

OPUS 2

INTERNATIONAL

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

Day 13

September 27, 2018

Opus 2 International - Official Court Reporters

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1 Thursday, 27 September 2018
 2 (9.30 am)
 3 (Proceedings delayed)
 4 (9.35 am)
 5 MR HOUGH: Sir, our first witness is Commander Adrian Usher.
 6 MS STEVENS: Sir, just whilst we are waiting for
 7 Commander Usher to come in, can I just check that you
 8 have had sight of our note from yesterday.
 9 THE CHIEF CORONER: I have, Ms Stevens and I've also seen
 10 the email that was sent earlier this morning by Ms Jones
 11 in relation to the response to your note.
 12 MS STEVENS: I'm very grateful. We don't ask for time to be
 13 taken up with legal argument, we just wanted to check
 14 that you were aware of our position.
 15 THE CHIEF CORONER: I am, thank you.
 16 COMMANDER ADRIAN USHER (Continued)
 17 A. Good morning, sir.
 18 THE CHIEF CORONER: Can I just say before we start,
 19 Mr Hough, that I am conscious we're trespassing very
 20 much on Commander Usher's time. He has had to come back
 21 for a second occasion.
 22 I know, Mr Keith, I'm fairly sure I remember you
 23 need to be away by midday today. What I'm going to do
 24 is we will finish Commander Usher's evidence by midday,
 25 I sincerely hope, allowing sufficient time for you to

1

1 ask any questions that might arise.
 2 MR KEITH: Thank you.
 3 THE CHIEF CORONER: I would have thought, Mr Keith, if
 4 I were to give you half an hour for you, would that be
 5 sufficient?
 6 MR KEITH: That would be ample, thank you.
 7 THE CHIEF CORONER: What I will then do, I know Mr Hough is
 8 going to cover a few matters which have come to light
 9 since the last occasion, but then I will -- the other
 10 time we will divide between others who wish to ask
 11 questions.
 12 MR KEITH: We'll let them fight it out amongst themselves.
 13 Further examination by MR HOUGH QC
 14 MR HOUGH: I'll be as brief as I can, sir.
 15 Commander Usher, you are still on oath, you are
 16 aware?
 17 A. Yes, sir.
 18 Q. You were giving evidence on Monday, 24 September, and
 19 you are aware, I think, that a couple of matters arose
 20 in your evidence which required further inquiries or
 21 exploration?
 22 A. Yes.
 23 Q. The MPS has assisted with those in the interim and you
 24 addressed the issues in a fourth statement dated
 25 24 September; I hope you have that to hand?

2

1 A. Yes.
 2 Q. I'm going to ask you further questions to elicit that
 3 evidence.
 4 Now, Commander, do you remember on Monday afternoon
 5 you were being questioned by Mr Adamson about checks
 6 carried out by supervisors about compliance with post
 7 notes by authorised firearms officers at the
 8 Palace of Westminster?
 9 A. Yes.
 10 Q. Do you recall that you mentioned that you had seen
 11 records of some checks, whereas we had understood that
 12 none existed?
 13 A. Yes, sir.
 14 Q. May we please bring up on screen {WS5131/4}. Then if we
 15 can move to page 5 as well, so that both pages have been
 16 seen {WS5131/5}. Commander, is that the document you
 17 were referring to when you said you had seen a document
 18 containing some checks?
 19 A. Yes.
 20 Q. When were you first shown that document?
 21 A. On Monday, sir.
 22 Q. At what time on Monday?
 23 A. I believe it was the lunch break.
 24 Q. Had you seen any record of compliance checks on AFOs at
 25 the Palace of Westminster before Monday lunchtime?

3

1 A. No, sir.
 2 Q. Now, I think further inquiries have been made and it's
 3 been established that that document was produced by
 4 Inspector Munns, a supervisor at the
 5 Palace of Westminster; is that right?
 6 A. That's right, sir, yes.
 7 Q. And I think it's also been established that that's part
 8 of wider records, a wider set of records, created by him
 9 to record compliance checks by his sergeants?
 10 A. Yes.
 11 Q. And if we go, please, to {WS5131/7} of the same
 12 document, do we see the first page of that wider set of
 13 records?
 14 A. Yes, sir.
 15 Q. And are you aware that those records ran
 16 from September 2015 to February 2016?
 17 A. I am, sir, yes.
 18 Q. When did Inspector Munns first provide that to the
 19 Metropolitan Police and its legal team?
 20 A. On Monday morning, sir. Inspector Munns -- I should be
 21 clear, Inspector Munns created this spreadsheet for his
 22 own use and therefore on his own Metropolitan Police
 23 account, and therefore it has not been produced on
 24 a system that was searchable by the Met as a crime
 25 report would be or criminal intelligence might be.

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1 So we were unaware of it because we couldn't search
 2 against it until Inspector Munns came back to work, he
 3 has been off on a period of paternity support, and he
 4 arrived back at work on Monday and then produced this.
 5 Q. Does the MPS, to the best of your knowledge, have any
 6 central record of these or any other compliance checks
 7 on Palace of Westminster AFOs?
 8 A. No, they would not.
 9 Q. And is that why the MPS didn't provide such records in
 10 response to earlier inquiries?
 11 A. Yes, sir.
 12 Q. Inspector Munns' records only cover the period up
 13 to February 2016?
 14 A. Yes.
 15 Q. As I understand it, further inquiries have since been
 16 made to establish whether Inspector Munns' successors
 17 kept similar records of their own?
 18 A. Yes, Inspector Munns moved on at the beginning of 2016.
 19 We have checked with the two other inspectors who would
 20 have been responsible for compliance and neither kept
 21 records such as this.
 22 Q. When you were giving evidence on Monday you said that
 23 you had seen the compliance checks document you referred
 24 to within the last fortnight, and that's page 147 of the
 25 transcript.

5

1 A. Yes.
 2 Q. Are you able to explain why you didn't say you'd seen it
 3 that lunchtime?
 4 A. Because what happened in the lunchtime was that I was
 5 briefly shown the front page of it twice. I confess
 6 that the number of documents that I've been shown in the
 7 last six months, but certainly in the last week or two
 8 weeks, has been huge, and I've tried to grasp them all.
 9 When I've seen the document for the second time, the
 10 predominant thought in my head was "I've seen that
 11 before". It may seem odd, but it was a fairly pressured
 12 lunchtime, and I just simply thought "I've seen that
 13 before". Therefore when I was asked in court I was
 14 being really careful to make sure that I gave the most
 15 accurate answer I could, and when being asked when
 16 you've seen it, I thought: I've seen that before and
 17 I wanted to cover as much time as possible in order to
 18 make sure I was giving an honest answer. Because
 19 I think the question was "When did you first see it?"
 20 and that's why I've gone back further than that.
 21 Q. Now, a couple of points arising from the document,
 22 please. What the document shows, as we can see, is for
 23 each sector the notes that Inspector Munns, or rather
 24 his sergeants, have recorded against that sector in
 25 respect of the AFOs' duties?

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1 A. Yes, I believe it shows the time at which the checks on
 2 any particular sector by the sergeant were done,
 3 followed by comments. I should say, sir, that I haven't
 4 seen this document in this expanded form prior to now.
 5 Q. When we look at a comment such as "No issues", either on
 6 this document or on the version that you saw --
 7 A. Yes.
 8 Q. -- is this right, it doesn't tell us what the sergeant
 9 thought the AFOs ought to be doing; it tells us merely
 10 that he thought the AFOs were doing what they should be,
 11 whatever that was?
 12 A. Yes, I believe that to be right.
 13 Q. If we go to the next page {WS5131/8} we can see that for
 14 each of these, or for a number of these cells additional
 15 comments have been added.
 16 A. Yes.
 17 Q. Now, may I ask you to look at one of those, please,
 18 page 23 first of all {WS5131/23}, and do we see here
 19 that cell C22, so if we go down to row 22.
 20 A. 11 o'clock.
 21 Q. Column C, it's the 11.00 am shift at sector 3, which we
 22 know is New Palace Yard.
 23 A. Yes.
 24 Q. And if we go to the next page, page 24, please
 25 {WS5131/24} do we see in relation to cell C22 this entry

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1 in relation to the supervision:
 2 "Reminded officers to patrol the area rather than
 3 just stand at the gates."
 4 A. Yes.
 5 Q. Now, we know, and I won't take you back to it unless you
 6 ask me to, that the post instruction at that time was
 7 for the officers to remain, essentially, at the gates.
 8 A. Sorry, just remind me of the date of this?
 9 Q. This is 23 November 2015. Perhaps it's best if I bring
 10 up the ...
 11 A. Yes, I'm just reminding myself of the date of when it
 12 moved from that. Yes, I understand that, sir, yes.
 13 Q. Yes. So at this time, according to the post notes, the
 14 officers' instruction was to stand at the gates?
 15 A. Yes.
 16 Q. May this document be read as suggesting that the
 17 sergeant thought the officers' duty included some sort
 18 of patrol in New Palace Yard?
 19 A. It could be viewed in that way, yes, sir.
 20 Q. In fairness, it doesn't suggest, does it, what the
 21 supervisor thought the extent of the patrol might be?
 22 A. That's right, sir.
 23 Q. So we can take that down now.
 24 Also when giving evidence on Monday you said that
 25 you had been told that 83 per cent of armed officers on

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1 the PaPD command had logged on to ADAM recently.
 2 A. Yes.
 3 Q. And for the lawyers, that's page 82 of the transcript.
 4 Now, the MPS has shown us, the Inquest team,
 5 a schedule which shows that 84 per cent of these
 6 officers had logged on to the system --
 7 A. Yes.
 8 Q. -- between October 2012 and July 2016.
 9 A. Yes.
 10 Q. I think you're aware of that schedule and what it shows?
 11 A. I am, sir, yes.
 12 Q. Would you accept as a matter of fairness that that
 13 doesn't show of itself that 84 per cent had logged on
 14 recently, prior to March 2017?
 15 A. I would accept that, and therefore if my original answer
 16 said -- and I take you at your word -- that I had said
 17 recently, then I offer the court my apology, it was
 18 an honest statement made believing that that's what that
 19 showed. Having been shown, as you have this morning to
 20 me, the break-down, I understand that it shows that
 21 84 per cent of officers have engaged with the ADAM
 22 system, but not necessarily recently.
 23 Q. Yes. I don't know if Commander Usher can be provided
 24 with a note that we prepared giving --
 25 A. I think I have it, sir.

9

1 Q. You have it, good. I think all the lawyers have it too.
 2 Now, this is our team's analysis of the schedule
 3 showing the numbers of officers who had logged in on the
 4 most recent occasion for each of a number of months
 5 from October 2012 through to July 2016; do you see that?
 6 A. Yes, I do.
 7 Q. If you look at that, the figure in the second column for
 8 any given month is the percentage of officers on the
 9 command who last logged into the ADAM system in that
 10 month --
 11 A. Yes.
 12 Q. -- viewed from the perspective of August 2016?
 13 A. Yes.
 14 Q. And if you look at the third column, what has been done
 15 there is to show the cumulative percentage or proportion
 16 of officers who had logged in to the system by
 17 a particular date, viewed from August 2016.
 18 A. Yes, I understand.
 19 Q. So if you look at the figure for December 2015 and the
 20 third column, do you see that on our analysis, which of
 21 course the MPS can check, the cumulative total is
 22 13 per cent?
 23 A. Yes.
 24 Q. Suggesting, is this right, if the arithmetic is correct,
 25 that 13 per cent of officers on the command had logged

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1 in between December 2015 and the end of July 2016?
 2 A. Yes.
 3 Q. And you will understand the reason I pick
 4 out December 2015 is that it was the date of the last
 5 set of post notes?
 6 A. Yes.
 7 Q. And then if you go over the page and look
 8 at January 2015, the third column there, do we see that
 9 33 per cent of officers on the command had logged in
 10 between January 2015 and August, or the end
 11 of July 2016?
 12 A. Yes.
 13 Q. And you will understand that's the figure I pick out
 14 because that's the date of the last post notes but one?
 15 A. Yes.
 16 Q. The earlier set of post notes. And is this right: that
 17 one only gets above 50 per cent in the cumulative total
 18 figure when one goes back beyond mid-2014?
 19 A. Yes.
 20 Q. So if those figures are correct, do they suggest that
 21 PC Ashby was not unusual in not having logged on to the
 22 system more recently than early 2015?
 23 A. Can I just think through the maths of this for a
 24 second --
 25 Q. Yes, of course, please take your time?

11

1 A. -- I'm just trying to grasp ... (Pause).
 2 Yes, that's right, sir, yes.
 3 MR HOUGH: Those are all my questions. Thank you sir.
 4 Examination by MS STEVENS (Continued)
 5 MS STEVENS: Thank you. Susannah Stevens for the parents
 6 and siblings of Police Constable Palmer.
 7 Commander Usher, you will recall that we had
 8 actually got to the point where I was in the process of
 9 asking you questions on Monday when we had to break
 10 because of time.
 11 A. Yes.
 12 Q. Can we go back, please, and what I want to ask you about
 13 next is when did you, as the person responsible for
 14 security at the Palace of Westminster on behalf of the
 15 Metropolitan Police Service, when did you first watch
 16 the CCTV of Police Constable Palmer's murder?
 17 A. I haven't watched the CCTV of Police Constable Palmer's
 18 murder in its entirety. I've watched a very short
 19 excerpt of it.
 20 Q. When did you watch that?
 21 A. It would be, I think, a year ago.
 22 Q. Bearing in mind your role, you must have watched that
 23 footage pretty soon after the terrorist attack?
 24 A. No, ma'am. And the reason I didn't is because I think,
 25 as I've said before, there was a clear delineation here

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1 between my command and the investigative team, and it's
 2 right that there is so. My command, including myself,
 3 are likely to be more emotionally involved in wanting --
 4 maybe wanting a certain outcome, and therefore we take
 5 no part in it.

6 Q. Certainly you must have read the press reports the very
 7 next day, raising questions about the absence of armed
 8 officers at Carriage Gates?

9 A. I can't recall whether I did or I did not.

10 Q. Bearing in mind your role --

11 A. Yes.

12 Q. -- you must have been aware very soon thereafter that
 13 there was a question mark about why there were no armed
 14 officers present when Police Constable Palmer was
 15 murdered?

16 A. Well, I would take issue with the no armed officers
 17 present. As I've given evidence on before, there were
 18 armed officers within Palace Yard. I didn't know -- if
 19 your question is did I know soon after where those
 20 officers were standing? No, I didn't. Was I aware of
 21 the post notes to which they should have been standing
 22 against? No, I wasn't.

23 I think it's also fair at this point to make clear
 24 that although for security reasons I won't be describing
 25 how many officers I have under my command, but it runs

13

1 to the thousands. So I give that merely as context for
 2 not knowing the post notes and their individual
 3 deployments.

4 I also don't --

5 Q. Commander Usher, sir, I don't want to cut across you,
 6 but I'm very conscious that I have a limited period of
 7 time to ask questions.

8 A. Okay. I don't usually allow press reports to influence
 9 my decision-making. And I can't recall whether I saw
 10 them or not. And I wouldn't have seen them from any
 11 other source.

12 Q. Well, in the press reports the former commissioner,
 13 Sir Ian Blair, made comments about security arrangements
 14 needing to be changed at Carriage Gates; do you not
 15 remember that?

16 A. No.

17 Q. The former Home Secretary, Alan Johnson, made comments
 18 in the press about the lack of security; do you not
 19 remember that?

20 A. No.

21 Q. The truth is, isn't it, of course you were aware shortly
 22 after Police Constable Palmer's murder, that serious
 23 questions were being raised about the absence of armed
 24 officers at Carriage Gates?

25 A. It is my experience in 30 years of policing that in any

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1 major incident that makes the papers, very serious and
 2 often important questions are raised, but they're based,
 3 usually, on almost no information. They're normally
 4 based on speculation and wild conjecture.

5 So it is my practice to wait until we have a clear
 6 idea of what actually happened and make decisions based
 7 upon that, not upon speculation by ex-officers or MPs.

8 Q. Well, who was it within the Metropolitan Police Service,
 9 within the months of March or, indeed, April, or
 10 indeed May, who decided that the absence of armed
 11 officers at Carriage Gates should be looked into?

12 A. From how I've understood your question, nobody at that
 13 stage, the investigation would be ongoing.

14 Q. The reason, the family suggest, for that complete lack
 15 of investigation during all of those months, is because
 16 the Metropolitan Police Service knew that armed officers
 17 would be on a patrol in New Palace Yard. That's the
 18 truth, isn't it?

19 MR KEITH: I'm so sorry to rise to my feet. It is
 20 impermissible examination, as my learned friend knows
 21 full well, without a proper basis by way of instruction
 22 to suggest to a witness by implication that the truth is
 23 something other than what that witness has said.

24 THE CHIEF CORONER: Yes.

25 MR KEITH: It is wrong to suggest the truth is something

15

1 then state a proposition when in fact there is not
 2 already evidence to suggest that the account already
 3 given is contrary or undermined by something else.

4 THE CHIEF CORONER: Yes.

5 MR KEITH: It is also not permissible to suggest, by way of
 6 implication, that over a period of time things were not
 7 done, or that there was no investigation, when my
 8 learned friend has no basis at all for that proposition.

9 THE CHIEF CORONER: Yes.

10 MS STEVENS: Sir, can I deal with that: the last matter
 11 that's been raised, that there's no evidential basis for
 12 what has been suggested on the family's behalf, namely
 13 that nothing was done by way of investigation between
 14 the months of March, April, May, in fact, it goes
 15 further, it goes through to September, is on the clear
 16 evidential foundation that the Department of
 17 Professional Standards investigation was
 18 in September 2017. There has been no suggestion of any
 19 other investigation before that date. If there had been
 20 that, of course, should have been disclosed, so that's
 21 the second point.

22 In relation to the first point, there is, again,
 23 a proper evidential foundation, which is this: if it was
 24 right that the Metropolitan Police Service was of the
 25 view that armed officers should be tethered to Carriage

16

1 Gates, it would have been immediately apparent that that
2 hadn't occurred, and therefore when you put those two
3 factors together, there is a proper basis for the family
4 to suggest that the only reasonable inference in
5 relation to that is that the Metropolitan Police Service
6 knew that the practice was a patrol, and therefore it
7 did not come as an alarming surprise in March, April
8 or May, that there were no armed officers tethered to
9 the gates.

10 THE CHIEF CORONER: Well, Ms Stevens, I'm going to let you
11 put your question to Commander Usher. Whether he can
12 answer it, of course, is a separate matter.

13 MS STEVENS: Of course, thank you.

14 Commander Usher, do you want me to put the question
15 again?

16 A. Yes, please.

17 Q. The family suggest that the reason that there was no
18 investigation between March and, in fact, September of
19 2017 into the whereabouts of the armed officers, is that
20 the Metropolitan Police Service knew that the practice
21 of those officers was to undertake a patrol.

22 A. I would disagree that there was no investigation. The
23 investigation that was taking place by SO15 was large,
24 comprehensive in my belief, and thorough in trying to
25 uncover all evidence. I think the court has heard

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1 evidence of many thousands of statements being taken.

2 So there was a thorough investigation underway.
3 I had immediately asked for a review, an independent
4 review of security at the Palace to ensure that the
5 security measures that were in place were appropriate
6 subsequent to the attack.

7 I don't see a process by which there is a rush to
8 judgment against an officer as and when that was
9 uncovered, and I have described to you when I was aware
10 of it, that that would have assisted.

11 Also I don't understand your implication that
12 a delay would in some way have assisted the
13 Metropolitan Police. The fact is that when I discovered
14 that there was this discrepancy, I asked for the DPS to
15 step in and look at it. They would be looking at
16 exactly the same facts in September as they would have
17 been looking at in March.

