the officers could respond to
 5 that. So any static post, and in sector 3, as it is
 6 called, there is -- the tactic is that officers are
 7 broadly to remain where that post note tells them, which
 8 is by the gates, or by Cromwell Green entrance, but that
 9 within sector 3 there is a reactive role should
 10 something occur, ie somebody climbing over the fence at
 11 Bridge Street or, indeed, in Parliament Square.
 12 Q. Would it be normal to include that sort of reactive
 13 contingency in post notes?
 14 A. Well, the post notes at the beginning, as we saw, talk
 15 about what the overall aim of the role of those firearms
 16 officers is, and I believe it's contained within that,
 17 within the sense of those instructions.
 18 Q. Next can we look at the tactical assessment
 19 for June 2015, the one that followed these notes,
 20 {WS5099/31}. Now, we see that this is another tactical
 21 planning review, this one created in June 2015, again by
 22 Inspector Stephenson, reviewed by Sergeant McSweeney.
 23 A. Yes.
 24 Q. And if we turn, please, to page 33 {WS5099/33} and we
 25 look first of all at paragraph 8 where the author says

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1 his recommendations are:
 2 "... based around the ability for AFOs to be able to
 3 provide an initial response to counter a threat, pending
 4 further armed support arriving at the scene."
 5 A. Yes.
 6 Q. And then he refers to additional resources that can be
 7 brought to the scene?
 8 A. Yes.
 9 Q. Are you aware that that was a guiding principle of the
 10 firearms assessment?
 11 A. Yes.
 12 Q. And then page 35, please {WS5099/35}, paragraphs 49 and
 13 50, under the heading relating to New Palace Yard and
 14 Carriage Gates, the author says:
 15 "These features sits within a secure area which
 16 borders the perimeter fence line ... of the
 17 Parliament Square aspect of the estate. It is a busy
 18 vehicular and pedestrian access point (different
 19 entrance formats for pedestrians) and frequent route
 20 used by Protected Persons. Carriage Gates, when open,
 21 represent one of the weakest points in the physical
 22 perimeter."
 23 A. Yes.
 24 Q. So that is essentially a carbon copy of the equivalent
 25 paragraph from the previous assessment but with the

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1 final sentence added?
 2 A. Yes.
 3 Q. So this was adding a new point, that Carriage Gates when
 4 opened represented one of the weakest points in the
 5 physical perimeter of the estate?
 6 A. Yes.
 7 Q. We know, and presumably the reviewer would have known,
 8 that they were open all day long?
 9 A. Yes.
 10 Q. They would also have been one of the most obvious means
 11 of access to the estate from anybody looking at it?
 12 A. Yes.
 13 Q. Paragraph 50:
 14 "The whole area is covered by x2 AFOs whose primary
 15 focus is Carriage Gates and the exit point of
 16 Cromwell Green Public Entrance."
 17 A. Yes.
 18 Q. Now, this review appears to have removed the reference
 19 to intermittent patrol by one officer?
 20 A. Yes.
 21 Q. And then there's reference to weaponry at paragraph 51,
 22 and over the page, please, to {WS5099/36}, paragraph 52:
 23 "Recommendation: Carriage Gates: this should
 24 continue to be the focus of armed policing when the
 25 gates are open. Consideration should be given to

55

1 provide a short patrol into New Palace Yard, towards the
 2 exit point of Cromwell Green search area. In doing
 3 this, AFOs will also be visible to Members' Entrance."
 4 A. Yes.
 5 Q. 54, first bullet:
 6 "Carriage Gates notwithstanding the presence of
 7 alarms, CCTV coverage and security guards,
 8 Carriage Gates is the very public face of British
 9 Parliament providing iconic views of the estate, the
 10 clock tower and the historic Palace. Any committed
 11 intruder could realistically be over the physical
 12 barriers of the vehicle barriers/fence and be directly
 13 into New Palace Yard and subsequently the Palace itself
 14 without being challenged by police if these posts were
 15 not in situ. Therefore this is an essential post to
 16 retain."
 17 A. Yes.
 18 Q. Then bullet point 2 refers to the AFOs being within the
 19 secured fence line again, but says:
 20 "... the ability to challenge, close down and
 21 effectively control a subject outside the fence line is
 22 possible but fraught with challenges."
 23 A. Yes.
 24 Q. So the same comment as the previous assessment.
 25 Then the final bullet point:

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1 "While the main focus of this pair should be as
2 described in the above recommendations, there is value
3 in the occasional, and irregular, patrol around
4 New Palace Yard as a whole. Officers engaged in such
5 a patrol should be tactically separated from each other
6 but must remain in sight and hearing in order that
7 mutual support can be provided."
8 A. Yes.
9 Q. So is it right to read this document as developing the
10 deployment somewhat by referring not to one intermittent
11 patrol, a patrol by one officer intermittently towards
12 Cromwell Green, but a patrol irregularly by both
13 officers around the square as a whole?
14 A. Yes.
15 Q. And if the officers were patrolling in that way, both of
16 them together within sight of each other, it must follow
17 that there would be times when both of them would be out
18 of sight of the gates?
19 A. Yes, that's true. But this tactical advice, my belief
20 is that the post notes that derived from this tactical
21 advice do not include a patrol throughout Palace Yard,
22 irregular or otherwise.
23 Q. I understand that, and we'll come to those post notes in
24 just a moment. I'm just focusing first of all --
25 A. Yes.

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1 Q. -- on the advice and its implications before we get to
2 the post notes and theirs.
3 A. Yes.
4 Q. Now, we don't see in this document, I think, any
5 rationale for the patrol being by two officers, not just
6 one: are you aware yourself of any rationale for that
7 particular approach?
8 A. The context of this change of a whole, of bringing --
9 the difference between the 2014 document and this
10 document, is largely tethering the firearms officers
11 more closely to Carriage Gates, and that was due to
12 changes in intelligence and information and the threat
13 level against police officers. The threat level had
14 been moved up to severe at the beginning of 2015, and
15 I believe this document reflects that in the advice
16 that's being given.
17 As to the specific point of patrolling as a pair or
18 separately, I don't think I can really comment.
19 Q. Page 37 now, please. {WS5099/37}, paragraph 71. Having
20 recognised that the threat level is now severe, as
21 you've told us, and that the comments in the document
22 are based on that threat level, the author writes at
23 paragraph 71:
24 "Since January 2015 specific heightened threats
25 exist. The positioning of additional armed officers and

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1 the AFOs' presence in close proximity to their unarmed
2 colleagues and staff provides a significant highly
3 visible armed deterrent to public view and also
4 immediate and armed protection element at potential
5 first points of contact with armed/dangerous subjects.
6 It is anticipated that these will enhance overall
7 protection of the Palace of Westminster estate and those
8 persons within."
9 A. Yes.
10 Q. So with the raising of the threat level to severe, and
11 with the specific threats to officers at the gates, it
12 was regarded as ever more important that armed officers
13 should be at the exit points -- access points, and
14 visible there?
15 A. Yes.
16 Q. Now may we move, then, to the post notes based on this
17 review, or informed by it, at any rate, {DC8032/1}.
18 Now, we see these were dated 14 December 2015, based on
19 the tactical assessment of June 2015?
20 A. Yes.
21 Q. And we see the information section is as before?
22 A. Yes.
23 Q. Then if we go on to the second page, please {DC8032/2},
24 again, we see that the sector is described as
25 Carriage Gates, and the number of officers and their

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1 weaponry is as before?
2 A. Yes.
3 Q. Then this:
4 "Officers are to work together, working within
5 proximity of each other but not specifically as a pair.
6 Officers to be positioned in close proximity to the
7 gates when they are open, but not outside.
8 "Both officers are to be positioned in line of sight
9 of each other with the ability to respond to
10 Cromwell Green Entrance search point and should include
11 a short patrol into New Palace Yard towards the exit
12 point of the Cromwell Green search area."
13 A. Yes.
14 Q. So is this right, that this set of post notes picks up
15 the recommendation not from the most recent tactical
16 assessment, but from the previous one, suggesting
17 a short patrol towards the exit point of Cromwell Green?
18 A. I couldn't say whether they had rooted that in -- it's
19 not possible for me to say what was in the mind of the
20 person writing that, as to which tactical review,
21 I believe it could have been rooted in either in the way
22 that they're written.
23 Q. Now, this doesn't make clear in this document if it's
24 a patrol by one or both officers?
25 A. No.

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1 Q. With your knowledge, how would you interpret it and what
2 would you have expected authorised firearms officers to
3 do in terms of patrolling just one of them or both
4 together?

5 A. I think the important point is that the distance between
6 the Carriage Gates and the visitor centre is some 20,
7 25 yards, therefore patrolling together would have been
8 acceptable and patrolling separately would have been
9 acceptable as they would have been in line of sight of
10 each other.

11 What perhaps would have been pivotal would be that
12 those patrols would be irregular in that in terms of
13 combating hostile reconnaissance, the random nature of
14 a patrol is key.

15 Q. But still, is this right: a patrol under this
16 instruction would only be, as you have told us, 20 or
17 25 yards from the gates?

18 A. Yes.

19 Q. Would still have been within eyeline of the gates?

20 A. Yes.

21 Q. And would not have placed the officers, for example, in
22 the colonnades --

23 A. No.

24 Q. -- where their view would have been obstructed to the
25 gates?

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1 A. That's correct.

2 Q. Now we may look at a document that the
3 Metropolitan Police has provided showing historic post
4 notes for sector 3, {DC8040/1}. I'm addressing these
5 for context, Commander Usher. First of all, I think you
6 are familiar with this document, looking at the 2010 and
7 2011 post notes, do we see that each of them refers to
8 there being two armed posts "when H/S"; house sitting?

9 A. Yes.

10 Q. Each refers to one officer by the vehicle search point
11 and the second in visual contact?

12 A. Yes.

13 Q. At a point where the roadway and the colonnade meet?

14 A. Yes.

15 Q. And a short patrol near the café?

16 A. Yes.

17 Q. So one officer would have been close to the gates, being
18 at the vehicle search point?

19 A. Yes. About a similar distance to the back of the --
20 just the other way, the back of the visitor centre.

21 Q. So 20 or 25 yards from the gates with view of them.

22 A. Yes.

23 Q. And the second in visual contact at a point where
24 the roadway and the colonnade meet?

25 A. Yes.

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1 Q. And then 2012 refers to officers posted in this area to:
2 "... patrol in pairs specifically in the highlighted
3 areas as indicated by the relevant sector maps.
4 Officers also to provide an initial armed response to
5 [something] within their sectors in the required
6 response times."

7 A. Yes.

8 Q. Now, we'll come back to this document later, but may we
9 go, please, to the unredacted sector map, I think our
10 operator is able to bring that up. If not, I can give
11 a reference to the redacted version.

12 Now, Commander Usher, if you look at the bottom of
13 the screen, close to you, or the large screen in front
14 of you, this we know was a map posted in the base room
15 for firearms officers under New Palace Yard until quite
16 recently?

17 A. Yes.

18 Q. In your witness statement you describe this, and it's
19 paragraph 69 of your first statement, you describe this
20 as a historic map from 2012.

21 A. Yes.

22 Q. Now, we've heard that it was still on the wall of the
23 base room until very recently, including, I think, when
24 you produced that witness statement?

25 A. Yes.

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1 Q. So it's right to say it wasn't historic in that sense:
2 it hadn't been put in the bin?

3 A. No.

4 Q. Also, assuming this was a map from 2012, as you tell us,
5 may we presume that it was the highlighted sector map
6 referred to in the post notes from 2012?

7 A. No.

8 Q. It wasn't?

9 A. I don't believe so because, for a number of reasons:
10 this map shows alarm points. There are a number of
11 different things it could show within the geography
12 there that it doesn't show, security measures, covert
13 and overt, and other matters. The fact that it just
14 shows alarms, I believe that the predominant purpose of
15 this map is to show where those alarms are and how they
16 sit within sector 3.

17 My second reason for believing that this isn't
18 a patrol map is the shaded area that goes round to the
19 front of the Cromwell Green entrance, which certainly
20 didn't form part of an armed patrol. So for those
21 reasons I don't think that's what this is.

22 I also believe, I think I'm right in saying, that
23 the post notes to which you were just referring did come
24 with their own map.

25 THE CHIEF CORONER: Just in the bottom right-hand corner we

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1 see the first issue date, it looks like 12 July 2012?
 2 A. Yes.
 3 MR HOUGH: Now, are you able to say yourself what area was
 4 highlighted on the highlighted sector map referred to by
 5 those 2012 post notes?
 6 A. I would have to see the original of the post notes and,
 7 as you might understand, I've seen a large number of
 8 post notes recently, going back historically. From
 9 memory there was a specific map attached to that note
 10 with a blue shaded area. From memory the top -- the
 11 area between Carriage Gates and the vehicle search
 12 point. But I couldn't be 100 per cent sure of that.
 13 Q. So we can look into this, but based on your recollection
 14 now, you believe that the shaded area referred to, the
 15 highlighted area, showed highlighted the area between
 16 Carriage Gates and the vehicle search point?
 17 A. Yes.
 18 Q. Thank you very much. May we return to the schedule of
 19 post notes, {DC8040/1}. In 2014, November 2014 refers
 20 to the two armed officers located within the sector
 21 patrolling in pairs:
 22 "Officers will patrol in pairs on the cobbles
 23 outside the colonnade paying attention to the Members'
 24 Entrance.
 25 "Officers will where appropriate split and

1 simultaneously patrol either side of New Palace Yard
 2 making their way towards Carriage Gates, with Officer 1
 3 paying attention to New Palace Yard Vehicle Search Point
 4 and Officer 2 paying attention to Cromwell Green Search
 5 Entrance."
 6 A. Yes.
 7 Q. So that involved, it would appear, a more wide-ranging
 8 set of patrols?
 9 A. Yes.
 10 Q. And the officers splitting up in making those patrols?
 11 A. Yes.
 12 Q. And the officers when splitting up in that way,
 13 presumably at some times being out of eyeline of each
 14 other?
 15 A. Not necessarily, I believe that the firearms training of
 16 those officers would have meant that in engaging in
 17 those patrols they would have known to have remained
 18 within eyesight of each other, and if as described they
 19 are going from essentially from the colonnades either
 20 side of the central garden up to Carriage Gates, they
 21 could perform that function whilst seeing each other.
 22 Q. We can take that document down now, because we have
 23 looked at the 2015 sets of notes, the ones of real
 24 relevance to us.
 25 Now, Commander Usher, you're aware, I think, that

1 we've had evidence from PCs Ashby and Sanders, the
 2 firearms officers on duty on the day of the attack?
 3 A. Yes.
 4 Q. And from PCs Ross and Glaze, who had previously been
 5 firearms officers at the Palace?
 6 A. Yes.
 7 Q. I think you've been able to read transcripts of relevant
 8 evidence?
 9 A. Certainly of PCs Ashby and Sanders.
 10 Q. Thank you. Now, their understanding, they've told us,
 11 in 2017 was that the AFOs in New Palace Yard were to
 12 patrol generally in the yard in the area highlighted by
 13 the sector map we've just looked at?
 14 A. The alarm map.
 15 Q. Whatever we call it, it's --
 16 A. Sorry, I'm distinguishing it from the -- yes.
 17 Q. The map with the blue shading.
 18 A. Yes.
 19 Q. Now, their understanding was that there had been a point
 20 in time when AFOs had been required to stand by or near
 21 to Carriage Gates?
 22 A. Yes.
 23 Q. But that they'd been deployed to this area numerous
 24 times with numerous colleagues and that in recent years,
 25 they've always adopted the approach of patrolling the

1 whole of New Palace Yard?
 2 A. I believe from memory that they say -- certainly
 3 PC Ashby says that prior to March 2017, about -- again
 4 from memory -- 18 months prior to that, that he
 5 remembers the post as being static on the gates, and
 6 that at some point after that, he'd been given
 7 a different instruction to patrol the whole of the yard.
 8 That would marry up with the changes that came about at
 9 the beginning of 2015 in the post notes.
 10 Q. Now, they gave evidence that while patrolling on
 11 a roving patrol all around the square in recent years,
 12 they were often seen by supervisors and more senior
 13 officers in the area of Carriage Gates?
 14 A. Yes.
 15 Q. And they were often seen, they also said, by officers
 16 when they were some distance from Carriage Gates?
 17 A. Yes.
 18 Q. And that nobody ever disputed that they were doing their
 19 job; that was their evidence?
 20 A. That was their evidence.
 21 Q. Commander Usher, have you visited the New Palace Yard
 22 area on many occasions over the last couple of years
 23 since you have been in post?
 24 A. Yes.
 25 Q. Between April 2016 and March 2017, have you seen what

1 the officers, the authorised firearms officers, were
 2 doing there when posted there?
 3 A. I have. I wouldn't have been as familiar then as I am
 4 now with the individual post notes, so as to my
 5 knowledge of whether they were standing in the right
 6 place or otherwise I couldn't say, at the time.
 7 Q. Can you remember from any visits to that area between
 8 taking up post in April 2016 and the attack
 9 in March 2017, can you remember where the AFOs were when
 10 you were --
 11 A. I can certainly remember the AFOs at the gates, because
 12 that -- depending on the reason why I've gone there,
 13 that may be the route in, and seeing the AFOs, talking
 14 to AFOs on my way in. But I couldn't discount having
 15 seen them other than in accordance with the post notes.
 16 Q. So you couldn't discount having seen them elsewhere in
 17 the square?
 18 A. I really couldn't say one way or the other. I'm at risk
 19 of being misleading if I try to nail that down.
 20 Q. Now, if PCs Ashby and Sanders are right in that not only
 21 they but others with whom they patrolled --
 22 A. Mm-hm.
 23 Q. -- were regularly some distance away from the gates in
 24 recent years, in, say, the period from 2015 to 2017, it
 25 might be suggested that these most recent post notes

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1 were something of a dead letter, as far as they and
 2 their other armed colleagues who patrolled with them
 3 were concerned?
 4 A. Well, that would depend on why they weren't where the
 5 post notes said they should be. That could be for
 6 a variety of reasons and I wouldn't want to guess their
 7 motivation.
 8 Q. But setting aside why individual officers may have
 9 behaved as they did, if the tactical assessment was that
 10 officers needed to be tethered to the gates --
 11 A. Yes.
 12 Q. -- and significant numbers of officers weren't
 13 patrolling in that way, wouldn't that suggest that the
 14 system wasn't operating as it was supposed to operate?
 15 A. It would depend on a number of factors: one is on what
 16 is a significant number of officers, and the information
 17 I have in -- from 2015 to 2017, is that the vast
 18 majority, by which I mean the high 80s -- 80 per cent or
 19 more of officers were engaged with the ADAM system,
 20 which tells officers exactly where to patrol, then
 21 I would believe that the majority of officers were doing
 22 as they were told by that system.
 23 There was a back-up to that system, because the IT
 24 is not infallible, due to the nature of the heritage
 25 estate at Parliament, and it doesn't mean that those

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1 officers who hadn't looked at ADAM weren't complying
 2 with the post notes, because there was a hard-copy
 3 binder of post notes within the base room.
 4 It is also practice and culture amongst firearms
 5 officers that all firearms officers work to post notes.
 6 It is language with which they are familiar.
 7 Q. Now, you refer to the ADAM system, the Armed Deployment
 8 Authorities Management system, and you tell us that that
 9 contained the information that officers needed to know
 10 their post instructions?
 11 A. Yes.
 12 Q. That was a system onto which officers could log which
 13 would give them access to post instructions for
 14 a variety of posts on the estate?
 15 A. Yes, and my own experience of seeing it is that is
 16 pretty much all it contains.
 17 Q. What were the requirements for armed officers to access
 18 that system?
 19 A. I'm sorry, do you mean in terms of they were required in
 20 that they were told to?
 21 Q. Were they required to, and how regularly?
 22 A. They were -- the initial instruction, which I believe
 23 was issued in 2015, was that they should regularly
 24 access ADAM. It was the sole repository of the
 25 definitive guide to post notes. As to the definition of

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1 "regularly", I couldn't go further.
 2 Q. When post notes were updated, what was done to ensure
 3 that armed officers read the new versions?
 4 A. Supervisors would have been emailed from the -- from our
 5 operations centre to inform them that there had been
 6 a change to the post notes, and that that should be
 7 disseminated to staff.
 8 Q. Now, we've received emails, and they've been disclosed,
 9 showing that there were reminders of that kind to
 10 supervisors.
 11 A. Yes.
 12 Q. But we haven't received emails from supervisors to AFOs
 13 such as PCs Ashby and Sanders?
 14 A. I understand that. I believe that's possibly a work in
 15 progress.
 16 Q. But if there weren't emails, is it the case that those
 17 supervisors would have been required to give that
 18 instruction orally?
 19 A. Yes.
 20 Q. Now, you met, I think, PCs Ashby and Sanders in the late
 21 summer of 2017, you tell us in your statement?
 22 A. That's right.
 23 Q. And at paragraph 71 of your statement, you say that both
 24 of them honestly believed that they were required to
 25 carry out a roving patrol across the whole of

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1 New Palace Yard?

2 A. That was my impression at the time.

3 Q. They have given evidence that at the time you didn't

4 challenge them and tell them that they were acting

5 wrongly; is that right?

6 A. That's absolutely incorrect. I can go further, if you

7 would wish me to, on that point?

8 Q. Yes, please.

9 A. So, quite rightly and properly I was not involved or

10 kept apprised of the investigation into this matter, so

11 I had -- I literally did not know the work of SO15 as to

12 the details of who had been where when the attack had

13 happened. My concern at this time was around the

14 effectiveness of the occupational health system that we

15 have, ie what have we done post-event. So I saw every

16 officer that was in New Palace Yard, with the exception

17 of the officers who had fired the shots, because they

18 are subject to a different post-incident procedure, and

19 the Deputy Commissioner, largely because he was the

20 Deputy Commissioner. Everybody else I spoke to, and

21 broadly the conversation was the same: did you engage

22 with occupational health, did you find it helpful, and

23 I got the sort of responses that you would anticipate

24 that I would get. Some didn't feel it necessary, some

25 felt it necessary and very helpful, and some felt it

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1 necessary and not as helpful.

2 In the course of one of those conversations, shortly

3 before meeting Ashby and PC Sanders, an unarmed officer

4 had met with me and said, during a very long and

5 somewhat emotional conversation with them,

6 understandably as they had experienced some very serious

7 trauma on the events of that day, they made a comment

8 that they wouldn't speak to a firearms officer going

9 forward. They were upset with firearms officers, was

10 the impression I got. I asked them to expand on that,

11 but they were reluctant to do so.

12 As a result of that conversation, I thought I should

13 see the post notes, and therefore I asked for the post

14 notes, which were delivered in hard copy to me. I read

15 them, they seemed to make sense.

16 I think either the day or the day after I received

17 those post notes, I met with PCs Ashby and Sanders and

18 the context of that conversation was exactly the same as

19 the other 20 conversations I had had, which was "What

20 was your impression of occupational health", et cetera.

21 Very early on in that conversation PC Ashby produced

22 from his pocket an aide-memoire, as he referred to it,

23 and said: this was where we were patrolling, sir, this

24 is what we were told to do.

25 Q. Just pausing there. What was the aide-memoire that he

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1 produced?

2 A. He produced a version of the alarm map.

3 I looked at that and straightaway said to them:

4 look, Lee, that's not right, and the reason I happen to

5 know it's not right is sitting on my desk are the post

6 notes, and I went physically out of the meeting room to

7 my desk, got the post notes and brought them back and

8 sat down with them and discussed them with the officers.

9 Now, what I said when I made my statement is true:

10 at the time I believed that they thought that they were

11 patrolling in the right area, I thought that was

12 an honest-held belief, and therefore, yes, that they did

13 believe it, but to say that I didn't challenge that is

14 wholly wrong.

15 Q. In your statement, being fair to you, you say that it

16 appeared to you that despite you showing them the actual

17 post notes, as you referred to that process, both

18 officers retained the honest-held belief they had been

19 acting in accordance with their understanding of that

20 post note?

21 A. Yes.

22 Q. Is that still your view?

23 A. I have -- having seen the evidence of PC Ashby I find it

24 difficult to reconcile some of the things that were said

25 with my understanding of the facts. Understandably --

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1 and PC Ashby remains one of my officers, it is our

2 intention to make sure that he is looked after. Events

3 such as this, as traumatic as this -- losing an officer

4 is the most traumatic thing that can happen to a command

5 or, indeed, to a commander. It, of course, pales into

6 insignificance as to the distress and upset to the

7 family but it is fair to say that when something like

8 this happens, and I have unfortunately experienced it

9 more than once in my 30 years' service, the command

10 shakes and officers consider their own actions, they

11 revisit it, they question themselves endlessly,

12 usually -- and that certainly is true of myself -- as to

13 what could they have done, and in doing so, that may be

14 affected by emotion, it may be affected by a number of

15 factors.

16 I do believe now that, certainly PC Ashby, was

17 probably aware that there was a problem with where he

18 was patrolling prior to him seeing me, and I base that

19 on a number of things that have happened since and the

20 evidence that I've seen him give to this court.

21 I wouldn't really want to go much further than that

22 because at the end of the day that is a belief I have,

23 it may be that that belief is based to some degree on

24 speculation, and I don't think this is perhaps the forum

25 with that speculation to be aired, though I can tell you

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1 how I have arrived at that conclusion but yes, that's
 2 the thought process I have had.
 3 Q. Commander Usher, I am afraid I probably ought to press
 4 you as to what led you to that conclusion, because it is
 5 important to understand these officers' perception of
 6 their role and whether it was, first of all, genuine,
 7 and secondly, justified.
 8 A. Well, I would certainly not go as far as perhaps to say
 9 whether it was genuine or not, but certainly in the
 10 events afterwards, PC Ashby says that he is told
 11 repeatedly for years on end by a sergeant, on an almost
 12 daily basis, that when he is patrolling New Palace Yard
 13 he should refer himself to the map that is on the base
 14 room wall. That in itself may well be the case, it is
 15 slightly odd in that New Palace Yard is a rectangle
 16 defined by perfectly clear architectural structures, and
 17 if you told me to patrol New Palace Yard on day one of
 18 my service on the command, I think I would understand
 19 that. I wouldn't need referencing back to the -- to
 20 a map on the base room wall in the same way as if you
 21 told me to patrol Parliament Square, or to
 22 Parliament Square largely, I think I would understand
 23 what you meant.
 24 It therefore causes me to reflect that on the
 25 meeting I had with PCs Ashby and Sanders, the rapidity

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1 with which PC Ashby produced the aide-memoire from his
 2 pocket and the necessity, in fact, to possess
 3 an aide-memoire at all in order to define patrolling
 4 New Palace Yard, now strikes me as slightly unusual. So
 5 for that reason I believe possibly that when PC Ashby
 6 came to see me he thought I was going to be inquiring
 7 about their patrolling, which broadly I wasn't. I made
 8 clear to every officer I saw and as I say, another 18 of
 9 them who I think would verify this, the focus of my
 10 attention was in the post-event trauma and how the
 11 Metropolitan Police had assisted with that, and was
 12 specific with every officer to say: if you are going to
 13 find discussing the events of the day traumatic, then
 14 please don't, but having gone through that initial
 15 preamble with PCs Ashby and Sanders, PC Ashby produced
 16 this aide-memoire almost immediately, and I think that
 17 may be because he recognised that there was
 18 a difficulty, and he was advancing a defence to his
 19 actions on the day, potentially.
 20 Q. Might it not also be, as you've referred to, that this
 21 was an officer who had lost a colleague and was seeking
 22 to explain his own position and movements by reference
 23 to what he thought was the textbook?
 24 A. It might have been.
 25 MR HOUGH: I'm about to move to the DPS process. I'm aware

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1 that we haven't yet had our mid-morning break. Would
 2 that be a convenient moment?
 3 THE CHIEF CORONER: It certainly would. We started a little
 4 bit earlier, Mr Hough, but I was keen not to interrupt
 5 the flow, but we will take a 15-minute break there.
 6 Thank you.
 7 (11.33 am)
 8 (A short break)
 9 (11.51 am)
 10 A. Sir, may I be permitted to say something just before we
 11 resume?
 12 MR HOUGH: Yes, of course.
 13 A. I've reflected on an answer I gave prior to the break
 14 and I think I ought to be clear: I think it isn't right
 15 to say that I had my belief eradicated that PC Ashby had
 16 an honest-held belief at that meeting. I think it is
 17 probably more proper to say that I believe that PC Ashby
 18 was aware there was a potential problem with where he
 19 had been patrolling prior to that meeting.
 20 Q. Thank you, Commander, and I've obviously asked you
 21 already about the basis for that belief.
 22 A. Yes.
 23 Q. After that meeting, or that set of meetings with
 24 PCs Ashby and Sanders, did you refer the question of
 25 their position and patrolling to the Directorate of

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1 Professional Standards, or DPS?
 2 A. Yes. It seemed appropriate that the question of whether
 3 where they had been patrolling had had any consequence
 4 be independently reviewed, and therefore that the
 5 Directorate of Professional Standards was the correct
 6 body with which to do that.
 7 Q. May we bring up the report produced as a result of that
 8 process, {WS5099/41}, and this is part of that report.
 9 Two-thirds way down this page, the author writes:
 10 "Armed Post Notes are saved and viewable by all
 11 staff on the ... ADAM system. It is accessed via the
 12 PaDP Information Point. The system records all access
 13 by officers and is time/date stamped. It does not
 14 record which post notes are opened once into the system.
 15 Officers are expected to regularly view and brief
 16 themselves on the posts they cover. The operations team
 17 at Apex House manage this system. They email all armed
 18 officers when a particular post has been updated in
 19 order for them to review the changes.
 20 "I have checked the access by both officers and
 21 there is no trace of PC Sanders having used the system.
 22 "PC Ashby last used the system on 29/06/2015. The
 23 post notes relevant to [New Palace Yard] at the time of
 24 the incident were updated on 14/12/2015. It would
 25 appear therefore that neither officer had accessed the

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1 system to read the relevant notes. This does not,
2 however, account for any verbal briefing these officers
3 may have had by any line supervisor concerning the
4 instructions when deployed in [New Palace Yard] sector.
5 I have also not had an opportunity to discuss this with
6 either officer."

7 Are you aware that that was one of the pieces of
8 inquiry and one of the conclusions reached in the DPS?

9 A. I am, yes.

10 Q. And then {WS5099/43}, please, looking at the top of the
11 page:

12 "Having looked at the ADAM system, there is
13 Organisational Learning ... across the whole command in
14 that I have established that there are a number of
15 officers who have either not registered to use the
16 system or who have not logged on for considerable
17 periods of time.

18 "This appears to be the case with PC Ashby and
19 Sanders ..."

20 A. Yes.

21 Q. Now, you told us earlier that you believed that a number
22 or proportion of officers had logged into the ADAM
23 system?

24 A. Yes, I believe that to be, and the only reason
25 I'm giving it as a percentage is I wouldn't want, for

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1 security reasons, to give the total number of armed
2 officers. I believe that number to be around
3 83 per cent of officers, armed officers on the command.

4 Q. Where did you get that information from?

5 A. That was provided to me recently in -- an officer who
6 did a search of that -- I believe did a search of the
7 ADAM system, or how many officers had accessed it prior
8 to 22 March 2017.

9 Q. Is that number the proportion of officers who had ever
10 accessed the system, or who had accessed it within
11 a particular period of time?

12 A. What I was told was that they had accessed it recently.
13 That is my best belief.

14 Q. Were you told what "recently" meant?

15 A. I took it to mean recently prior to 22 March 2017.

16 Q. No, but within what period?

17 A. I couldn't assist you, sir.

18 Q. Now, this document suggests that there is a number of
19 officers who either haven't registered to use the system
20 or who hadn't logged on for considerable periods of time
21 across the whole command?

22 A. Yes.

23 Q. Were you aware that that was a conclusion reached by
24 this report?

25 A. Yes.

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1 Q. And next page, please, page 44, {WS5099/44}, the
2 severity assessment at the conclusion of the report, if
3 we go down to the fourth paragraph beginning "Taking
4 those facts into accounts ...", the author writes that:
5 "... it is evident as outlined by both the PSC and
6 the OCU Commander (Chief Superintendent Johnston) from
7 the review of working practices, that officers consider
8 the post notes to be advisory and that there is scope
9 for some personal interpretation. This is not the case
10 and leads to poor practice and vulnerability in the
11 security operation, however it is evident that this
12 misconception is based upon a lack of learning and
13 awareness as opposed to any deliberate wilful intent to
14 ignore instructions let alone undermine the security
15 operation."

16 Now, that appears to be addressing something
17 different from failure to access the ADAM system,
18 doesn't it?

19 A. Yes.

20 Q. That appears to be suggesting that officers -- it
21 doesn't say how many -- consider the post notes of which
22 they are aware to be advisory rather than mandatory?

23 A. Yes.

24 Q. And the report's author says that that leads to both
25 poor practice and vulnerability in the security

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1 operation?

2 A. Yes.

3 Q. Was that a conclusion you were also made aware of?

4 A. Yes.

5 Q. And then looking at the next paragraph, there's
6 an assessment of what's described as the culpability of
7 officers Sanders and Ashby, and it's said that their
8 position is said to involve:

9 "... a case of poor practice arising from
10 a misjudged and misguided interpretation of what they
11 were allowed to do within their patrol area in terms of
12 the area covered."

13 It says:

14 "The officers were patrolling at the time within the
15 area therefore engaged in security patrols in that area,
16 the issue being this went over a more extended area. In
17 addition, it is clear that this practice is not unique
18 to these officers, and that wider command practice was
19 reflective of the same misunderstanding. What is key is
20 that the officers concerned and wider staffing learn
21 from this poor practice ..."

22 Et cetera. And I presume you are also aware of that
23 conclusion?

24 A. Yes.

25 Q. Are you able to explain the meaning of the words "wider

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1 command practice" recognising that you didn't, yourself,
 2 write the report?
 3 A. I'm not, and it hinges upon, as you identified, I think,
 4 earlier, really when it says "Officers" is how many
 5 officers is it talking about.
 6 So I can't, I don't think, legitimately assist you
 7 with that.
 8 Q. And the suggestion, is this right, by this report, is
 9 that it wasn't isolated on just a few officers; that it
 10 was a broader issue than that?
 11 A. I think it's -- I am not sure on what evidence I could
 12 base that interpretation. It is clear that it is the
 13 author's opinion that it is not just PCs Sanders and
 14 Ashby; that others have got the practice of believing
 15 that post notes are advisory rather than
 16 non-discretionary. I can't say how widely the author
 17 suggests that practice extended.
 18 Q. But the suggestion appears to be that PCs Ashby and
 19 Sanders weren't unique either in not accessing the ADAM
 20 system regularly, or in regarding post notes as being
 21 advisory, if that is how they regarded them, or in
 22 patrolling more widely within New Palace Yard than the
 23 post notes indicated?
 24 A. Well, certainly I'd agree with your first statement.
 25 The second statement, as to PCs Ashby and Sanders, of

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1 course they weren't asked. So when you say that they
 2 regarded them as advisory or otherwise, I don't think we
 3 can ...
 4 Q. Let's put it this way: first of all, the report's author
 5 recognises that PCs Ashby and Sanders weren't unique at
 6 all --
 7 A. Yes.
 8 Q. -- in their use or non-use of the ADAM system?
 9 A. Yes.
 10 Q. It recognises that some officers, it doesn't say how
 11 many, but some officers regarded post notes as advisory
 12 and that that led to poor practice and vulnerability.
 13 A. Yes.
 14 Q. And it recognised that PCs Ashby and Sanders were
 15 patrolling in an area wider than that which they were
 16 instructed to patrol under the post notes?
 17 A. Yes.
 18 Q. And the implication is that that error, if it was
 19 an error, was mitigated somewhat by the wider
 20 circumstances of how others behaved?
 21 A. Yes, and I think further mitigated by the author's
 22 belief that it probably had no consequence.
 23 Q. Now, in your witness statement you say at paragraph 77
 24 that following this report:
 25 "... organisational learning was implemented and it

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1 is now routine practice for supervisors to check that
 2 staff are regularly logging into the ADAM system and
 3 checking for any operational changes to Post Notes."
 4 A. Amongst other changes that we have made, that is one of
 5 them.
 6 Q. Is it right to say that that routine practice of
 7 checking was not taking place before March 2017?
 8 A. I couldn't say for certain, but I would agree it's
 9 likely that it was not.
 10 Q. Now, may we come to the day of the attack. We know that
 11 PCs Ashby and Sanders had been stationed under the
 12 colonnade on the far side of New Palace Yard from the
 13 gates without any unobstructed view of the gates for
 14 45 minutes prior to the attack?
 15 A. Yes.
 16 Q. We know that in 108 minutes, for which we have CCTV
 17 footage of those officers and PC Gerard, in the yard
 18 before the attack, there were armed officers near the
 19 gates for just 14 minutes.
 20 A. Yes.
 21 Q. In that position, would you accept that those officers
 22 wouldn't have had any real opportunity to respond
 23 quickly to a threat at Carriage Gates?
 24 A. Of the type of threat which was encountered, yes,
 25 I would agree. Yes, I would agree.

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1 Q. Or presumably to other kinds of armed pedestrian attack?
 2 A. Well, depending on your definition of "quickly", I mean,
 3 from they were standing I think it's about 50 yards to
 4 Carriage Gates, so they would have been capable of
 5 responding within a matter of seconds, not minutes.
 6 Q. Presuming, of course, that they could see what was going
 7 on?
 8 A. Yes.
 9 Q. Or presuming that they were drawn by specific radio
 10 messages?
 11 A. Yes.
 12 Q. They would certainly not, in that position, provide
 13 a visible deterrent to the outside world?
 14 A. Correct.
 15 Q. And they wouldn't provide immediate armed support for
 16 their unarmed colleagues?
 17 A. Well, again, I -- I mean, I don't wish to appear overly
 18 defensive about this, it depends upon your definition of
 19 "immediate". They could have reacted within seconds.
 20 Q. At the time of the attack we're aware that the first
 21 sign of trouble received by those within New Palace Yard
 22 was the sound of a vehicle colliding with the
 23 Bridge Street wall?
 24 A. Yes, that's right, and in my conversations with those
 25 officers, as I've described to you earlier, that was

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1 almost universally described as an explosion.
 2 Q. Yes. They, amongst others, described it as sounding
 3 like an explosion. Now, we know that they were at the
 4 colonnade and that they moved towards the sound
 5 together?
 6 A. Yes.
 7 Q. You, I think, are aware of their movements?
 8 A. Yes.
 9 Q. Now, I'm not going to ask you hypothetical questions
 10 about what they could have done in certain
 11 circumstances, but what were the responsibilities of
 12 an AFO, even if stationed at Carriage Gates, in response
 13 to hearing such a sound?
 14 A. Their response should have -- if they believed, as
 15 certainly everybody else believed, that that was
 16 a potential perimeter breach, it would have been their
 17 responsibility to move towards what they believed was
 18 a perimeter breach and advance on that threat.
 19 Q. Was it their responsibility under their instructions and
 20 training, as you understood them, to go immediately?
 21 A. Yes.
 22 Q. Was it their instruction to go together, or might it
 23 have been appropriate in some circumstances for one of
 24 them to go to check out the sound?
 25 A. This -- I cannot imagine the circumstances on hearing

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1 an explosion, and therefore the belief that there is
 2 an extant threat within a very short distance of you,
 3 that you would not advance together.
 4 Q. If that's the case, and that was the procedure in
 5 training, wouldn't that give rise to the difficulty of
 6 leaving the main gates, the main access point,
 7 undefended by armed officers and potentially opening
 8 a vulnerability after an initial distraction, perhaps
 9 deliberate, had been caused?
 10 A. Yes, but that's a professional judgment. Equally, you
 11 could say that remaining by the gates whilst a marauding
 12 terrorist firearms assault is taking place behind you
 13 and not responding to that is creating a vulnerability.
 14 It's a professional judgment for the officers to make
 15 and I would support them in the judgment that they made.
 16 Q. Drawing some threads together on this subject, even
 17 supposing that it was a minority of firearms officers,
 18 even supposing that it was 17 per cent, taking away your
 19 83 per cent, 17 per cent who weren't familiar with their
 20 post notes --
 21 A. Sorry, sir, can I just stop you there. 17 per cent who
 22 had not logged onto ADAM is not necessarily synonymous
 23 with not being familiar with post notes. It may have
 24 been they accessed the hard copy.
 25 Q. Let me put the question another way, to be fair. We

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1 have heard from PCs Ashby and Sanders that the general
 2 view was that officers were to carry out a roving patrol
 3 and not to remain by the gates?
 4 A. Yes.
 5 Q. Even if they are not right about that, and that it was
 6 a minority of officers holding that view --
 7 A. Yes.
 8 Q. -- but more than just a few, that would still have been
 9 a pretty serious problem in this area, wouldn't it?
 10 A. It would have been undesirable, certainly. I agree.
 11 Q. Because if even 10 or 20 or 30 per cent of the time this
 12 particularly vulnerable entrance to Parliament did not
 13 have an armed officer tethered to it, as you've put it,
 14 that would be a weakness in the security arrangements,
 15 wouldn't it?
 16 A. Yes, it would, in the assessment that was reached in
 17 2015. I think it's probably worth bearing in mind that
 18 they hadn't always been tethered at that point and were
 19 capable of more extensive patrols in the past.
 20 Q. When we look at the adequacy of security arrangements --
 21 A. Yes.
 22 Q. -- we must look, as your team did, at the threat as it
 23 presented itself, and as was understood?
 24 A. Yes.
 25 Q. And you've told us that the assessment that led to the

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1 instruction to tether officers to the gates was based
 2 upon the threat level and the intelligence at the time.
 3 A. Yes.
 4 Q. And you've explained that.
 5 A. Yes.
 6 Q. Thank you. May we now move away from these topics and
 7 look at recommendations about security arrangements in
 8 New Palace Yard before the attack, and I'm now looking
 9 from page 19 and following of your witness statement.
 10 A. Yes.
 11 Q. Firstly. In that part of the statement you summarise,
 12 I think, the relevant findings of a number of security
 13 reviews at the Palace prior to the attack?
 14 A. Yes.
 15 Q. And I would just like to pick up on a few of the most
 16 relevant, if I may. First of all, looking towards the
 17 top of page 20 of your statement, is it right that there
 18 was a review in September 2004 of the Parliamentary
 19 Estate generally?
 20 A. Yes.
 21 Q. And did annex C of that report in particular address the
 22 risk of a determined attacker on foot --
 23 A. Yes.
 24 Q. -- assailing the Palace? And did it refer to the
 25 presence of armed officers at main entrances as being

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1 an important deterrent to that type of attack?
 2 A. Yes, amongst the presence of other uniformed officers
 3 and an armed officer.
 4 Q. Now, did the report also refer to the risk of armed
 5 officers being rushed?
 6 A. Yes.
 7 Q. And as a result, make a suggestion of them standing
 8 a little back?
 9 A. Yes.
 10 Q. Now, to the extent that you can help us, is there
 11 a particular concern about having armed officers right
 12 at the perimeter because of the risk of them being
 13 rushed?
 14 A. Yes, there is. There is a, unfortunately, tragically,
 15 documented across Europe and North America, occasions in
 16 which armed officers standing in direct contact with the
 17 public have been overcome and their weapon -- by low
 18 sophistication attack with a knife and their weapons are
 19 then seized and used fatally elsewhere. This is true
 20 across that part of my command, so at embassies and in
 21 other locations it is a very serious consideration when
 22 we have armed officers standing directly in front of the
 23 public with no physical barrier between them.
 24 Q. So when we see even now at various locations armed
 25 officers standing a little back --

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1 A. Yes.
 2 Q. -- that may form part of the rationale?
 3 A. Yes.
 4 Q. May we move further down page 20 to Operation Standfast.
 5 Is it right that this was a report based on a security
 6 check exercise testing an imagined penetration of the
 7 Palace?
 8 A. Yes. And it's something that we do right across the
 9 Metropolitan Police estate, we do it on police stations
 10 and other police buildings to test, essentially, can you
 11 get in, and that tests the efficacy of the pass
 12 arrangements, physical security, and the culture of
 13 officers.
 14 Q. Did this report note that the visible use of armed
 15 officers would always provide, in effect, involving
 16 deterrence as well as disruption?
 17 A. Yes.
 18 Q. Did it also identify, looking at the top of page 21 of
 19 your statement, that Carriage Gates were a very busy
 20 entrance point of the estate?
 21 A. Yes.
 22 Q. And did it refer to easily identifiable and exploitable
 23 weaknesses there?
 24 A. It did, though it should be mentioned that this took
 25 place some four years, and in a very, very different

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1 security environment to that which was in place in 2017.
 2 Q. Following up on this, and just looking at your third
 3 statement, paragraph 14, where you refer in detail to
 4 the Operation Standfast report, you say this:
 5 "The fact that Carriage Gates was obviously one of
 6 the most difficult points on the estate to police on
 7 account of the fact that it was one of the main entry
 8 points, the one that was required at times to be kept
 9 open, has long been recognised."
 10 A. Yes.
 11 Q. And towards the top of that paragraph:
 12 "Carriage Gates, if profiled correctly, would
 13 provide the easiest method by which a person or persons
 14 with single or multiple weapons could enter the Palace."
 15 A. Yes.
 16 Q. So there were structural elements of Carriage Gates
 17 before the changes that had happened more recently --
 18 A. Yes.
 19 Q. -- that made it a difficult area to police and
 20 a vulnerable area to attack?
 21 A. Absolutely, it has long been recognised as a very
 22 challenging area, and I think it is also worth noting
 23 that the report made no recommendation in that there
 24 wasn't an obvious solution to the fact. It may be
 25 suggested it is axiomatic that if the gates are open, it

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1 is a weakness.
 2 Q. Can we move on in your first report to page 21 and
 3 a review in December 2013. Another general review of
 4 the security of the parliamentary estate?
 5 A. Yes.
 6 Q. And did the executive summary record in that report that
 7 hostile armed entry and attack was a high risk?
 8 A. Yes.
 9 Q. And that pedestrian entrances remained vulnerable to
 10 determined and hostile attack?
 11 A. Yes.
 12 Q. Then over the page, can we perhaps put on screen
 13 {WS5099/22}, and if we can maximise the paragraph at the
 14 top of the page, please, that's in italics, we see that
 15 this refers in the quoted passage at the top to:
 16 "The compatible disposition of Police and Security
 17 Personnel, particularly armed Police, [relating] to the
 18 outermost physical protective security provisions within
 19 the [Parliamentary Estate] ... a critical aspect of the
 20 overall security system."
 21 A. Yes.
 22 Q. It adds:
 23 "For high risk scenarios every practical measure
 24 should be employed to ensure that an event is contained
 25 at the outermost perimeter."