18 Q. The only --

19 A. And I can't pretend that this was by design, but they
20 would have also been looking at that when emotions,
21 perhaps, had settled some.

22 Q. Sorry, are you suggesting it would take from March
23 to September for officers within the Metropolitan Police
24 Service to be able to dispassionately assess why it is
25 that there were no armed officers at Carriage Gates?

18

1 A. Some of the officers who were present on that day will
2 never be able to describe dispassionately what happened.

3 Q. Commander Usher, in relation to the investigation that
4 took place in September of 2017, no officers were spoken
5 to, were they?

6 A. That's right.

7 Q. Therefore, the distress of officers has no bearing on
8 the timing of that investigation, does it?

9 A. I think I said at the start of that answer that I gave
10 you that it wasn't by design. I found out and I have
11 described accurately how I found out, the discrepancy
12 between post notes and practice between -- with PC Ashby
13 and PC Sanders, and I immediately commissioned DPS to
14 step in and look at that.

15 As I said before, I cannot see -- they were
16 examining the same facts in September as March.
17 I couldn't -- there is no benefit, had I known in March
18 or April, for a delay.

19 Q. Can we have a look, please, at what you have said about
20 this challenge, as you put it, with
21 Police Constables Ashby and Sanders, and if we could
22 bring up, please, it's {WS5099/18}. Thank you.

23 So, to put it in context, if we could just look at
24 the earlier page, {WS5099/17}, paragraph 70:

25 "In the late summer of 2017 I decided to explore the

19

1 effectiveness of the Occupational Health support
2 mechanisms ..."

3 Can you see that?

4 A. I can, yes.

5 Q. And then if we go over the page {WS5099/18}:

6 "As part of this process I met with PCs Ashby and
7 Sanders."

8 A. Yes.

9 Q. Paragraph 71:

10 "In speaking to them of their experiences it became
11 clear to me that the location at which they had been
12 standing at the start of the incident, at or near the
13 Colonnades/entrance to Speaker's Court, was at variance
14 with the Post Notes ..."

15 Pausing there.

16 A. Yes.

17 Q. This had nothing to do with occupational health, did it?

18 A. It had everything to do with occupational health, as the
19 other 15 or 20 officers whom I'd spoken to on this
20 matter would confirm. Every meeting --

21 Q. Sorry, because we are limited for time, so if you can
22 just focus on Police Constables Ashby and Sanders. Your
23 meeting with them had nothing to do with occupational
24 health, did it?

25 A. Yes, it did.

20

1 Q. You didn't even mention anything about occupational
2 health to Police Constable Ashby, did you?
3 A. The preamble that I introduced the meeting's purpose
4 remained consistent for all officers that I spoke to,
5 and that included the reason I was speaking to them was
6 to judge the effectiveness of occupational health and
7 had it been of use. We had recently switched from one
8 delivery model of occupational health support to
9 another. I thought it worthy of exploration.
10 Q. There is a dedicated occupational health department and
11 team within the Metropolitan Police Service, isn't
12 there?
13 A. Yes, but I can't assist much further than that.
14 Q. Right. It's not your role, is it, to deal with
15 occupational health?
16 A. It's my role and I have a duty of care, both moral and
17 legal, to my staff. I want to check that they're all
18 right, and that's why I talked to them.
19 Q. It's not your role to deal with occupational health,
20 that's the question.
21 A. Yes, it is. The health -- the mental and physical
22 well-being of my staff is absolutely my responsibility.
23 Q. You said on Monday that the police service is
24 a hierarchical system in which an inspector does not
25 address issues with a police constable. In terms of

21

1 that --
2 A. I don't think I said quite that, but I take your general
3 point: it is a hierarchical system and the question is
4 why was a commander speaking to constables.
5 Q. Sorry, can I just ask the question? I'm dealing --
6 A. Okay, I'm sorry --
7 MR KEITH: That's the third time that my learned friend has
8 tried to stop an answer. May I --
9 THE CHIEF CORONER: I'm going to -- I mean, it seems to me
10 in courtesy to the questioner and the respondent, people
11 should await the conclusion of an answer, in the same
12 way they should await the conclusion of a question. So
13 I'm going to ask everyone if we could do that, please.
14 A. I apologise, sir.
15 MS STEVENS: Yes, of course.
16 THE CHIEF CORONER: I'm not asking for any apology but if we
17 can just work on that basis going forward.
18 MS STEVENS: No, of course, sir, the only reason is we are
19 under real time constraints and therefore if an answer
20 doesn't relate to the question ...
21 THE CHIEF CORONER: In fairness, Ms Stevens, I will stop if
22 the matter is irrelevant. So if you ask the question
23 and the answer, we're going off-tangent, I will stop it.
24 MS STEVENS: Thank you. I'm just really on behalf of the
25 family conscious of the observations on behalf of the

22

1 Metropolitan Police Service that we will have to battle
2 it out amongst ourselves when it comes to the time that
3 we have allocated.
4 THE CHIEF CORONER: There's plenty of time, Ms Stevens and
5 if you ask the questions, then we'll make progress.
6 MS STEVENS: The question I asked you, Commander Usher, I'll
7 go back to it, is this: you said on Monday that the
8 police service is a hierarchical system in which
9 an inspector does not address issues with a police
10 constable; do you remember saying that?
11 A. I would be very surprised if I said those exact words.
12 I agree that I said that the police service is
13 a hierarchical system, but yes, that's what I would have
14 said.
15 Q. Beyond that I suggest that you said that an inspector
16 does not address matters with a police constable; do you
17 disagree with that?
18 A. I don't. In the normal course of events most issues
19 relating to an officer are dealt with by their immediate
20 line manager. So for a constable that would be
21 a sergeant.
22 Q. Right. Therefore, in this scenario, if you had concerns
23 about the welfare of Police Constable Ashby or
24 Police Constable Sanders, you could quite easily,
25 couldn't you, have sent an email to their line manager?

23

1 A. Yes, and I think that makes my point: that if the
2 primary purpose of meeting with them was to judge their
3 personal welfare, then that would have been a way
4 forward. But the primary purpose, as I've said, was
5 a more strategic view of how is the Metropolitan Police
6 occupational health service offer being delivered and is
7 it effective.
8 As a commander, I have the rank that allows me to
9 pull officers from various different armed, unarmed,
10 different teams to come and see me in relatively short
11 order, and therefore to be able to get a sense of,
12 across all of the people who are were in the yard that
13 day who were from many different teams, my rank allows
14 me to do that quite quickly.
15 Q. You didn't know Police Constable Ashby or
16 Police Constable Sanders, did you?
17 A. No, that's right.
18 Q. In talking about welfare matters, it would have been far
19 preferable for them to have spoken to their line manager
20 who they would have known well, wouldn't it?
21 A. Yes, ma'am, I accept that. I think I have
22 contextualised this, and I'm trying to be absolutely as
23 open and forthright as I can be. I asked officers about
24 their experience of occupational health. The preamble
25 that went with that was me saying to them: if you don't

24

1 want to talk about events on the day at all, then don't
2 feel that you have to, because some officers would find
3 that too traumatic.

4 So I fail to see that if I've opened with that
5 preamble of saying "You don't have to talk about events
6 on the day", that in any way the inquiries were being
7 made as some sort of investigation into the officers'
8 actions.

9 Q. In terms of talking about welfare matters, such issues
10 should be dealt with with officers individually, not as
11 a pair; that's right, isn't it?

12 A. It depends upon the purpose, and I can only reiterate
13 what the purpose was; was to say: how did you find
14 occupational health? Did it deliver something for you?
15 Did you engage with it? And how did you find the
16 service that was provided to you?

17 Q. What you told the court on Monday, and this is at
18 page 74, is as follows, and the only question I'm going
19 to ask you when I've put this to you is do you remember
20 saying this, all right?

21 You say as follows:

22 "Answer: I think either the day or the day after
23 I received those post notes, I met with Police
24 Constables Ashby and Sanders ..."

25 And the --

25

1 A. Sorry, which paragraph is this?

2 Q. This is from the transcript.

3 A. I see. I don't have the transcript in front of me --

4 Q. No.

5 A. -- but that sounds like my recollection of what I said.

6 Q. And what you said, in terms of the context, is that:

7 "Answer: Shortly before meeting Ashby and Sanders,
8 an unarmed officer had met with me ... [and] as a result
9 of that conversation, I thought I should see the post
10 notes."

11 Do you remember saying that?

12 A. I do, yes.

13 Q. Therefore, the day or day before that, the meeting with
14 PC Ashby and Sanders, you had seen the post notes and
15 appreciated that there was an issue?

16 A. No, I'd seen the post notes and thought that they seemed
17 to make sense to me. I wasn't aware at that stage that
18 PCs Ashby and Sanders weren't acting in accordance with
19 them.

20 Q. Commander Usher, can we just remember, if we go back to
21 what you said about this, you said just before the
22 meeting with Ashby and Sanders the unarmed officer made
23 a comment that he wouldn't speak to a firearms officer
24 going forward.

25 Do you remember?

26

1 A. I didn't say "He". I didn't say "he".

2 Q. If you want to have a look, is it possible to bring the
3 transcript up on the screen if there is an issue
4 about what's been said?

5 MR HOUGH: Transcripts are accessible via Opus.

6 MS STEVENS: I am very grateful, if it could be, please,
7 bearing in mind --

8 THE CHIEF CORONER: I have it in front of me. It seems to
9 me it's quite important, I think, for Commander Usher to
10 see the rest of the answer that he gave in relation to
11 occupational health, which we haven't yet had mention
12 of, but it's page 73 into 74 I think you've been reading
13 from.

14 MS STEVENS: Yes. Thank you, do you want to just read for
15 a moment, if you start off at 21 on 73 and if you read
16 down, I would suggest to the bottom of 74, but if you
17 want to read more, please do so.

18 A. If you could possibly say the words you would like me to
19 look at that might be easier for me.

20 Q. The part that I was putting to you, but in fairness I am
21 giving you an opportunity, if you want to read to
22 yourself page 73 and 74?

23 THE CHIEF CORONER: Can I just check, Ms Stevens we have the
24 right 73 and 74 because the final version differs to the
25 draft, and if you are looking at the final version

27

1 I think you need to go to a different page.

2 MS STEVENS: Yes, well I'm looking at the version that was
3 sent to us.

4 MR HOUGH: If the words could perhaps be given, then
5 Mr Usher may be able to find them.

6 THE CHIEF CORONER: If you tell us the start of the line you
7 are referring to, Ms Stevens?

8 MS STEVENS: Yes, well, sir, I think you wanted it to go
9 further back so everybody --

10 THE CHIEF CORONER: Which word do you want us to start from,
11 Ms Stevens?

12 MS STEVENS: The part that I have put to him starts with:

13 "In the course of one of those conversations,
14 shortly before meeting Ashby and ... Sanders, an unarmed
15 officer had met with me and said ..."

16 MR HOUGH: We've got that on screen now.

17 MS STEVENS: 74, line 2.

18 A. I have that. I have that. If it assists, I do recall
19 saying that and as I said to you when you referred that
20 I had said "he", I did not say "he", for it wasn't a he.

21 Q. Right. Don't worry about the sex for the moment. All
22 I'm asking about --

23 A. I worry, Ms Stevens, about being accurate.

24 Q. What I'm asking you about is this: you had a meeting
25 with an unarmed officer who said to you that they

28

1 wouldn't speak to a firearms officer going forward.
 2 That's what happened, isn't it?
 3 A. Yes.
 4 Q. Following that, you thought you should look at the post
 5 notes, didn't you?
 6 A. Yes.
 7 Q. Let's put the two together then: you have an unarmed
 8 officer saying they're not going to speak to a firearms
 9 officer going forward, and you have post notes which say
 10 that firearms officers should be in close proximity of
 11 Carriage Gates at all times --
 12 A. Yes.
 13 Q. -- when the gates are open.
 14 A. Yes.
 15 Q. Putting the two together, you knew full well, didn't
 16 you, that that meeting with PCs Ashby and Sanders would
 17 involve a conversation about their whereabouts, didn't
 18 you?
 19 A. No, if they haven't wished to talk about the events of
 20 the day, we wouldn't have talked about events of the
 21 day. I would have been confident in the course of 15's
 22 investigation that the issue of post notes would
 23 certainly have been acquired, they would have compared
 24 that with the actions of the officers on the day, and
 25 another officer, other than myself, would have initiated

29

1 an appropriate course of action.
 2 I'm describing to you the circumstances in which
 3 I became aware.
 4 I should also be clear that the two don't go
 5 together: an officer saying to me, and in my view trying
 6 to tell me something without telling me something, is
 7 very different to saying: they weren't standing where
 8 they should have been or there's a problem with the post
 9 notes. It was merely the first place I looked.
 10 Q. You were the one -- sorry, have you finished?
 11 A. Yes, ma'am.
 12 Q. You were the one who brought up with Police
 13 Constable Ashby and Police Constable Sanders the issue
 14 of the post notes, weren't you?
 15 A. No, I don't believe I was. It's very difficult to
 16 remember the individual conversation. I am certain of
 17 the context and certain of the preamble I would have
 18 given, because it would have been the same as every
 19 other officer. As to the real detail of how the
 20 conversation then flowed, I couldn't say, but certainly
 21 the issue of post notes was discussed, and the reason
 22 I remember that bit was I went to my desk to get them.
 23 What you will notice from my original statement is
 24 I don't reference to why they were on my desk, and I've
 25 spent a long time thinking about that, and that is when

30

1 I remembered it was as a result of the officer the day
 2 before, or a couple of days before, having that meeting
 3 with me.
 4 Q. You knew, didn't you, that you were going to bring up
 5 the issue of the post notes with those two officers,
 6 didn't you?
 7 A. No. And had I known that, I think I would have brought
 8 them into the room with me.
 9 Q. You should, shouldn't you, have given those two officers
 10 an opportunity to bring a Police Federation
 11 representative with them?
 12 A. No, this wasn't a disciplinary investigation, and had it
 13 been, you're quite right, but I think it's of note that
 14 in the investigation that then carries on, in the MM1
 15 documentation that describes that investigation, no
 16 reliance is placed on anything that PCs Ashby and
 17 Sanders said to me in that meeting.
 18 Q. You had nobody from occupational health present in the
 19 room, did you?
 20 A. Well, that may have skewed the answers being given about
 21 the effectiveness of occupational health.
 22 Q. Can you just answer the question: you had nobody present
 23 from occupational health, did you?
 24 A. No.
 25 Q. You had nobody present in the room with you at all, did

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1 you, other than those two PCs?
 2 A. That's right.
 3 Q. There was nobody present to make a note of the
 4 conversation, was there?
 5 A. There wasn't because I had no reason to believe that
 6 this would be a controversial or combative conversation
 7 which, indeed, it wasn't.
 8 Q. By the summer of last year you knew full well that there
 9 would be an Inquest, didn't you?
 10 A. I did, yes.
 11 Q. You knew that it was highly likely, if not inevitable,
 12 that you would have to give a statement, didn't you?
 13 A. Yes, I did.
 14 Q. You knew that it was highly likely, if not inevitable,
 15 that Police Constables Ashby and Sanders would have to
 16 give statements, didn't you?
 17 A. I didn't know that PCs Ashby and Sanders, their actions
 18 or anything about the course of their duty on that day
 19 until I met with them, so no, I wouldn't have known.
 20 Q. They're the two firearms officers who were on duty on
 21 the day that Police Constable Palmer was stabbed to
 22 death, weren't they?
 23 A. They were. What I suppose, to be as clear as possible,
 24 I would have understood that any officer on duty in
 25 Palace Yard that day would have had to have given

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1 a statement, yes.
 2 Q. Particularly the officers, the firearms officers, who
 3 one would have hoped would be in a position to help
 4 Police Constable Palmer.
 5 A. I think a statement would have been required from any
 6 officer on duty on that day.
 7 Q. You knew that you, quite properly, as you put it on
 8 Monday, were being kept out of the investigation into
 9 the events of 22 March, didn't you?
 10 A. Yes, that's the proper thing to do.
 11 Q. You said yourself on Monday it wasn't appropriate for
 12 you to investigate the misconduct, didn't you?
 13 A. Yes, I did.
 14 Q. Can you not see that you, as the commander responsible
 15 on behalf of the Metropolitan Police Service for
 16 security in New Palace Yard, should not have been having
 17 a private meeting with two witnesses, should you?
 18 A. Yes, I believe that I should within the context that
 19 I have described. I still have command of the command.
 20 It is still important that I understand the issues that
 21 may, you know, impact upon it. And occupational health
 22 is one of them.
 23 Q. There is a real power imbalance, isn't there, between
 24 a commander and a police constable?
 25 A. Yes, there is.

33

1 Q. That power imbalance would have been obvious to you when
 2 you were arranging that meeting, wouldn't it?
 3 A. Yes, I'm aware that I'm a commander and they were
 4 constables.
 5 Q. Yes. You were hoping, weren't you, that when you said
 6 to them: this is what the post notes says you should
 7 have been doing, that they, as police constables, would
 8 agree with you?
 9 A. Yes -- no, I suppose I hoped that that's what they'd
 10 been doing, and therefore they would agree with me.
 11 Q. You were hoping that the two PCs would accept that they
 12 individually had got it wrong rather than the system
 13 that you were responsible for was to blame?
 14 A. Not at all, and I think I've said several times, the
 15 purpose of the meeting was not to correct -- sorry,
 16 conduct an investigation into what the officers were
 17 doing. We could have walked out of that room and never
 18 mentioned the events of that day. They could have
 19 described to me purely their interaction with
 20 occupational health, which some of their officers did,
 21 and that would have been the end of it.
 22 Q. What happened instead is Police Constable Ashby was
 23 a strong police constable and he wouldn't agree with
 24 what you were suggesting about the post notes, would he?
 25 A. Police Constable Ashby in that meeting told me, prior to

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1 me raising the post notes of where he had been
 2 patrolling. He produced a map that he had described as
 3 an aide-memoire from his pocket and said that this is
 4 where he was patrolling. I said to him "That's not my
 5 understanding of the post notes", or words similar to
 6 that, and then said "In fact, I've got them", and I went
 7 and got them, we came back and discussed it.
 8 There was no tension in the room, there was no
 9 hostility on either side, there was a discussion about
 10 what had happened and then they left.
 11 Q. Do we agree with this, then: during that meeting, Police
 12 Constable Ashby got out of his pocket a laminated map
 13 which he showed to you whilst saying that he had to
 14 patrol sector 3?
 15 A. Yes, I think, words to that effect.
 16 Q. Can we have a look, please, at what you said in your
 17 statement, and it's {WS5099/18}. If you want to read
 18 paragraph 71 to yourself, first of all?
 19 A. I'm comfortable that I've read that.
 20 Q. It's important, isn't it, that Police Constable Ashby
 21 showed you a map of the area that he had to patrol?
 22 A. It's important in what sense?
 23 Q. It's important, isn't it, that Police Constable Ashby
 24 showed you a map and said "This is the area that I had
 25 to patrol"; do you agree or disagree with that?

35

1 A. I see, you're saying that I should have included that in
 2 the statement?
 3 Q. Can you please just answer the question? It's
 4 important --
 5 THE CHIEF CORONER: Ms Stevens, what do you mean by
 6 "important"? I think it's a perfectly valid comment
 7 that Commander Usher has said. Do you mean it's
 8 important that he should have included it in the
 9 statement; is that what you're saying?
 10 MS STEVENS: Do you think it is a relevant factor --
 11 THE CHIEF CORONER: Would you mind answering my question?
 12 MS STEVENS: Yes. That was going to be the next question
 13 I was going to put. Yes.
 14 A. Sorry, could I ask for the question again?
 15 Q. Yes, of course. It's a relevant fact, isn't it, that
 16 during the meeting when you're talking about where the
 17 officers were on the day that Police Constable Ashby got
 18 out a laminated map of the area that he said he had to
 19 patrol?
 20 A. "Relevant" seems the same as "important": relevant to
 21 what? I never disputed that that's what PC Ashby did.
 22 Q. Well, where is it in your statement?
 23 A. Well, it's not in my statement, nor is the rest of the
 24 conversation, nor are all the other conversations I had
 25 with other officers.