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1 A. Yes.
 2 Q. "Armed police, therefore, should be positioned in
 3 positions set back from the outer physical protective
 4 security boundary where they have a good field of
 5 vision, some protective cover from fire and still be
 6 visible from the outside."
 7 A. Yes.
 8 Q. "This gives them time to see an event, assess
 9 an appropriate response, call for support, be able to
 10 respond effectively and deter, but not be vulnerable to
 11 personal attack and the possible loss of their armament
 12 in the process."
 13 A. Yes.
 14 Q. So does that really, in a nutshell, encompass both the
 15 general guidance that we have seen in various documents,
 16 and your point about standing a little back in order to
 17 avoid being rushed?
 18 A. Yes.
 19 Q. We can take that off the screen, looking at further down
 20 page 22 of your report, was there a review in 2014
 21 specifically of the conduct of firearms operations at
 22 the Palace?
 23 A. Yes.
 24 Q. Did that review identify as one risk the risk of
 25 an attack by an armed individual?

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1 A. Yes.
 2 Q. And looking at the following page, page 23, did it
 3 identify the general arming principles at various threat
 4 levels?
 5 A. Yes.
 6 Q. Now, we know the relevant threat level was severe,
 7 I think.
 8 A. Yes.
 9 Q. And did it describe the general arming principle as
 10 being:
 11 "A bespoke armed response is provided that is
 12 visible and capable of immediate response to points of
 13 greatest risk."
 14 A. Yes.
 15 Q. So at the risk of labouring the point and stating the
 16 obvious, in New Palace Yard that meant visible from
 17 outside Carriage Gates?
 18 A. Yes.
 19 Q. And capable of immediate response to an attacker at
 20 Carriage Gates?
 21 A. To an attacker at Carriage Gates or Cromwell Green
 22 entrance, because Cromwell Green entrance of course
 23 forms the outer perimeter. The public coming to that
 24 point have had no checks, so that is why the
 25 Cromwell Green entrance is also regarded as a very

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1 vulnerable risk.
 2 Q. So needing to be able to respond to either end of that
 3 25-yard corridor?
 4 A. Yes.
 5 Q. Then the next heading, page 23, was there in May 2015
 6 a review of security specifically at Carriage Gates?
 7 A. Yes.
 8 Q. And that, I think, was a review, a brief one, by
 9 a police chief inspector in response to particular
 10 intelligence?
 11 A. I think it was commissioned by a chief inspector in
 12 response to specific intelligence, including that the
 13 threat to police officers had moved to severe.
 14 Q. And did this identify a particular risk to officers
 15 stationed at Carriage Gates?
 16 A. Yes.
 17 Q. On the basis, I think, that they were in a fixed and
 18 predictable location?
 19 A. Yes.
 20 Q. Visible from the outside?
 21 A. Yes.
 22 Q. And without strong physical protections?
 23 A. Yes.
 24 Q. Now, it's fair to say, isn't it, that the principal
 25 concern addressed in this review was of a vehicle

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1 attack?
 2 A. Yes.
 3 Q. Now, over the page, turning to page 24 of your report,
 4 it's right to say, I think, that the report came up with
 5 a number of short-term recommendations?
 6 A. Yes.
 7 Q. And at point 3, you put the recommendation in this way:
 8 "The pair of armed officers posted to
 9 [New Palace Yard] should be deployed to fixed posts at
 10 Carriage Gates. One of the pair, armed with a Taser,
 11 should stand back with their back to the Corus
 12 barrier ..."
 13 That's one of the vehicle barriers, I think?
 14 A. Yes.
 15 Q. "... and be located centrally between the in and out
 16 gates. The other officer should stand behind the Corus
 17 barrier. The rationale for this suggestion was that the
 18 officers would provide immediate support to armed
 19 colleagues and provide a visible deterrent."
 20 A. Yes.
 21 Q. You go on to say:
 22 "The report recognised that such new positions would
 23 create a potential vulnerability because a fixed post is
 24 more predictable."
 25 A. Yes.

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1 Q. And therefore the report suggested that the officers
2 should revert to patrol mode after five or six days or
3 during a day shift .
4 A. Yes.
5 Q. So was that suggesting that the officers should from
6 time to time, after five or six days, or during a day
7 shift , go on a patrol from time to time?
8 A. Yes, though I don't believe that those recommendations
9 made it as far as a change in the post notes. This --
10 to contextualise this report, it was done very quickly
11 in response to intelligence , it was not completed by
12 a tactical firearms assessor, and it was subsumed almost
13 immediately by the 2015 tactical review, which came
14 a matter of days after this .
15 Q. Now, would this report have been considered by the
16 tactical firearms assessor in his review?
17 A. I can't say, sir .
18 Q. And then finally in terms of these previous
19 reviews, March 2016, page 25 of your report, was there
20 a report following a particular incident of an intrusion
21 and a theft from within the Palace?
22 A. Yes.
23 Q. And did that recommend a review of the policy of leaving
24 gates open even when traffic volumes were low?
25 A. Yes.

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1 Q. Is that a reference to the gates or the external crowd
2 control barriers?
3 A. It was this report that led to the -- prior to this
4 report there were no external crowd control barriers .
5 What was noted on that incursion was that at such a busy
6 entrance, officers required a greater stand-off and
7 security of a barrier around them to prevent people
8 simply slipping past them. So this report led to the
9 pedestrian gates, barriers, at the front of
10 Carriage Gates, which were staffed by unarmed officers.
11 Q. Thank you.
12 Moving, then, to some emails that you exhibit to
13 your second witness statement. In the months after the
14 tactical assessment of November 2014, you provided us
15 with some emails between senior officers concerning the
16 AFO deployment to the Palace?
17 A. Yes.
18 Q. May we bring up the first set of those, {WS5103/13}. If
19 we look at the bottom of the page, do we see here
20 an email dated 16 January 2015 from DCI -- I think he
21 was then -- Aldworth to a number of colleagues?
22 A. Chief Inspector, yes.
23 Q. And Chief Inspector Aldworth says:
24 "Based on verbal consultation with SCO19 [that's the
25 firearms branch] earlier this week, now that the threat

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1 level has changed, it is our desire to change the
2 position of armed officers to provide more proximate
3 protection to our staff and visitors .
4 "Therefore as quickly as it can be implemented, and
5 no later than Monday morning [next page, please] can we
6 move to the following profile ...
7 "New Palace Yard -- The pair to be positioned in
8 close proximity to the gates when they are open, but not
9 outside. This means that the fixed patrol at the back
10 of [Cromwell Green] search area is freed to focus on
11 this location ." {WS5103/14}.
12 A. Yes.
13 Q. So that suggests that with the threat level change
14 around that time the positioning of AFOs near
15 Carriage Gates was regarded as an important matter?
16 A. Yes.
17 Q. Then {WS5103/17}, please, of the same document, we're
18 going to follow this chain along, if we may. This is
19 from February 2015, an email we'll see to Mr Aldworth:
20 "On my way through westminster hall following jcos
21 1715ish -- there was a dpg officer on the flats ...
22 I said I thought this post had been moved -- give him
23 his due he says he wasn't sure ...
24 "There was one other walking alone in the hall ...
25 "Can we pls confirm our understanding."

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1 That's the start of the chain.
2 A. Yes.
3 Q. If we can go one page back, please, to page 16, you see
4 at the bottom of the page that that was written on
5 24 February 2015 {WS5103/16}, and then Mr Aldworth
6 responds to that:
7 "This is getting a bit too frequent for our liking .
8 Below is an incident from yesterday evening that came to
9 the Bosses attention ."
10 So that's Mr Aldworth forwarding that email from
11 Sandra Looby to various others.
12 A. Yes.
13 Q. And identifying it as a matter of concern.
14 "I experienced similar on the evening of Thursday 12
15 Feb when the 2 cops were meant to be in
16 [New Palace Yard] were inside [Cromwell Green entrance]
17 (and inside for some time) and there were no cops at
18 SSE."
19 St Stephen's entrance?
20 A. Yes.
21 Q. "I phoned the duty sergeant (Adam?) who acknowledged
22 that he was a visitor and didn't really know what the
23 deployment plan was.
24 "How do we stop this from happening ... I think
25 there is a bit of frustration creeping in on our side."

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1 A. Yes.
 2 Q. Then back to page 15 {WS5103/15} just to complete the
 3 chain, Mr Myers emails Mr Aldworth and says:
 4 "This is tiresome as you say, and our Sergeants seem
 5 to be failing us all!
 6 "Is there any way your Duty a Officer can oversee
 7 officers are where they should be? The duty officer has
 8 ultimate say over [Palace of Westminster] and the
 9 deployments are simple to understand. The resources are
 10 yours/theirs and that will put in the correct management
 11 structure, plus help to reduce the 'us and them' we have
 12 at the moment? If there was a problem they can liaise
 13 with the Sergeant to put it right and escalate to us if
 14 there is a dispute (there should be no dispute as it's
 15 in the post notes)?"

16 A. Yes.
 17 Q. Then up to the top of the page, Mr Aldworth passing that
 18 on, and saying:
 19 "This is definitely part of the solution and is
 20 an action in progress ... however, like SO6 inspectors,
 21 our duty officers are line managing over 100 people
 22 each, which means that opportunities to be checking that
 23 people are in the right place all the time on an 8-acre
 24 estate is challenging for them ... we rely heavily on
 25 our Sergeants and Security managers to choreograph what

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1 happens on the ground ... I'd rather we get this right
 2 at sergeant level so it doesn't need to be checked and
 3 chased by inspectors."
 4 A. Yes.
 5 Q. So did that chain of emails suggest that at that
 6 time, February 2015, there was a problem about AFOs in
 7 the Palace not always being in their correct
 8 deployments?
 9 A. Yes, and I think in my statement that I supply some
 10 context for that, and that is that at that time, prior
 11 to April 2015, two separate — entirely separate
 12 commands were involved here: there's the
 13 Palace of Westminster command, which is an unarmed
 14 command, and delivering security with unarmed officers
 15 and security officers working to that chain of command.
 16 The armed element at that point was essentially
 17 contracted in from the wider Met model, usually from the
 18 Diplomatic Protection Group, as it then was, to come on
 19 to the estate and provide the armed cover.
 20 Because they were in separate commands, what that
 21 meant was that armed officers coming on to the estate
 22 were unfamiliar with supervisors, they were probably
 23 unfamiliar with the estate, and possibly not as familiar
 24 as they might have been with the practices of the
 25 security operation.

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1 Recognising that that was always going to — once
 2 you establish that armed officers are always going to be
 3 required at Palace of Westminster, it made sense for
 4 those commands, the DPG, and the Palace of Westminster
 5 to be amalgamated, and that's what formed PaDP, the
 6 Parliamentary and Diplomatic Protection service,
 7 in April of 2015, and that move was an attempt to
 8 reconcile some of these difficulties to ensure that
 9 there was consistent armed presence, the same officers,
 10 and that they were working to consistent supervision.

11 I can quite understand the difficulty, and you can
 12 hear the frustration on both sides of that email
 13 exchange, of officers, sergeants from one command
 14 attempting to tell constables from another command what
 15 to do and finding it challenging. But the amalgamation
 16 of those commands was one of the ways in which this was
 17 challenged.

18 Q. Just for the timing of that amalgamation, in your second
 19 witness statement at page 3 you refer to the
 20 amalgamation happening in spring 2016?

21 A. Yes, so the amalgamation — it's sort of two-stage, the
 22 amalgamation happened, I believe, in spring 2015. The
 23 last, or all of the security officers which previously
 24 had worked for the MPS were TUPE'd over to the
 25 Parliamentary Security Department in April 2016.

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1 Q. They, of course, were not armed officers.
 2 A. No.
 3 Q. They were the people who manned the search points and so
 4 on.
 5 A. Yes, so the armed wing were brought in and amalgamated
 6 in, I believe, April 2015.
 7 Q. Now, the emails suggest that, quite apart from the
 8 structural problem of having these two different
 9 commands, as you've described, there were problems of
 10 the sheer logistics of duty officers line managing very
 11 large numbers of people over a very large estate. Was
 12 that — were those problems resolved in any way by the
 13 structural changes you've described?
 14 A. Well, I mean they would be reflected across the wider
 15 police service. We're a hierarchical structure. We
 16 don't rely on inspectors, broadly, to supervise
 17 constables. We have the sergeant rank to do that,
 18 that's what would have been expected in wider policing
 19 and what would have been expected in this case.
 20 Q. Now, if it's determined based on the evidence in these
 21 Inquests that officers in New Palace Yard were still
 22 failing to be where they should have been, even after
 23 the structural changes —
 24 A. Mm—hm.
 25 Q. — is that a matter of concern and a matter to be

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1 addressed by future learning or institutional changes?
 2 A. I think it's fair to say that as a result of the
 3 events — the terrible events of 22 March 2017, that we
 4 instituted a whole series of changes in any event to
 5 ensure that supervisors were absolutely certain that
 6 their constables were sure of their role on any post
 7 within the command, and I think that would be — that
 8 was a prudent thing to do irrespective of the finding of
 9 this court, with all due respect.
 10 Q. Thank you very much. We can take those emails down.
 11 May I deal now with reports and recommendation about
 12 tasers for unarmed officers?
 13 A. Yes.
 14 Q. Now, it may be suggested one means of giving better
 15 protection at Carriage Gates and other vulnerable entry
 16 points was to equip unarmed officers with tasers, and
 17 you're aware that that's an issue which has been raised
 18 and which you have dealt with in your statements?
 19 A. Yes.
 20 Q. May we look at an email from Mr Aldworth from March 2015
 21 on this subject, {WS5103/29}.
 22 Now, if we look at the bottom of the page, this is
 23 Mr Aldworth on 31 March 2015 saying to colleagues that
 24 if he reads the SA, which I think is the Standing
 25 Firearms Authority, correctly, it opens the door to them

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1 having non-AFO taser users on the command, and asking if
 2 that's how it's interpreted by others?
 3 A. Especially overnight and on Sundays.
 4 Q. Yes:
 5 "If this is the case, this is a great opportunity to
 6 uplift our capability at [Palace of Westminster]
 7 especially overnight and on Sundays when we don't have
 8 AFOs deployed but do maintain external patrols."
 9 A. Yes.
 10 Q. And then moving on, was a report made in 2016 which
 11 raised the possibility of equipping a number of unarmed
 12 officers with tasers?
 13 A. Yes.
 14 Q. Can we look at that? {WS5103/19}, so this is a report
 15 from Sergeant Ashmore of PaDP, I think?
 16 A. Yes.
 17 Q. And in the executive summary at the top it says that:
 18 "This report proposes the introduction of TASER to
 19 unarmed [PaDP] officers working within the Palace ...
 20 estate ...
 21 "It is proposed that this would reduce the risk of
 22 injury in violent confrontations at the earliest
 23 opportunity without involving officers with conventional
 24 firearms."
 25 A. Yes.

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1 Q. And seeks to identify the challenges and seek approval?
 2 A. Yes.
 3 Q. And if we go next to page 21, please {WS5103/21},
 4 paragraph 7, the author refers to the Palace being one
 5 of the most iconic sites in London, which attracts
 6 public demonstrations.
 7 A. Yes.
 8 Q. It attracts people with mental health issues, many
 9 fixated with public figures whether connected with the
 10 site or not?
 11 A. Yes.
 12 Q. Many such people are known to police to have a history
 13 of violence but still have a right of access to contact
 14 their MP, and it refers to a male have entered wielding
 15 a hammer needing to be detained without taser support.
 16 A. Yes.
 17 Q. Then down the page, paragraph 12, the author records:
 18 "As well as coordinated attacks, due to the high
 19 concentration of member of the public attending daily,
 20 the site is vulnerable to the low tech 'lone wolf' type
 21 of attack encouraged by IS/Daesh. If [the] attacker
 22 were able to gain access to the site in possession of an
 23 undetectable weapon such as a ceramic knife, or take a
 24 knife from the unlocked kitchens, unless challenged
 25 immediately the effect could be devastating and would be

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1 a terrorist publicity triumph."
 2 A. Yes.
 3 Q. Then {WS5103/24} please, the author sets out options,
 4 and if we look, one of them, at paragraph 15, is to
 5 train all NFOs?
 6 A. Non-firearms officers.
 7 Q. Non-firearms officer, at the Palace with the taser.
 8 That would obviously have a substantial cost
 9 implication, and may be unnecessary because of the
 10 number of AFOs at certain times?
 11 A. Yes.
 12 Q. Then the third option, which was the recommended option,
 13 was to train the 48 officers from the four core teams of
 14 the Palace, allowing taser coverage during night duty,
 15 including mobile patrol, when AFOs have been dismissed
 16 and additional taser resources during other times.
 17 A. Yes.
 18 Q. As you understand it, what was the reference to
 19 additional taser resources during other times?
 20 A. I can only imagine that it refers to — the only time
 21 when taser was not available as an option in
 22 New Palace Yard or anywhere else on the estate was
 23 during night duty or on a Sunday, when authorised
 24 firearms officers who, of course, are tri-armed, were
 25 not available.

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1 Q. Just to be clear, it was the third of those options that
2 was the recommended one?

3 A. Yes.

4 Q. If that had been taken, would it have resulted in any
5 unarmed officers carrying tasers in New Palace Yard on
6 the day of the attack?

7 A. No.

8 Q. Now, is it right that the response to that report was
9 produced in November 2016 and we can see it at page 25
10 of the same document {WS5103/25}, this being a review
11 by, I think, Inspector Turner?

12 A. Yes.

13 Q. And if we can, please, to page 27 {WS5103/27}, we see
14 his conclusions that it wasn't necessary to have unarmed
15 officers trained in taser:

16 "Most of the points mentioned as a rationale deal
17 with times when the public have access to the estate,
18 therefore the AFOs are the most appropriate resource.
19 Due to the cost, et cetera, it's far more cost-effective
20 for this department to use fully trained AFOs in a TASER
21 only role, as opposed to specially training 'Beat Duty'
22 Officers. In addition AFO training allows them to
23 deploy with AFOs should future post changes be
24 required."

25 A. Yes.

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1 Q. Would there at the time have been any difficulty in
2 arranging taser training for officers at the Palace,
3 given the demands on that training at the time?

4 A. Yes. The commander in charge of taser training,
5 firearms training at the time, Commander Twist, having
6 been engaged in email in the interim between these two
7 reports, stated that the training capacity was operating
8 at 110 per cent, and bearing in mind that in terms of
9 prioritising, the Met, as it uplifted tasers across the
10 whole of the Met, this was only providing an additional
11 solution during night duty and on a Sunday, and
12 therefore the comparison that you have to make for that
13 prioritisation process to exist is, is an officer at the
14 Palace of Westminster on a night duty or on a Sunday at
15 a greater threat than potentially a borough officer
16 working in Brixton or Barnet or any of the other London
17 Boroughs. Statistically the data would show that they
18 were not.

19 Q. You, I think, have experience in your own professional
20 career of being a borough commander?

21 A. I have.

22 Q. Was it ever considered, to your knowledge, that
23 equipping officers who are posted on the entrances to
24 the Palace of Westminster, unarmed officers with
25 a taser, would be a valuable back-up given the

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1 vulnerabilities of those entrances even though, and even
2 when, authorised firearms officers were present?

3 A. No, that's based on a misunderstanding of how taser is
4 used. Taser is an option that is deployed very often
5 when we have a violent individual with mental health
6 needs, so violent they require a physical response, but
7 that a firearms response would be inappropriate.

8 The question then is which areas of London -- when
9 I was a borough commander -- how many taser officers am
10 I going to require on each shift to allow me to be
11 confident that the taser option is capable of relatively
12 rapid deployment, and how likely is it that it will be
13 deployed, and that likelihood will be based on
14 historical evidence and on the nature of my borough.

15 It is not for an individual -- it is not deployed in
16 these circumstances as an individual officer's defence.
17 If that were the case, the Met would have decided to arm
18 all officers with taser, whatever the training
19 implications of that would be. If we haven't arrived at
20 that decision, it is a question of how quickly to any
21 incident, mental health or otherwise, can we get a taser
22 and what would be reasonable in those circumstances.

23 So, of course, at the Palace of Westminster, whilst
24 authorised firearms officers are on duty, throughout day
25 duty every day, apart from Sunday, the answer to that

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1 was immediately.

2 Q. I think you know a little about the characteristics of
3 tasers and their efficacy. Is it right to say, without
4 going into any sensitive details, that tasers aren't
5 always effective?

6 A. That's correct.

7 Q. And is it also right to say that tasers have a specific
8 tactical value for certain situations, particularly when
9 dealing with somebody who does have mental health
10 problems and is difficult to command?

11 A. Indeed. In fact, they were used not long after the
12 22 March attack by PaDP officers against just such
13 an individual at Parliament.

14 Q. Now since the attack, is it right to say that a very
15 substantial security review was carried out by Sir
16 Jon Murphy which has resulted in multiple
17 recommendations for security across the entire
18 parliamentary estate?

19 A. Yes.

20 Q. You, I think, are familiar with that report and its
21 recommendations?

22 A. Yes.

23 Q. Is it right to say that the very great majority of them
24 are of no relevance for our purposes in these Inquests?

25 A. Yes.

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1 Q. As well as being highly sensitive?
 2 A. Yes.
 3 Q. Insofar as the report has dealt with the security of
 4 New Palace Yard, are you satisfied that your evidence
 5 has addressed the issues as they stood on 22 March 2017?
 6 A. I believe so.
 7 Q. And just dealing with some concluding points, we've seen
 8 from the various security reviews that a number of them
 9 delivered the message that Carriage Gates were
 10 vulnerable and a highly visible entry point to the
 11 estate.
 12 A. Yes.
 13 Q. That AFOs needed to be present there and that that was
 14 something of an imperative?
 15 A. They needed to be within the vicinity of the gates, yes.
 16 Q. They needed to be visible as a deterrent and present to
 17 provide a line of defence against potentially armed
 18 attack?
 19 A. Indeed, but balanced against the predictability of
 20 a static post that they should also engage in irregular,
 21 random short patrols.
 22 Q. Now, the post notes giving instructions for the armed
 23 officers to be in close proximity to Carriage Gates were
 24 not known to the officers on duty at the time of the
 25 attack?

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1 A. I can't say that, sir.
 2 Q. If we take their evidence --
 3 A. If we take their evidence at face value, yes.
 4 Q. And were not observed by the other officer on duty --
 5 A. Certainly.
 6 Q. -- on the afternoon of the attack. There is evidence in
 7 the DPS document that they were not known to or observed
 8 by at least some other officers policing the estate?
 9 A. Again, I don't wish to be overly defensive, but the DPS
 10 document says that other officers had not logged onto
 11 the ADAM system.
 12 Q. As PaDP commander, even if you had post notes giving
 13 superb guidance, if they were ignored in practice, if
 14 they were ignored in practice by a significant number of
 15 AFOs, that would be a serious problem, wouldn't it?
 16 A. Yes.
 17 MR HOUGH: Thank you very much. Those are my questions.
 18 A. Sir.
 19 THE CHIEF CORONER: Mr Adamson, can I simply say that, as
 20 before, I can imagine there are a number of topics that
 21 you are going to cover that others may wish to cover.
 22 I'm quite happy that there may be follow-up questions,
 23 you may not cover every point, but I would hope that
 24 we can, as before, not cover the same grounds more than
 25 once. And if that means a division between people,

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1 I'm quite content with that.
 2 Examination by MR ADAMSON
 3 MR ADAMSON: Yes, sir.
 4 Commander Usher, my name is Dominic Adamson and
 5 I ask questions on behalf of the widow of PC Palmer.
 6 Commander Usher, this court heard on Thursday,
 7 through counsel for the Met Police, that no stone had
 8 been left unturned in attempting to understand the
 9 motives and actions of Khalid Masood.
 10 A. Yes.
 11 Q. Do you consider that the same can be said of your review
 12 of the security arrangements in New Palace Yard on the
 13 day of this incident: that no stone has been left
 14 unturned in that investigation?
 15 A. In my review?
 16 Q. Yes.
 17 A. In my understanding, yes.
 18 Q. We heard about 2,400 statements being taken, 10,000
 19 documents having been reviewed, and 6,000 hours' worth
 20 of CCTV footage having been reviewed. How many
 21 statements have been taken from authorised firearms
 22 officers other than PCs Ashby and Sanders regarding
 23 practice in the yard?
 24 A. None, as far as I know.
 25 Q. None?

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1 A. No.
 2 Q. How many statements have been taken from sergeants
 3 supervising authorised firearms officers regarding
 4 practice in New Palace Yard?
 5 A. I believe that work is currently ongoing, and that is
 6 a result of the fact that the evidence of PC Ashby only
 7 became obviously known to us when he gave it to this
 8 court, and therefore challenging that evidence is
 9 something that's taking place now.
 10 Q. I'm sorry, you are saying to this court that PC Ashby's
 11 evidence was a surprise to the Metropolitan Police
 12 Service?
 13 A. Certainly parts of PC Ashby's evidence were a surprise.
 14 I conceded, I think, in my main evidence and statement
 15 that I was aware that PC Ashby hadn't been patrolling
 16 where the post notes said, and that that matter is
 17 referred to the Directorate of Professional Standards.
 18 Q. It wasn't just PC Ashby though who gave evidence as to
 19 general practice in the yard, was it, in this court; it
 20 was also PC Sanders?
 21 A. Yes.
 22 Q. PC Sanders told this court that he had patrolled with
 23 between 50 and 100 other AFOs --
 24 A. Yes.
 25 Q. -- during his time on duties in New Palace Yard.

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1 A. Yes.
 2 Q. And that not one of them had ever suggested the way in
 3 which he was going about his duties was wrong and/or
 4 contrary to the post instruction. You must be familiar
 5 with that evidence?
 6 A. I believe that's -- yes, that's what he said.
 7 Q. Yes. And so what his evidence suggests is that there
 8 was a widespread systemic failure in relation to the
 9 implementation of the relevant post instructions; do you
 10 accept that that is the thrust of his evidence?
 11 A. That's the implication.
 12 Q. Yes.
 13 A. Of his evidence.
 14 Q. Do you accept that that is correct?
 15 A. No.
 16 Q. And you say that having obtained or reviewed statements
 17 from no other AFOs; is that correct?
 18 A. Well, I say that having looked at the process that he's
 19 gone through to arrive at what those post notes are.
 20 That's a comprehensive process that involves many
 21 different ranks from strategic to tactical to ensure
 22 that the evidence that is being used to form that
 23 review, the intelligence, the assessments, the
 24 experiential evidence, is correctly gathered and
 25 a tactical assessment is written, and the post notes

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1 follow from that.
 2 It would seem extraordinary to me that, having gone
 3 through this almost continual process of reassessment of
 4 what is the correct security stance, and inspectors
 5 being made aware of that, and sergeants being made aware
 6 of that, which we have evidence of, that that wouldn't
 7 be -- that it wouldn't form part of their briefings to
 8 their constables. Notwithstanding the fact that there
 9 is a standing instruction that officers familiarise
 10 themselves with the post notes with which post they are
 11 assigned.
 12 So I can't see any reason why an inspector or
 13 sergeant, having got this information regularly given to
 14 them on changes to post notes, would not brief their
 15 constables. I can't see a motive as to why they
 16 wouldn't.
 17 So all of that tells me that it is likely that
 18 inspectors and sergeants -- I know that inspectors and
 19 sergeants were aware, that they are telling their
 20 constables that these are the changes, these are the
 21 posts to which they are assigned, and further that
 22 constables are directed to look at post notes as
 23 a matter of routine if they are firearms officers.
 24 So to what extent you can say: I'm aware of every
 25 constable on my command being told, I can't say that.

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1 But what I can say is that in my experience of the chain
 2 of command, this is not difficult or controversial
 3 territory, saying to an officer: patrol over here as
 4 opposed to over there. It makes no difference to the
 5 sergeant or the inspector. It's not a difficult command
 6 to give, so I cannot imagine as to why they wouldn't
 7 give it.
 8 Q. It would be a serious embarrassment to the Metropolitan
 9 Police Service, would it not, if post instructions were
 10 not being followed as a matter of routine at this
 11 location in particular?
 12 A. I think that's an emotive question. I can't say to
 13 whether it would be an embarrassment. It would clearly,
 14 operationally, be not desirable.
 15 Q. Not desirable?
 16 A. Yes. That is not -- we don't engage in this very
 17 comprehensive and resource-intensive system to ensure
 18 that the appropriate mitigation is put against likely
 19 threat to then simply not implement it.
 20 So, yes, that of course would not be something that
 21 we would want. "Embarrassment" is your word.
 22 Q. We have been taken to the tactical planning review which
 23 was performed in November 2014. Can we have that up on
 24 screen, please? It's {DC8043/1}. Now, this was
 25 a document to which Mr Hough drew your attention

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1 earlier; do you recall it?
 2 A. Yes.
 3 Q. Can we turn to the second page, please {DC8043/2}. Now,
 4 we have a description of ranger sector 3 there; do you
 5 see?
 6 A. Yes.
 7 Q. Top of the page:
 8 "Carriage Gates, New Palace Yard, Members' Entrance,
 9 Cromwell Green public entrance search [area] and river
 10 terrace."
 11 A. Yes.
 12 Q. Is that the entirety of sector 3?
 13 A. I think the entirety of sector 3 at that time, or indeed
 14 currently, is New Palace Yard. I mean, this is
 15 a document from some four years ago. I can't say that
 16 would -- New Palace Yard includes all of those other
 17 locations.
 18 Q. I see. And it says:
 19 "These posts sit within a secure area which borders
 20 the perimeter fence line of the Parliament Square
 21 aspect of the estate."
 22 A. Yes.
 23 Q. Why is it described as a secure area?
 24 A. Because within the protection of Parliament, a line is
 25 drawn at some point what at the outermost layer of

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1 security is, and that would be referred as a secure
 2 line.
 3 Q. And so the perimeter fences represent the boundary of
 4 the secure area?
 5 A. Yes.
 6 Q. There are differences in terms of the level of security
 7 provided by the physical assets of the estate; is that
 8 fair to say?
 9 A. Yes. Yes.
 10 Q. So the fence, for example, on Bridge Street is more
 11 secure than the gates at the front of New Palace Yard?
 12 A. It depends to what attack. So the fence in Bridge
 13 Street, with no armed officer standing immediately next
 14 to it, is more vulnerable to an armed attack than the
 15 gate at the front or anywhere else that has an armed
 16 officer. But broadly I would agree that the gates being
 17 open represent a greater vulnerability than the
 18 fenceline at Bridge Street.
 19 Q. Well, I'm grateful for that. The fence itself on the
 20 Bridge Street side is quite a high fence in itself, is
 21 it not?
 22 A. It is, though it is put --
 23 Q. Yes, and if one were to go over the fence --
 24 A. Yes.
 25 Q. -- there is a very substantial drop, is there not?

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1 A. Yes, a reasonably substantial drop.
 2 Q. Yes.
 3 A. But the fence is porous to projectile attack.
 4 Q. Then it goes on to describe the posting. It refers to:
 5 "Carriage Gate is staffed by X2 AFOs and provides
 6 a short foot patrol around New Palace Yard for X1
 7 officer whilst the other remains at the gates. The
 8 officers remain within line of sight."
 9 A. Yes.
 10 Q. Yes. And in terms of the purpose of this document, do
 11 you expect the assessment to be reflected in the post
 12 instructions?
 13 A. Eventually, yes, depending on what iteration it is. As
 14 I said in my main evidence, it goes to a number of
 15 iterations and then eventually will end up in post
 16 notes.
 17 Q. But I am working on the assumption -- correct me if I am
 18 wrong -- that this is the assessment that feeds into
 19 the January 2015 post instruction?
 20 A. Yes, but that was also informed, wasn't it, by the email
 21 of Chief Inspector Aldworth, who in January 2015 asks
 22 for immediate changes to be made to the security
 23 position.
 24 Q. Well, we will come to that in due course.
 25 A. Right.

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1 Q. The date of the post instruction is 16 January 2015, and
 2 this is the tactical planning review which pre-dates it?
 3 A. Yes.
 4 Q. Yes. So am I to assume, correct me if I am wrong, that
 5 what we see in the tactical planning review should be
 6 reflected in the post instructions?
 7 A. If there was nothing else in between, yes.
 8 Q. So if there was a significant omission from the tactical
 9 planning review in the post instruction, that would be
 10 a flaw in the post instruction, would it?
 11 A. Yes, I think so.
 12 Q. Okay. Can we read on, please. It says:
 13 "Member's Entrance is a static post in situ when the
 14 House is Sitting."
 15 A. Yes.
 16 Q. What post is that?
 17 A. I don't know, sir. I mean, I can't comment, I wasn't on
 18 the command at that point so I don't know to what post
 19 that refers; you would have to ask the author.
 20 Q. Right, but you would agree with me that this appears to
 21 suggest that within New Palace Yard there was a posting
 22 at Carriage Gate; yes?
 23 A. Yes.
 24 Q. And that there was a fixed post at members' entrance?
 25 A. Yes, but it doesn't -- whether that refers, and

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1 I'm assuming it does, to a firearms post, I don't know,
 2 but yes, I agree with you that's what the document says.
 3 Q. Right. Do you know what happened to that post?
 4 A. No, sir. If that was a post, I do not, sir.
 5 Q. Well, if it wasn't a post, why is it referred to in the
 6 document?
 7 A. Well, I know that there's a doorkeeper at the members'
 8 entrance, and the members' entrance is already within
 9 the secure perimeter. I struggle, and I agree I am not
 10 a tactical firearms assessor, but I struggle to see why
 11 the members' entrance would be a vulnerability: it is
 12 already behind the secure perimeter fence. It's not
 13 an entrance from the public side of Parliament to
 14 Parliament. It is within Parliament.
 15 Q. You've read this document before giving evidence today?
 16 A. Yes.
 17 Q. And your evidence is that you don't know what became of
 18 that post?
 19 A. No. Amongst the many, many post note instructions I've
 20 read, I can't assist you with that. If that was a post,
 21 I can't assist you with that.
 22 Q. So if that post existed, and you can't say whether it
 23 did or it didn't, you don't know what happened to it?
 24 A. No, sir. Because I've never seen a post note that
 25 covers that post.

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1 Q. I see. Could we go on to the recommendations, then?
 2 "Carriage Gates: This post should be retained.
 3 Consideration should be given to provide a short patrol
 4 into New Palace Yard."
 5 Yes?
 6 A. Yes.
 7 Q. "Members' entrance: This post should be retained when
 8 House is sitting and consideration should be given to
 9 provide a short patrol to Cromwell Green public
 10 entrance."
 11 A. Yes.
 12 Q. So the suggestion is that the post that you didn't know
 13 existed ought to be maintained and that the person
 14 deployed to that post should include within their patrol
 15 a patrol to the Cromwell Green public entrance?
 16 A. Yes, that's correct.
 17 Q. Yes. But you don't know whether that happened or not?
 18 A. Well, I don't know whether a post four years ago
 19 existed, and I don't know what happened to it, as that
 20 was some two years before I took up command.
 21 MR ADAMSON: Sir, I'm conscious of the time. Is that
 22 a convenient moment?
 23 THE CHIEF CORONER: We'll break there and we'll pick up,
 24 please, at 2.05.
 25 (1.00 pm)

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1 (The Luncheon Adjournment)
 2 (2.05 pm)
 3 MR ADAMSON: Commander Usher, before the break we had been
 4 looking at the tactical planning review from
 5 5 November 2014, and I want us to have that in mind, but
 6 can we turn, please, to the post instruction dated
 7 16 January 2015, which is {WS5103/9}.
 8 Again, this was a document you were taken to earlier
 9 by Mr Hough.
 10 A. Yes.
 11 Q. On the second page we can find the duties in relation to
 12 sector 3 {WS5103/10}. We can see there, in the duties
 13 relating to sector 3, there's no reference, is there, to
 14 the retention of the members' entrance static post?
 15 A. No, there isn't, and I should say that I am still unsure
 16 as to whether that members' entrance static post in the
 17 2014 document exists, in as much as I think the number
 18 of AFOs -- and this has been fairly -- I've just glanced
 19 at this -- don't add up. If you look earlier in the
 20 document as to the number of AFOs posted to
 21 New Palace Yard when the House is sitting and when the
 22 House is not sitting, in both cases that's two.
 23 Now, if that's the case, that simply doesn't add up,
 24 that you could have a Carriage Gates and Cromwell Green
 25 post, and a members' entrance post. So I ...

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1 Q. We can certainly agree that if you have two AFOs on
 2 duty, then they can't perform the role of three AFOs on
 3 duty?
 4 A. Yes.
 5 Q. And you agree with me that on the face of it, the
 6 tactical planning review seems to imagine there being
 7 three AFOs on duty?
 8 A. I'm not -- again, and this is an extremely quick
 9 looking, I'm not sure that's right. I don't know
 10 whether the members' entrance post that's referred to is
 11 in place of another post. It would seem to me that if
 12 the person who constructed that, presumably one author,
 13 said that there are two AFOs in New Palace Yard in
 14 total, and that's what the document says, then whenever
 15 describing the posts within Palace Yard, he's describing
 16 alternatives rather than fixed posts. I can't make the
 17 numbers add up any other way. Now I agree that there's
 18 a degree of supposition in that because I'm not the
 19 author and can't say what was in his mind.
 20 Q. Does it amount to this: that the content of the tactical
 21 planning review does not tally with the content of the
 22 post instruction?
 23 A. Well, it doesn't contain -- I agree with you, it doesn't
 24 contain members' entrance.
 25 Q. Yes. So if the officers were under the illusion that

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1 they had some responsibility for the members'
 2 entrance --
 3 A. Yes.
 4 Q. -- prior to the post instruction 2015, January 2015, you
 5 would say that as a result of this document they should
 6 then be disabused of that notion: they should realise
 7 immediately that they are no longer responsible for the
 8 members' entrance?
 9 A. I would say that we -- the sole repository of what an
 10 officer should be doing is the post notes, and those
 11 post notes from January 2015 do not mention
 12 members' entrance.
 13 Q. Yes, you say at paragraph 68.1 of your statement, I can
 14 take you to it if you wish, that officers are not
 15 allowed to exercise:
 16 "... any degree of flexibility or personal
 17 interpretation in respect of the instructions given."
 18 A. Quite.
 19 Q. So that's an absolutely emphatic rule, isn't it?
 20 A. Yes.
 21 Q. The post instructions you say are there to be obeyed and
 22 to be obeyed at all times?
 23 A. Yes.
 24 Q. I see. Can I ask you, please, to turn to page 4 of the
 25 post instructions, which is {WS5103/12}, and in the top

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1 box, the penultimate sentence in that box it says:
 2 "Recorded periodic checks are to be carried out to
 3 ensure compliance with these instructions."
 4 A. Yes.
 5 Q. Yes. We have requested copies of the records relating
 6 to those periodic checks.
 7 A. Yes.
 8 Q. I'm aware that I am not the only legal representative
 9 who has requested that material. No such documents have
 10 been produced; do you understand that?
 11 A. I didn't understand that. I do believe that they exist.
 12 Q. Right. So there are recorded checks, are there?
 13 A. Supervisory checks, I believe so, sir, yes.
 14 Q. And who keeps them?
 15 A. I think that's, in terms of getting the exact audit
 16 trail right, without wishing in any way to mislead the
 17 court, I would need to look further into outside of the
 18 courtroom, but my belief is they exist, I have seen
 19 them, recording checks on -- by sector, I think, saying
 20 that a supervisor has attended, checked there is
 21 an understanding of -- that there are no issues and
 22 there is, in some cases, you know, events planned for
 23 that evening, et cetera, and checked officers'
 24 understanding of post notes.
 25 Q. So are you able to explain why we were told there were

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1 no such documents?
 2 A. I'm not.
 3 Q. How often are these checks supposed to take place?
 4 A. I couldn't answer that, sir, but I believe probably
 5 daily. I mean, I couldn't say for certain in 2015, but
 6 I think it's likely that it would have been daily.
 7 Q. Well, if instructions are to be applied so rigorously
 8 that no degree of flexibility or personal interpretation
 9 is appropriate, one would expect, therefore, there to be
 10 a rigorous regime for checking?
 11 A. Well, or a rigorous regime for briefing. We're talking
 12 about armed officers, and they carry a weighty
 13 responsibility. They're selected because we feel they
 14 can carry that weighty responsibility, and part of that
 15 responsibility is to ensure that they know what they're
 16 doing, they take personal responsibility for the
 17 professionalism that they display at work.
 18 So if I tell you at the start of your shift that
 19 this is what I expect you to do for eight hours, yes,
 20 a regime of checking is sensible. How rigorous that
 21 regime needs to be might depend on how complicated the
 22 instructions are.
 23 In this case the instructions would appear to be,
 24 from the post notes, relatively straightforward.
 25 Q. So there is some flexibility in the way in which

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1 recorded checks are carried out?
 2 A. Yes, I would think so.
 3 Q. So why is there flexibility there but not elsewhere?
 4 A. Well, I -- you've used the word "flexibility": I'm not
 5 sure whether those checks -- flexibility is not the same
 6 as regularity, or irregularity. What I'm saying to you
 7 is I don't know how often those checks were carried out.
 8 That some checks were carried out would seem to be
 9 appropriate.
 10 Q. Can we go back, please, to page 2 of that document
 11 {WS5103/10}. Now, there are concepts which are
 12 introduced into the discussion of the duties of an AFO
 13 in sector 3 -- sorry, the following document, please --
 14 namely the need to be approximate to each other but not
 15 working specifically as a pair.
 16 A. Yes.
 17 Q. And to be in close proximity to the gates when they are
 18 open?
 19 A. Yes.
 20 Q. They are, you would agree, descriptions which are
 21 capable of personal interpretation?
 22 A. Yes, they are.
 23 Q. Yes. So are AFOs expected to apply personal
 24 interpretation in relation to those concepts?
 25 A. I think a common understanding of the word "proximate"

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1 would give, if I thought that even at its most liberal
 2 interpretation an officer had interpreted the word
 3 "proximate", that I would find them somewhere close to
 4 the gates. It's very difficult to say across the
 5 command whether everybody has the same understanding of
 6 the word. I agree with you that proximate is open to
 7 a degree of interpretation. There are probably better
 8 words and, in fact, in I think later iterations of the
 9 post notes, it is clearer what is expected of officers.
 10 I think by the time we get to the end of 2015 and we're
 11 looking at the post notes then, that the words are far
 12 clearer, and in fact those are the post notes which are
 13 in play in March 2017.
 14 Q. So despite the fact you say at paragraph 68 of your
 15 statement that no degree of personal interpretation or
 16 flexibility is permissible --
 17 A. Yes.
 18 Q. -- you accept that the post instructions
 19 for January 2015 inevitably require a degree of personal
 20 interpretation?
 21 A. As I say, sir, I mean, I am genuinely trying to assist
 22 here for an accurate picture of the position
 23 in January 2015. It seems to hinge on does everybody
 24 have the same understanding of the word "proximate" --
 25 Q. Do you not think that that is --

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1 A. -- and I don't know.
 2 Q. Do you not think that that is vital in relation to
 3 duties at this location?
 4 A. No. No, sir, I think that's overstating it. I think,
 5 by any understanding of the word "proximate" that it
 6 means pretty close to the gates.
 7 Q. Yes.
 8 A. And bearing in mind that later on the notes go on to say
 9 "and a short patrol to Carriage Gates 30 yards --"
 10 sorry, "to the rear of the visitors' entrance some
 11 30 yards away", I would still regard that probably as
 12 proximate. But could there be a better word? Perhaps.
 13 Was it in the mind of the author? I doubt it, but
 14 I can't say for sure.
 15 Q. I confess, I'm surprised by that answer. Surely the
 16 author of a document as important as a post instruction
 17 should have very clearly in mind what their words mean
 18 to the people who are supposed to be applying those
 19 rules.
 20 A. Well, sir, I can only say that I think whole legal
 21 battles have been fought on the meaning of words that
 22 have taken weeks and months of courts' time. I'm sure
 23 that -- I think this was completed by an inspector,
 24 I'm sure he was making himself as clear as he could
 25 possibly be. Could he have picked a better word? Maybe

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1 he could.
 2 Q. The next document in the sequence that I would like to
 3 take you to if I may, is an email which shortly
 4 postdates this tactical planning review, {WS5103/5}.
 5 No, sorry, that's the wrong reference. I do apologise.
 6 {WS5130/5}. (Pause).
 7 I'm told it was uploaded. It's the email dated
 8 16 January 2015. It's definitely {WS5103/5}.
 9 THE CHIEF CORONER: I think we had it on screen this
 10 morning.
 11 MR ADAMSON: I think we did.
 12 THE CHIEF CORONER: Certainly an email of that date. So
 13 I think the next one in the sequence was 24 February.
 14 I am afraid I didn't note down the reference.
 15 MR ADAMSON: Mr Patterson has very kindly shown me his copy.
 16 MR HOUGH: We have checked and Mr Moss has been able to
 17 bring it up on Opus and the reference is correct.
 18 THE CHIEF CORONER: Right.
 19 MR HOUGH: It may be that Mr Patterson's hard copy could be
 20 given to the witness?
 21 MR ADAMSON: Just for the benefit of everyone in the
 22 courtroom, this is an email dated 16 January 2015, the
 23 same day as the tactical planning review is dated. So
 24 the post instruction is dated, and it's the email from
 25 Nick Aldworth, who is the Chief Inspector of Operations

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1 at the Palace of Westminster, and it's --
 2 THE CHIEF CORONER: Can we try {WS5103/13}.
 3 MR ADAMSON: No, sir, that's the email attachments to the
 4 earlier statement. These are emails which have been
 5 more recently disclosed.
 6 THE CHIEF CORONER: So the bottom email was the same date?
 7 MR ADAMSON: It is, yes, that's correct, sir.
 8 THE CHIEF CORONER: Sorry, you were reading the content?
 9 MR ADAMSON: So it's from Nick Aldworth, Chief Inspector of
 10 Operations, Palace of Westminster, to all personnel,
 11 SO17?
 12 A. Yes.
 13 Q. And it says:
 14 "Dear Colleagues
 15 "This week's edition of PoW WOW contains some
 16 important messages. Please read and absorb."
 17 And then in capitals:
 18 "INCREASE IN THREAT LEVELS."
 19 A. Yes.
 20 Q. "You will hopefully have seen a message from AC Rowley
 21 sent to staff via email but I reprint the following
 22 extract from that message. I have deliberately
 23 highlighted three areas that are important to emphasise.
 24 "In light of recent attacks in France and globally,
 25 and the continued anti-police rhetoric from Islamic

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1 extremists, I want to alert you that the terrorist
 2 threat level for UK police officers and staff has today
 3 been raised from substantial (an attack is a strong
 4 possibility) to severe (an attack is highly likely).
 5 This puts the threat to policing at the same level as
 6 the threat to the UK as a whole."
 7 So do we understand from that paragraph -- I'm very
 8 grateful, it's been located and it's now on our screens.
 9 Some of our screens.
 10 Do we understand from that passage that there had
 11 been an increase in the risk to police officers
 12 particularly?
 13 A. Yes.
 14 Q. And at that time it was regarded that as an attack by
 15 a terrorist on a police officer was regarded as highly
 16 likely?
 17 A. Yes. Which brought it into line with that to the wider
 18 public, which had been at severe for some time.
 19 Q. But this was presumably an adjustment for a reason?
 20 A. Yes.
 21 Q. And it says that the main threat is from opportunistic
 22 attack?
 23 A. Yes.
 24 Q. Would you agree with me that the attack that occurred on
 25 22 March was an opportunistic attack?