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1 I have to try and strike the balance between being
 2 accurate, informative and concise. I didn't include it,
 3 I thought the sense of me saying that it became clear to
 4 me that what he had described was at variance with the
 5 post notes was the relevant point.
 6 Q. It's not just that what he described was at variance
 7 with the post note; he showed you a piece of evidence,
 8 namely a map, didn't he?
 9 A. Well, I'm not sure it was a piece of evidence, but he
 10 certainly showed me a map.
 11 Q. All that you say about the issue of maps is, if we have
 12 a look, please, if we go to page 17 {WS5099/17},
 13 paragraph 69, you say:
 14 "I am aware of a photograph ... produced by
 15 PC Sanders, that was taken of a map of the
 16 Palace of Westminster Ground Floor Plan ..."
 17 Can you see that?
 18 A. I can.
 19 Q. So you did think that it was relevant to mention the
 20 photograph produced by Police Constable Sanders, didn't
 21 you?
 22 A. No, I think I was asked about that either by the Inquest
 23 team -- I -- in preparing my statement I had been shown
 24 that photograph and asked of its relevance or
 25 provenance. That's how I came to make that remark.

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1 Q. When looking into why Police Constable Ashby and
 2 Police Constable Sanders were in the area that they were
 3 on 22 March, it is relevant, isn't it, that they thought
 4 they had to be in that area because of the map?
 5 A. I mean, I've said that I was not looking into that fact
 6 with PC Ashby and Sanders. I referred the matter to DPS
 7 for them to look at.
 8 Q. I'm not asking whether you are looking into it. Could
 9 you just please answer the question. In terms of
 10 looking at why Police Constable Ashby and
 11 Police Constable Sanders were in another area of
 12 New Palace Yard, it's relevant, isn't it, that they had
 13 a map which showed the entirety of New Palace Yard.
 14 A. If the question is "Why", then yes.
 15 Q. Sorry, the question is, is it relevant, yes or no?
 16 A. No, no, you said to me in examining the question of why
 17 they were where they were.
 18 Q. Right. So in examining the question of why, it is
 19 relevant?
 20 A. Yes.
 21 Q. It's second of all relevant that they told you that
 22 their sergeants had given them instructions to patrol
 23 according to the map; that's right, isn't it?
 24 A. I'm sorry, I hesitate only because -- it's relevant to
 25 what? I wasn't conducting an investigation. As you've

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1 rightly said, the officers weren't represented, this
 2 wasn't a discipline matter, and therefore, when DPS look
 3 at it, what they've said to me, or didn't say to me,
 4 wouldn't have been taken into account because the
 5 officers haven't been afforded correct protection, and
 6 that's why I had nothing to do, and wasn't asked, nor
 7 should I have been asked, by DPS about the content of
 8 that conversation.
 9 Q. I'll ask the question in the same way that I asked the
 10 other question then: it's relevant to why Police
 11 Constables Ashby and Sanders were in the area that they
 12 were on 22 March that they had been told to patrol that
 13 whole area and to follow the map; that's right, isn't
 14 it?
 15 A. If the question of why -- if the question is in trying
 16 to determine why they were where they were, then yes,
 17 the issue of the map may have been relevant.
 18 Q. You were the person who referred them to the Department
 19 of Professional Standards, weren't you?
 20 A. Yes.
 21 Q. Did you refer the matter to DPS by email or did you have
 22 a face-to-face meeting with the officer?
 23 A. I believe it would have been via email. I certainly
 24 didn't meet anybody face-to-face. I don't quite recall
 25 the mechanism or who directly it went to in DPS, but

39

1 I began the chain of events, yes.
 2 Q. If you look, please, at the misconduct report,
 3 {WS5099/39}.
 4 A. Yes.
 5 Q. If you look halfway down the box which is headed
 6 "Overview of Circumstances", it says this:
 7 "The matter to be considered is, at the time of the
 8 incident, were the deployed armed officers complying
 9 with the published post notes for [New Palace Yard]?"
 10 A. Yes.
 11 Q. Does that follow the terms of your reference to DPS?
 12 A. I couldn't say.
 13 Q. There's nothing in here, is there, about officers
 14 following maps?
 15 A. No.
 16 Q. You didn't tell DPS, then, did you, that Police
 17 Constable Ashby had actually shown you a map of sector 3
 18 and told you that was the area that he had to patrol?
 19 A. That's right. I didn't do that.
 20 Q. If we turn over and look, please, so we're moving to
 21 {WS5099/40}, there's an extract there of the post notes;
 22 do you see that?
 23 A. Yes.
 24 Q. That extract does not include what we now know the
 25 actual post note includes, namely the following:

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1 "Directed patrols. All relevant maps and post times
2 are displayed within the base room at
3 Palace of Westminster."
4 That's not included, is it, in this misconduct
5 report?
6 A. Those words are not included and I don't recognise them.
7 Q. You don't recognise the words --
8 A. No, I don't know where they're from, from memory.
9 Q. Right. You recognise then the fact that under directed
10 patrols, directed patrols are told:
11 "All relevant maps are displayed within the base
12 room at the Palace of Westminster."
13 A. Sorry, where is that coming from?
14 Q. We'll take it up on the screen if you want to look at
15 it, it's {DC8032/4}. Can you see under "Directed
16 Patrols", if you look --
17 A. What's the date of this, could I ask?
18 Q. -- five paragraphs down, this is the relevant post note
19 that we're dealing with.
20 A. Sorry, I must insist on a date to understand what I'm
21 talking about.
22 THE CHIEF CORONER: I think we can find the date for you,
23 it's no problem.
24 MS STEVENS: Yes, if you want to look at {DC8032/1}.
25 A. Got it, 14/12.

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1 Q. It is 14 December 2015. All right. So if we can go
2 back, then, to the page I was just asking you about?
3 A. Yes.
4 Q. {DC8032/4}, do you now accept that this is the relevant
5 post note?
6 A. Yes.
7 Q. It says, doesn't it:
8 "Directed patrols ...
9 "All relevant maps ... are displayed within the base
10 room at [Palace of Westminster]."
11 Do you see that?
12 A. Not currently -- oh yes, I do now.
13 Q. Yes?
14 A. Yes.
15 Q. If you go back, then, to the misconduct report
16 {WS5099/40}, there is no reference, is there, in the
17 relevant passages of the post note to the fact that AFOs
18 are directed to the maps in the base room?
19 A. I'm not sure -- I'm not sure that they are -- if I've
20 understood what you're saying correctly, they are not
21 directed to patrol in accordance with the maps on the
22 base room wall. The note on the post note says, the
23 sentence on the post note says that all available maps,
24 all the relevant maps are available in the base room,
25 and that goes for the whole estate.

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1 Q. The question is simply this, and I'll use the exact
2 wording from the post note. There is no reference, is
3 there, first of all to "directed patrols"; that wording
4 doesn't appear, does it?
5 A. I -- no, I don't see it.
6 Q. No. There is then no reference, is there, to "all
7 relevant maps displayed within the base room at the
8 Palace of Westminster"?
9 A. No, that's right.
10 Q. Did you provide the entirety of the post note to the
11 Department of Professional Standards?
12 A. I don't believe I provided it at all. I don't know who
13 did, but they would have, I thought, provided the whole
14 post note.
15 Q. If we look at what you said --
16 THE CHIEF CORONER: Well, just before we leave that
17 document, I think what I see on the screen, Ms Stevens
18 is that the author of this document says:
19 "I have obtained a copy of the post notes dated
20 14 December 2015 which were current on the
21 22 March 2017. I have reproduced the relevant passages
22 within the post note below."
23 So my reading of that is that the author of this has
24 got the entire post note and has thought these passages
25 to be the relevant ones. I appreciate that's not quite

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1 the question you're asking Commander Usher, but that's
2 my reading of what you've put on the screen.
3 MS STEVENS: Thank you. That's very helpful.
4 The reality is, isn't it, Commander, that if you had
5 told the investigator who you had tasked to carry out
6 this investigation that Police Constable Ashby had
7 produced a map that he said he had been told to follow,
8 that would have helped the investigator in terms of his
9 investigation, wouldn't it?
10 A. I don't believe so.
11 Q. You don't believe so?
12 A. No. I think the officer, in completing this form, has
13 been clear on the question that they are answering, and
14 the question they're answering is, were the officers
15 patrolling in accordance with the post notes? They
16 haven't included a term of reference to include why that
17 was. I can't specifically speak to why they've done
18 that.
19 What I can say, for absolute clarity, is I didn't
20 have any conversation with any investigator from DPS
21 directly. So I've started the investigation and then
22 stood back, as is the right thing to do.
23 Q. Can you really not see that an investigator who is
24 tasked with looking at why Police Constable Ashby and
25 Sanders were in the location that they were, that that

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1 investigator would be helped by knowing that Police
 2 Constable Ashby had said he was following a map?
 3 A. Well, I think I've just said, the terms of reference
 4 that they've adopted is to find out where they, and I've
 5 also said, and been, I think, very clear, that the
 6 contents of the conversation that PCs Ashby and Sanders
 7 had with me, it wouldn't have been proper to report
 8 those to professional standards because the officers
 9 hadn't been afforded any protection in what they were
 10 saying. It was a conversation.
 11 Q. The officer from Department of Professional Standards
 12 says that everything is so sensitive that he can't even
 13 talk to Police Constables Ashby and Sanders; you
 14 remember that, don't you?
 15 A. Where does he say that? Or she?
 16 Q. Well, do you remember that, first of all?
 17 A. Remember what?
 18 Q. The fact that the DPS investigator is of the view that
 19 things are so sensitive that he can't look at
 20 a statement, or talk to a witness?
 21 A. I don't think I have said that in those terms. I think
 22 I've said it was a very sensitive investigation and
 23 I can understand why, in answering the question that the
 24 officer has posed, that speaking to the officers wasn't
 25 necessary.

1 Q. In your referral, do you suggest that the matter is so
 2 sensitive that the officer within DPS can't look at any
 3 written statement or speak to any witness?
 4 A. No, I wouldn't have said anything like that, and
 5 I don't -- to the best of my recollection and the
 6 best -- and some of this is assumption -- I would
 7 probably have spoken to the OCU Commander of PaPD, Chief
 8 Superintendent Johnson, and said: this is what I want to
 9 happen, there needs to be an investigation to reconcile
 10 that fact that it appears they're patrolling outside of
 11 the post note, could you make that happen? It wouldn't
 12 have required anything further than that.
 13 Q. If you have a look at the misconduct report,
 14 {WS5099/39}, you can see "Overview of Circumstances",
 15 last paragraph:
 16 "I have not been given access to any written
 17 statements due to the sensitivity of the matter."
 18 Do you see that?
 19 A. I do.
 20 Q. Then it's clear that the investigator has not been able
 21 to speak to Police Constables Ashby and Sanders, you're
 22 aware of that?
 23 A. Yes.
 24 Q. A police officer within the Department of Professional
 25 Standards is well placed to deal with sensitive matters,

1 aren't they?
 2 A. Yes.
 3 Q. The police officer could have signed, if it was
 4 necessary, a confidentiality undertaking, couldn't they?
 5 A. No, that wasn't the sensitivity. It isn't an issue of
 6 whether the details would have become known to wider
 7 audience. The sensitivity was that on a command where
 8 an officer has been murdered, any issue relating to the
 9 behaviour and conduct of officers leading up to that is
 10 going to be highly sensitive for the command. I mean,
 11 to put it as bluntly as I can, I couldn't afford for it
 12 to appear to anybody that there was any suggestion of
 13 a witchhunt here. So in referring it to DPS, and
 14 bearing in mind the welfare of my officers, I would have
 15 made it clear to Chief Superintendent Johnson, if that's
 16 who it was, and I think that's likely, that this needed
 17 to be handled sensitively for all of the reasons that
 18 I think you're kind of now implying.
 19 Q. You knew, didn't you, that if the Department of
 20 Professional Standards investigator was allowed to speak
 21 to Police Constables Ashby and Sanders, that it would
 22 have come out, wouldn't it, the fact that AFOs were
 23 tasked to follow a map of the entirety of
 24 New Palace Yard; that's right, isn't it?
 25 A. I had never considered that. I can't -- I can honestly

1 say to you I had never thought about that for
 2 an instant. I believed at the time in the run-up to
 3 this Inquest for the last 18 months, that absolutely
 4 everything would, should, come out, and therefore if
 5 that was an issue, it would come out here.
 6 Q. If that had come out, that would make it clear, wouldn't
 7 it, that this wasn't a case of individual failures; this
 8 was a case of a general practice of AFOs following the
 9 map, wouldn't it?
 10 A. No. Because an officer justifying being in
 11 contravention with the post notes has given
 12 an explanation of that to this court. That isn't, in my
 13 view, now or then, evidence of anything other than that
 14 officer's explanation for why he wasn't acting in
 15 accordance with the post notes.
 16 So had it come out in the summer of last year, or
 17 now, the situation would remain the same.
 18 Q. Can you not see that there is a conflict in terms of
 19 your role as the person responsible for security at the
 20 Palace of Westminster and you being the one that spoke
 21 to Police Constables Ashby and Sanders; can you not see
 22 that?
 23 A. I can't see any conflict in the commander of a command
 24 speaking to their own staff when it is not an issue of
 25 discipline, and there are well documented rules to abide

1 by when it is a matter of discipline .
 2 Q. If we look at your statement, please, in terms of what
 3 you had to say about the relevant post note, it is
 4 {WS5099/16}, paragraph 67. If you just want to remind
 5 yourself of the parts that you said were relevant.
 6 A. Sorry, could you remind me of the paragraph?
 7 THE CHIEF CORONER: 67.
 8 MS STEVENS: Yes, of course. Thank you, sir .
 9 A. 67. The relevant parts of the PaPD post instructions .
 10 Yes, I'm reminding myself of the parts that I consider
 11 to be relevant.
 12 Q. That's very kind, thank you. If you then look over to
 13 the next page {WS5099/17}, if you want to remind
 14 yourself of the other parts that you thought were
 15 relevant.
 16 A. Yes.
 17 Q. Nowhere in your statement do you refer to the section
 18 which says "Directed patrols. All relevant maps are
 19 displayed within the base room", do you?
 20 A. No, I don't, because I don't believe them to be
 21 relevant.
 22 Q. You don't believe them to be relevant?
 23 A. To the post note. To the direction that the officers
 24 are being given, I don't believe saying there are maps
 25 of Parliament on the wall of the base room is relevant.

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1 Q. When you made your statement, though, you, of course,
 2 had the benefit of knowing what Police Constable Ashby
 3 had said to you about maps, didn't you?
 4 A. I was aware that Police Constable Ashby had produced
 5 an aide-memoire from his pocket, as he referred to it,
 6 and showed it to me. To be honest, that wasn't at the
 7 forefront of my mind when I was writing this statement.
 8 Q. Let's be plain: the aide-memoire was a map, wasn't it?
 9 A. Yes.
 10 Q. The question was, then, when you wrote this statement
 11 you had the benefit of what Police Constable Ashby said
 12 in terms of him patrolling as per a map, didn't you?
 13 A. Yes.
 14 Q. So did you really not think it was relevant that in the
 15 post note it says "Directed patrols. All relevant maps
 16 are displayed within the base room"?
 17 A. No. I did not consider that.
 18 Q. The reality is, isn't it, that you have not included
 19 anything about the post note referring to maps or Police
 20 Constable Ashby talking about maps, because you want to
 21 portray this as a case of Police Constable Ashby getting
 22 it wrong, don't you?
 23 A. I have no interest in portraying this in any one way or
 24 another. I didn't include the issue of PC Ashby's
 25 comments around maps because I didn't consider it my

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1 evidence to give. I was certainly aware that PC Ashby
 2 was going to give evidence to this Inquest. I have
 3 never spoken to him again about the issue.
 4 Q. When you gave evidence on Monday, do you remember that
 5 you gave evidence relating to whether or not Police
 6 Constable Ashby was a genuine and honest police
 7 constable?
 8 A. Yes, I do.
 9 Q. Yes.
 10 A. I remember giving evidence about PC Ashby.
 11 Q. Counsel to the Inquest asked you a number of questions
 12 about that; do you remember?
 13 A. I do.
 14 Q. You said that at the time you wrote your statement you
 15 thought he was an honest police constable, but then you
 16 raised a number of factors that you said had caused you
 17 to reassess that opinion; do you remember?
 18 A. No, I --
 19 THE CHIEF CORONER: Can you give me the page number, please?
 20 MS STEVENS: Yes, of course, it's page 64.
 21 THE CHIEF CORONER: 54?
 22 A. I think I was, from memory, referring to PC Ashby's
 23 honest-held belief that he was patrolling in the place
 24 he thought he should be patrolling. I don't think I've
 25 ever made any comments about the honesty or otherwise of

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1 PC Ashby.
 2 THE CHIEF CORONER: I've got page 54 but I don't see that at
 3 all, Ms Stevens.
 4 MR HOUGH: I think Ms Stevens said 64.
 5 THE CHIEF CORONER: 64. That may explain why it's not at
 6 54.
 7 MS STEVENS: Now, in relation to what you said, because you
 8 then went on to deal with why you thought that the map
 9 that Police Constable Ashby had was an alarm map; do you
 10 remember that?
 11 A. Yes.
 12 Q. One of the matters that you said in evidence was that
 13 you thought it was an alarm map because the post notes
 14 came with their own map; do you remember saying that?
 15 A. I think so, yes.
 16 Q. The post notes do not come with their own map. You are
 17 wrong on that.
 18 A. Iterations of the post notes from 2008 onwards have
 19 included maps.
 20 Q. Well, we have sought disclosure of that and so that you
 21 know, we have been told that the post notes did not come
 22 with maps.
 23 A. I see. Well --
 24 MR HOUGH: In fairness both to the witness and Ms Stevens,
 25 we have said that the most recent sets of post notes did

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1 not come with maps.
 2 THE CHIEF CORONER: Yes.
 3 MR HOUGH: Some materially older post notes did come with
 4 maps and Commander Usher is right to say so.
 5 THE CHIEF CORONER: Thank you.
 6 MS STEVENS: Well, as you know, sir, we've sought disclosure
 7 of any map that came with a post note and we renew that
 8 application.
 9 Moving on, page 65 of the transcript if anyone
 10 wishes to follow it, you said this:
 11 "Answer: From memory, there was a specific map
 12 attached to the post note with a blue shaded area ..."
 13 A. Yes.
 14 Q.
 15 "Answer: From memory, the top -- the area between
 16 Carriage Gates and the vehicle search point."
 17 Do you remember saying that?
 18 A. I do.
 19 Q. You were wrong in relation to that.
 20 THE CHIEF CORONER: The rest of his answer was:
 21 "But I couldn't be 100 per cent sure of that."
 22 MS STEVENS: Yes.
 23 THE CHIEF CORONER: I'm just conscious that we've got the
 24 transcript in front of us, Commander Usher doesn't, and
 25 if he's being asked about an answer he's given, in