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1 A. I don't know enough about Masood's motivation to tell
 2 you that. I'm not involved in the investigation and
 3 I haven't concerned myself deliberately with that
 4 investigation, but if you tell me the evidence of this
 5 court and of 15 that they have given so far that it was
 6 an opportunistic attack, I wouldn't disagree with you.
 7 Q. It goes on to say:
 8 "It's a reality that police officers are easy to
 9 identify when they're in uniform and because of the
 10 public nature of their work, easily accessible."
 11 A. Yes.
 12 Q. "But there's also a risk that terrorist groups use
 13 people's personal internet presence ..."
 14 And it goes on to deal with aspects of that. Then
 15 just above the section "High-viz Jackets" it says:
 16 "We are one team and we will always be better than
 17 the 'bad guys' when we work as a team and look after
 18 each other ..."
 19 A. Yes.
 20 Q. "... and ensure we deliver our operation as it is
 21 designed."
 22 A. Yes.
 23 Q. So do you agree with me that any failure to deliver
 24 security in line with the content of post instructions
 25 would be a failure to deliver your operation as it was

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1 designed?
 2 A. Yes. I think it's important that you note this didn't
 3 go to armed personnel.
 4 Q. Is that significant?
 5 A. Well, no, if you were saying that armed personnel having
 6 received this information and had then gone on to --
 7 weren't performing as they should have been in
 8 contradiction of this email, this email has gone to
 9 SO17, which is Palace of Westminster.
 10 Q. I'm seeking to explore with you --
 11 A. Yes.
 12 Q. -- the importance of compliance with the operation as
 13 it's designed?
 14 A. I absolutely concede that compliance with the operation
 15 is key.
 16 Q. Yes, and it says:
 17 "Now more than ever, we need to do this."
 18 A. Yes.
 19 Q. It says:
 20 "With immediate effect, officers on posts are no
 21 longer required to wear high-viz jackets. The exception
 22 to this is those posts that are likely to engage with
 23 traffic or operate in the roadway. This specifically
 24 includes Carriage Gates and Corus."
 25 Do we take from that that in order to reduce the

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1 visibility of police officers within the Palace of
 2 Westminster, those officers who were not on vehicle
 3 duties would not be wearing hi-vis jackets?
 4 A. They're not required to.
 5 Q. But those who were, like PC Palmer on such duties, would
 6 be required to wear such hi-vis jackets?
 7 A. Yes.
 8 Q. And the reason why you removed hi-vis jackets was
 9 because they made it easy to identify those who were
 10 police officers and those who were not; is that right?
 11 A. I haven't, prior to this, considered that point, but
 12 that would seem logical.
 13 Q. Yes. And so does this email then encapsulate the
 14 following: one, that an attack on a police officer was
 15 a high likelihood; yes?
 16 A. That's the definition of "severe".
 17 Q. Yes. Two, that a police officer dressed in high
 18 visibility gear would be a particularly vulnerable
 19 police officer; yes?
 20 A. A police officer dressed in high visibility gear would
 21 be highly visible and highly identifiable as a police
 22 officer.
 23 Q. And three, it was essential that the post instructions
 24 were delivered as set out?
 25 A. Yes.

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1 Q. We know, and you've been taken to emails to this effect,
 2 that within days of this email, it had become apparent
 3 that post instructions were not being complied with?
 4 A. Yes, if you are referring to the other Nick Aldworth
 5 email that went across.
 6 Q. Indeed I am, I don't intend to go back to them because
 7 you've got them well in mind.
 8 A. Yes.
 9 Q. And so that would be a matter of considerable concern,
 10 would it not, to somebody in your position?
 11 A. Yes.
 12 Q. What efforts have you made to establish what happened
 13 after February 2015 to be satisfied that post
 14 instructions were being complied with after that date?
 15 A. Well, as I say, I have seen supervisory checks that say
 16 that officers were being checked, that they were on
 17 their posts and had some understanding of what they were
 18 meant to be doing on those posts, and I have had --
 19 I have seen that the email trail from Chief Inspector
 20 Aldworth's message to DPG was appropriately dealt with,
 21 it goes to the right people at DPG to say: look, this is
 22 a problem, and it may be that Chief Inspector Aldworth
 23 would say: I have sent out this email and clearly
 24 I'm attempting to ensure my own house is in order and
 25 that the unarmed officers are being told to be on post,

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1 and then a few days later has written to DPG who are
2 providing the armed support and saying: you need to do
3 the same, that broadly the Chief Superintendent has seen
4 a couple of officers not on post, wants an information,
5 and that gets down to the inspector level where it
6 should do. So that is what I would have expected to
7 happen.

8 Q. I'm unclear: is this what you would have expected to
9 happen or what did happen?

10 A. What did happen -- sorry, it's both. An officer is seen
11 by a senior officer, not on post. They alert Chief
12 Inspector Aldworth, who alerts DPG to say: this is
13 what's happened and it's happened more than once, and we
14 need to sort this out and I think -- and I'm speaking in
15 paraphrase -- but I think it's your sergeants who need
16 to take responsibility for this. And that ends up at
17 inspector sergeant level within DPG. I described this
18 morning the difficulty of two commands attempting to
19 operate in unison, essentially officers having two
20 masters, and that the solution to that was seen in part
21 to bring them both into the same command.

22 Q. So one would expect in the period after February 2015
23 a series of records which you have indicated exist,
24 which demonstrate that there was compliance.

25 A. I have said that I have seen supervisory checks being

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1 conducted, or records of some supervisory checks in
2 2015. I can't say precisely when, and ... the matter to
3 a degree moves on when the commands are amalgamated.

4 Q. Leave the amalgamation of the commands for a moment.

5 A. Yes.

6 Q. Please describe to me what the document recording these
7 supervisory checks looks like. What's on it?

8 A. The one I saw was --

9 Q. You've seen one?

10 A. Well, I've seen an example of one.

11 Q. Right, okay.

12 A. And that looked like a spreadsheet that included the
13 sectors, and I think dates and some commentary in each
14 of the boxes saying that checks had been carried out.

15 Q. And sorry, this is a record that applies in relation to
16 sector 3, does it?

17 A. I believe -- it includes sector 3, it includes all the
18 sectors.

19 Q. So somebody will fill in his Excel spreadsheet saying:
20 went around the Palace today, saw the two AFOs standing
21 at Carriage Gates, tick?

22 A. Yes.

23 THE CHIEF CORONER: And I think you said some comments as
24 well?

25 A. Yes, "Checked understanding of post notes", maybe, or

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1 mention of an event that evening.

2 MR ADAMSON: The example that you have seen, what date --

3 A. I can't recall, sir. I believe it's in 2015.

4 Q. When did you examine this document?

5 A. In preparation for coming here today over the previous
6 weeks and months I've looked at many hundreds, if not
7 thousands, of documents. I can't recall exactly, sir.

8 Q. Well, was it within the last fortnight?

9 A. I think I have seen it within the last fortnight,
10 probably, if not again, if you see what I mean. I may
11 have seen it months ago and I have seen it again in the
12 last fortnight.

13 Q. And was it after a request that was made by the two
14 legal teams representing the differing families?

15 A. It may be. It may be that that's how it has been
16 unearthed. Or why, sorry, it has been unearthed.

17 Q. The next document in the chronology is the tactical
18 planning review, which is prepared in June 2015.

19 A. Yes.

20 Q. {WS5099/31}. Now, specifically I want to first draw
21 your attention to paragraph 49 of that document, which
22 is at page 35 {WS5099/35}, and you were asked a little
23 bit about this by Mr Hough, and the final sentence has
24 been added to that paragraph, in the sense that the
25 earlier tactical planning review was identical in

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1 relation to the first three or four sentences, but the
2 final sentence says this:

3 "Carriage Gates, when open, represent one of the
4 weakest points in the physical perimeter."

5 Do you see that? The final sentence of
6 paragraph 49.

7 A. Yes, sorry.

8 Q. Is there a reason why that sort of information is not
9 included within the post instructions?

10 A. Well, it's not instructions.

11 Q. It's not an instruction?

12 A. No. It's an observation, and an observation with which
13 I'd agree, but it's not an instruction.

14 Q. The following page, sorry, paragraph 50 rather, not the
15 following page, it says:

16 "The whole area is covered by x2 AFOs whose primary
17 focus is Carriage Gates and the exit point of
18 Cromwell Green Public Entrance."

19 A. Yes.

20 Q. So, again, when it says "primary focus", do I assume
21 from your last answer that the reason why that sort of
22 language is not used in the post instruction is because
23 that's an observation too?

24 A. No, I think, from the way I'm reading this, the officer
25 who is constructing it is building a case for what is

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1 the current position, and what the current position
2 should be, and in doing so he is saying that currently
3 their primary focus is on -- there were two AFOs within
4 Palace Yard and their primary focus is on Carriage Gates
5 and the rear of the visitor centre, the College Green
6 entrance, and I think -- my understanding of that is
7 he's describing what the current position is, and he
8 then goes on in the course of the review to either make
9 recommendations that posts should be removed or changed
10 in some way. So that's the way I'm reading that. I may
11 be wrong.

12 Q. I see.

13 Over the page, please {WS5099/36}. Now, there's
14 an acknowledgment in paragraph 54 as to the particular
15 vulnerability of Carriage Gates, is there not:

16 "Any committed intruder could realistically be over
17 the physical barriers of the vehicle barriers/fence and
18 be directly into New Palace Yard and subsequently the
19 Palace itself without being challenged by police ..."

20 A. Yes.

21 Q. And that is identified as one of the reasons why those
22 posts, ie Carriage Gates, must remain in place?

23 A. Yes.

24 Q. So it is essential that there be AFOs at Carriage Gates;
25 correct?

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1 A. No. That's not quite right. It says that it is
2 essential that that post is retained. And that post, as
3 we know, contained a short patrol, I think, to
4 Carriage Green -- sorry, the rear of the visitor centre.
5 So the officer is saying: I've looked at the steady
6 state, I've looked at the current position and
7 I recommend -- the recommendation is that these things
8 are retained, and observing that there is a particular
9 vulnerability at Carriage Gates, which would seem
10 self-evident with the gates being open, and therefore
11 it's essential that we retain that post. Which, of
12 course, we did.

13 Q. The next bullet point says:

14 "While the main focus of this pair should be as
15 described in the above recommendations, there is value
16 in the occasional, and irregular, patrol around
17 New Palace Yard as a whole."

18 A. Yes.

19 Q. "Officers engaged in such a patrol should be tactically
20 separated from each other but must remain in sight and
21 hearing in order that mutual support can be [given]."

22 A. Yes.

23 Q. So just so I'm clear, this tactical review envisages
24 officers patrolling the whole of the yard?

25 A. Yes. At --

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1 Q. At -- sorry.

2 A. Sorry, at irregular intervals, and I don't believe that
3 that advice gets as far as the post note.

4 Q. Why not?

5 A. I can't say for certain, but not all the -- the
6 recommendation at the top does make it as far as the
7 post note, and there are some observations underneath,
8 and those who have translated the tactical advice into
9 the post note may have focused on the recommendation and
10 not focused on the observation.

11 Q. So you are saying that somebody has made a determination
12 not to include that?

13 A. No, I think somebody has -- I don't know for certain,
14 but I would suspect that somebody has gone to the
15 recommendation and has been -- the recommendation is
16 very clear and that's how we will construct the post
17 note.

18 I think the observation refers -- the sense of the
19 observation is that there is an irregular patrol. We
20 know that static posts are a problem and, therefore,
21 varying that is challenging for hostile reconnaissance,
22 and that's probably why that's in there.

23 But it doesn't get to the post note because probably
24 the person constructing the post notes has gone on the
25 recommendation alone.

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1 Q. I'm -- I don't understand why a tactical planning review
2 says there's value in a particular thing being done and
3 yet it's not translated into the post instruction.

4 A. Well, you could ask the same question a different way,
5 which is if the value of that was so strong, why did it
6 not form a recommendation?

7 Q. So what are you saying is the explanation? You simply
8 don't know?

9 A. No, that's true. I'm surmising, based on experience,
10 but I can't say for sure.

11 Q. The post instruction in December 2015, we can call that
12 up, {WS5099/16} -- oh, I apologise, I'm quoting from the
13 passage in your witness statement, that's not the copy
14 we've all been looking at. Let me give you a different
15 reference so we can be familiar with it. It's
16 {DC8032/1}. So this is the December 2015 review --
17 sorry, instruction; yes?

18 A. Yes.

19 Q. And {DC8032/2} we have the post instruction for Carriage
20 Gate.

21 A. Yes.

22 Q. Now, again, this is a document which includes the
23 concepts of proximity and close proximity. I don't want
24 to go over that again, you've given your answers in
25 relation to that.

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1 The second paragraph says:
 2 "Both officers are to be positioned in line of sight
 3 of each other with the ability to respond to
 4 Cromwell Green Entrance search point and should include
 5 a short patrol ... towards ... the Cromwell Green search
 6 area."
 7 A. Yes.
 8 Q. "The exit point of the Cromwell Green search area."
 9 A. Yes.
 10 Q. So do I understand that you would not envisage them
 11 going to the Cromwell Green entrance search point?
 12 A. No. The instruction is towards where the search point
 13 exits into New Palace Yard.
 14 Q. And so if we were to look at a diagram which was
 15 attached to your first statement, which we've not seen
 16 before, {WS5099/28}.
 17 A. Yes.
 18 Q. Can we see Cromwell Green search point exit marked on
 19 that plan, do we not?
 20 A. We do.
 21 Q. So do I understand your evidence to be that the patrol
 22 envisaged in the post instructions, would not involve
 23 the AFOs going beyond that point?
 24 A. Yes, I think that's reasonable.
 25 Q. And so if an officer was ever located in what one might

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1 call the back half of the New Palace Yard, they would
 2 not be complying with their post instruction, would
 3 they?
 4 A. That's correct.
 5 Q. It would be, therefore, obvious to anyone carrying out
 6 any supervisory check of the AFOs, whether they were or
 7 were not complying with their instructions?
 8 A. Yes.
 9 Q. And it would be obvious to any AFO where they were
 10 permitted to go?
 11 A. Yes.
 12 Q. And yet we've got evidence from PC Ashby that they went
 13 past that point?
 14 A. Yes.
 15 Q. We've got evidence from PC Sanders that they went past
 16 that point?
 17 A. Yes.
 18 Q. And we've got evidence from PCs Glaze and Ross to the
 19 effect that they were aware, as a matter of routine,
 20 that they would be performing their duties with AFOs in
 21 effect nowhere to be seen?
 22 A. I haven't genuinely seen that evidence, but I accept if
 23 that's what they've said, then yes, that's their
 24 experience.
 25 Q. Are you saying this was an isolated incidence of the

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1 post instructions not being complied with, or do you
 2 accept that there was routine non-compliance with the
 3 post instructions?
 4 A. I can't accept that there was routine non-compliance
 5 because I haven't seen evidence of that. What I have
 6 seen is evidence of PCs Ashby and Sanders not complying
 7 and, therefore, I can agree with you that there wasn't
 8 100 per cent compliance.
 9 It's difficult to go further than that not because
 10 I'm trying to be unhelpful, but because I want what
 11 I say to be evidence-based, and I don't have currently
 12 in front of me, because I don't have the supervisory
 13 checks schedule that you say you have requested, or that
 14 I think exists, certainly in 2015, as to whether in 2016
 15 and 2017, to what extent officers were complying.
 16 The best evidence I have is that I am told that 83,
 17 84 per cent of officers are regularly logging on to
 18 ADAM.
 19 Q. Regularly logging on to ADAM and complying with your
 20 post instructions are different things, are they not?
 21 A. They are, sir, yes.
 22 Q. Yes.
 23 A. But I think from what I've seen of ADAM is that it
 24 doesn't contain very much else.
 25 Q. You have seen the MM1 document, disciplinary review

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1 relating to PCs Ashby and Sanders?
 2 A. Yes.
 3 Q. Could we call that up on screen, please {WS5099/39}.
 4 Now, on the first page of this document, bottom
 5 half, in the paragraph which is above the line, do you
 6 see that?
 7 A. Yes.
 8 Q. "I have not been given access to any written statements
 9 due to the sensitivity of the matter."
 10 A. Yes.
 11 Q. "It also raises the question of proportionality given
 12 that officers have [given] honest accounts of their
 13 recollections of the incident for a terrorist inquiry.
 14 It may therefore be inappropriate to then use ...
 15 statements as part of ... possible misconduct matter."
 16 A. Yes.
 17 Q. Why would it be inappropriate to use honest statements
 18 as part of a misconduct process?
 19 A. Because officers, if — and I want to talk completely
 20 outside of Ashby and Sanders — if an officer has done
 21 something wrong and they are being investigated by the
 22 Directorate of Professional Standards, they are afforded
 23 certain protections in that they are informed that
 24 potentially something is wrong and that they have, you
 25 know, various rights, and if they're going to be

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1 required to make a statement.
 2 These officers have made a statement potentially
 3 incriminating themselves if they had read the post notes
 4 and were ignoring them, and they've done that in order
 5 that the best possible picture is arrived at for this
 6 court to adjudge what happened on that day and why it
 7 happened. It may, therefore, seem unfair that having
 8 had them do that, we then use that for misconduct
 9 purposes. So that would be the explanation for the
 10 potentially inappropriateness of that.
 11 Q. It goes on to say:
 12 "The review of the CCTV should be able to answer
 13 this question as to where they were but not why."
 14 A. Yes.
 15 Q. And that was the critical question, wasn't it?
 16 A. What, why they were there?
 17 Q. Yes.
 18 A. Well, it's -- the critical question is for this inquiry,
 19 is were they complying with the post notes, and I can
 20 understand the officer who is investigating this saying:
 21 well, I can determine that from the CCTV.
 22 Q. The critical question is why they were where they were.
 23 Where they were could be observed from the CCTV footage.
 24 A. Well --
 25 Q. In order to carry out a proper review, you need to know

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1 why they were there at that time, do you not?
 2 A. This isn't a review, sir.
 3 Q. Sorry?
 4 A. This isn't a review: this is a misconduct process in
 5 which the officers are being looked at for have they
 6 done something potentially wrong. So it's not
 7 a wide-ranging review. The officer -- as I said this
 8 morning, and this is where I think the word
 9 "sensitivity" of the matter comes in, when something of
 10 this nature happens on a command there is a great deal
 11 of sensitivity by all the officers on the command as to
 12 their own actions.
 13 Now, I absolutely have to put in context that is as
 14 nothing to the family's distress, but it does mean that
 15 the command is very, very sensitive particularly to
 16 potential allegations of misconduct. So it had to be
 17 handled sensitively and delicately so that it didn't
 18 appear like some witchhunt was taking place: something
 19 has gone wrong and we need to find an officer to blame
 20 and therefore that the officer decides the most
 21 sensitive way he can do this is not call in Ashby and
 22 Sanders and start a whole load of hares running, but
 23 simply to answer the question: were they where the post
 24 notes are meant to be? The answer to that from the CCTV
 25 is no.

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1 Q. Right. Can you answer me this: the next page we can
 2 see, towards the bottom {WS5099/40}, that the officer
 3 was given access to CCTV footage for 15 minutes prior to
 4 the incident.
 5 A. Sorry, where am I looking, sir?
 6 Q. Bottom of the page.
 7 A. Yes.
 14:50:58 8 Q. "14:25:26 CCTV commences".
 9 A. Yes.
 10 Q. Are you able to help us as to why only 15 minutes' of
 11 CCTV were supplied to the person carrying out this
 12 review?
 13 A. I don't see that 15 minutes of material was supplied.
 14 He is quoting 15 minutes of material. I can't tell you
 15 how much material he saw.
 16 THE CHIEF CORONER: Or she.
 17 A. Or she, indeed.
 18 THE CHIEF CORONER: It's done by, I think, Jane Johnson.
 19 A. I would be very surprised if it was Jane.
 20 MR ADAMSON: The first review, I think, was by Inspector
 21 Gary Wilson, I think, sir.
 22 Because it would be far more striking, wouldn't it,
 23 if the period of time that the officers were absent from
 24 the gates was of the order of an hour, do you agree,
 than if it was 15 minutes?

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1 A. Striking, sir?
 2 Q. Well, it would be an even more striking departure from
 3 the content of the post instructions if you were shown
 4 footage which revealed that the officers on duty hadn't
 5 been present at the gates for almost an hour?
 6 A. Well, it would answer the question that I think is being
 7 asked: were they complying with the post notes? No.
 8 You could say maybe if they weren't complying for longer
 9 then they are potentially more culpable, but I don't
 10 think it goes to that. I think the officer has looked
 11 to say: are they complying? No, they're not.
 12 Q. Page 41 we can see that the fact that PCs Ashby and
 13 Sanders had not accessed the most recent iteration of
 14 the post instructions on ADAM, that's towards the bottom
 15 of page 41?
 16 A. Yes.
 17 Q. And then over the page, {WS5099/42}, middle of the page,
 18 the author again says:
 19 "According to the completed duty sheets, PCs Ashby
 20 and Sanders were deployed on Sector 3 between [2.00 and
 21 3.00 pm]. I do not have the benefit of explanation from
 22 them as to why it appears from CCTV that they emerged
 23 from the Colonnades post incident and then are seen
 24 walking towards their injured colleague and shot
 25 assailant".

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1 So again, the author of this document is
 2 acknowledging the problem of making a proper assessment
 3 of this case in the absence of an account of the two
 4 officers ; do you agree?
 5 A. Yes, he is .
 6 Q. "Having reviewed the CCTV, it appears that no armed
 7 officers patrolled in close proximity to either
 8 Carriage Gates or the exit from the Cromwell Green exit
 9 in the 15-minute period preceding PC Palmer's murder."
 10 Yes?
 11 A. Yes.
 12 Q. Yes. But again, I suggest to you that the information
 13 that is being provided to the person carrying out this
 14 review is extremely limited, is it not, because it was
 15 much worse than that, because we know that they hadn't
 16 been there for not only 15 minutes, but almost an hour?
 17 A. Well, as I said, sir, I don't know how much material he
 18 was provided with. If you are not complying with the
 19 post instructions for 15 minutes, is that -- as compared
 20 to 45 minutes, is that worse or is this just
 21 a black-and-white situation of: you're not complying,
 22 you know, which seems to be the case, are you complying
 23 with the post notes immediately prior to Keith's murder,
 24 because part of the purpose of this -- and it's
 25 addressed within the document is -- was there

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1 a consequence to that, and therefore 45 minutes before
 2 Keith's murder, or 15 minutes before, the fact was at
 3 the point of Keith's murder, the officers are not where
 4 the post notes said they should be, and that is the
 5 point that the officer compiling this eventually comes
 6 to consider in terms of was there a consequence to them
 7 not being where they were. He, I think, reaches a view,
 8 if it's him, or I think it was subsequently reviewed by
 9 a more senior superintendent, but they reached the view
 10 that it probably didn't.
 11 Q. Well, I was coming to that, but since you have raised it
 12 I'll deal with it now. I think the passage you're
 13 referring to is at page 44, isn't it? {WS5099/44}. And
 14 it's the third final paragraph on that page "In terms of
 15 seriousness", do you see that?
 16 A. Yes.
 17 Q. "In terms of seriousness, the loss of PC Palmer's life
 18 is a tragedy, however there is no suggestion whatsoever
 19 given the spontaneous and unexpected nature and speed of
 20 the incident which occurred that the presence of the
 21 officers in the vicinity or exactly at Carriage Gates
 22 may have resulted in a different outcome."
 23 A. Yes.
 24 Q. Is that the point that you are making?
 25 A. Yes.

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1 Q. There was no suggestion?
 2 A. No.
 3 Q. Can I ask you to turn back, please, to page 42.
 4 {WS5099/42}, and it's two paragraphs down from the one
 5 that we were looking at, and it begins:
 6 "PC Palmer sadly lost his life ..."
 7 Do you see that?
 8 A. Yes.
 9 Q. "PC Palmer sadly lost his life within seconds of the
 10 assailant running in the gate. It is debatable whether
 11 the presence of PaPD armed officers in proximity of
 12 Carriage Gates or beyond the railings patrolling towards
 13 the CGE exit would have prevented his death."
 14 A. Yes.
 15 Q. So that's a far cry, isn't it, from saying that there's
 16 no suggestion; do you agree?
 17 A. Yes, I would. They would appear to be contradictory
 18 statements.
 19 Q. Yes.
 20 A. It may be that the officer has completed this page at
 21 some stage in the investigation, and then the second
 22 page at a completely different stage, and has reached
 23 a view.
 24 Q. Well, no, I don't think that's correct, but just so that
 25 we don't leave this point without a complete picture,

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1 can we also look at page 43 {WS5099/43}. At the bottom
 2 of the page, Audrey Shannon is carrying out a severity
 3 assessment; do you see that? The penultimate paragraph
 4 there:
 5 "Having viewed ..."
 6 A. Yes.
 7 Q. "Having viewed the CCTV of the attack at Carriage Gates
 8 I support the assertion that the loss of PC Palmer could
 9 not necessarily have been avoided had they fully
 10 complied with the post notes."
 11 A. Yes.
 12 Q. "Not necessarily".
 13 A. Yes.
 14 THE CHIEF CORONER: I think, Mr Adamson, we get that in the
 15 top box as well.
 16 A. Yes:
 17 "I am not convinced the loss of PC Palmer could have
 18 necessarily been avoided ..."
 19 THE CHIEF CORONER: Which I think is Inspector Gary Wilson
 20 putting that point first of all, and as I read this
 21 document, Audrey Shannon is agreeing with that
 22 assessment.
 23 MR ADAMSON: Yes, but the point I'm making, and it may be
 24 that I'm missing it here, is that there is plainly
 25 a suggestion that the life of PC Palmer could have been

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1 saved; do you agree with that?
 2 A. Well, I don't know who would have made that suggestion.
 3 It clearly is in the minds of both of the officers who
 4 have completed this form that it's a question that they
 5 have considered and they've reached a view on it.
 6 I have a view on it, it may be different to their view,
 7 it may be different to everybody in this court's view,
 8 and I'm sure the court will arrive at a view of it.
 9 But in completing this form they have used, I think,
 10 appropriate language which says they've thought about it
 11 and in their view it may not necessarily have been
 12 prevented.
 13 Q. You appear to attach great significance to opinions and
 14 documents which support what you have concluded
 15 yourself, and rather --
 16 A. What's your evidence for that, sir?
 17 Q. Well, you are the one who relies on page 44, the "no
 18 suggestion".
 19 A. Well, I didn't rely on it, sir, you asked me about it
 20 and I agreed that it was there. I didn't complete the
 21 form, and for the very reason I referred this for
 22 independent review, independent investigation, because
 23 it wouldn't be appropriate for me to investigate my own
 24 staff, particularly when I may have formed a view.
 25 Q. Back to page 44, please. Again, this is a topic which

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1 is touched upon by Mr Hough. {WS5099/44}. Halfway down
 2 the page:
 3 "Taking those facts into account ..."
 4 Do you see that?
 5 A. Yes.
 6 Q. "... it is evident as outlined by both the PSC and the
 7 OCU Commander (Ch Supt Johnston) from the review of
 8 working practices, that officers consider the post notes
 9 to be advisory and that there is scope for some personal
 10 interpretation."
 11 A. Yes.
 12 Q. Do you accept that finding?
 13 A. Yes, I think I accepted that this morning. I still do.
 14 Q. And so, so far as that is concerned, how many officers
 15 regarded the post instructions as advisory?
 16 A. I think I've answered to the best of my ability on this,
 17 and that is that all I can tell you is the number of
 18 officers who appeared to be logging on to ADAM and
 19 checking the post notes. That would seem odd behaviour
 20 if they weren't then going to comply with them. The
 21 other 17 per cent may or may not have been referring to
 22 the hard copy binder, I don't know, and I don't know
 23 what percentage of officers would regard the post notes
 24 as advisory as opposed to absolutely mandatory.
 25 I couldn't tell you that.

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1 But my belief is the vast majority believed them to
 2 be -- the post notes are in the vernacular firearms
 3 officers across the Met. They are understood, as far as
 4 I am aware, and my experience in 30 years of doing this,
 5 that armed officers regard even more so than unarmed
 6 officers, his instructions as pretty black-and-white.
 7 That is the world they inhabit, because it's dangerous.
 8 Q. Again, if the world in which these officers inhabit is
 9 one where the rules are black-and-white, when you see
 10 this --
 11 A. Yes.
 12 Q. -- that presumably would set alarm bells ringing in your
 13 mind as to the adequacy of the supervisory arrangements
 14 at the New Palace Yard, surely?
 15 A. Well, I don't -- I can't tell you exactly when I saw
 16 this for the first time. I was aware of the outcome of
 17 this pretty quickly after it happened, but it would
 18 certainly lead me to ask questions of the OCU, which
 19 I did, and as I've acknowledged, there was changes in
 20 practice to make the supervision if not more rigorous,
 21 then certainly more visible and auditable to outside
 22 parties. So changes were made after March 22, as you
 23 would expect, and those changes included a more visible
 24 supervisory regime.
 25 Q. If post instructions are so obviously important and

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1 demand compliance --
 2 A. Yes.
 3 Q. -- and the fact that a review into an incident concludes
 4 that a misguided interpretation of post instructions was
 5 being applied within the command, surely you would want
 6 to get to the bottom of why that occurred?
 7 A. Well, I mean I think I was aware of this process.
 8 I think the officers, when I initially met them and this
 9 topic came up, gave me an account of why that was. When
 10 I got the report back from this that said they weren't
 11 complying but it should be treated as organisational
 12 learning, I thought that was an appropriate outcome,
 13 I agreed with it, not that that mattered, really.
 14 So I thought the investigation had run its course
 15 into those officers, and come to an appropriate
 16 conclusion.
 17 Q. I suggest to you it's extraordinary that you are giving
 18 evidence in this process which involves the death of
 19 a police officer within your command and you do not know
 20 how many officers had a misguided understanding of what
 21 their post instructions actually meant; do you accept
 22 that?
 23 A. That's an emotive question, sir. I did lose an officer
 24 and I think I've done everything I can to determine
 25 whether the arrangements for security were appropriate

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1 on the day that Keith died.

2 Q. Right. But that does not include taking a single
3 statement from an AFO other than PCs Ashby and Sanders?

4 A. We didn't take statements from PCs Ashby and Sanders in
5 regard to the misconduct process. As I have explained,
6 it was sensitive and it would have been
7 counter-productive. The question that was asked was, in
8 terms of misconduct, not in terms of this process, not
9 in terms of a rigorous pursuit of the truth, the
10 question that was asked by the investigation was: were
11 they complying with the post notes. The answer to that
12 question was no, and therefore the question was how best
13 that be dealt with by way of a severity assessment and
14 I, again, think the appropriate conclusion was reached:
15 organisational learning was the right outcome.

16 Q. Yes, and your answer, if I may say so, exposes the
17 wholly inadequate nature of this investigation, this
18 assessment and the approach generally because you said
19 the question was were they complying with the post
20 instructions. That wasn't the question, was it? This
21 review acknowledged that the real question was why
22 weren't they complying with their post instructions?

23 A. No, I think this investigation, and you are right,
24 I didn't include in my previous answer: were they
25 complying with the post instructions and was there

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1 a consequence to that? And no, they weren't, and this
2 investigation broadly says that it didn't think that
3 there was a consequence to that.

4 As I say, I have my own view on that, but that's
5 what the investigation was there for. It wasn't to
6 subvert or preempt this process.

7 Q. Because, again, it would be much more embarrassing,
8 wouldn't it, for the Metropolitan Police Service if this
9 investigation concluded that not only were PC Ashby and
10 Sanders not doing what they were supposed to be doing,
11 but basically (inaudible) other authorised firearms
12 officer was not doing what they were supposed to be
13 doing as well?

14 A. I don't make decisions based on what is embarrassing or
15 not for the Metropolitan Police, particularly not, any
16 sense of loyalty I have to the Met is entirely
17 transcended by the death of an officer. I would not do
18 anything, hide anything, nor leave any act undone were
19 it to misinform this court or not give them the fullest
20 possible picture, and though the heavens fall, and that
21 includes the embarrassment of the Metropolitan Police.

22 Q. To describe the outcome of this as positive in the sense
23 that there was organisational learning --

24 A. I don't think I described it as positive.

25 Q. Well, you say that there was organisational learning as

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1 a result of this review.

2 A. Yes. I say that's the appropriate outcome.

3 Q. That did not involve detailed scrutiny, did it, of what
4 the sergeants were doing and what the inspectors above
5 them were doing?

6 A. I think that the normal supervisory processes that
7 engaged on the command, the same as every other command,
8 were to the best of our knowledge in place and working.

9 As I've said a few times, all of this activity,
10 which is a huge amount of work, and resource-intensive
11 and complicated and expensive, to determine what are the
12 threats, what are the appropriate mitigations, what are
13 the appropriate security measures, how do we deliver
14 them, it seems -- I have seen no evidence that that just
15 stopped at inspector level. Particularly when I say, as
16 I said this morning, I can't see what the motivation of
17 the inspector or the sergeant would be to just ignore
18 all of that.

19 Q. You have known since the late summer of last year that
20 the sector map was what PC Ashby had been utilising as
21 the means for -- sorry, the sector map delineated the
22 area which fell under his patrol?

23 A. I have been aware since late summer last year that
24 that's what he said, yes.

25 Q. Can we please just call that document up on screen.

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1 I would like, if I may, {WS1633/5}. Now, the area at
2 the bottom of that page is blacked out, is it not?

3 A. Yes.

4 Q. And do you know why it was blacked out?

5 A. It was blacked out, I believe, because originally it was
6 thought that it wasn't necessary to expose what the
7 detail of that map contained in terms of security.

8 Q. So it was blacked out for security reasons?

9 A. I believe so.

10 Q. Yes. Why did those security reasons evaporate during
11 the examination of PC Ashby in court last week?

12 A. I couldn't tell you, sir. I wasn't here and I wasn't
13 involved in that decision.

14 MR KEITH: Sir, Commander Usher needs no support from me but
15 I'm loath to see my learned friend take a bad point.
16 These documents were secured by the investigating team
17 in SO15 at the direction of the Inquest team. For good
18 reason or ill, they would have had to reach a view as to
19 whether or not the putting into the public domain of the
20 alarm locations would violate the security arrangements
21 at the Palace of Westminster.

22 The suggestion that that issue was in some way swept
23 aside or determined by a forensic issue concerning the
24 cross-examination of PC Ashby, is utterly offensive. In
25 any event, the issue of that map and alarms was raised

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1 in the initial questioning of PC Ashby, as far as
 2 I'm aware, and when I asked him questions, I asked him
 3 about the red dots first and then your own counsel ---
 4 THE CHIEF CORONER: I think you asked him what the red dots
 5 meant. I think you asked him, Mr Keith, what the red
 6 dots meant, and I think in due course, I think Mr Hough
 7 put the unredacted version on the screen.
 8 MR KEITH: Indeed he did.
 9 MR HOUGH: If I can perhaps clarify the position. It was
 10 the SO15 team who, no doubt, for perfectly proper
 11 reasons, passed on to us the message that the fact that
 12 the red dots denoted alarms ought to and could be kept
 13 sensitive.
 14 THE CHIEF CORONER: Yes.
 15 MR HOUGH: When Mr Keith, and I don't criticise him for
 16 this, asked for the meaning of those dots to be
 17 explained, then it occurred to me that that sensitivity
 18 could not trump the full explanation of this matter, and
 19 therefore we made arrangements for the unredacted map to
 20 go on screen.
 21 But, in fairness to the Metropolitan Police Service,
 22 that was the order of events.
 23 THE CHIEF CORONER: Yes. Thank you very much.
 24 MR ADAMSON: Well, there we are.
 25 The reality is, is it not, Commander Usher, that the

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1 whole focus of the Metropolitan Police's approach to
 2 this Inquest has been to pass the buck and to assert
 3 that responsibility for the non-compliance with the post
 4 instructions rested with PCs Ashby and Sanders; do you
 5 accept that?
 6 A. Absolutely not, sir. And I'm sure you're aware of how
 7 offensive that is. I have no reason, and nor does the
 8 Metropolitan Police, to take such a course of action.
 9 It is not --- well, I suppose I can't speak for the Met,
 10 but for me there is no benefit in doing that, and we all
 11 have to consider what happened when Keith died, as well
 12 as four other people murdered. There is nothing that
 13 you could say that I would do that would obstruct or not
 14 assist with this court's search for the truth of what
 15 happened and why it happened.
 16 Q. A couple of concluding points, Commander Usher. There
 17 were numerous reviews of Palace security which
 18 identified these gates as a particular vulnerability.
 19 A. Yes, sir.
 20 Q. There were numerous reviews of security which identified
 21 officers at those gates as being in a position of
 22 particular vulnerability?
 23 A. Yes.
 24 Q. The security arrangements in place had the unhappy
 25 consequence, did they not, of requiring AFOs to

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1 interpret the scope of their responsibilities by
 2 reference to a plan which was misleading; is that fair?
 3 A. No, sir, it's not.
 4 Q. That the Metropolitan Police over a period of years had
 5 failed to identify the fact that its armed officers were
 6 not doing what they were supposed to do?
 7 A. That's not fair, sir, no.
 8 Q. And to this day, it has failed to properly acknowledge
 9 the failings that it was responsible for in allowing
 10 that state of affairs to persist?
 11 A. I have said that I do not believe that to be the state
 12 of affairs, but I would also say that if I did believe
 13 it, I would have said so way, way before this court
 14 process, and I would have said it to Keith's family.
 15 Q. And the result was that PC Palmer was standing at the
 16 gates with his baton and spray, defending himself
 17 against a terrorist armed with two knives. That was the
 18 sort of attack which was highly predictable, was it not?
 19 A. With the benefit of hindsight, sir, yes, it was.
 20 Q. No, not with the benefit of hindsight.
 21 A. Then my response is with the benefit of hindsight: I've
 22 explained what the thinking was in the most likely forms
 23 of attack that informed the tactical assessment that
 24 informed the post notes at that time. It is fair to say
 25 that the attack on that day changed the way security is

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1 viewed at Westminster, and the way we do it, but it's
 2 engaged in exactly the same process. The sad fact is
 3 that the reason it has changed is because one of the
 4 experiential things that we now take into account is the
 5 death of Keith.
 6 Q. That which was entirely predictable occurred, and the
 7 Met Police failed to have in place proper arrangements
 8 to protect Keith at those gates, did they not?
 9 A. No, sir. I do not agree with you.
 10 Q. Well, do you agree with this: that they certainly
 11 weren't in place on 22 March?
 12 A. I believe that the actions --- that the fact that those
 13 officers were not acting in accordance with the post
 14 notes, and you can imagine I have given this
 15 considerable thought, did not have a consequence in
 16 terms of saving Keith. I believe the officers would
 17 have done had they been standing at the gates exactly
 18 what they did ---
 19 MS STEVENS: Sir, I hesitate to rise, but we have had legal
 20 argument about this this morning.
 21 THE CHIEF CORONER: Well, at the moment I think he is
 22 answering the question that Mr Adamson has posed.
 23 MS STEVENS: Yes, but we are trespassing into ---
 24 THE CHIEF CORONER: At the moment, I'm interested to hear
 25 the answer and I will see what the answer is before ---

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1 whether there is any follow-up from it.
 2 A. I believe that the officers would have gone to the scene
 3 of what they thought was an explosion, and my evidence
 4 for that belief is that that is what they did.
 5 I further believe that had they been standing at the
 6 gates, such was the speed and ferocity of the assault --
 7 MS STEVENS: Sorry, excuse me, sorry, I do interject, this
 8 is --
 9 THE CHIEF CORONER: That bit I am going to stop it.
 10 MS STEVENS: Thank you.
 11 THE CHIEF CORONER: It was the last bit I wanted to hear,
 12 Ms Stevens, because it seemed to me that the first bit
 13 of the answer was essential, but I agree with you, it
 14 should stop there.
 15 MS STEVENS: Thank you.
 16 A. Sir, if I have overstepped the line, please be
 17 reassured, it was unwitting.
 18 MR ADAMSON: Thank you Commander Usher.
 19 MR HOUGH: Sir, there has been a suggestion that we, I think
 20 from Mr Keith, that it might be useful to have our
 21 mid-afternoon break at this point.
 22 THE CHIEF CORONER: I was going to suggest we took our break
 23 when Mr Adamson finished, and we will certainly do that.
 24 MR HOUGH: Sir, we may need to sit a little bit late to
 25 finish Commander Usher's evidence today, but I would

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1 suggest that that would be beneficial.
 2 THE CHIEF CORONER: Yes.
 3 MR HOUGH: Because we only have Superintendent Aldworth
 4 tomorrow morning. He is flying out at 1.00 pm, or has
 5 to leave here to fly out at 1.00 pm, and it would be,
 6 I think, beneficial to everyone to have heard all of
 7 Commander Usher's evidence before we hear that of
 8 Superintendent Aldworth.
 9 THE CHIEF CORONER: The only hesitation in that, Mr Hough,
 10 is obviously what has emerged from the evidence elicited
 11 by Mr Adamson is the existence of material which,
 12 I suspect going back to the argument this morning, he
 13 would want to have the opportunity of looking at in
 14 relation to deciding whether, in fact, this officer
 15 needs to be recalled.
 16 MR HOUGH: Well, we understand that. We have put in train
 17 inquiries about that. As you will be aware, sir, we had
 18 been given to understand that there was no record of
 19 supervisory checks, and so we are pursuing that line in
 20 view of Commander Usher's answers.
 21 THE CHIEF CORONER: Yes.
 22 MR KEITH: Can I assist --
 23 MS STEVENS: Sir, sorry --
 24 MR KEITH: I was on my feet first, if you please.
 25 I have, during the course of the day, repeated

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1 inquiries that Mr Butt and myself made throughout these
 2 Inquests, and in particular at the end of last week. We
 3 had been assured that, from a variety of sources and
 4 individual officers, that there was no exercise and
 5 testing checks prior to March 2017, no record of post
 6 note compliance checks recorded, and that further
 7 inquiries were going on to see whether or not there was
 8 any form of compliance document instigated around about
 9 the commencement of 2015.
 10 THE CHIEF CORONER: Yes.
 11 MR KEITH: In our written submissions over the weekend, we
 12 aver to the fact that we had been told there were no
 13 such documents in existence.
 14 During the course of the evidence, and as I've told
 15 my learned friend, we have received some more
 16 information which may cast that assurance into doubt.
 17 I do not know the full extent of it. You can imagine
 18 that Mr Butt and I are not sitting idly by, further
 19 inquiries are continuing, but it may be that there is
 20 some form of document but I simply do not know the shape
 21 or the scent of it.
 22 THE CHIEF CORONER: Mr Keith, what Commander Usher has said
 23 is he has described either a soft or hard copy
 24 spreadsheet with various boxes on it and he is obviously
 25 relying upon the benefit of his recollection of that

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1 document.
 2 MR KEITH: Well, he may very well be right, because just
 3 a few moments ago on Mr Butt's screen has appeared
 4 a coloured chart of some form, maybe
 5 an Excel spreadsheet. But, as I said in my email to
 6 your team, we obviously need to find out more about it,
 7 where it comes from and what it is, and then of course
 8 we will provide it.
 9 THE CHIEF CORONER: Thank you.
 10 Ms Stevens.
 11 MS STEVENS: Sir, hopefully I can address you now.
 12 Our application this morning was that the parents
 13 and siblings of Police Constable Palmer should not be
 14 put in a position of asking questions when, in
 15 a situation that we've been deprived of relevant
 16 material. We queried the answers that we had been given
 17 by the Metropolitan Police Service and time has shown
 18 that the family were right to do that.
 19 Time and again when my learned friend Mr Adamson has
 20 asked questions of Commander Usher, he has been met with
 21 answers that he was simply unable to deal with because
 22 we do not have the disclosure.
 23 In my submission, that is not a fair situation for
 24 somebody asking questions to be in, and I therefore
 25 renew the application made this morning. You are now in

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1 a much better position to consider it because it is
2 absolutely plain that there is outstanding material.
3 It's clear the outstanding material affects the evidence
4 that Commander Usher has to give, and for any counsel to
5 be able to ask questions on a fair basis, that material
6 should be given first and, therefore, my application is
7 that we rise now, that the family should not be forced
8 to ask questions today, and when the material is
9 provided, then Commander Usher should be brought back to
10 court.

11 Of course that causes difficulties for the
12 timetable. Of course it may no doubt pose problems for
13 Commander Usher, but those two matters, in my
14 submission, should come second to the primary objective
15 of getting to the truth, and a key way to ensure that we
16 get to the truth is to allow the family to be given
17 relevant material and ask questions when they have had
18 it.

19 THE CHIEF CORONER: Yes. I think, Mr Adamson, you were
20 about to get to your feet too.

21 MR ADAMSON: I simply say this, it's not the first time I've
22 got my feet to ask questions to discover that there's
23 material that hasn't been disclosed. On a previous
24 occasion it was, in fact, only after I'd sat down that
25 I was alerted to the existence of material.

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1 It's plainly unsatisfactory that these records which
2 have been specifically sought on, I think at least three
3 occasions, and it's only now that we are told that there
4 is material which may exist, should come to light in the
5 manner that it has. It does give me difficulty in
6 effectively examining Commander Usher on that point.