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1 fairness to him he ought to be given the whole answer.
 2 MS STEVENS: Yes, sir. I'm perfectly happy to you. Would
 3 you like to have a look at the transcript?
 4 THE CHIEF CORONER: I don't think he needs to see it, as
 5 I say, it was just reading the whole answer that you're
 6 asking a question about.
 7 MS STEVENS: Yes, of course. In future I'll read the
 8 entirety of the answer or, indeed, Commander Usher, if
 9 you would like to see any part of the transcript that
 10 I put to you, then of course please say.
 11 A. I fully accept what you say. I -- yes.
 12 MR KEITH: Could I also add to this debate, please, sir,
 13 that when my learned friend Mr Hough QC asked the
 14 witness:
 15 "Question: Are you able to say yourself what area
 16 was highlighted on the highlighted sector map referred
 17 to by the 2012 post notes?
 18 "Answer: I would have to see the original of the
 19 post notes and, as you might understand, I've seen
 20 a large number of post notes recently, going back
 21 historically. From memory there was a specific map
 22 attached to that note with a blue shaded area. From
 23 memory ... but I couldn't be 100 per cent sure ..."
 24 MS STEVENS: Sorry --
 25 MR ADAMSON: Sorry to interrupt, my learned friend

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1 Ms Stevens is quite right to highlight the fact that the
 2 2012 post notes did not have a map attached to them.
 3 MS STEVENS: Further -- I'm grateful to my learned friend --
 4 further, in fairness, we have been told categorically,
 5 bearing in mind we have not been given disclosure of any
 6 of the 2012 post notes or the maps, we have been told in
 7 terms that there is no map in existence that has a blue
 8 shaded area between Carriage Gates and the vehicle
 9 search point.
 10 MR KEITH: No. We told the Inquest team who have every
 11 post instruction in full that there was no map attached
 12 to the 2012 post notes.
 13 MS STEVENS: Well, can I ask, because I asked my learned
 14 friend, counsel to the Inquest, specifically whether or
 15 not there was a map that had a blue shaded area between
 16 Carriage Gates and the vehicle search point, and we were
 17 told no. Bearing in mind we have made it clear that we,
 18 the family, are at a disadvantage because there is
 19 outstanding disclosure, is there a map in existence that
 20 has blue shading area from Carriage Gates to the vehicle
 21 search point?
 22 MR HOUGH: Sir, I don't recall the detail of the
 23 conversation which is being alluded to. I do recall
 24 having made clear to my learned friend that there were
 25 maps attached to some post notes predating 2012 --

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1 THE CHIEF CORONER: Yes.
 2 MR HOUGH: -- which had corridors shaded on them. I don't
 3 recall saying whether there was a particular colour, and
 4 I don't recall now what the particular colours are. The
 5 position taken by the Inquest team, and expressed in
 6 a number of documents, is that since this inquiry is not
 7 an investigation into historic arrangements for security
 8 at New Palace Yard going back to 2010 and earlier, post
 9 notes going back that far have not been disclosed.
 10 THE CHIEF CORONER: Yes.
 11 MR HOUGH: That's the position we've explained.
 12 I appreciate that my learned friend doesn't agree with
 13 it, but that's the position we've explained and taken.
 14 Her submissions have not been ignored, they have been
 15 answered.
 16 THE CHIEF CORONER: Yes.
 17 MS STEVENS: Sir, can we deal, please, with this particular
 18 point. The family have proceeded on the basis of what
 19 we were told. I appreciate that my learned friend says
 20 he doesn't recollect that, so can we move on.
 21 Is there a specific map attached to a post note that
 22 has a blue shaded area between Carriage Gates and the
 23 vehicle search point? Commander Usher has given
 24 evidence about that. We, the family, do not have that
 25 disclosure. It can't be said to be an irrelevant

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1 matter, bearing in mind it's in evidence, and so if our
 2 understanding is wrong, could it be clarified, please?
 3 It's plainly an important point whether or not there is
 4 a map that has shaded area between Carriage Gates and
 5 Cromwell Green search point.
 6 THE CHIEF CORONER: Well --
 7 MR HOUGH: Sir, just in a sentence, because a question is
 8 asked about a subject does not make it relevant or
 9 a matter for further inquiries to be made or disclosure
 10 to be given.
 11 THE CHIEF CORONER: It seems to me, Mr Hough, that you have
 12 made clear what the position was in your earlier answer.
 13 I'm going to suggest we move on. What we all know is
 14 that there is no map attached to the 2012 post notes,
 15 and those are the ones which are of prime importance in
 16 this Inquest.
 17 MR HOUGH: Certainly to the questions that were being asked
 18 by me on Monday, the 2012 notes have some relevance.
 19 THE CHIEF CORONER: Yes.
 20 MR HOUGH: Obviously the notes that are of real relevance to
 21 this Inquest are the two sets of notes from 2015.
 22 THE CHIEF CORONER: Yes, absolutely.
 23 Mr Adamson.
 24 MR ADAMSON: Sir, I hesitate to rise to my feet. I simply
 25 can't agree with my learned friend Mr Hough in relation

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1 to the way he puts it with respect to the 2012
 2 post instructions. The reality he adduced this
 3 evidence, we can reasonably assume that Mr Hough was
 4 adducing it because it was relevant. There was
 5 an answer given by Commander Usher which, on the face of
 6 it, was wrong, and in the circumstances, in my
 7 submission, the existence of a map which conforms to the
 8 description that he gives would be relevant in that
 9 context.
 10 THE CHIEF CORONER: That is -- you are referring to the
 11 answer on page 65?
 12 MR ADAMSON: The answer on page 65. He says in terms there
 13 is a map attached to the 2012 post instruction which
 14 conforms with --
 15 THE CHIEF CORONER: I think what he says, as I say, to read
 16 the whole answer:
 17 "Answer: I would have to see the original of the
 18 post notes and, as you might understand, I've seen
 19 a large number of post notes recently, going back
 20 historically. From memory there was a specific map
 21 attached to that note with a blue shaded area. From
 22 memory the top -- the area between Carriage Gates and
 23 the vehicle search point. But I couldn't be
 24 100 per cent sure of that."
 25 MR ADAMSON: It is caveated undoubtedly.

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1 THE CHIEF CORONER: Yes.
 2 MR ADAMSON: But the point made, in my submission, is that
 3 there was such a map and that it conformed to
 4 a description.
 5 THE CHIEF CORONER: Yes.
 6 MR ADAMSON: And in my submission, given that that is the
 7 evidence that he gave in response to a question to
 8 counsel to the Inquest my learned friend Ms Stevens is
 9 right to say that the existence one way or another of
 10 a document which conforms to that description is
 11 a relevant matter.
 12 THE CHIEF CORONER: Thank you.
 13 MS STEVENS: Sir, it's also relevant because it's one of the
 14 reasons that's given in relation to Commander Usher's
 15 contention that the other map is an alarm map. So if we
 16 need to put it in context, if we look at page 64, line 9
 17 on the version I have, and if we want to put it further
 18 into context, line 4:
 19 "Question: ... assuming this was a map from 2012,
 20 as you tell us, may we presume that it was the
 21 highlighted sector map referred to in the post notes
 22 from 2012?
 23 "Answer: No.
 24 "Question: It wasn't?
 25 "Answer: I don't believe so, because for a number

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1 of reasons: this map shows alarm points ..."
 2 So that's number one. Then Commander Usher goes on
 3 to give a second reason for why he says that this is
 4 an alarm map. Clearly whether or not it's an alarm map
 5 or whether or not it's a sector patrol map is a matter
 6 in issue that needs to be grappled with. It is part of
 7 his explanation, if we follow it through to 65, that he
 8 believes that there is a specific map which would be the
 9 patrol map as far as he understands the patrol, namely
 10 the area between Carriage Gates and Cromwell Green
 11 entrance point.
 12 Therefore, this isn't a matter of evidence that
 13 relates to issues that are not pertinent to your
 14 consideration. This is one of the central issues
 15 whether or not the map in question is an alarm map, as
 16 some within the senior leadership team would have it, or
 17 whether or not, as Police Constables Ashby and Sanders
 18 would have it, this is a patrol map, and therefore we do
 19 ask for a decision as to this, please, because at the
 20 moment we're asking questions on an unclear premise
 21 through no fault of the family's. When we ask questions
 22 and then there's interjection and objection on the basis
 23 we're getting it wrong, the difficulty is we don't have
 24 the core material upon which to get it right.
 25 MR HOUGH: Sir, very briefly, the pertinent facts in

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1 relation to my questions were that in 2012 there was
2 a post note containing a specific patrol instruction,
3 and that patrolling instruction has been disclosed in
4 the form of the schedule of the relevant parts of the
5 post notes.

6 THE CHIEF CORONER: Yes.

7 MR HOUGH: And that at that time, the post note didn't have
8 a map attached to it.

9 THE CHIEF CORONER: Yes.

10 MR HOUGH: In 2012 there was a map, because we've seen the
11 date of the map in the base room.

12 THE CHIEF CORONER: Yes.

13 MR HOUGH: The fact that there may have been a map showing
14 something else in a post note even earlier in 2010 is,
15 in my submission, of no relevance to the question of
16 what officers understood, rightly or wrongly, in 2017.
17 At most it is relevant to a forensic attempt to attack
18 Commander Usher's credibility.

19 Sir, that isn't a proper basis for engaging in very
20 wide-ranging further inquiries and disclosure of the
21 kind suggested. That's been our position. Sir, if you
22 take a different view, we're obviously in your hands.

23 THE CHIEF CORONER: I don't take a different view, Mr Hough.
24 It seems to me that I've got to be very clear as to the
25 issues that we have to deal with, otherwise this Inquest

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1 will be non-ending.

2 MS STEVENS: Sir, in which case I can't ask anymore
3 questions as to that point. I'll move on.

4 Could you have a look, please, at {WS1237C/3}. This
5 is the map that Police Constable Sanders said was the
6 patrol map; do you recognise it?

7 A. No.

8 Q. You don't?

9 A. No, that's not the photograph I had seen taken by
10 PC Sanders saying that he thought it was the patrol map.

11 Q. Have you seen this before?

12 A. No.

13 Q. If you have a look at it, and if you see in small
14 letters at the top of the page it says "Nick Sanders map
15 taken from PaPD briefing"; do you see that?

16 A. Yes.

17 Q. This map doesn't have any alarms on it, does it?

18 A. No.

19 Q. This map has, doesn't it, sector 3 clearly marked —

20 A. Yes.

21 Q. — as the entirety of New Palace Yard, doesn't it?

22 A. Yes.

23 Q. Would you accept, having now seen this map, that you may
24 be wrong in thinking that the blue shaded area on the
25 other map was just to do with alarms?

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1 A. No, I don't accept that. This is a map that tells us
2 where sector 3 is, which I would agree is
3 New Palace Yard. It also says New Palace Yard x 2 which
4 I assume refers to AFOs, because there were obviously
5 other police officers and security personnel within that
6 sector. I don't know where it's come from, but it
7 accurately describes what sector 3 is, which is
8 New Palace Yard. It doesn't describe what the patrol
9 strategy was.

10 Q. But in fairness, if the police constables are told to
11 patrol in accordance with this map, you would
12 understand, wouldn't you, why they would patrol all of
13 New Palace Yard?

14 A. If they'd been told to patrol in accordance with that
15 map, then yes.

16 Q. If we can look, please, at the tactical review,
17 {DC8043/1}, can we look at page 1 first and then you've
18 got the date. Thank you. Can you see the date there,
19 5 November 2014?

20 A. Yes.

21 Q. If you could look, please, at the second page
22 {DC8043/2}.

23 A. Yes.

24 Q. Can you see that members' entrance is referred to there?

25 A. On the top line?

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1 Q. Yes. It's referred to as being part of sector 3. Then
2 you'll remember you were taken to this on Monday, we've
3 got a static post referred to at members' entrance.
4 I'm not going to ask you any more questions about that.

5 A. Yes.

6 Q. But then if you see:

7 "Recommendation ...

8 "Members' Entrance: This post should be retained
9 when House is Sitting and consideration should be given
10 to [providing] a short patrol to Cromwell Green public
11 entrance."

12 Do you see that?

13 A. Yes, I can see that.

14 Q. All right. You said on Monday that you struggled to see
15 that members' entrance was a vulnerable location within
16 New Palace Yard. Can you accept that certainly on the
17 basis of this tactical planning review it was a location
18 of vulnerability and note?

19 A. Yes, I can. I think I said at the time that I didn't
20 believe it to be a static post.

21 I also, just for clarity, should be clear, ranger
22 sector 3 is described at the top of the page as also
23 including the river terrace, which I don't think anybody
24 has ever suggested is part of sector 3.

25 Q. Right. I'm just asking about members' entrance.

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1 A. Sorry, I offer that only as to the ...
 2 THE CHIEF CORONER: Thank you.
 3 MS STEVENS: In terms of members' entrance, and, sir, before
 4 anybody objects, I have discussed this particular
 5 question with counsel to the Inquest and have been told
 6 that I can ask it.
 7 In relation to members' entrance, if anybody was to
 8 walk along Bridge Street today --
 9 A. Yes.
 10 Q. -- at times, they would be able to see two AFOs at
 11 members' entrance, wouldn't they?
 12 THE CHIEF CORONER: That's today?
 13 A. I am reluctant on security grounds to describe the
 14 picture today of security posts.
 15 MS STEVENS: Well, sorry --
 16 MR HOUGH: Sir, Ms Stevens is quite right that I did say it
 17 was legitimate to put to an officer what a member of the
 18 public could see walking past at times of day.
 19 THE CHIEF CORONER: Yes.
 20 MR HOUGH: Of course Commander Usher should not go into
 21 details about the periods of time for which officers are
 22 present, whether that's a standard patrol, whether they
 23 are always present there, the numbers, any of that sort
 24 of sensitive detail, but the form in which the question
 25 is put is a form that Ms Stevens very properly discussed

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1 with me and, in my submission, can fairly be asked.
 2 A. Yes, sir, having heard it within -- placed precisely
 3 within that context, then yes.
 4 MS STEVENS: Therefore when you said on Monday that you
 5 struggled to see that members' entrance is a point of
 6 vulnerability, that doesn't really fit, does it, with
 7 the present security arrangements?
 8 A. And that's why I don't like tactical firearm
 9 assessments. I'm not trained on that matter. I do
 10 still struggle to this day to understand why that would
 11 be seen as a point of vulnerability, but if a tactical
 12 firearms assessor has looked at this and believes that
 13 it is and that it should be included as part of a patrol
 14 strategy, or any other secure measures, then I would bow
 15 to their expertise on that.
 16 The only other possibility for that, where it would
 17 make sense in my experience of wider policing, is as
 18 a matter of reassurance to members who are using that
 19 entrance, seeing armed officers in the wake of what was
 20 a terrible attack, that it may have been instituted for
 21 that reason.
 22 Q. Therefore reassurance of MPs is a relevant
 23 consideration?
 24 A. No, I couldn't possibly go that far. I'm trying to --
 25 I made the comments I did in an attempt to assist the

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1 court as to why that post would be there. I cannot see
 2 a particular -- no. I cannot see that it is a greater
 3 vulnerability than other areas of New Palace Yard, and
 4 I see it a considerably less vulnerability than specific
 5 areas such as Carriage Gates and the rear of the College
 6 Green entrance.
 7 Q. Certainly we'll agree that Carriage Gates is an area of
 8 greater vulnerability --
 9 A. Yes.
 10 Q. -- but the question simply was, this is an area of
 11 vulnerability within New Palace Yard; that's right,
 12 isn't it?
 13 A. Members' entrance?
 14 Q. Yes.
 15 A. It has been identified in this report as such. I can't
 16 tell you what the author's chain of rationale is for
 17 that.
 18 Q. Cromwell Green entrance is also a point of
 19 vulnerability, isn't it?
 20 A. It is, yes.
 21 Q. The subway entrance/colonnades, is another area of
 22 vulnerability, isn't it?
 23 A. It is, but I think I said on Monday that I think, again,
 24 that is a lower -- it is at lower risk and lower
 25 vulnerability than Carriage Green entrance and Carriage

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1 Gates.
 2 Q. Yes, so that you understand, I'm not suggesting that any
 3 of these areas is of a higher or lower risk.
 4 A. I see.
 5 Q. Simply it is a point of vulnerability, isn't it?
 6 A. Well, the entire perimeter is a point of vulnerability.
 7 Q. There is a benefit to having fixed armed posts, isn't
 8 there?
 9 A. Yes.
 10 Q. Clearly, therefore, we all know, there are fixed armed
 11 posts at areas like Downing Street and Buckingham
 12 Palace, aren't there?
 13 A. There are.
 14 Q. The issue has been raised as to the fact that fixed
 15 posts do not have the advantage of unpredictability; is
 16 that right?
 17 A. That's correct.
 18 Q. An easy way of ensuring that you have the benefit of
 19 a fixed post and the benefit of unpredictability would
 20 be to have both the fixed post and a patrol; that's
 21 right, isn't it?
 22 A. No. The disbenefits of having a fixed post are in terms
 23 of hostile reconnaissance, as we have seen across Europe
 24 and other places, if you are conducting a low
 25 sophistication attack, ie an attack that may be

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1 conducted with a knife, or knives, your ability to know
2 precisely and permanently where armed officers are is
3 not good for security, because if you can quickly attack
4 those officers and disable them, you are then in
5 possession of firearms.

6 So that is one reason why predictability is not
7 desirable. So it isn't the nature of the patrol that
8 adds a secure element in the model you're suggesting.
9 What you would have is still permanent armed officers in
10 a place that was entirely predictable.

11 Q. We heard from AFOs who were at the
12 Palace of Westminster, and you accepted you've never
13 worked as an AFO ever, have you?

14 A. No.

15 Q. Certainly not at the Palace of Westminster?

16 A. I've not worked anywhere as an AFO.

17 Q. No. We heard from AFOs who have worked at that location
18 that they were told at one point to stand further back,
19 therefore they would have greater protection and
20 response time in relation to people, members of the
21 public outside; does that strike a chord with you?

22 A. Yes, that would seem to make sense.

23 Q. Therefore, if you had a fixed post that is further
24 within the Palace of Westminster, that deals with,
25 doesn't it, the issue that you have just raised?

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1 A. I think I, or we, have strayed into the realm of
2 tactics, with which I am -- I fully confess is not my
3 area of expertise, and this is precisely why we engage
4 the system in the way that we engage the system, which
5 is not -- it is not speculated on by two people, neither
6 of whom are conversant with firearms document tactics.

7 It is a rigorous and comprehensive process that draws
8 upon expertise from a number of different disciplines to
9 provide the correct security model, the appropriate
10 security model for any area of weakness.

11 Q. Well, Commander Usher, you're the witness that the
12 family has been told that question should be put to.

13 Who do you say, then, within the police service --

14 THE CHIEF CORONER: We've had other witnesses who have been
15 asked questions about tactics.

16 MS STEVENS: Yes, but Commander Usher is obviously giving
17 evidence --

18 THE CHIEF CORONER: Yes.

19 MS STEVENS: -- about what he says --

20 THE CHIEF CORONER: But he has just said that he is perhaps
21 not the best person to answer a question about the
22 tactical analysis of whether a fixed post some way back
23 from a spot might be best or not.

24 MS STEVENS: Which is why, sir, if I may, I was just going
25 to ask the question as to who would be best placed to

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1 answer that.

2 If I may, who would be, then, if you can't answer
3 that, who would be able to?

4 A. I think I've described in broad terms the issues with
5 static posts, and I think I'm equipped and able to do
6 that. The reason I hesitated on further questioning was
7 that we seemed to be getting into the tactical detail of
8 tactical firearms assessment, and that's conducted by
9 an expert. So any tactical firearms assessor of the
10 type that have put these reports together would be
11 better placed than I am to talk about firearms tactics.

12 Q. Right. In terms of what you know -- maybe you can help
13 with this, maybe you can't -- but certainly following on
14 from Mumbai and Paris, by March 2017 you, within the
15 Metropolitan Police Service, would have been fully
16 familiar with the concept of marauding attacks, wouldn't
17 you?

18 A. Yes, we'd seen, tragically, evidence of marauding
19 terrorist firearms assault across the globe.

20 Q. Not just firearms attacks; you remember I went through
21 that on Monday?

22 A. You went through that -- extracted from the document,
23 but it has no relevance to the delivery of security at
24 the Palace of Westminster or anywhere else. It is
25 a document constructed for command and control purposes

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1 after a terrorist incident.