7 Of course, it wasn't confined to the records of the
8 inspections: we also heard for the first time today from
9 Commander Usher about a plan, which was apparently
10 annexed to a post instruction. We still haven't seen
11 that plan, if it exists, and so again that's another
12 very unsatisfactory state of affairs. I can't really
13 say anything more than that. Plainly that is material
14 which we ought to be able to see.

15 THE CHIEF CORONER: What I'm going to do at the moment,
16 Mr Adamson, is simply to rise so that we can simply have
17 our mid-afternoon break, which we will have in any
18 event, and it may well be in that time that the material
19 that Mr Keith has indicated is coming through to him, he
20 will at least be able to give me a picture as to when
21 that material can be passed on to the Inquest team, and
22 it seemed to me in any event you had, as Ms Stevens put
23 down a marker this morning, hers in a rather different
24 way, but yours in the sense that if we continue with
25 Commander Usher there may be a requirement for him to

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1 come back.

2 MR ADAMSON: Yes.

3 THE CHIEF CORONER: And I'm conscious that people coming to
4 this Inquest to give evidence lead otherwise very busy
5 lives and we have to try and accommodate people as best
6 we can but I am sure Commander Usher will also
7 understand the importance of me being provided with the
8 material that I need to see in terms of the
9 determinations that I need to make.

10 MR ADAMSON: Sir, I completely agree.

11 MR HOUGH: Sir, if it assists, on the other point that
12 Mr Adamson raised about a map appended to the post
13 notes, that has been checked and there wasn't one
14 appended to the post notes which were referred to, the
15 2012 post notes.

16 THE CHIEF CORONER: Well, as I say, I'm going to rise for
17 the moment. We'll sit again at 3.45.

18 MR MOSS: I'm so sorry to detain you, just for a moment, if
19 I may. Sir, perhaps once you have risen could you just
20 give thought whether it might be possible to release
21 Mr Hepburn for today. There's no potential for him to
22 be [reached]. He has agreed to be able to come back at
23 a time I think is most convenient to the court on
24 Thursday, but if it were possible to release him, it
25 seems to me there's no realistic potential for him to be

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1 reached.

2 THE CHIEF CORONER: Mr Hough, I think that must be right.

3 MR HOUGH: Indeed.

4 MR MOSS: I am very grateful.

5 (3.27 pm)

6 (A short break)

7 (3.47 pm)

8 THE CHIEF CORONER: Mr Hough.

9 MR HOUGH: Sir, during the mid-afternoon break, Mr Keith has
10 shown me what has come through to him during the course
11 of today.

12 THE CHIEF CORONER: Yes.

13 MR HOUGH: First of all, a short document referring only to
14 some sort of checks in mid or late September 2015.

15 THE CHIEF CORONER: Yes.

16 MR HOUGH: And then very recently a spreadsheet going into
17 2016. What we're going to propose is that Ms Stevens
18 asks such questions as she is able to on topics where
19 she is not put in difficulty by the existence of this
20 material becoming apparent late in the day, and then
21 that we finish for the day. That after this afternoon,
22 Commander Usher is asked to make a further statement,
23 explaining what document he was referring to and
24 exhibiting that document, or documents, and also
25 explaining any further documents which the MPS team have

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1 produced, how they were produced, how they are to be
 2 interpreted and what they show.
 3 THE CHIEF CORONER: Yes.
 4 MR HOUGH: Then Commander Usher will, I am afraid, have to
 5 be called back to deal with any questions arising from
 6 those documents and follow-on questions by Ms Stevens
 7 indeed by Mr Adamson and by others --
 8 THE CHIEF CORONER: Yes.
 9 MR HOUGH: -- as well as Mr Keith's concluding questions,
 10 and any final questions from me.
 11 THE CHIEF CORONER: Thank you very much for that, Mr Hough.
 12 I was certainly concerned not to cause Ms Stevens or
 13 indeed the Palmer family generally, because I know that
 14 Mr Adamson is also concerned about this point, by
 15 requiring her to ask questions on topics where it's
 16 become apparent, if it wasn't apparent before, but it
 17 has certainly become apparent in some of the answers
 18 that Mr Adamson has elicited that there is material, so
 19 I think the steps that you have suggested are the
 20 appropriate ones.
 21 Certainly I suspect if Ms Stevens is able to deal
 22 with topics that fall outside that difficulty, now would
 23 be a good time to deal with that. As I say, I will
 24 leave it to her as to when we get to material which she
 25 clearly would be embarrassed about moving into, and we

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1 will break at that point.
 2 MR HOUGH: Yes.
 3 MR ADAMSON: Sir, before Ms Stevens rises to her feet, in
 4 relation to that further statement, could I also ask
 5 that it deals with what one might call the 83 per cent
 6 point.
 7 THE CHIEF CORONER: Yes. Thank you.
 8 Ms Stevens.
 9 MS STEVENS: Sir, thank you. I will certainly cover all the
 10 questions but I'm also mindful of the time.
 11 THE CHIEF CORONER: Thank you very much.
 12 MS STEVENS: Because my learned friend Mr Adamson and I, as
 13 with other witnesses, we have split up topics.
 14 THE CHIEF CORONER: Thank you. It seemed to me, to both of
 15 you, unnecessary to cover the same topics twice, but
 16 also in terms of division of labour to take different
 17 topics, absolutely fine.
 18 Examination by MS STEVENS
 19 MS STEVENS: Thank you.
 20 My name is Susannah Stevens and I ask questions on
 21 behalf of the parents of Police Constable Palmer and,
 22 indeed, his siblings.
 23 There should never have been a situation, should
 24 there, where an unarmed police officer was stabbed to
 25 death by a terrorist inside the perimeters of the

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1 Palace of Westminster?
 2 A. Of course there shouldn't, but if your point is was
 3 appropriate mitigation in place, I believe that it was.
 4 Q. You believe that it was?
 5 A. It was in place in terms of the security model that was
 6 in place on 22 March.
 7 Q. The security model, then, just didn't foresee
 8 a situation where an unarmed officer could be stabbed to
 9 death inside the perimeters of the
 10 Palace of Westminster?
 11 A. I think that there is a limit to what are preventable
 12 acts, and that limit extends to police officers who wear
 13 uniform and work across London, and I'm mindful of my
 14 previous answer that caused some difficulty here, but
 15 police officers faced with explosions of violence that
 16 they had no way of knowing were going to happen, it's
 17 very, very difficult to protect those officers from, and
 18 whether that is officers walking the streets of London
 19 on routine patrol, or whether it's attending an incident
 20 or whether it's standing inside Parliament; officers
 21 face those risks.
 22 Q. Of course, but there's a huge difference, isn't there,
 23 in terms of managing the risks that a police officer
 24 takes whether or not the police officer is within the
 25 perimeters of the Palace of Westminster compared to

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1 walking the streets; can you not see that?
 2 A. Well, I would say that any police officer, unarmed
 3 officer, who is standing in immediate proximity to the
 4 public, which was the case at Carriage Gates, even when
 5 the outer pedestrian barriers were closed, officers are
 6 standing in immediate proximity to large numbers of the
 7 public. That's true whether you are on patrol or
 8 whether you are standing in the positions that they were
 9 standing, and there is, within that, a limit to what we
 10 can prevent.
 11 Q. The question was: there is a difference, isn't there,
 12 between managing the risks in relation to a police
 13 officer who is within the perimeters of the
 14 Palace of Westminster, and a police officer out on the
 15 street; that's right, isn't it?
 16 A. And I'm saying that I see that the risks that they face
 17 because of their immediate proximity to the public are
 18 the same, can be the same, and that is that to protect
 19 yourself against the actions, whether just extremely
 20 violent or lethal actions of an individual who you
 21 weren't expecting, are the same.
 22 Q. The same. So there's no difference, is there not, in
 23 relation to a police officer who is working at
 24 a location that's an obvious terrorist target?
 25 A. So the difference is the other support that is put in

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1 place, whether that's physical structures or other
 2 officers, that are built into the security model to
 3 provide that officer with some security, because
 4 essentially you are providing Parliament with that
 5 security.
 6 Q. You are talking about the measures. I'm focusing on the
 7 risk. There is a difference in terms of the risk, isn't
 8 there, between a police officer who is working at
 9 an obvious terrorist target, like the
 10 Palace of Westminster, and an officer who is out on the
 11 street?
 12 A. Yes. There is -- the most likely risks that they face
 13 are different.
 14 Q. They're different because they're greater, aren't they,
 15 if you work at an obvious terrorist target?
 16 A. Well that's a very difficult question to answer. They
 17 are different. Statistically, of course, far more
 18 officers are injured, sometimes tragically fatally,
 19 outside the Palace of Westminster than in it, and if you
 20 were to compare the number of total officers and the
 21 injuries sustained in the Palace of Westminster against
 22 the backdrop of borough officers, for instance, or
 23 officers on the Territorial Support Group, I think you
 24 would find that those injuries would be lower.
 25 Q. What is the point, then, of all the reviews that you

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1 have been taken to that include the fact that the
 2 Palace of Westminster is an obvious terrorist threat?
 3 What's the point of those people including that in the
 4 reports?
 5 A. Because it is an obvious terrorist threat.
 6 Q. Which means that you have to assess the risk, don't you,
 7 to unarmed officers at such a location?
 8 A. Yes.
 9 Q. Right. In terms of that, it's your duty and
 10 responsibility, isn't it, to ensure that officers at the
 11 Palace of Westminster are adequately protected?
 12 A. As far as is possible.
 13 Q. Yes, but it's your responsibility, because of your role;
 14 that's right, isn't it?
 15 A. Yes, an overarching responsibility, yes.
 16 Q. Yes. So in terms of the security at the
 17 Palace of Westminster, as far as the Metropolitan Police
 18 Service is concerned, other than the Commissioner being
 19 ultimately responsible, the buck stops with you, doesn't
 20 it?
 21 A. Yes.
 22 Q. Yes. You must have been, then, extremely concerned, the
 23 buck stopping with you, that Police Constable Palmer was
 24 stabbed to death by a terrorist when there was no armed
 25 support in the vicinity?

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1 A. The death of Keith, I would say, the least of my
 2 emotions was where the buck would stop, whether it was
 3 me or anyone else.
 4 Q. Are you saying that during the whole period of time
 5 since 22 March last year and today, it has not gone
 6 through your mind that the buck stops with you?
 7 A. No, I don't think in the terms that you are suggesting,
 8 no. I mean, that's the nature of command: all decisions
 9 ultimately stop with me, of those officers that I lead.
 10 Q. If things went wrong in terms of the systems, that
 11 clearly is going to come back to you, isn't it?
 12 A. Well, it depends, depending on what the fault is and at
 13 what level. I can't -- that's a very hypothetical
 14 question, I can't really answer that.
 15 Q. What I suggest is, on behalf of the family of
 16 Police Constable Palmer, you are fully aware of the fact
 17 that legitimate criticism should be made of you, and
 18 that is why you are having to defend the systems; that's
 19 right, isn't it?
 20 A. I'm not defending the systems. I'm being asked
 21 questions and giving truthful answers. I don't have
 22 the motivation to defend the systems.
 23 Q. That's why you are claiming that you did all that you
 24 could do because the alternative is that one of your
 25 police colleagues died as a result of failures with the

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1 systems; that's right, isn't it?
 2 A. No.
 3 Q. The systems have changed since, haven't they?
 4 A. Yes.
 5 Q. The Carriage Gates are now closed?
 6 A. Yes.
 7 Q. We have heard the type of gates changed?
 8 A. Yes.
 9 Q. We don't need to hear the specifics but the number of
 10 AFOs in New Palace Yard have increased, haven't they?
 11 A. Yes.
 12 Q. There's a fixed post at Carriage Gates now; yes?
 13 A. Yes.
 14 Q. The systems have changed because previously they weren't
 15 good enough, were they?
 16 A. No, as I think I answered earlier, the systems have
 17 changed because the type of attack that was used to
 18 murder Keith is -- has now -- is at the very forefront
 19 of our thinking, and thus something as, I think,
 20 momentous as Parliament would say, as the closing of the
 21 gates has occurred, but even that took eight months.
 22 Q. On behalf of Police Constable Palmer's family, I suggest
 23 to you that it should not have taken Police Constable
 24 Palmer to die for the systems to change, should it?
 25 A. I can't adequately answer that question.

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1 Q. Well, can you --

2 A. If I say that the system -- the model that was in place

3 on 22 March was mitigating the most likely threats, and

4 that since that time, obviously the nature of the most

5 likely threats has changed, as we have seen in Europe

6 and America, and domestically, then you would expect

7 that to change.

8 What didn't change was the system by which those

9 were determined. Intelligence is assessed, information

10 is gathered, experience is looked at, and then the most

11 likely threats mitigated.

12 Q. Well, did you ever go to the Parliamentary Authorities,

13 to Mr Hepburn or to anyone else for that matter, and

14 say: look, the systems at the moment are not sufficient

15 to deal with an armed attack at Carriage Gates; did you

16 ever say that?

17 A. No.

18 Q. No. Did you ever say to them: however important the

19 principle of open democracy may be to you, I cannot take

20 the risk of one of my unarmed PCs being attacked at the

21 gates. Did you ever say that?

22 A. No, I did not.

23 Q. You didn't, therefore, go and highlight to Parliament

24 the risks that your unarmed colleagues were forced to

25 endure, did you?

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1 A. Parliament was fully aware of the risks that we were --

2 that were present, because it's a partnership in which

3 those issues were discussed. The issue of the gates

4 being closed was something that had been visited, as

5 I understand it, several times in the past, and

6 Parliament had been absolutely clear that the gates had

7 to remain open, and in fact, as I said earlier, even in

8 the aftermath of the murder of Keith, they still

9 maintained that position. And it isn't -- you know, it

10 isn't within my gift to have the gates closed.

11 Q. What is within your gift, though, Commander Usher, is on

12 behalf of the police constables who you are responsible

13 for looking after, is to go to Parliament and raise

14 their concerns. You never did that, did you?

15 A. I hadn't heard -- I wasn't made aware of their concerns.

16 There is an obvious point that the gates being open is

17 less secure than the gates being closed, and, as I say,

18 that was a decision for Parliament that we could not

19 alter.

20 Q. You're saying, then, are you, that you were never made

21 aware of any concerns on the behalf of AFOs or unarmed

22 officers about the security systems in New Palace Yard?

23 A. I don't believe so.

24 Q. Well, you say you don't believe so.

25 A. Well, to the very best of my recollection, no. I talked

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1 to dozens and dozens of officers within the command, and

2 have done over the last two and a half years. Obviously

3 since the death of Keith security and the model being

4 used is on everybody's mind, but prior to that time

5 I don't have any recollection of concerns being raised

6 to me.

7 Q. You --

8 A. That doesn't mean -- and to be fair -- sorry,

9 Ms Stevens -- and to be fair, for them to have reached

10 me, that would have gone up through a chain of command,

11 so to be fair I can't say that they weren't raised to

12 anybody, but all I can say is that I had not heard those

13 concerns.

14 Q. To be an effective head of security at the

15 Palace of Westminster does require having your finger on

16 the pulse to a certain degree, doesn't it?

17 A. I'm not the head of security at the

18 Palace of Westminster; Eric Hepburn is.

19 Q. All right, but you are responsible on behalf of the

20 Metropolitan Police Service, aren't you?

21 A. I'm responsible for ensuring that the systems that we

22 put in place to ensure that appropriate mitigation is

23 delivered against realistic risk were conducted by

24 experts as they were, in a timely fashion, which they

25 were, that they were repeated, and were an iterative

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1 process, which they were.

2 Q. To be an effective senior officer, you should be in

3 touch with what's going on at the ground, shouldn't you?

4 A. Yes, but I mean, just realistically, the reason you have

5 a hierarchy of command is so that if there is something

6 such as concerns -- I can't name the number of officers

7 under my command, but it's a big number -- that you rely

8 upon the chain of command in order that those concerns

9 reach you.

10 Now, occasionally you do speak directly to officers

11 and ask about concerns, so you may hear them outside the

12 chain of command, but largely you have to rely upon the

13 chain otherwise, you know, none of the systems work.

14 Q. Yes. But somebody in a senior role like yours should

15 not be sitting in an ivory tower unaware of the practice

16 that's being followed, should you?

17 A. I don't believe I have ever sat in an ivory tower.

18 Q. Well, if we have a look at it, you were the -- you took

19 over in April 2016, didn't you?

20 A. Yes.

21 Q. You told us earlier today that even though you have

22 responsibility on behalf of the Metropolitan Police

23 Service for the Palace of Westminster --

24 A. Yes.

25 Q. -- you didn't even know where police officers were meant

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1 to be standing. That's what you told us, didn't you?
 2 A. If you're referring to the members' entrance question,
 3 I think my answer was that I'm not sure that that was
 4 a post, and it was also from a document in 2014, before
 5 I was on the command. I don't think I've answered that
 6 I was unaware.
 7 But, having said that, I have, in terms of
 8 deployments across my command, many, many hundred every
 9 day. If your question to me is do I know where all of
 10 those deployments are at any given moment, the answer is
 11 no.
 12 Q. The part of your evidence I'm referring to, in fact, is
 13 when you were asked whether or not you ever went to the
 14 Palace of Westminster and if you ever saw officers
 15 standing in a location away from Carriage Gates; do you
 16 remember being asked about that?
 17 A. Yes, I do, yes.
 18 Q. Your answer was that you can't remember if you saw
 19 officers in the New Palace Yard area away from
 20 Carriage Gates because at that time you weren't aware of
 21 what the post note said?
 22 A. No, that's true.
 23 Q. Right. So you remember that?
 24 A. Yes.
 25 Q. So that means, then, that you are responsible for

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1 security at the Palace of Westminster on behalf of the
 2 Metropolitan Police Service and you don't even know that
 3 armed officers should be standing in proximity of
 4 Carriage Gates at all times; that's right, isn't it?
 5 A. It's right to say that I don't know verbatim the details
 6 of post notes across every post on my command. That is
 7 true.
 8 Q. Not verbatim: there were only two armed police officers
 9 in New Palace Yard during the time that you were
 10 responsible; that's right, isn't it?
 11 A. It is, but as I think we've established, if I'm aware
 12 that two armed officers are in Palace Yard, in order to
 13 determine whether they are in the right or the wrong
 14 position, I do have to know verbatim what those post
 15 notes are, and I concede that I don't know all of the
 16 post notes from all of the posts.
 17 Q. Just focusing on Carriage Gates.
 18 A. Yes.
 19 Q. At the time between April 2016 and March 2017, were you
 20 really unaware that there should be two armed officers
 21 in the vicinity of Carriage Gates at all times?
 22 A. Yes.
 23 Q. You were unaware of that?
 24 A. Yes. I think I said in my evidence earlier that in the
 25 course of -- before meeting PCs Ashby and Sanders I had

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1 to ask what the post notes were because I didn't know
 2 until that point, speaking to another PC, that there was
 3 a problem. And at that point I asked for the post
 4 notes. So that is likely to be late summer 2017.
 5 Q. Let's have a look at what you were aware of. If we
 6 could just bring up, please, paragraph 27 of your first
 7 witness statement, so that is {WS5099/6}.
 8 Thank you. If you have a look at paragraph 27, you
 9 say this:
 10 "In the years leading up to 22nd March 2017, the
 11 predominant physical threats from terrorism that were
 12 consistently being assessed and mitigated were those of
 13 a Marauding Terrorist Firearms Assault ... or a Vehicle
 14 Borne Improvised Explosive Device ... All the
 15 assessments, strategic plans and reviews that I have
 16 seen from 2010 onwards refer, in some form or another,
 17 to these threats."
 18 Can you see that?
 19 A. I can.
 20 Q. Are you unaware of the terminology that is used in the
 21 MPS operational response guidance?
 22 A. Sorry, I missed the second -- of MPS operational?
 23 Q. Response guidance. Are you aware of that document?
 24 A. No.
 25 Q. No?

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1 A. No.
 2 Q. You don't know that that's a document that's used to
 3 train the MPS officers in relation to how they should
 4 respond to operations?
 5 A. To operations?
 6 Q. Have you never come across this document?
 7 A. No.
 8 Q. All right. Because would it come as a surprise to you
 9 to hear that that document makes it clear that you
 10 shouldn't refer to marauding terrorist firearms
 11 assaults; rather, you should refer to marauding
 12 terrorist assaults; are you unaware of that?
 13 A. Yes, I have said, I'm unaware of that document or the
 14 instructions as to terminology.
 15 Q. So it's never been part of your training or information
 16 that's provided to you that you have to take into
 17 account marauding terrorist attacks because they can
 18 take a number of forms?
 19 A. Well, you'd have to, I think, in fairness, let me see
 20 the document, and when that was dated and who it was
 21 produced by, and what its purpose was for me to be able
 22 to determine whether or not I have any recollection.
 23 I certainly have currently no recollection of seeing it.
 24 Q. Yes. Well unfortunately that hasn't been disclosed to
 25 the family of Police Constable Palmer so I can't do

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1 that.
2 MR KEITH: I'm so sorry, if my learned friend would allow
3 me, that is an outrageous implication that there has
4 either been such a request for a document or that it has
5 been refused.

6 THE CHIEF CORONER: Yes.

7 MR KEITH: There is a reference in the statement taken at
8 the direction of your Inquest team from
9 Superintendent Morris to operational guidance which has
10 not been disclosed with the full authority of your team
11 because it is sensitive and secret.

12 There are also a number of versions, and it also
13 would appear that there are a number of dates, this
14 document having been, I think, prepared in iterative
15 form over many, many years.

16 So to put that sort of wide insinuation without even
17 producing the document or referring to the relevant
18 part, and then implying that my learned friend is
19 hindered because of non disclosure is, I'm sorry to say,
20 absolutely wrong.

21 THE CHIEF CORONER: Ms Stevens, that may be a very good
22 point, but can I just simply say in relation to the
23 question that you asked before we looked at
24 paragraph 27, related to the knowledge on the part of
25 Commander Usher to having two armed officers on the

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1 Carriage Gates, we then went to paragraph 27, which
2 I think, the way I read paragraph 27, it's very much
3 a summary of the period between 2010 and 2017 as to what
4 the principal issues that were concerning over security,
5 because there are two forms mentioned, and then it goes
6 on to say:

7 "All the assessments, strategic plans ..."
8 et cetera.

9 In relation to the last document you have asked
10 about, it seems to me that in order to have put the
11 question, you must be aware what the document says.

12 MS STEVENS: In relation to the fact that you shouldn't
13 always "marauding terrorist firearms assault", rather,
14 you should use "marauding terrorist assault"?

15 THE CHIEF CORONER: Yes.

16 MS STEVENS: Yes, can I come to that, and I will put it
17 fairly and squarely --

18 THE CHIEF CORONER: But I think also if there is a document
19 certainly it would help me to know what the date of that
20 document is you're referring to, and I have no doubt
21 also Commander Usher would like to know what the date of
22 it is.

23 MS STEVENS: Of course.

24 THE CHIEF CORONER: So I think Mr Keith has a good point in
25 the sense that there are no doubt a number of iterations

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1 of all of these documents. Some of them have multiple
2 dates on them. I mean, for example, one of the
3 documents we looked at earlier on is dated in June 2015
4 but has as a footer February 2015, which may be
5 explicable but, as I say, I'm just conscious that it
6 certainly helps me to know which dates of documents are
7 being referred to.