2 Q. No, forgive me, Commander Usher. I went through it with
3 you on Monday, going through the various stabbing
4 incidents in Paris; do you remember that?

5 A. I see. Yes, you named some stabbing incidents.

6 Q. Right. Therefore, by March 2017, you would have known,
7 wouldn't you, that in relation to marauding attacks,
8 they don't always happen at the same time, do they?

9 A. They don't always happen at the same time?

10 Q. Yes, so if you have a marauding attack where different
11 attacks happen at different locations, those attacks
12 don't always happen at exactly the same time, do they?

13 A. I would never have presumed that they would.

14 Q. No. Therefore you can easily have, can't you, a period
15 of seconds, minutes, or even hours, between different
16 attacks?

17 A. Yes, clearly.

18 Q. You would know, wouldn't you, by March 2017, that
19 terrorists can employ distraction tactics?

20 A. Yes.

21 Q. Ie, you can have what appears to be an attack in one
22 location, whereas you're actually planning the attack in
23 a different location. You are familiar with that?

24 A. Yes.

25 Q. In terms of training, AFOs within the Metropolitan

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1 Police Service would also be trained as to that,
 2 wouldn't they?
 3 A. I couldn't say.
 4 Q. You couldn't say?
 5 A. No, I couldn't say what the training of authorised
 6 firearms officers is, and whether that includes
 7 specifically an input on distraction. I don't see why
 8 it would. It doesn't fit the -- firearms officers are
 9 trained in firearms doctrine and tactics in order to be
 10 safe and have the correct skills to be able to deploy
 11 firearms correctly.
 12 The model, then, that they are asked to deploy those
 13 firearms in may consist of patrolling through London or,
 14 in the case of the Palace of Westminster, in accordance
 15 with the post notes that are delivered at every post,
 16 and the background material that we give to officers
 17 that is also included in the post notes, which says, you
 18 know: the perimeter security is part of your
 19 responsibility, and, you know, a variety of other
 20 factors. They're not taught, when they're taught down
 21 at Gravesend, when they are being taught firearms
 22 tactics, of all the ways that they may be deployed.
 23 That's up to the command upon which they are being used.
 24 Q. Are you saying that AFOs are not taught about
 25 an awareness of distraction tactics and how to deal with

1 such a situation?
 2 A. No, I think I was quite clear, I said I didn't know.
 3 Q. Can you talk about training at all of AFOs?
 4 A. In the broadest possible terms, but not -- I can't talk
 5 to the individual specifics of training, no.
 6 Q. You don't know, do you, the detail of the training that
 7 AFOs at the Palace of Westminster would have undertaken?
 8 A. No, I think I've just said that.
 9 Q. Well, I'm asking, you see, because on Monday you gave
 10 evidence of the training that AFOs would have had. So
 11 I'm clarifying. You actually don't know, do you?
 12 A. Sorry, what evidence did I give of firearms training on
 13 Monday?
 14 Q. On Monday you said that the training that AFOs were
 15 given would be such that they would go to the scene of
 16 an explosion; do you remember saying that?
 17 A. Yes, and the context in which I said that is that
 18 firearms training has changed in that the predominant
 19 doctrine up until relatively recently in a firearms
 20 incident was to isolate and contain the threat in the
 21 hope that peaceful resolution could be brought about.
 22 It is understood that in the context of global
 23 terrorism that that doctrine was inadequate,
 24 particularly when faced with Mumbai and similar style
 25 attacks, and therefore the doctrine changed, which was

1 no longer to try and isolate and contain, but there were
 2 many circumstances in which the correct thing to do
 3 would be to go forward and engage. That was
 4 a significant change in firearms doctrine, so
 5 significant that even non-firearms officers such as
 6 myself are aware of it, and I was made aware of it on my
 7 strategic firearms course.
 8 So what I -- the context of the answer I gave on
 9 Monday is that the doctrine has changed. We don't wait
 10 and try and contain; we move forward and try and
 11 neutralise. So a perimeter breach, I believe, in those
 12 circumstances with that training, the correct course of
 13 action for the officers would have been to move forward
 14 and try and contain that threat.
 15 Q. Well, we're going to come on to that in a minute, but
 16 the reality is, isn't it, you have absolutely no idea of
 17 what training the AFOs at the Palace of Westminster were
 18 given about how to deal with marauding attacks?
 19 MR KEITH: I'm sorry to rise to my feet. The premise of
 20 this question appeared to be that Commander Usher gave
 21 evidence about something which he agrees he is not
 22 professionally qualified to do so, namely training, and
 23 that therefore that undermined the answer he gave on
 24 Monday.
 25 My learned friend Mr Hough, in fact, asked this

1 question:
 2 "Question: I'm not going to ask you hypothetical
 3 questions about what they could have done ... but what
 4 were the responsibilities of an AFO, even if stationed
 5 at Carriage Gates, in response to hearing such a sound?
 6 "Answer: Their response should [said Commander
 7 Usher] ... if they believed, as certainly everybody else
 8 believed, that that was a potential perimeter breach, it
 9 would have been their responsibility to move towards
 10 what they believed was a perimeter breach and advance on
 11 that threat."
 12 Then it was Mr Hough who said:
 13 "Question: Was it their responsibility under their
 14 instructions and training, as you understood them, to go
 15 immediately?
 16 "Answer: Yes."
 17 THE CHIEF CORONER: Thank you. And the page?
 18 MR KEITH: 24.
 19 THE CHIEF CORONER: Thank you.
 20 MS STEVENS: Sir, it doesn't matter who asked the question,
 21 the importance is understanding --
 22 THE CHIEF CORONER: Well I think the importance is just
 23 hearing the answer. I'm conscious you've got, by my
 24 looking at that clock, about a minute and a half,
 25 Ms Stevens to go before it is 11.30, and that doesn't

1 allow for any further questions that Mr Adamson may have
 2 had.
 3 MS STEVENS: Well, that's very troubling because there are
 4 important issues to deal with. Of course I'm coming on
 5 to this issue that Commander Usher was asked about on
 6 Monday, which we all know is a central one, bearing in
 7 mind there is no expert evidence.
 8 THE CHIEF CORONER: Well, can I suggest you put your
 9 questions rather than take up time telling me what it is
 10 you're going to ask.
 11 MS STEVENS: No, of course, but, sir, simply a minute is not
 12 going to be sufficient, I am afraid. That's why I was
 13 dealing with it.
 14 THE CHIEF CORONER: Can I suggest you make the maximum use
 15 of it, because I did say what the time limit was when we
 16 started. You've spent an awful lot of time going over
 17 the same topic a number of times.
 18 MS STEVENS: Well, sir, I'm not going to respond to that.
 19 I will use the minute.
 20 Sir, is that all we're going to have to be able to
 21 deal with this?
 22 THE CHIEF CORONER: Well, as I say, I'm conscious that
 23 Mr Adamson may have some questions that he wants to ask,
 24 I don't know, I'm looking at him at the moment, but
 25 certainly on Monday he indicated there may be some other

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1 matters that he would want to come back to and also
 2 I have to allow time for Mr Keith to follow with any
 3 questions that he may have.
 4 MS STEVENS: Yes. Sir, obviously we didn't have
 5 an opportunity to really ask questions on Monday.
 6 Bearing in mind the importance of this issue I would ask
 7 to have time to be able to deal with it.
 8 THE CHIEF CORONER: Well, there is no other time,
 9 Ms Stevens. You did have some time on Monday. We
 10 paused at a stage where we are going to go on to matters
 11 which were going to be covered by a further statement.
 12 Mr Adamson has covered quite a lot of the ground as
 13 well.
 14 MS STEVENS: Sir, one of the issues, so that you know, I did
 15 discuss this morning whether or not, bearing in mind we
 16 had got to a point on Monday that I was in the middle of
 17 my questioning, whether or not I could actually go first
 18 because that, of course, would have assisted with time
 19 in that I could have started straightaway as opposed to
 20 being given a later slot.
 21 On behalf of the family, the matters that we need to
 22 deal with, which have not been dealt with yet, they
 23 weren't dealt with on Monday, in relation to why it was
 24 that there were no AFOs at Carriage Gates, they haven't
 25 been covered, they can't be covered with any other

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1 witness, the position in relation to Legal Aid has not
 2 changed. The family, as I understand it, as of now --
 3 I'm just going to turn my back -- there has been no
 4 response whatsoever by the Legal Aid Agency to the
 5 family's request to have funding to instruct an expert,
 6 and therefore this is the only witness who we can ask
 7 questions of about the important issue of whether or not
 8 it would have made any difference. This witness has
 9 given evidence on Monday that it wouldn't have made any
 10 difference. If we don't have an opportunity to deal
 11 with that, then the family are not going to be able to
 12 obtain the answers that they so desperately seek. There
 13 is no other way. We can't ask the questions of
 14 Mr Hepburn. I've made it clear, if it helps, in terms
 15 of that that we have very few questions for him. We
 16 can't ask the questions of Chief Superintendent Morris,
 17 who merely gives training to senior officers, and
 18 I don't seek to diminish that but, of course, that means
 19 that she can't assist in terms of training to police
 20 constables.
 21 Therefore, if we can't ask the questions now, the
 22 position is going to be that there is nothing we can add
 23 as to this matter.
 24 MR HOUGH: Sir, I was just going to explain that I went
 25 first today to adduce Mr Usher's fourth statement

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1 evidence. I did so in, I think, a little over ten
 2 minutes. Mr Adamson asked questions for an hour and
 3 a half on Monday, and did so with efficiency and effect.
 4 Ms Stevens for your note, sir, has taken 2 hours and 20
 5 minutes in total in her questioning so far.
 6 THE CHIEF CORONER: Mr Hough, I set out the timing at the
 7 beginning for fairly obvious reasons, because it seemed
 8 to me I had to make clear that there was a limited
 9 amount of time for counsel to cover the topics they
 10 wished to cover, and it seems to me that I have given
 11 sufficient time to everyone.
 12 I'm conscious that it may be that I can trespass on
 13 Mr Keith to cut down the half an hour that I gave to
 14 him, because I'm conscious I ought to give some further
 15 time to Mr Adamson because material that he had not then
 16 seen he indicated he wished to ask some questions on,
 17 but I think the time has now come for me to switch to
 18 Mr Adamson.
 19 What I'm going to do is to suggest that he takes, if
 20 he can, ten minutes, and then that will give Mr Keith
 21 the remainder until 12 o'clock.
 22 MR KEITH: In light of the predicament in which my learned
 23 friend tries to place you, we have, whilst she was
 24 making her submissions, been able to make some
 25 alternative arrangements, so there is a little more time

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1 than we may have had this morning. I do not wish it to
 2 be thought in any shape or form that my learned friend
 3 has been shut out because of any personal difficulty in
 4 terms of other professional obligations on my part, we
 5 can deal with that, but I, too, would adopt the
 6 submissions of your learned counsel, which is that we
 7 have had now two hours and 20 minutes, much of which has
 8 been centred on the issue of MM1 and Messrs Ashby and
 9 Sanders.

10 MR ADAMSON: Sir, if it helps Ms Stevens given that Mr Keith
 11 has now freed up some more time --

12 THE CHIEF CORONER: Yes.

13 MR ADAMSON: -- can I allow her to conclude her bit insofar
 14 as -- I have got, I would have thought, ten minutes of
 15 material.

16 THE CHIEF CORONER: Well, Ms Stevens you may have a further
 17 ten minutes, then we'll move on to Mr Adamson.

18 MS STEVENS: Thank you.

19 Could you have a look, please, at {WS5099/28}.

20 A. Yes.

21 Q. Yes. You said on Monday when giving evidence that
 22 Cromwell Green search point is about 20 yards from
 23 Carriage Gates; do you remember saying that?

24 A. Yes, 20 or 30 yards.

25 Q. Do you remember saying on Monday that you are of the

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1 view that that area, therefore, is within close
 2 proximity of Carriage Gates because it is but 20 to
 3 25 yards?

4 A. I don't recall that specifically, but if that's what the
 5 transcript shows ...

6 Q. Therefore, are you saying it's in sight of Carriage
 7 Gates?

8 A. The entrance, the Cromwell Green search entrance point
 9 exit, at the precise point that text is written probably
 10 isn't, because of the low wall and the curve. But
 11 it's -- I think it's in sight of the south gate, it may
 12 not be in sight of the north gate, but I couldn't say
 13 for sure.

14 Q. All right. But certainly if we are further down towards
 15 where the barriers are, that is in sight?

16 A. Sorry, further up.

17 THE CHIEF CORONER: Further up the map.

18 MS STEVENS: Yes, further up if we're going up the page;
 19 yes?

20 A. Yes.

21 Q. Closer and in sight of Carriage Gates; yes?

22 A. Yes.

23 Q. Therefore, if we were to go the other way round towards
 24 Bridge Street and were to go 20 yards, that too is in
 25 close proximity of Carriage Gates, isn't it?

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1 A. I just need to be careful as to whether I said that
 2 I thought 20 to 30 yards was in close proximity. But
 3 I agree with you that it is a similar distance around
 4 the other shoulder.

5 Q. Similar distance and similar line of view; yes?

6 A. I believe so, yes.

7 Q. You were asked on Monday by counsel to the Inquest
 8 whether or not if an AFO was walking from Carriage Gates
 9 to Cromwell Green, whether it would be appropriate for
 10 one of them to go rather than together; do you remember
 11 being asked that?

12 A. I certainly remember being asked about whether one or
 13 two officers should go in the context of the explosion.

14 Q. No, in terms of Cromwell Green.

15 A. Yes. I don't have a direct recollection. I think
 16 I said along the lines of if one officer remained at
 17 Carriage Gates and the other walked towards the search
 18 point exit, that that would be within sight of each
 19 other and therefore acceptable.

20 Q. Yes, I'm conscious of time, but for anyone's reference
 21 it's at 66.

22 Therefore, exactly the same principle applies,
 23 doesn't it, if one was going towards Bridge Street as
 24 opposed to Cromwell Green, ie if they remain in line of
 25 sight, there's no reason why two officers have to travel

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1 together. That's right, isn't it?

2 A. Well, they shouldn't be travelling that side at all.
 3 The reason for the travelling to the rear of
 4 Cromwell Green search point exit is that that is the
 5 other major point of vulnerability. So that is why,
 6 I believe, the notes have been constructed in that way.

7 Q. The question is simply this: if you are saying that it
 8 is appropriate for officers to travel separately as long
 9 as they remain in the line of sight between Carriage
 10 Gates and Cromwell Green, that applies equally if they
 11 were to travel the other way, doesn't it?

12 A. I am afraid not, because you have said it is acceptable?
 13 It isn't acceptable under the post note in place
 14 from November 2015 until March 2017.

15 Q. You said in evidence on Monday that because of the loss
 16 of Police Constable Palmer that officers are going to:
 17 "... consider their own actions ... revisit them ...
 18 question themselves endlessly ... as to what they could
 19 have done, and in doing so, may be affected by
 20 emotion ..."

21 Do you remember saying that?

22 A. Yes.

23 Q. That's at page 76. That would certainly apply, wouldn't
 24 it, to the question of whether or not armed officers
 25 being present at Carriage Gates would have made

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1 a difference?
 2 A. Sorry, are you asking me whether I've asked that
 3 question?
 4 Q. No.
 5 A. No.
 6 Q. What you said was that officers are going to consider
 7 their own actions, revisit them, and in doing so may be
 8 affected by emotion.
 9 A. Yes.
 10 Q. That's certainly going to be the case, isn't it, if
 11 officers are going back over in their mind whether or
 12 not an armed officer being present at Carriage Gates
 13 would have saved the life of Police Constable Palmer?
 14 A. Yes, I think that's right.
 15 Q. Yes. It's important, therefore, isn't it, to consider
 16 what officers had to say at the time of the incident,
 17 and in their statements thereafter?
 18 A. It's certainly important to consider what they said in
 19 their statements.
 20 Q. Yes. You suggested on Monday that if the AFOs believed,
 21 as everyone did, that the explosion may have caused
 22 a perimeter breach, then they would have left Carriage
 23 Gates; do you remember saying that?
 24 A. I'm sure that's right.
 25 Q. In fact, I suggest, that not a single officer who was

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1 present at Carriage Gates said in the statements that
 2 they have given that they thought that the perimeter had
 3 been potentially breached by an explosion.
 4 A. I haven't read any of the statements of the officers who
 5 have given evidence. That comment was based in the
 6 conversations I had with between 15 and 20 officers who
 7 were present in Palace Yard, and I think we've described
 8 earlier that from memory every single one of them said
 9 that they thought there had been an explosion.
 10 Q. No, I'm talking about your evidence that everyone
 11 believed that there might have been a perimeter breach,
 12 and what I'm suggesting to you is, that when one looks
 13 at the statements that they gave, not a single officer
 14 says that they believed the perimeter may have been
 15 breached.
 16 A. Well, I wasn't responsible for taking those statements
 17 and it will have depended upon what questions they were
 18 asked in trying to usefully construct those statements.
 19 But I haven't seen them. I accept your word that they
 20 haven't said that. But every officer that I spoke to,
 21 personally, said to me: the first thing we thought was
 22 there's been an explosion.
 23 Q. In terms, therefore, of whether or not an officer has
 24 a responsibility to go off towards the, let's call it
 25 a loud sound, to be neutral, all right -- whether or

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1 not -- and I can hear noises behind me, sorry.
 2 MR KEITH: Yes, "a loud sound" is not a neutral description
 3 of the evidence which has actually been heard in these
 4 Inquests, primarily by PC Ross, the fact that it was
 5 an explosive sound, which he reported as an explosion
 6 near Portcullis House.
 7 MS STEVENS: It's a very neutral word because different
 8 people describe it in different ways.
 9 THE CHIEF CORONER: Ms Stevens, you are gusting very close
 10 to your time. Why don't you simply ask the question?
 11 MS STEVENS: Sir, yes, it's difficult though because when
 12 there's an objection like that, of course it needs to be
 13 dealt with.
 14 THE CHIEF CORONER: Yes, but the question can be put quite
 15 shortly, and the question can be put in terms which are
 16 fairly neutral.
 17 MS STEVENS: Can I turn my back to see if there's
 18 an expression that is neutral? (Pause).
 19 Thank you, I'm very grateful to my learned friend,
 20 "bang". In terms of your answer as to whether or not
 21 there was a responsibility to go towards the bang, you
 22 gave that answer, therefore, believing that everybody
 23 had been concerned about a perimeter breach; that's
 24 right, isn't it?
 25 A. I gave the answer because the question was "Do you

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1 believe that one or two officers would move towards that
 2 area -- I'm trying to desperately be neutral -- and my
 3 answer was that on the descriptions that I'd had from
 4 officers, it was very, very unlikely that an officer
 5 would go on their own to what they considered to be
 6 an explosion at a perimeter breach.
 7 Q. Could you have a look, please, at -- and it's the
 8 statement of Police Constable Sanders dated 1 June 2017.
 9 It's {WS1237A/1}. Thank you. Could we go to the second
 10 page of that, please {WS1237A/2}. So it's the statement
 11 of 1 June 2017, there are three pages. Thank you very
 12 much. It's the second page of that, please.
 13 If you have a look, please, seven lines down from
 14 the top.
 15 A. Yes.
 16 Q. This is what Police Constable Sanders had to say in June
 17 last year.
 18 A. Yes.
 19 Q. "I thought that the loud bang was loud enough to be
 20 an explosion. I was therefore looking for signs of
 21 this, however there was no smoke or smell indicative of
 22 an explosion."
 23 Pausing there, in terms of an officer's
 24 responsibility, it would be dependent, wouldn't it, on
 25 first of all what an officer can see?

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1 A. Yes.
 2 Q. Second of all, what an officer can smell?
 3 A. Yes.
 4 Q. Third of all, what an officer can hear?
 5 A. Yes.
 6 Q. He then goes on to say this:
 7 "I then thought that it may have possibly been
 8 an accident ..."
 9 A. Yes.
 10 Q. Sorry, I've missed out a sentence:
 11 "I was therefore looking for signs of this ..."
 12 So in his statement he says, doesn't he, he's
 13 looking for signs of an explosion?
 14 A. Yes.
 15 Q. "... however there was no smoke or smell indicative of
 16 an explosion."
 17 A. Yes.
 18 Q. "I then thought that it may have possibly been
 19 an accident involving a bus as that could have been the
 20 only sort of thing that could have made such a loud
 21 noise."
 22 Do you see that?
 23 A. I do.
 24 Q. So in terms of the statement that he gave near the time
 25 he has positively excluded the possibility of

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1 an explosion, hasn't he?
 2 A. No. Everybody knows by the time he made this statement
 3 that there wasn't an explosion. He says, I think very
 4 clearly, that it was a bang loud enough to be
 5 an explosion. That would seem to indicate that his
 6 first reaction is that it might have been an explosion.
 7 THE CHIEF CORONER: That's the second line at the top of the
 8 page:
 9 "The loud bang initially sounded like an explosion
 10 to me ..."
 11 A. Also, I was asked that question with reference to what
 12 do I think the officers would or should have done.
 13 THE CHIEF CORONER: Yes.
 14 A. And, again I'm choosing my words as carefully as I can:
 15 my answer, the substance of my answer was that
 16 I believed they would and should have gone to the
 17 perimeter breach, if that's what it was, or that's what
 18 they believed it to be, and that I don't believe that
 19 had they been standing at Carriage Gates, that that
 20 would have been any different unless they had
 21 experienced at Carriage Gates hearing or seeing
 22 something different, which I don't believe would have
 23 been the case.
 24 MS STEVENS: If you have a look again at the map, please,
 25 WS --

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1 THE CHIEF CORONER: Ms Stevens, this is the last question,
 2 is it?
 3 MS STEVENS: Thank you.
 4 THE CHIEF CORONER: I mean the very last question.
 5 MS STEVENS: No, no, that's understood, sir. {WS5099/28}.
 6 A. Yes.
 7 Q. The officers going off towards the collision site --
 8 A. Yes.
 9 Q. -- would have left wide open the entrance into the
 10 Houses of Parliament and the chamber there, wouldn't it?
 11 A. Well, no more wide open than it was because of the
 12 division bell on 22 March. Officers standing at the
 13 colonnades leave the open gate wide open. It would have
 14 been no more vulnerable had the officers moved to the
 15 perimeter fence than it would have been and in fact was
 16 by officers standing under the colonnades.
 17 MS STEVENS: Well, I can't ask any more questions.
 18 Further examination by MR ADAMSON
 19 MR ADAMSON: Commander Usher, as you'll recall my name is
 20 Dominic Adamson and I ask questions on behalf of the
 21 widow of PC Palmer.
 22 Commander Usher, could I ask for pages 146 and 147
 23 of the transcript of your evidence to be put up on
 24 screen, please. {Day10/146:1}
 25 Commander Usher, that is the evidence that you gave

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1 when answering questions from me about the documentation
 2 concerning supervisory checks.
 3 A. Yes.
 4 Q. You remember that evidence?
 5 A. Yes.
 6 Q. And you will see on page 146 I ask you to describe the
 7 document and you said that you had seen one?
 8 A. Yes.
 9 Q. Yes?
 10 A. I have seen an example of one.
 11 Q. Indeed. And so in answering my questions, you were
 12 referring to a single document; is that correct?
 13 A. Yes, I was referring, to be specific, to those two
 14 pages, I think dealing with 28 and 29 September 2015 --
 15 Q. Yes.
 16 A. -- which is what I had seen.
 17 Q. Yes. When did you become aware that requests had been
 18 made for disclosure of material such as that
 19 documentation?
 20 A. I was never aware.
 21 Q. You were never aware?
 22 A. No, it wouldn't be -- it wouldn't be my role or
 23 responsibility to furnish the Inquest team with any
 24 material other than statements that I've been asked to
 25 write.

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1 Q. Right. You were asked by me -- and this is now on to
2 page 147:
3 "Question: The example that you have seen, what
4 date --
5 "Answer: I can't recall, sir. I believe it's in
6 2015."
7 A. Yes.
8 Q. So that's the consistent with what you have just
9 described, namely that the document you were referring
10 to was that in September 2015?
11 A. Yes.
12 Q.
13 "Question: When did you examine this document?"
14 A. I think "examine" is a bit strong, but I was shown it on
15 the lunch break -- I was shown it twice on the lunch
16 break on Monday.
17 Q. The question I put to you was:
18 "Question: When did you examine this document?"
19 Yes? Do you see that, on the transcript?
20 A. I see. Oh right, yes. Yes, I can see that question.
21 Q. And then your answer:
22 "Answer: In preparation for coming here today over
23 the previous weeks and months I've looked at many
24 hundreds, if not thousands, of documents. I can't
25 recall exactly, sir."

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1 A. Yes.
2 Q. Was that answer true?
3 A. Yes. In as much as I -- yes, it was true. I think
4 I described --
5 Q. Why the qualification?
6 A. I think I described this morning that I was conscious of
7 when did I first see that document, and there was
8 a trigger in my brain that had said: you've seen that
9 before. The reason for that is because I'd been shown
10 it twice during the lunch break.
11 But in trying to be as accurate as possible and
12 standing here with the pressure of the moment, I wanted
13 to ensure I didn't make a mistake. So I was saying it's
14 within the previous weeks or months because of the many,
15 many documents I've seen, that document I knew I had
16 seen before.
17 If it provides -- I had -- I now completely accept
18 I had never seen that document prior to the lunch break
19 on Monday. I believe my answer was honest, because
20 that's what my belief was at the time, and I think it's
21 also very possible that it's verifiable electronically
22 when that document was produced or found upon search by
23 Inspector Munns.
24 Q. That was an extremely long answer to what was a simple
25 question.

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1 A. Well, no, I think, sir, I'm trying to be clear to the
2 court in that I wouldn't want there to be any shadow of
3 a doubt about -- if it could appear to the court that
4 I had attempted in any way to mislead them. So
5 I suppose I am being longer in my answer to try and
6 eliminate any such doubt.
7 Q. The next question that I asked you:
8 "Question: Well, was it within the last fortnight?"
9 A. Yes.
10 Q.
11 "Answer: I think I have seen it within the last
12 fortnight, probably, if not again, if you see what
13 I mean. I may have seen it months ago and I have seen
14 it again in the last fortnight."
15 A. Yes.
16 Q. Your evidence today is that you had seen it probably no
17 more than 45 minutes before I was asking you these
18 questions for the first time?
19 A. Yes.
20 Q. How do you explain that answer in the context of that
21 evidence?
22 A. Well, I think I've tried to explain it. The first thing
23 I should say is it was absolutely -- I cannot see any
24 benefit at all to me not telling you the complete truth
25 on this both on Monday or today, and my answer on Monday

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1 was truthful: in my head at that time I knew I had seen
2 it very recently and I was also thinking: I think I've
3 seen that before, and the best explanation for why
4 I thought that I'd seen it before is because I had seen
5 it earlier in the lunch break.
6 Q. Commander Usher, the first question I asked you when
7 I started examining you on Monday was whether or not
8 your review into the circumstances of this case had been
9 as thorough as the investigation into the actions of
10 Masood?
11 A. Yes.
12 Q. I asked you had every stone been unturned, and you said
13 yes, it had.
14 A. Yes. I think to provide clarity to that answer,
15 I haven't conducted a review into the circumstances in
16 the terms that you are describing. SO15 have conducted
17 a comprehensive investigation, as far as I can
18 determine, into the circumstances of what happened on
19 22 March. We have had independent reviews of the
20 security at the Palace of Westminster to provide the
21 best possible model going forward. We have had
22 an independent investigation by the Directorate of
23 Professional Standards into the conduct and actions of
24 two officers. I can't add that I have conducted --
25 I have conducted a short review of the effectiveness of

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1 occupational health by talking to officers, but
 2 I haven't conducted a review, I think in the terms in
 3 which you are describing.
 4 Q. The significance of supervisory checks --
 5 A. Yes.
 6 Q. -- in the context of the evidence in this case as
 7 a whole cannot have escaped you, can it?
 8 A. No, I think that's right, as it has developed within
 9 this case since the Inquests began, yes.
 10 Q. And so when you are shown on 24 September, 18 months
 11 after these events, for the first time documents which
 12 show that there appear to have been some form of
 13 supervisory checks.
 14 A. Yes.
 15 Q. The significance of that material must have been obvious
 16 to you?
 17 A. I don't think it impacted in quite the way you're
 18 describing. I very briefly glanced at those documents,
 19 must have been aware of the date on the document,
 20 because I remember it, but I didn't think that is
 21 a momentous piece of evidence.
 22 I was also, to be fair, unsure on the rules
 23 surrounding quite how I could introduce it, and
 24 I introduced it when I was asked about it: are you aware
 25 of supervisory checks, and I think I gave the honest

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1 answer.
 2 Q. Please can you be clear: did you see it before or after
 3 you commenced giving evidence?
 4 A. I saw it after I commenced giving evidence.
 5 Q. Commander Usher, how many times have you given evidence
 6 in court?
 7 A. Countless.
 8 Q. You were mid-way through giving your evidence --
 9 A. Yes.
 10 Q. -- and during your evidence in a luncheon break --
 11 A. Yes.
 12 Q. -- you were being briefed on documents, were you?
 13 A. I was told this document had surfaced, yes.
 14 Q. By another police officer?
 15 A. Yes.
 16 Q. Did you not say to that police officer "I cannot speak
 17 to you about the evidence that I've given?"
 18 A. That wasn't the evidence I'd given. This was emerging
 19 evidence. I think it's fair to say, I wouldn't claim to
 20 be an expert on the rules within a Coroner's court, this
 21 evidence appeared to have surfaced, I briefly saw those
 22 two pages, and I then believe it was -- the appropriate
 23 course of action was taken with it. I don't believe
 24 that the officer showing it to me intended anything
 25 untoward by that.

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1 Q. But surely you must have appreciated the fact that you
 2 were under oath in the middle of giving your evidence?
 3 A. And therefore it was important that I didn't discuss my
 4 evidence with anybody, which I didn't.
 5 Q. So you are just shown a piece of paper?
 6 A. I think in the circumstances in which I've described of
 7 how that became available by an officer who has returned
 8 to work, having been off for some time, and has quickly
 9 produced it on that day because he has become aware of
 10 a request, I don't know where from, then an officer
 11 saying to me: we have the document that an inspector has
 12 produced, I don't think there is any malice in that:
 13 I glanced at it and moved on.
 14 Q. So you are perfectly comfortable with discussing
 15 documents mid-way through your evidence?
 16 A. I think I've been clear that I didn't discuss.
 17 Q. Well, you must have had some conversation in order to
 18 have had it explained to you what it was that you were
 19 being shown?
 20 A. As I say, an officer produced the document and said:
 21 this is -- I'm paraphrasing -- this has emerged from
 22 Inspector Munns around the supervisory checks he did,
 23 and I said something like "Yes".
 24 Q. Could Commander Usher's statement of 24 September be put
 25 up on the screen, please.

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1 MR HOUGH: It's {WS5131/1}.
 2 MR ADAMSON: I'm grateful.
 3 Now, the fourth paragraph of that statement:
 4 "The first document, 'Compliance checks' is
 5 a document, which I first became aware of on the morning
 6 of 24th September 2018."
 7 A. Yes.
 8 Q. Just so I'm clear, was that before or after you started
 9 giving evidence?
 10 A. It was after I'd started giving evidence.
 11 Q. And so it follows that despite the fact that you were
 12 identified as the person who was able to give evidence
 13 on behalf of the Metropolitan Police as to the security
 14 arrangements generally in New Palace Yard --
 15 A. Yes.
 16 Q. -- and what you understood to be the systems that were
 17 in place --
 18 A. Yes.
 19 Q. -- it was not until 24 September 2018 --
 20 A. Yes.
 21 Q. -- that you became aware of any records of supervisory
 22 checks?
 23 A. Yes, that's right. These checks emerged on Monday.
 24 I wasn't aware of them before.
 25 Q. You've given evidence today about ADAM.

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1 A. Yes.
 2 Q. You told this court on Monday that 83 per cent of AFOs
 3 had accessed the system recently, and you've expressed,
 4 I think, regret for that evidence today.
 5 A. Yes.
 6 Q. Because it didn't accurately reflect the reality, did
 7 it?
 8 A. It contained the word "recently". It was an honest
 9 answer and I have, I think, done my best to clear that
 10 up.
 11 Q. Because, as Mr Hough has pointed out this morning, and
 12 I'm now looking at the document that he handed to you.
 13 A. Yes.
 14 Q. That from December 2015 onwards, only 13 per cent of
 15 AFOs had logged into ADAM in the period
 16 between December 2015 and August 2016.
 17 A. July. Is it July or August? But yes, 1 August, yes.
 18 Q. That is a woeful statistic, isn't it?
 19 A. I don't think I can answer that.
 20 Q. Well, this is the principal means --
 21 A. It is the sole arbiter of what the post notes are.
 22 Q. Sorry, I hadn't finished my question.
 23 A. I'm sorry.
 24 Q. It is the principal means by which the post instructions
 25 are brought to the attention of officers; do you agree?

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1 A. I agree -- no, not brought to their attention. I agree
 2 that all officers are expected to be able to access ADAM
 3 and therefore access the post notes. The post notes are
 4 also kept in a hard-copy binder in the base room which
 5 I think I said to you was to overcome potentials for IT
 6 difficulties within the Palace of Westminster, and
 7 I further said that changes in post notes were
 8 communicated to sergeants who would be verbally briefing
 9 officers as to any changes.
 10 Q. The ADAM system is the only auditable record --
 11 A. Yes.
 12 Q. -- of officers accessing, or at least potentially
 13 accessing, post instructions?
 14 A. That's right.
 15 Q. And this system was only accessed by 13 per cent of your
 16 officers --
 17 A. Yes.
 18 Q. -- in a period of eight months, nine months --
 19 A. Yes.
 20 Q. -- between the post instruction being issued and the
 21 date when the search was carried out?
 22 A. Yes.
 23 Q. Again, I put it to you that that is a woeful statistic,
 24 isn't it? It reflects that ADAM is simply not being
 25 utilised.

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1 A. It's been utilised, I think, by some officers. It is
 2 clear that most, nearly all officers, know how to
 3 utilise it, but the reality is that post notes change
 4 extremely infrequently, otherwise we wouldn't have
 5 a system whereby emailing supervisors would be
 6 sufficient to -- you know, if that was a regular
 7 occurrence that would be a cumbersome and inefficient
 8 system for alerting changes. They don't happen very
 9 frequently, therefore officers who are coming on duty
 10 every day and reading the same post note on the ADAM
 11 system, I can quite understand where after a period of
 12 time they don't do it daily. They may do it --
 13 I couldn't answer how frequently individual officers do
 14 it.
 15 Q. Are you telling this court that it causes you no concern
 16 that 87 per cent of your officers did not utilise the
 17 system in that period?
 18 A. Of course I'm concerned.
 19 Q. Yes.
 20 A. I'm reassured by some of the other methods that we have
 21 for briefing officers, such as -- the predominant one
 22 being sergeants, and I'm also cognisant of the fact that
 23 since 22 March there's a very different system in place.
 24 Q. Pause there, because I've got limited time as well. So
 25 you're reassured by the system of briefing by sergeants?

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1 A. Yes.
 2 Q. I think about the fourth question that I asked you when
 3 I examined you on Monday was how many statements have
 4 you taken from sergeants in relation to this
 5 investigation on the patrol -- on the responsibilities
 6 of AFOs, and you said that was a work in progress, or
 7 words to that effect.
 8 A. Yes.
 9 Q. I'll doubtless be corrected by Mr Keith if I've
 10 paraphrased it wrongly.
 11 A. Yes.
 12 Q. So you can't be satisfied of something if you haven't
 13 asked anybody, can you?
 14 A. In terms of preparing the evidence that this court is to
 15 hear, it wouldn't be appropriate for me to be gathering
 16 statements from my own staff as to -- from PCs Ashby and
 17 Sanders or anybody else as to what they intended to say
 18 in the court. When I said that it was a work in
 19 progress, I was aware that requests had been made from
 20 one of the legal teams, at least, to determine whether
 21 there are any documents referring to supervisory
 22 records, and I meant that the work in progress was,
 23 I was aware that the question was being asked on the
 24 command of supervising officers: have you got documents
 25 that support your supervisory regime, and as a result of

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1 that I believe we get the record from Inspector Munns.
 2 Q. Because when you gave evidence to the effect that
 3 83 per cent of officers logged in, the impression you
 4 were clearly giving, wasn't it, was that this is
 5 a routinely utilised system?
 6 A. I think the answer I gave was that it's -- I didn't say
 7 routine for precisely --
 8 Q. No, no, I'm suggesting to you, the impression that you
 9 were plainly seeking to give this court was that that
 10 system was being routinely utilised by AFOs?
 11 A. I think I said that it showed that 83 per cent of
 12 officers had engaged with it. I never tried to give
 13 an impression of anything other than an accurate picture
 14 of the truth, and that's what I'd been told and I told
 15 it to the court as it was my belief.
 16 Q. The 83 per cent figure that you gave, and again, I think
 17 we derive this from your statement that you gave on
 18 Monday, and it's page 2 of that document.
 19 No, the previous document we had up was the
 20 document, it was just the second page we needed to look
 21 at.
 22 MR HOUGH: {WS5131/2}.
 23 MR ADAMSON: Thank you. The bottom paragraph:
 24 "On 1st August 2016 Police Sergeant Dave Pirie
 25 conducted a check covering how many Authorised Firearms

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1 officers had logged into the system since its inception.
 2 This figure, as stated in my evidence today, is 83%."
 3 A. Yes.
 4 Q. And so am I to assume that prior to your giving
 5 evidence, that was really the only inquiry that had ever
 6 been made in the period between this incident and the
 7 commencement of these Inquests as to the extent to which
 8 ADAM was accessed?
 9 A. No, it's done monthly now, post the attack. But prior
 10 to March 2017, the only evidence I have that a check was
 11 carried out was the one carried out on 1 August in 2016.
 12 Q. So Dave Pirie, Police Sergeant Dave Pirie was asked to
 13 find out how many officers had accessed ADAM; yes?
 14 A. Sorry, when are you suggesting that request was made?
 15 Q. When he conducted the inquiry which was referred to in
 16 the final paragraph of your statement which you gave on
 17 Monday.
 18 A. So, my understanding is this: Sergeant Pirie conducted
 19 that check on 1 August in 2016. It is further my
 20 understanding that were we to try and conduct the same
 21 check for the same period today that that would not be
 22 possible in terms of the IT being archived, I can't
 23 pretend to be an expert on this, but in asking the
 24 question could we do the same check of that period
 25 today, the answer is no.