8 MS STEVENS: Yes. Sir, certainly I was going to come,
9 before I was interrupted, to the document that
10 I'm relying on, but in relation to that, could I just
11 make this point on behalf of the family: that the family
12 does ask if, perhaps, the temperature could reduce
13 a little bit when the Metropolitan Police Service legal
14 team interjects, because we have had interjections
15 saying that the family is making absurd propositions,
16 we've now had an interjection, an objection, saying that
17 the family is being outrageous.

18 Could I just ask the temperature to drop a little
19 bit, because it is causing distress to the family
20 that --

21 THE CHIEF CORONER: Well, Ms Stevens, I'm with you. I would
22 like the temperature to drop entirely. It seems to me
23 we are here involved in an extremely serious exercise.
24 I am the one at the end of the day who has to make
25 conclusions and findings, and I certainly don't find

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1 anyone's heat helping me at all. I appreciate sometimes
2 people are concerned in the way in which questions are
3 being put, so I will simply say so far as I am
4 concerned, that applies across the board to everyone:
5 that we will simply not have the heat.

6 MS STEVENS: Sir, on behalf of the family, thank you very
7 much.

8 Can I then deal with what I was proposing to go to,
9 and it's the statement of chief superintendent
10 Dawn Morris, because so that it's clear, sir, we do not
11 have the MPS operational response guidance, so this is
12 the only document I can take you to. So it is
13 {WS5106/2}, and I'm very grateful to Mr Coke-Smyth.

14 Thank you very much. Commander Usher, can you read
15 paragraph 32 or is it in too small print where you are?

16 A. I can't see a paragraph 32.

17 Q. Okay, apparently it should be {WS5106/5}. Thank you.
18 I can see it up on the screen now.

19 Just to put this in context for you,
20 Commander Usher, this is the witness statement of Chief
21 Superintendent Dawn Morris who says that she has been
22 asked by the Chief Coroner to provide a statement
23 detailing the training the Metropolitan Police Service
24 provides to officers in relation to terrorist attacks,
25 particularly those involving knives following the

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1 attacks in Paris in November 2015, which I'll come on
2 to.

3 But at paragraph 32, can you see that she says this:
4 "Whilst the MPS operational response guidance, as
5 detailed above, focuses on the response to a significant
6 multi-seated terrorist attack as seen in Paris in 2015
7 and internationally thereafter, it applies equally to
8 low sophistication, lone-actor type activity. Therefore
9 the guidance also relates to attacks which may or may
10 not immediately be obvious as CT related. These are
11 known as 'Ambiguous Attacks' and should initially be
12 assessed and treated in the same way as a known CT
13 attack."

14 Then this was the part that I have just been asking
15 you about:

16 "To reflect this continuity of approach, the MPS
17 uses the term Marauding Terrorist Attack (MTA)
18 throughout the response guidance rather than Marauding
19 Terrorist Firearms Attack ..."

20 And really the importance of it, I suggest, is this:

21 "This reflects the fact that attacks can take many
22 forms, the most recent of which have not involved
23 firearms but body worn improvised explosive devices,
24 knives and vehicles."

25 Because what I suggest to you is that by March 2017,

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1 you should certainly have been reviewing and considering
2 terrorist attacks that involved knives, shouldn't you?

3 A. Yes, that should have been included. I think it's only
4 fair to say that Dawn has put this document together and
5 said that:

6 "This reflects that attacks can take many forms, the
7 most recent of which ..."

8 And finishes that sentence in a document dated
9 13 July of this year. There's no suggestion within that
10 document that the terminology -- and I fully accept if
11 I've got the terminology wrong, that it should not be
12 MTFA anymore, but it doesn't make reference to what was
13 in use in 2017, or in 2016 when the tactical assessments
14 were being put together -- sorry, or, indeed, in 2015.

15 And, further, it isn't my job to conduct the
16 tactical assessment. It's my job to ensure that we have
17 a system that is rooted in doctrine rather than opinion.
18 And that's because many, many people in Parliament,
19 whether it be actually sitting MPs, Lords, serving
20 officers, members of the public have views on a range of
21 mitigation we might use in Parliament to keep it safe,
22 and across many other protected sites.

23 There has to therefore be a system that allows sober
24 reflection of what the intelligence is, what the
25 information is, what we know from testing and

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1 exercising, and therefore what the most likely form of
2 attacks might be and how we mitigate them and how we can
3 try and mitigate against all attacks.

4 I ensure that that process is taking place and that
5 the people who are engaged in it are appropriately
6 trained, were asking the experts for advice, and they're
7 delivering it, and we translate that into the model that
8 we agree with Parliament.

9 So if your line of questioning is am I, as I think
10 I said almost immediately, not a firearms-trained
11 officer and therefore -- and also not a firearms
12 assessor, tactical firearms assessor or strategic
13 firearms assessor, then I don't -- I'm not familiar
14 with, perhaps, particular terms. I rely upon others who
15 are expertly trained in those fields to deliver that
16 model for me.

17 Q. As somebody who is responsible, you have to ensure,
18 don't you, that you are on top of all the relevant
19 information that's coming through to you, don't you?

20 A. Yes, but I'm not reading -- just in terms of the
21 capacity of my working life, it's not possible for me to
22 read all of the latest doctrine on firearms tactics or
23 be completely across the intelligence coming in to us on
24 a daily basis from across the world, that's why we have
25 departments that do that for us, and ensuring that they

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1 are brought together in a sensible way is the
2 responsibility of the security coordinator, who is
3 appropriately trained, and that is what was happening in
4 this case and has continued to happen. All that -- what
5 has changed, as you pointed out, is that the tragedy of
6 Keith's murder has been included as sadly one of the
7 experiential factors that is now taken into account and
8 that changed the firearms stance and changed the gate
9 position in New Palace Yard.

10 Q. Commander Usher, the point is this: it was absolutely
11 plain, even on basic knowledge of what was going on in
12 Europe, let alone the world at large, that unarmed
13 officers would be at risk of a terrorist attack using
14 knives; that's right, isn't it?

15 A. They would have been at risk of that and, as I say, we
16 would have had the intelligence assessments from the
17 security services, our own intelligence people and
18 elsewhere, to determine what were the most likely forms
19 of attack at Parliament.

20 Q. Because in terms of your evidence that it took
21 Police Constable Palmer to be stabbed to death for
22 systems to change, can I just put to you the --

23 A. That's not -- Ms Stevens I don't believe that's quite
24 what I said.

25 Q. To appreciate the risks and to --

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1 A. No, no. I'm sorry, the implication there is not right.
 2 I said that as a result of Keith's murder, the fact that
 3 there had been a knife attack in the UK in this way
 4 which had not happened before, was obviously built then
 5 into the model.
 6 Q. Right. When you are assessing the risks of terrorism
 7 and how to put into place adequate security systems --
 8 A. Yes.
 9 Q. -- you don't just rely on what's happening in the United
 10 Kingdom, do you?
 11 A. No, I've described to you the system that is in place to
 12 make those intelligence assessments both domestically
 13 and internationally.
 14 Q. By March 2017, you would have been fully aware of the
 15 fact that individuals working on behalf of the country
 16 could be killed by terrorists using knives and cleavers,
 17 because 2013, that was the murder of Lee Rigby, wasn't
 18 it?
 19 A. Yes.
 20 Q. And if we look at just Paris alone, in 2013, the same
 21 year, you would have been able to take into account when
 22 assessing risk that a French soldier was stabbed by
 23 a terrorist in La Defence area; that's right, isn't it?
 24 A. Yes.
 25 Q. 2014, at Tours police station there is a terrorist

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1 attack by a terrorist using a knife against three police
 2 officers; you would have been aware of that, wouldn't
 3 you?
 4 A. The people engaged in assessing intelligence would have
 5 been aware of that.
 6 Q. Well, you would be aware of it, wouldn't you?
 7 A. Well, as I've said, and there's no way of saying this
 8 without it sounding more defensive than I'd like it to
 9 be: it isn't my job to be aware of every knife attack
 10 internationally across the world over a period of five
 11 years. That is why we have to have systems in place
 12 that make rational assessments of all that information
 13 coming in.
 14 If you are saying to me am I aware of every knife
 15 attack against a police officer, or even a firearms
 16 attack against a police officer internationally across
 17 the world, the answer is no. If you take Israel alone,
 18 there have been hundreds of attacks against police
 19 officers and members of the military in the last six
 20 years, I'm not aware of all of them, or, indeed, the
 21 vast, vast majority of them.
 22 Q. Commander Usher, I'm just asking you in the years
 23 running up to March 2017, in relation to a nearby
 24 country, focusing on stabbings -- all right, and I am
 25 asking you about that in the context of your statement

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1 where you claim that the predominant physical threats
 2 from terrorism were either firearms assaults or vehicle
 3 explosives, okay? I'm just --
 4 A. I'm saying, and the statement I've given is clearly
 5 I wasn't in command until 2016, so the statement that
 6 I have made there is a summary of the intelligence
 7 assessment, the tactical firearms assessment and the
 8 intelligence assessment, the threats that were being
 9 mitigated over that time, and what seemed to be
 10 a consistent theme of those threats was that
 11 vehicle-borne IEDs and MTFA -- and the term MTFA was
 12 used -- were amongst a diverse, an almost impossibly
 13 diverse range of possible terrorist attack
 14 methodologies.
 15 Q. Right. Well in terms of the impossibly diverse range,
 16 if we go back to what I am asking about, you couldn't
 17 have failed to have known, could you, about the attack
 18 in February 2015 on a Jewish centre in Nice where three
 19 military men who were guarding that centre were stabbed.
 20 You must have read about that in the news?
 21 A. Are you saying that me personally?
 22 Q. Did you not read about that in the news?
 23 A. I'm sorry, you are saying me personally aware of that
 24 attack?
 25 Q. Yes, did you read about that?

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1 A. Yes, so -- I'm sure I did read about it.
 2 Q. Right.
 3 A. And as the Borough Commander of Barnet, that is
 4 something that would have impacted me with a significant
 5 Jewish community and I have no doubt taken that into
 6 account when assessing my community engagement strategy.
 7 What I wouldn't have done was taken account of it in
 8 regard to the security of Parliament.
 9 THE CHIEF CORONER: Not in 2015?
 10 A. No, sir.
 11 THE CHIEF CORONER: No, because you weren't doing that job
 12 then.
 13 A. I was the Borough Commander of Barnet at that point.
 14 MS STEVENS: Of course, but I'm asking you about what you
 15 said as to your knowledge of the years leading up to
 16 22 March 2017. So I'm asking you about that.
 17 A. And so, to be clear, I would say that that knowledge,
 18 and the knowledge that I've represented in the statement
 19 I gave, has been gleaned by the tactical firearms
 20 assessments and the intelligence assessments produced
 21 historically that I've gone back through and looked
 22 through, and tried to produce a summary of what they
 23 were to assist the court rather than simply saying
 24 I didn't know anything before I was posted there in
 25 2016.

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1 Q. Yes, but what's noticeable, I would suggest,
 2 Commander Usher, is this complete absence of any
 3 recognition that it was well known that terrorists were
 4 attacking servicemen and women using knives. You knew
 5 about that, didn't you?
 6 A. Yes.
 7 MS STEVENS: Yes.
 8 THE CHIEF CORONER: Ms Stevens, I was going to suggest we
 9 break fairly soon, because I am conscious that we've
 10 been going since 9.30 this morning, and I know we were
 11 dealing with matters other than Commander Usher, but
 12 I'm certainly conscious that the shorthand writers in
 13 court have been going for a long time. If that's
 14 interrupted your thought, we'll break there, but if
 15 there's anything you want to just deal with on that
 16 topic?
 17 MS STEVENS: Thank you, that's very kind, no, I can leave
 18 that topic there, thank you.
 19 Discussion re procedural matters
 20 THE CHIEF CORONER: Commander Usher, I know you are a busy
 21 man, but you will understand the importance of coming
 22 back, as Mr Hough has explained, to deal with the
 23 matters that have come out this afternoon.
 24 A. Yes.
 25 THE CHIEF CORONER: I hope that won't be too long away from

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1 now, but I think you know the sorts of areas where
 2 a statement and the material you've been asked about may
 3 be of great assistance.
 4 A. Yes, sir.
 5 THE CHIEF CORONER: And if I could simply ask that through
 6 liaison with my team, that is done as quickly as
 7 possible.
 8 A. Yes.
 9 THE CHIEF CORONER: Because what I would like to happen
 10 obviously is for the interested persons to see your
 11 statement and the material in good time before you come
 12 back so that when you return, we can deal with matters,
 13 I hope, relatively shortly time-wise.
 14 A. Yes.
 15 THE CHIEF CORONER: And as Ms Stevens and Mr Adamson have
 16 indicated, they're not going to cover the same material,
 17 at my request, they're simply, hopefully, covering
 18 different topics.
 19 A. Yes, sir.
 20 THE CHIEF CORONER: Thank you.
 21 MR HOUGH: Sir, just before we rise, may I deal with one
 22 point. I didn't want to interrupt Ms Stevens and her
 23 questioning, but as regards the operational response
 24 document --
 25 THE CHIEF CORONER: Yes.

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1 MR HOUGH: -- that is a document which we reviewed. It is
 2 a sensitive document. Also, as may be apparent from
 3 Superintendent Morris' statement, it is a document about
 4 command and control in relation to terrorist incidents.
 5 THE CHIEF CORONER: Yes.
 6 MR HOUGH: As such, it has no real relevance to what
 7 happened on 22 March because, of course, command and
 8 control could not be established until after Masood had
 9 been shot and the incident was over.
 10 THE CHIEF CORONER: Yes.
 11 MR HOUGH: And for that reason, disclosing a whole lot of
 12 sensitive tactics about command and control in a more
 13 protracted terrorist incident would have been both
 14 sensitive and irrelevant.
 15 THE CHIEF CORONER: Thank you. That's very helpful.
 16 A. May I ask you just one point, sir, before we break, that
 17 is to be pointed in the direction of somebody who can
 18 adequately equip me with the rules as to who I can talk
 19 to and not talk to.
 20 THE CHIEF CORONER: Yes. What I'm sure will happen,
 21 Commander Usher, is that Mr Hough and Mr Keith will
 22 liaise between the two of them and make sure you get the
 23 appropriate steer.
 24 A. I'm very grateful, sir.
 25 MR HOUGH: As a matter of transparency to everybody, it will

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1 be that Commander Usher can receive guidance for the
 2 purpose of producing a statement of the ambit I've
 3 indicated, and for the purpose also of dealing with
 4 Mr Adamson's reference to the 83 per cent point.
 5 THE CHIEF CORONER: Yes.
 6 MR HOUGH: But shouldn't be discussing the balance of his
 7 evidence.
 8 THE CHIEF CORONER: Absolutely.
 9 In terms of tomorrow, Mr Hough, I think at the
 10 moment we are listed for 10 o'clock tomorrow morning.
 11 MR HOUGH: We have Superintendent Aldworth who needs to be
 12 finished by 1.00 pm.
 13 THE CHIEF CORONER: Yes.
 14 MR HOUGH: I would anticipate that I will be about 40 or 45
 15 minutes with him, covering both topics of the barriers
 16 and his role as a firearms DCI at the
 17 Palace of Westminster. I don't know, I haven't yet got
 18 estimates from everyone else, but obviously it would be
 19 helpful to have an indication now so that we can decide
 20 whether to sit at 10.00 or 9.30.
 21 THE CHIEF CORONER: Yes.
 22 MR ADAMSON: Sir, Mr Patterson and I have been in discussion
 23 about what one might call the security on the bridge
 24 related issues that Chief Superintendent Aldworth deals
 25 with. I'm going to deal firstly with those matters.

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1 THE CHIEF CORONER: Yes.
 2 MR ADAMSON: But as a result of recent developments, his
 3 evidence has expanded, so I anticipate that I will be
 4 probably of the order of 45 minutes or so --
 5 THE CHIEF CORONER: Yes.
 6 MR ADAMSON: -- in relation to Mr Aldworth.
 7 THE CHIEF CORONER: That's an hour and a half together.
 8 Any?
 9 MR PATTERSON: 20 minutes, 25 minutes, something of that
 10 sort.
 11 THE CHIEF CORONER: Right. Anyone else?
 12 MS STEVENS: Sir, sorry. There was one issue of disclosure
 13 that related to Chief Superintendent Aldworth. I think
 14 it might have been resolved, but because I don't know
 15 what the contents of that material is, it's rather
 16 difficult to say, but I would definitely be less than my
 17 learned friend Mr Adamson. I don't have a lot for Chief
 18 Superintendent Aldworth, subject to that issue of
 19 disclosure.
 20 THE CHIEF CORONER: It sounds, Mr Hough, as if the sensible
 21 thing might be to start at 9.45, and then if we finish
 22 him with a bit of time to spare, all very well. But the
 23 last thing I would want is for people either to be
 24 rushing against a very tight deadline, or for the
 25 witness themselves to be in that position.

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1 MR HOUGH: Yes, we have in the afternoon Dr Cowan, who will
 2 be a short witness.
 3 THE CHIEF CORONER: Yes.
 4 MR HOUGH: Dr or Professor Chisholm, and it may be that we
 5 can cover PCs Keen and Clarke as well.
 6 THE CHIEF CORONER: Yes. The quite interesting description
 7 of a short witness, in a different jurisdiction I was
 8 told the next witness was going to be short and the
 9 gentleman came in 6 foot 10. So, as you might imagine,
 10 everyone being told he was going to be short caused the
 11 court to collapse.
 12 MR ADAMSON: Sir, sorry to rise to my feet once again,
 13 I think the disclosure issue to which my learned friend
 14 Ms Stevens was referring related to a recording of
 15 a disciplinary process which took place following
 16 an exchange between Mr Aldworth and another officer, and
 17 the precise background to this exchange is not entirely
 18 clear, but the long and short of it is that there was
 19 an officer on duty in New Palace Yard who apparently was
 20 not complying with his post instructions. That resulted
 21 in some form of exchange between him and Mr Aldworth.
 22 There was then a disciplinary process at which
 23 a recording of an exchange between Mr Aldworth and the
 24 officer concerned was produced.
 25 We would like to see, or rather hear that recording,

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1 because it's alluded to in the statement of Mr Aldworth,
 2 which we received on Friday evening, in order to verify
 3 its content and to see whether and to what extent it is
 4 relevant to (a) the issues regarding compliance with
 5 post instructions within the yard, and (b) to satisfy
 6 ourselves that Mr Aldworth's interpretation of the tape
 7 and any consequences that may have flowed from it is
 8 an accurate one.
 9 MR KEITH: Sir, Chief Superintendent Aldworth prepared
 10 a statement in response to the anonymous WhatsApp or
 11 text messages which were sent to Mr Adamson by
 12 an anonymous informant. In the course of his statement,
 13 which was circulated as soon as it had been prepared, he
 14 describes how an unarmed officer recorded, without his
 15 knowledge, a conversation with him. As a result of that
 16 recording, either the officer or somebody else reported
 17 Mr Aldworth. In any event, the matter was submitted to
 18 the MPS Department for Professional Standards who
 19 decided that there had been no breach of the code of
 20 conduct in respect of the conversation that had been
 21 conducted between a senior officer and an unarmed
 22 officer.
 23 The MPS does not have that recording. The officer,
 24 the unarmed officer who made the recording without
 25 Mr Aldworth's knowledge, appears, however, to have

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1 offered it to the press at some point subsequently. He
 2 is not a member of the Metropolitan Police, he is no
 3 longer a serving officer, we have no means of securing
 4 that recording from him. We do not, I repeat, have it.
 5 But, in any event, we really do question, with
 6 respect and not with heat, why the recording could
 7 possibly be relevant. If it is suggested or desired to
 8 be suggested to Superintendent Aldworth that this
 9 conversation evidenced a failure by him to supervise
 10 an unarmed officer, he can be asked about it. He is
 11 a witness tomorrow.
 12 If it is wished to be secured for the purposes of
 13 asking Superintendent Aldworth why he used intemperate
 14 language or why, in the course of the relationship with
 15 the unarmed officer he said or did something that led to
 16 this matter being investigated by DPS, we would say that
 17 would be entirely irrelevant but, in any event, if you
 18 wished it, it can of course be put to the officer when
 19 he gives evidence tomorrow.
 20 THE CHIEF CORONER: Yes.
 21 MR ADAMSON: Sir, I quote from paragraph 5 of Mr Aldworth's
 22 statement in light of the statement just made by
 23 Mr Keith the MPS does not have this recording,
 24 paragraph 5 states:
 25 "The recording was submitted to the MPS Department

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1 for Professional Standards who decided that there had
 2 been no breach of the code of conduct.”
 3 So I don’t understand why they do not have it , and
 4 this would not be the first time where material which
 5 might be relevant to these proceedings turns up at
 6 a late stage. So in circumstances, it does appear to be
 7 available , and if it ’s not available I don’t know where
 8 it ’s gone, but certainly we have got no explanation as
 9 to where it ’s gone.
 10 As to the purpose of this material, well, it ’s
 11 a further indication of non-compliance with post
 12 instructions .
 13 THE CHIEF CORONER: The first issue is to get to the bottom
 14 of where it is. I mean, Mr Keith says that the MPS do
 15 not have it .
 16 MR ADAMSON: Well, the statement says it was submitted.
 17 THE CHIEF CORONER: The statement says to the contrary, it
 18 seems to me that needs to be resolved as a matter -- as
 19 the first matter.
 20 MS STEVENS: In terms of that could we ask, because
 21 unfortunately things do seem to have gone awry in terms
 22 of the information that ’s being given to the
 23 Metropolitan Police Service counsel, could we ask that
 24 the Department of Professional Standards are in turn
 25 requested to look through their files because, on the

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1 face of it , bearing in mind they have an obligation to
 2 keep documentation for six years, it really should be in
 3 existence .
 4 The second reason why it is relevant, just to pick
 5 up on that, is there are two versions as to what’s on
 6 the recording. If it ’s version one, it goes to the fact
 7 that post notes were being ignored by others over and
 8 above Ashby and Sanders. But version two, according to
 9 others, this conversation was a police constable telling
 10 Chief Superintendent Aldworth that he was unhappy with
 11 the security systems that were in place, and that he did
 12 not agree with the removal of the fixed post and, the
 13 police constable having raised that, there was then
 14 an attempt on the part of Chief Superintendent Aldworth
 15 to bully him into submission.
 16 So it ’s relevant on the basis of either Chief
 17 Superintendent Aldworth’s version of events, or the
 18 other story.
 19 THE CHIEF CORONER: Mr Hough, it seems to me that the first
 20 question, I suppose, is to ask Mr Keith to do the
 21 double-check.
 22 MR HOUGH: Well, I think that ’s what has to happen.
 23 THE CHIEF CORONER: Yes.
 24 MR HOUGH: And then once the recording has been listened to,
 25 a view can be taken as to --

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1 THE CHIEF CORONER: If it’s available it can then be
 2 listened to and a view taken as to its relevance and its
 3 admissibility .
 4 MR HOUGH: Yes.
 5 MR KEITH: We will, of course, double-check. I wouldn’t
 6 have given the assurance to the court unless I had
 7 already verified DPS don’t have it . It was submitted to
 8 them. That is not necessarily dispositive of whether
 9 they still have it but we will check again.
 10 THE CHIEF CORONER: Thank you very much.
 11 9.45 in the morning.
 12 (4.45 pm)
 13 (The hearing adjourned until 9.45 am on
 14 Tuesday, 25 September 2018)
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