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1 So what that document that you have summarised is,
 2 is that, as you said, the system is auditable so what we
 3 were able to do was say what checks have been done, and
 4 we come across the one by Police Sergeant Pirie on
 5 1 August 2016, and now please print that in a ...
 6 Q. Who asked him to do it?
 7 A. What, the one in 2016?
 8 Q. Yes?
 9 A. I don't know, sir.
 10 Q. He didn't just do it of his own volition? Somebody must
 11 have asked him to do it?
 12 A. I said sir, I don't know who asked him to do it. It
 13 certainly wasn't me.
 14 Q. Because in terms of a search --
 15 A. Yes.
 16 Q. -- inquiring as to how many officers have accessed it
 17 since its inception is about as useless, isn't it, as
 18 it's possible to be?
 19 A. No, I don't -- I think that's stating it too far, sir.
 20 It shows that officers know how -- 83 per cent of
 21 officers at least know how to access it and they also
 22 know what's on it.
 23 Q. Better statistics to inquire about would be, for
 24 example, how many accessed it in December 2015 when the
 25 post instructions were issued. That would be a better

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1 inquiry, wouldn't it?
 2 A. Well, depending on what you're trying to establish, it
 3 may well be, yes.
 4 Q. Well, if you were trying to establish why Police
 5 Constables Ashby and Sanders were not where they were
 6 supposed to be --
 7 A. Yes.
 8 Q. -- then one relevant inquiry would be to see whether or
 9 not officers in December 2015, when the
 10 post instructions were issued, were actually accessing
 11 the system to review them.
 12 A. No, I think that DPS conducted a reasonable inquiry
 13 which was, in trying to establish whether PCs Ashby and
 14 Sanders had understood their post notes correctly, they
 15 conducted an IT search that shows the results that it
 16 showed. I think one officer had accessed it once and
 17 the other hadn't accessed it.
 18 MR ADAMSON: You are presenting the statistics in the most
 19 favourable light, are you not?
 20 A. I'm presenting them accurately, sir, as I understand
 21 them.
 22 THE CHIEF CORONER: Mr Adamson, I'm conscious I've let you
 23 go on for more than your ten minutes but ...
 24 MR ADAMSON: We received recently a statement from Inspector
 25 Stuart Rose.

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1 A. Yes. I haven't seen that statement.
 2 Q. You haven't seen that statement?
 3 A. No, sir.
 4 Q. Well, he refers in that statement to having been made
 5 aware of a CAD system which was created to document all
 6 supervisory checks on post?
 7 A. As I say, sir, I'm not aware of that statement.
 8 Q. A supplementary point in relation to that. You have
 9 been asked questions about the scope of the patrol and
 10 the question of whether or not the officers were in
 11 close proximity to the Carriage Gates; yes?
 12 A. Yes.
 13 Q. If somebody was in close proximity to the members'
 14 entrance --
 15 A. Yes.
 16 Q. -- would you agree with me they are not in close
 17 proximity to the Carriage Gates?
 18 A. Broadly, yes. There may be some geographical area of
 19 overlap in which that may fulfil both criteria, but yes
 20 I would probably agree with you. I'm thinking of the
 21 search point at Carriage Green entrance, you could say
 22 potentially was in close proximity, but in general
 23 I agree.
 24 Q. So in the circumstances if an inspector carrying out
 25 supervisory checks was of the view that somebody who was

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1 in close proximity to the members' entrance was
 2 operating within the scope of the post instructions --
 3 A. Yes.
 4 Q. -- you would not agree with that, would you?
 5 A. As I say, it would depend on where they were standing.
 6 THE CHIEF CORONER: Mr Adamson, you have had 25 minutes.
 7 MR ADAMSON: Sir.
 8 THE CHIEF CORONER: Mr Keith.
 9 Examination by MR KEITH QC
 10 MR KEITH: Commander Usher, may we just deal, briefly, with
 11 some of the issues raised today. In relation to the
 12 figures provided concerning the access to the ADAM
 13 system, what you said on Monday is:
 14 "Answer: The best evidence I have is that I am told
 15 that 83, 84 per cent of officers are regularly logging
 16 [in]."
 17 When you referred to your understanding of what the
 18 figures showed, had you looked at the primary data?
 19 A. No.
 20 Q. The figures?
 21 A. No.
 22 Q. The charts?
 23 A. No.
 24 Q. Had you sat down and gone through them yourself and
 25 tried to make sense of what we have now in abbreviated

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1 form?
 2 A. No.
 3 Q. Were you relying upon what you were told by somebody
 4 else?
 5 A. My only contribution was to take -- I was told of the
 6 total number of officers who had accessed the system,
 7 I'm aware of the total number of officers that I have as
 8 armed firearms officers, and I did the maths.
 9 Q. Did you understand that the issue of logging in had
 10 become an issue important in this Inquest?
 11 A. Yes.
 12 Q. And therefore that the ability to provide an answer
 13 would be of assistance?
 14 A. Yes.
 15 Q. And did you in good faith, therefore, provide what you
 16 understood to be the position?
 17 A. Yes.
 18 Q. In relation to the chart, it's been suggested to you
 19 that you have in some way acted wrongly or improperly by
 20 having the information about Inspector Munns' chart
 21 brought to your attention in the course of giving
 22 evidence?
 23 A. Yes.
 24 Q. Could you just say something about the circumstances in
 25 which you were first shown something to do with that

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1 chart. Where were you?
 2 A. I think I was in the witness room and I think my staff
 3 officer, whose primary role is to show me documents on
 4 an almost minute-by-minute basis when we're under normal
 5 procedures, showed me a document and said "This has come
 6 to light". As I said, I think I said "Oh". And
 7 I should be clear, I wasn't aware of the rules regarding
 8 whether -- I suppose the clearest way of saying it is
 9 I didn't recognise that there were dangers here.
 10 Q. Can you think of any reason why you would have wished to
 11 have lied about how long you had been aware of that
 12 document?
 13 A. No, and as I say, sir, I'm sure that auditably it could
 14 be determined when that document surfaced.
 15 Q. Well we know because we have been provided with
 16 information that Inspector Munns came back on duty on
 17 Monday and that was the first opportunity he had had to
 18 bring to everyone's attention a record not kept,
 19 essentially.
 20 Would it have been sensible for you to say to your
 21 chief of staff: you're trying to show me something to do
 22 with the evidence I've given, go away, I don't want to
 23 know?
 24 A. I may have phrased it differently, but with hindsight
 25 and greater knowledge, yes.

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1 Q. You've probably thought over the course of the few days
2 whether you had ever seen that document before. Have
3 you found, or have you recollected any email to yourself
4 exhibiting that document or referring to it in any shape
5 or form before Monday?
6 A. There is definitely no such thing as I definitely saw it
7 for the first time on Monday.
8 Q. Is there anything that you have remembered or
9 recollected or seen that suggests that you were shown
10 that document ever before Monday?
11 A. No.
12 Q. Looking more widely, it was suggested to you that the
13 Metropolitan Police Service had known that AFOs were not
14 in close proximity to Carriage Gates in March 2017, but
15 took no action between March and September.
16 After the terrible events of March 2017, who bore
17 the primary responsibility of investigating, as you
18 understood it, the events of the day?
19 A. SO15, Counter Terrorism Command.
20 Q. Were you aware that there was a coronial investigation
21 in play as well?
22 A. That there would be.
23 Q. Were you tasked with the responsibility of investigating
24 the SO15 investigation or of commanding it?
25 A. No.

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1 Q. Did you have any responsibility at all for the direction
2 or command of the SO15 investigation?
3 A. No, it wouldn't have been right.
4 Q. Given that you are a very senior commander in
5 Parliamentary and Diplomatic Protection, would it have
6 been appropriate for you to be concerned?
7 A. Absolutely not.
8 Q. Were you tasked with an investigation into
9 Operation Classific ?
10 A. No.
11 Q. Were you tasked with an investigation into DPS?
12 A. No.
13 Q. When you saw and spoke to the AFOs in New Palace Yard,
14 were you aware that, of course, there were only two AFOs
15 on duty in sector 3 at that time?
16 A. No, I don't think so.
17 Q. How many AFOs do you believe, or would you have likely
18 believed, had been on duty on that day?
19 A. I don't think I want to say, sir, in terms of ...
20 Q. Okay, very roughly: two or three or more?
21 A. On duty across the whole estate?
22 Q. No, no, in sector 3?
23 A. Across the whole ...
24 Q. No, at that time?
25 A. I see.

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1 Q. So after lunch on that day.
2 A. I see. Two or three.
3 Q. Can you think of any reason why you would have spoken to
4 every AFO in New Palace Yard, which is what you said,
5 and not just PCs Ashby and Sanders if it were not for
6 the purpose of ascertaining their position on
7 occupational health?
8 A. No, as I said, I spoke to every AFO, every armed and
9 unarmed officer who were present in New Palace Yard on
10 that day.
11 Q. In fact, in your witness statement at paragraph 71, you
12 said that you were prepared to accept Messrs Ashby and
13 Sanders had had the honestly-held belief that they were
14 patrolling where they were meant to patrol?
15 A. Yes.
16 Q. Because it was suggested to you that you had in some way
17 sought to suborn their account and to put the Met
18 position and to perhaps assume or make them take the
19 fall for the Met. Were you, in fact, prepared to accept
20 what they had said, which is that they held
21 a honestly-held belief?
22 A. Yes, I was.
23 Q. Did you speak to them with any type of improper or
24 malign motive?
25 A. No, and I believe the meeting, as I said, started and

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1 finished amiably.
2 Q. And did you go into the meeting with the post notes
3 already in your possession?
4 A. They were on my desk but I didn't have them with me.
5 Q. In relation to the MM1, which was the form filled out by
6 officers from DPS, is that a form that you in any shape
7 or form would have been expected to fill out yourself?
8 A. No. No.
9 Q. Was it your job to initiate any sort of investigation by
10 DPS, to carry it out?
11 A. Not to carry it out. I believed it was my
12 responsibility having established what I thought I had
13 established, that it required independent investigation.
14 Q. If, having been told by Messrs Ashby and Sanders, that
15 they believed that they were patrolling correctly, but
16 when you, having read the post notes, believed that they
17 were not patrolling correctly, would it have been right
18 or proper not to bring that to the attention of DPS?
19 A. I don't believe so.
20 Q. Just some questions, please, now, about the
21 Palace of Westminster itself. In broad terms, as
22 a location requiring intense consideration of security
23 considerations, does it -- does the
24 Palace of Westminster present a difficult and complex
25 task?

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1 A. Yes, it does.
 2 Q. Because there are, of course, a very significant number
 3 of officers?
 4 A. Yes.
 5 Q. A very significant number of patrol areas?
 6 A. Yes.
 7 Q. In terms of the range and complexity of threats, is it
 8 one of the most difficult locations to police?
 9 A. Yes.
 10 Q. There is a blended model of armed and unarmed policing,
 11 is there not?
 12 A. There is.
 13 Q. And in relation to the operation of that model, were
 14 there and do there remain very significant and practical
 15 limitations on what the police can do?
 16 A. There are significant operational parameters.
 17 Q. And that ranges, does it not, from the geography of the
 18 estate?
 19 A. Yes.
 20 Q. The ability of the police to bring about physical
 21 changes to that infrastructure?
 22 A. Yes.
 23 Q. To move a gate, a wall?
 24 A. None of those things are within the gift of the police.
 25 We can only hope to influence.

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1 Q. In relation to access, does the estate present very real
 2 difficulties?
 3 A. Yes. And the parameters with which we are given to
 4 ensure that access at certain times is completely
 5 unfettered and at other times is free and open.
 6 Q. And we've heard, of course, something about the
 7 constitutional right of openness, the democratic
 8 imperative of having access to the Houses of Parliament,
 9 for several thousands of visitors, members of the
 10 public, and the members themselves?
 11 A. Yes.
 12 Q. Did, in March 2017, the police have a full discretion to
 13 operate as it would have entirely wished in relation to
 14 security arrangements?
 15 A. No, sir, were security the only consideration the model
 16 of course would have been very, very different.
 17 Q. In relation to the way in which the operational police
 18 model is imposed, could you just describe for us,
 19 please, the role of the tactical firearms assessor. The
 20 police may have a variety of different views or a range
 21 of views as to what could be done, but is it permissible
 22 to put into place arrangements concerning the use of
 23 firearms without specialist advice from a tactical
 24 firearms assessor?
 25 A. No, it's not, and as I think I described earlier, first

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1 of all the security coordinator will determine how best
 2 to mitigate threats and if in that determination they
 3 reached the conclusion that firearms are necessary, they
 4 don't complete that assessment themselves, they go in
 5 search of expert advice from a tactical firearms
 6 assessor, and that expertise is what is brought to bear.
 7 Q. We know that a number of post instructions were in place
 8 from time to time. Perhaps we could have on the screen
 9 {DC8048/1}. This is a schedule, Commander, of
 10 post instructions from 2010 through to, of course, the
 11 post instructions that were in force on the day?
 12 A. Yes.
 13 Q. Would all or any of these post instructions have been
 14 promulgated, put into effect only after there had been
 15 prior tactical firearms advice?
 16 A. Yes.
 17 Q. Is tactical firearms advice routinely made available to
 18 the officers, the PCs, who have to patrol the various
 19 sectors?
 20 A. No.
 21 Q. What is the sole document to which they must have regard
 22 for the purposes of defining their patrol area?
 23 A. The post notes.
 24 Q. Would you explain, please, perhaps again, but briefly,
 25 the importance of post instructions to a patrolling

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1 authorised firearms officer?
 2 A. The world of firearms is, by definition, extremely
 3 dangerous. It is an environment that operates in blacks
 4 and whites, because there is little, if any, room --
 5 margin for error or room for interpretation, so in all
 6 firearms environments, whether it's static guarding,
 7 patrolling, or the delivery of tactics on the streets of
 8 London, there are extremely clear parameters that are
 9 described to officers and that they understand about how
 10 they might deploy firearms, when they might deploy
 11 firearms, and that is entirely necessary for the safety
 12 of the officers and for the safety of the public.
 13 Q. In your first statement, perhaps we could have on the
 14 screen {WS5099/24}, and perhaps go back one page, please
 15 {WS5099/23}, there was on 22 May 2015 a review of
 16 security at Carriage Gates?
 17 A. Yes.
 18 Q. And you described there how that was a brief review
 19 requested by an MPS Chief Inspector, in fact
 20 Mr Aldworth; is that right?
 21 A. He commissioned it, yes.
 22 Q. He commissioned it. Responding to specific
 23 intelligence?
 24 A. Yes.
 25 Q. Was that report an authorised firearms assessor report?

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1 A. No.
 2 Q. Was it a tactical planning review?
 3 A. No.
 4 Q. Was it a general report about the arrangements in this
 5 particular area of the Palace of Westminster or
 6 a specific response to specific intelligence?
 7 A. I believe that it was a response to specific
 8 intelligence, the changes of threat level in which that
 9 then Chief Inspector Aldworth decided that something
 10 should be done and at least the circumstances examined
 11 to determine whether something could be done.
 12 Q. And is he to be commended for having raised the issues
 13 that are obviously raised?
 14 A. He was attempting to look after his own staff.
 15 Q. But he is not a trained firearms advisor?
 16 A. No.
 17 Q. And therefore must we approach this report on the basis
 18 that whatever it recommended would have to be considered
 19 in light of any subsequent tactical planning review?
 20 A. It was well intentioned but it is always going to be
 21 weaker than the tactical firearms advice.
 22 Q. And was there such a tactical planning review in fact on
 23 1 June 2015?
 24 A. Yes.
 25 Q. At the time a number of officers, in fact, Mr Aldworth

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1 himself agreed that he was one of them, raised issues
 2 and considerations and concerns in relation to security
 3 at Carriage Gates?
 4 A. Yes.
 5 Q. Was it in any way possible, would it have been in any
 6 way possible for those concerns or suggestions or
 7 recommendations to have been put immediately into effect
 8 without a tactical firearms review?
 9 A. Suggestions are made by my own staff and by, as I've
 10 said, members and the wider public, extremely regularly.
 11 We have to have a rigid system rooted in doctrine in
 12 order to determine the best model.
 13 Q. Why must there be a system which provides for the direct
 14 input of tactical advice and a system that reflects
 15 changes in threat and operational need?
 16 A. Because the number of possible threats, as I've said
 17 earlier, are bounded only by imagination. The number of
 18 potential tactical mitigations to those threats are also
 19 extensive. In order to bring sense from that volume of
 20 both consideration and mitigation, there needs to be
 21 a well run and resourced system, which is what we have,
 22 and had at that time.
 23 Q. So there may be changes in terms of threat?
 24 A. Yes.
 25 Q. Genesis, type, magnitude, source?

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1 A. Yes.
 2 Q. Changes of operational need?
 3 A. Yes.
 4 Q. Changes in resources?
 5 A. Yes.
 6 Q. Responses to specific intelligence?
 7 A. Yes.
 8 Q. As well as the issues that no doubt need to be
 9 considered when the safety of any police officer is
 10 under consideration?
 11 A. Yes.
 12 Q. Is it possible for all or any of those factors simply to
 13 be put into effect physically, outwith a system such as
 14 this?
 15 A. No, it would be chaotic. Every single aspect and
 16 variable within that system alters almost daily from the
 17 intelligence, to the threat level, firearms doctrine,
 18 available physical kit, it evolves extremely quickly.
 19 So it needs to have a system that will bring sense to
 20 all of that volume of information.
 21 Q. Carriage Gates themselves, was that but one issue which
 22 required operational and tactical consideration?
 23 A. It was but one issue.
 24 Q. On the day, of course, at that time, we all know that
 25 the division bell had rung?

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1 A. Yes.
 2 Q. And the gates were required to be open and to be left
 3 open?
 4 A. Yes.
 5 Q. Can you think of any circumstances which might have
 6 existed in March 2017 in which, notwithstanding the
 7 ringing of the division bell, those gates could have
 8 been shut at that time around about 14.40?
 9 A. No.
 10 Q. Was the issue of security at Carriage Gates ever
 11 a matter that was considered lightly, blithely, or
 12 without proper consideration?
 13 A. The evidence I have that from before my time on the
 14 command it was regularly and rigorously examined by both
 15 the police and parliamentary security, and that since my
 16 time, the same has remained the case.
 17 Q. You have spoken, and you've been asked questions about
 18 some of the competing factors or considerations involved
 19 in taking decisions about the location of authorised
 20 firearms officers.
 21 A. Yes.
 22 Q. Vulnerability?
 23 A. Yes.
 24 Q. Arising from predictability?
 25 A. Yes.

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1 Q. The need to ensure they cover a wide enough area to be
2 able to respond effectively to unknown threats from
3 unknown directions?
4 A. Yes.
5 Q. The need to introduce mobility, so as to confound
6 predictability?
7 A. Yes.
8 Q. And, of course, the need to ensure that there are enough
9 officers to counter possible, but not every threat?
10 A. No. The most likely worst case scenarios are the ones
11 that we mitigate against.
12 Q. And not so many officers that you are obliged to put
13 officers every 20 feet in a circle around
14 New Palace Yard?
15 A. Yes.
16 Q. Is there an obvious and easy solution to the balance
17 between those competing issues?
18 A. No, it is a balance that's faced by every police force,
19 law enforcement agency, domestically and
20 internationally. I've looked both domestically and
21 internationally at, sadly, similarly tragic attacks, and
22 I have not found a solution to the necessity of having
23 officers in proximity to the public and yet totally
24 safe.
25 Q. And that in itself raises a number of other ancillary

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1 issues, does it not, because proximity to the public
2 introduces a risk all of its own?
3 A. Yes.
4 Q. Authorised firearms officers as a general rule are
5 probably undesirably kept in close proximity to members
6 of the public?
7 A. We in most cases attempt to keep them separate.
8 Q. In your first statement you introduced a number of
9 historic reviews into security at the
10 Palace of Westminster --
11 A. Yes.
12 Q. -- and sought to focus on those reviews where they
13 address the issue of security in New Palace Yard?
14 A. Yes.
15 Q. One, for example, September 2004, the security of the
16 parliamentary estate, could we have up {WS5099/19},
17 please. At the bottom of the page you will see the
18 header "September 2004 -- The Security of the
19 Parliamentary Estate", and then over the page
20 {WS5099/20}, some paragraphs concerning that report.
21 A. Yes.
22 Q. When considering the issue of the positioning of armed
23 officers at gates, is there a genuine concern that
24 officers may not have sufficient cover, or that they
25 might be rushed by somebody attacking from outside the

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1 Palace of Westminster from the public area?
2 A. That concern is addressed.
3 Q. Operation Standfast, 6 July 2013, on page 20 of your
4 report, of your statement, we can see there at the
5 bottom of the page "Operation Standfast --
6 6th July 2013". You turned to this report in response
7 to some follow up questions from the Inquest team in
8 your third statement of 28 August.
9 A. Yes.
10 Q. Could we just have that, please {WS5108/1}, and
11 {WS5108/2}, paragraph 9 you refer to that July 2013
12 report, Operation Standfast, and you note how that
13 report commented that:
14 "... the level of security, vis-à-vis
15 police/security staff was highly predictable, and that
16 the shift changes were clearly recognisable, as was the
17 rotation of officers and security staff between posts.
18 The conclusion was that predictability undermined the
19 effectiveness of the guard force."
20 A. Yes.
21 Q. Is there an easy way in which authorised firearms
22 officers can be given mobility so as to undermine
23 predictability without at the same time pulling them
24 away from every potential area from which a threat may
25 emerge?

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1 A. The tactic of short patrols would be the response to
2 that.
3 Q. And the doctrine, or the suggestion of short patrols,
4 was that the doctrine which was instituted by virtue of
5 the post instructions from November 2014 on?
6 A. Yes.
7 Q. Were both the post instruction in force on the day
8 of March 2017 and its earlier emanation consistent in
9 both advocating the short patrol?
10 A. I believe so, yes.
11 Q. Was the short patrol, in your professional opinion, and
12 those of the authorised firearms officers -- tactical
13 advisors, I apologise -- the best way of meeting these
14 competing demands?
15 A. Yes.
16 MR ADAMSON: Does my learned friend trespass with that
17 question into the question of expertise being delivered
18 to an issue which Commander Usher has indicated he is
19 not an expert.
20 MR KEITH: That's an entirely fair point and I sought, in
21 fact, to correct myself by referring to the tactical
22 firearms advisors.
23 Page 13, paragraph 7 of that earlier Standfast
24 report is identified by you in paragraph 11 of your
25 third statement, if you could go one page further on

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1 {WS5108/3}, you say this:

2 "[The] paragraph comments that the visible use of
3 armed officers will always provide ... a 'Disrupt' and
4 'Deter' effect, but that the effect is limited on
5 account of the lack of sterile ground, close proximity
6 to public areas and the tactical need to separate such
7 officers from routine interaction with staff and
8 visitors."

9 Is that a useful summary of some of the problems or
10 the tactical issues that are raised in this area?

11 A. Indeed, sir. Yes.

12 Q. And then further down, paragraph 4 of page 22, towards
13 the bottom of that page {WS5108/22}, you note that the
14 Standfast report identified that:

15 "... Carriage Gates entry point, if profiled
16 correctly, would provide the easiest method by which
17 a person with weapons could enter the Palace. [But you
18 say] The fact that Carriage Gates was, obviously one of
19 the most difficult points on the estate to police ...
20 has long been recognised."

21 A. Yes.

22 Q. "It is for this reason that it has been the subject of
23 repeated recommendation and tactical assessment and the
24 position of armed and unarmed officers and the physical
25 security mitigation has of course changed

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1 significantly ..."

2 A. Yes.

3 Q. Has it indeed?

4 A. Yes.

5 Q. The post instructions themselves were, as we've heard,
6 available on ADAM, and you've been asked questions about
7 how often officers logged in. As we've seen from the
8 schedule, and as you said a few moments ago,
9 post instructions changed, but not frequently. Would
10 there have been a requirement on officers to log into
11 ADAM daily or even weekly, perhaps not even monthly, or
12 at least unless and until post instructions, new ones,
13 were introduced?

14 A. There is a responsibility on officers to understand the
15 post notes that are in force on that day, but, as I've
16 said to you, post notes change infrequently, and
17 therefore I don't think I could say how frequently or
18 otherwise an individual officer should log-in. It would
19 depend very much on their role and probably their rank.

20 Q. You mentioned a hard-copy binder containing
21 post instructions, which was available in the base room
22 from which the AFOs operated. Are you aware of any
23 other method, electronic or otherwise, by which officers
24 could be alerted to the fact that a post note had been
25 newly promulgated and therefore there was a requirement

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1 to check on ADAM?

2 A. Supervisors would be alerted to that fact.

3 Q. Was it your understanding that officers in general terms
4 were perfectly aware of the ADAM system and perfectly
5 aware of post instructions?

6 A. That's -- yes, sir.

7 Q. Was it ever brought to your attention that there was
8 a generic systemic failure on the part of AFOs and their
9 supervisors to become aware of post instructions?

10 A. No, I was not aware of that. I cannot see a reason why
11 there would have been, and particularly in the area of
12 firearms, that's even less likely than in wider
13 policing. It does occur, no supervisory system is
14 perfect, not every officer always is acting in
15 accordance with the instructions they've been given, but
16 I have no reason to believe in a systemic failure.

17 Q. What is the Metropolitan Police position in relation to
18 whether there was a degree of flexibility in the
19 post instructions?

20 A. There is no flexibility in the interpretation of
21 post instructions. That is part of the reason for them.

22 Q. As the commander responsible, as you've agreed, for the
23 system, and based on your -- and, I accept, non-tactical
24 expert understanding -- would a lengthy static position
25 in the near vicinity of the colonnades be in close

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1 proximity to Carriage Gates?

2 A. I don't think it could be described as that.

3 Q. You were asked about Inspector Munns' chart. Could we
4 just have {WS5131/23} on the screen, please, and the
5 entry on 25 November 2015, the 11.00 entry. It was
6 suggested to you, in fact, by my learned friend
7 Mr Hough, that the post instruction at that time would
8 have been to be on the gate. I'm sure that that was
9 a reference to close proximity. Would you accept that
10 at that time, November 2015, that the post instructions
11 required close proximity to the gate, not on the gate?

12 A. Yes.

13 Q. You were asked questions about the map, which was
14 contained in the briefing from Superintendent Causer,
15 {WS1237C/3}. This is, as we've seen from a witness
16 statement, part of a PowerPoint document sent out by
17 email to a number of police officers, but certainly
18 including supervisors, and Superintendent Causer's email
19 found its way, in fact, to either PC Ashby or
20 PC Sanders. It is a map which demonstrably states
21 sector 3 --

22 A. Yes.

23 Q. -- as showing the whole of that area?

24 A. Yes.

25 Q. Does that map say anything about the means by which it

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1 is to be patrolled?
 2 A. No, it does not.
 3 Q. Does it say anything about post instructions?
 4 A. No, and now that you have given me the context of who
 5 sent this map, which I don't think I was given in
 6 cross-examination earlier, I understand exactly what the
 7 purposes of this map is, and it is nothing --
 8 Q. What was it?
 9 A. This was an assignment -- we were getting firearms
 10 officers from outside the Palace of Westminster who were
 11 on routine patrol across London, who because of the
 12 uplift in their numbers had some capacity for work, and
 13 we were requesting and getting them as a part of routine
 14 activity to come on to the estate. They were unfamiliar
 15 with the estate, superintendent Causer sent out
 16 a PowerPoint to all of our own staff to determine how
 17 they were to be welcomed and shown through the estate as
 18 a general way of increasing the knowledge of what the
 19 estate was amongst all firearms officers.
 20 Q. You have heard of, and no doubt you have thought long
 21 and hard about the map on the base room wall --
 22 A. Yes.
 23 Q. -- produced by PC Ashby, and also produced thereafter in
 24 better form by an officer from SO15, which we have seen
 25 has red dots with personal alarm locations on it, and

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1 unredacted, a reference to alarm locations?
 2 A. Yes.
 3 Q. In your experience, and as the Commander of PaPD, is
 4 that map a post instruction?
 5 A. No, it is not.
 6 Q. But PCs Ashby and Sanders as AFOs on that terrible day,
 7 could they have ignored, in your view, the explosive
 8 noise, the noise believed by some present to be
 9 an explosion that took place on Bridge Street?
 10 A. No, they could not.
 11 MR KEITH: I have no further questions, sir.
 12 MR HOUGH: Sir, nothing more from me save to thank
 13 Commander Usher for giving evidence over some time and
 14 for his work on the various statements.
 15 THE CHIEF CORONER: Yes, thank you very much. I'm sorry if
 16 I've inconvenienced you by having you back today, but
 17 you can probably understand why we needed to, but thank
 18 you very much.
 19 A. Indeed, sir, thank you.
 20 THE CHIEF CORONER: Mr Hough, we didn't take a morning
 21 break, my apologies to the shorthand writers. What I am
 22 going to suggest is we break there and we sit again at
 23 2.00. We have two witnesses, I think, to cover this
 24 afternoon.
 25 MR HOUGH: I think we should be able to cover both

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1 Mr Hepburn and Chief Superintendent Morris.
 2 THE CHIEF CORONER: As I mentioned to, I think, all counsel
 3 who were in court yesterday afternoon, I need to be away
 4 by 4.30 at the latest, so we will endeavour to do that
 5 if we can.
 6 MR HOUGH: Yes, sir.
 7 THE CHIEF CORONER: I'll rise.
 8 (12.49 pm)
 9 (The Luncheon Adjournment)
 10 (2.06 pm)
 11 THE CHIEF CORONER: Yes, Mr Hough.
 12 MR HOUGH: Mr Hepburn, please.
 13 MR ERIC HEPBURN (Sworn)
 14 THE CHIEF CORONER: Mr Hepburn, as with any other witness,
 15 make yourself comfortable, whether that's sitting or
 16 standing.
 17 A. Thank you very much.
 18 Examination by MR HOUGH QC
 19 MR HOUGH: Would you please give your full name to the
 20 court.
 21 A. Eric Hepburn.
 22 Q. Mr Hepburn, you understand, I'm asking you questions on
 23 behalf of the Coroner first and then you may be asked
 24 questions by other lawyers?
 25 A. I do, thank you.

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1 Q. What is your current post?
 2 A. I'm the Director of Security for Parliament.
 3 Q. When did you take up that post?
 4 A. On 1 September 2016.
 5 Q. Before that, what were your last couple of relevant
 6 posts?
 7 A. I was Head of Security for the Foreign Office and before
 8 that I was HM Consul-General and Counsellor of Corporate
 9 Services in the USA.
 10 Q. Mr Hepburn, do you understand you are here to give
 11 evidence about the security arrangements at the Palace
 12 of Westminster?
 13 A. I do.
 14 Q. You've made a statement on that subject which you may
 15 make reference to as you wish.
 16 A. Thank you.
 17 Q. Your statement covers a lot of ground and, just so you
 18 know, I'm going to focus on matters of greatest interest
 19 and relevance to the Inquest, if I may.
 20 Beginning, if I may, with the background and
 21 structure of the Parliamentary Security Department,
 22 first of all, the department you head, I think, is
 23 called the Parliamentary Security Department?
 24 A. It is, yes.
 25 Q. What is its responsibility, in a sentence or two?

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1 A. We're responsible, or I'm responsible for the
 2 operational security of Parliament, and Parliament for
 3 this purpose covers the House of Commons and the House
 4 of Lords.
 5 Q. To whom or to what bodies does your department report?
 6 A. I have several reporting lines. On the political side
 7 I report to both Mr Speaker in the House of Commons and
 8 the Lord Speaker in the House of Lords. From
 9 a corporate view, I report to the Clerk of the
 10 House of Commons and the Clerk of the House of Lords,
 11 and I also report to the Director General of the
 12 House of Commons.
 13 Q. Is it right also that there are bodies who are
 14 responsible for administration and services of the
 15 House of Commons and Lords called the House of Commons
 16 Commission and the House of Lords Commission?
 17 A. That's correct.
 18 Q. And do they, to an extent, oversee the work of your
 19 department?
 20 A. They have ultimate responsibility for security on both
 21 Houses and they're chaired by the Speaker and the Lord
 22 Speaker respectively.
 23 Q. Is your department also, in addition to those lines of
 24 reporting and that oversight, also subject to oversight
 25 by a members' consultative panel on security?

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1 A. Yes.
 2 Q. As a matter of history, when did the Parliamentary
 3 Security Department, PSD, first come into existence?
 4 A. It came into existence on 1 January 2016.
 5 Q. Before that time, was there still a director of
 6 security?
 7 A. There was, there was a director of security and before
 8 that, a security coordinator.
 9 Q. What was the main difference, in practical terms, that
 10 took -- that we saw with the coming into existence of
 11 the PSD?
 12 A. Before the role which I currently occupy, the director
 13 of security was responsible for security strategy and
 14 direction, but the operational security was divided
 15 between the Black Rod in the House of Lords and the
 16 Sergeant at Arms in the House of Commons.
 17 Q. I think the PSD came into existence as a result of
 18 recommendations from some security reviews?
 19 A. It did, yes.
 20 Q. What, in a nutshell, was the recommendation, or set of
 21 recommendations, that brought it into existence?
 22 A. It came into existence following a report in 2014 by
 23 Sir Paul Jenkins QC who was asked to look at security
 24 because the House considered security to be unclear and
 25 slightly dysfunctional. The recommendation from that

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1 report was that a single person was appointed to be
 2 director of security covering both houses.
 3 Q. So combining the strategic and operational roles?
 4 A. Correct.
 5 Q. We've heard that at the Palace, security is provided by
 6 a combination of police officers and security staff?
 7 A. Correct.
 8 Q. Is it right to say that those security staff had been
 9 employed by the Metropolitan Police before 2016, but are
 10 now employed by the House of Commons?
 11 A. Yes, the security officers who now work at the
 12 House of Commons in my department, prior to
 13 1 April 2016, were Metropolitan Police civilian officers
 14 and they TUPE'd across.
 15 Q. You tell us in your statement that your department
 16 employs a little over 400 people?
 17 A. Yes.
 18 Q. And that the great majority of those are the security
 19 officers who carry out tasks such as manning visitor
 20 search points, monitoring CCTV, and overseeing
 21 communications?
 22 A. Yes.
 23 Q. May we turn, now, to the respective roles of the
 24 Parliamentary Security Department and the
 25 Metropolitan Police. You deal with these from page 6 of

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1 your witness statement, if it helps.
 2 We have heard already that police deployments at the
 3 Palace are governed by a special service agreement?
 4 A. Correct.
 5 Q. That, I think, is an agreement between the
 6 Metropolitan Police and the two Houses of Parliament.
 7 A. Correct.
 8 Q. We've heard already that the police contingent fall
 9 within the Parliamentary and Diplomatic Protection group
 10 or division under Chief Superintendent Johnson?
 11 A. Yes.
 12 Q. And that she, in turn, reports up to Commander Usher?
 13 A. Correct.
 14 Q. In summary, is it right to say that the responsibility
 15 for security at the Palace is shared between your
 16 department and the Metropolitan Police?
 17 A. The responsibility for security in Parliament is my
 18 responsibility on a day-to-day basis, but it is
 19 undertaken in partnership with the Metropolitan Police.
 20 Q. In the event of an emergency at the Palace or a crime
 21 being committed somewhere at the Palace, what happens?
 22 A. Operational control for that incident immediately passes
 23 to the Metropolitan Police.
 24 Q. In practical terms, what does that mean?
 25 A. It means that in practical terms, if an incident occurs

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1 or an emergency happens, the Metropolitan Police will
 2 immediately take charge of resolving that incident. My
 3 staff on the parliamentary side will then be responsible
 4 for looking after the members and staff and visitors and
 5 keeping them out of harm's way, and also cooperating
 6 with the Metropolitan Police to help them do their job.
 7 Q. In the ordinary course, do you have periodic meetings
 8 with Chief Superintendent Johnson to deal with strategic
 9 issues?
 10 A. I have regular meetings with Chief Superintendent
 11 Johnson.
 12 Q. Are there also more regular meetings attended by
 13 representatives of the Metropolitan Police in your
 14 department?
 15 A. Yes, there are.
 16 Q. You describe them in your witness statement as including
 17 weekly risk assessment meetings?
 18 A. Correct.
 19 Q. Give us an idea: what sort of risks would be discussed
 20 in those meetings and what sort of decisions made?
 21 A. During Parliament sitting, there are regular meetings of
 22 the chambers and also committee meetings. What we would
 23 be looking at in those meetings is to look at the risk
 24 that might be posed to security and, I guess, safety of
 25 Parliament of those meetings. So we would look at who

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1 was attending, what kind of subjects might be debated,
 2 and therefore, what kind of resourcing might be needed
 3 to be allocated to where.
 4 Q. On a daily basis is it right that briefings are provided
 5 to staff in your department and Metropolitan Police
 6 staff?
 7 A. Correct.
 8 Q. What sort of subject matter do those briefings cover?
 9 A. Those briefings will tell the officers on the ground
 10 precisely what kind of meetings are taking place that
 11 day, also whether there are any very important people
 12 coming into Parliament who have to have special
 13 arrangements made, potentially what kind of cars or
 14 which cars are coming into the Palace which they need to
 15 be aware of.
 16 Q. Security of the estate. Who has political
 17 responsibility or accountability for that?
 18 A. The political responsibility is with both speakers.
 19 Q. And the legal responsibility?
 20 A. Legal responsibility is with clerks of both houses, as
 21 are accounting officers.
 22 Q. Under the service agreement, is it right that the chief
 23 superintendent is responsible for the provision of
 24 police officers?
 25 A. Correct.

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1 Q. And at any given time is it right that there's a duty
 2 security operations manager from your department who is
 3 responsible for the management of your department's
 4 staff?
 5 A. Yes, I have a duty security operations manager on duty
 6 all the time, 24/7.
 7 Q. Is it also right to say that at any given time there's
 8 a duty officer for the police?
 9 A. Correct.
 10 Q. So that the two of them can liaise on matters of common
 11 interest?
 12 A. Yes.
 13 Q. Armed policing next, please. Whose responsibility is it
 14 for deciding on deployments of armed police officers
 15 around the Palace?
 16 A. It is the Metropolitan Police's responsibility.
 17 Q. Would your department ever express views on the need for
 18 armed officers in particular areas?
 19 A. No, it's a highly specialist area and we rely on the
 20 Metropolitan Police to give us advice and guidance on
 21 that area.
 22 Q. If you or your staff strongly believed that armed
 23 officers were needed in a particular area, or needed to
 24 be moved from one place to another, is that something
 25 you could bring to the attention of your police

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1 colleagues?
 2 A. By meeting regularly, then yes it is, but it's not
 3 something we would seek to interfere with. We rely on
 4 the expert advice of the Metropolitan Police to tell us
 5 where those officers should be deployed and how they
 6 should be deployed.
 7 Q. Are police tactical assessments shared with your team,
 8 including tactical assessments governing the deployment
 9 of armed officers?
 10 A. We will be aware of them, yes.
 11 Q. Would you be given copies?
 12 A. That I can't say, I am afraid.
 13 Q. Are you aware that police officers, specifically armed
 14 officers at different points around the estate, work in
 15 accordance with post notes, or post instructions?
 16 A. Yes, I am aware.
 17 Q. Do you and your team have access, and are you given
 18 copies of, those post notes?
 19 A. No, we are not.
 20 Q. Would there be any value in your team having access to
 21 police post notes to understand where the officers ought
 22 to be in relation to them?
 23 A. No, I think the way that we divided it up is that from
 24 an operational security point of view we have our own
 25 post notes, and that's my responsibility and my team's

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1 responsibility to manage our own security officers ,
 2 exactly the same way as the Metropolitan Police who have
 3 their own post notes for them to manage their staff .
 4 Q. So you might have a post note for governing a search
 5 point or another post, a door post, for example, on the
 6 estate covered by one of your staff , which effectively
 7 tells that member of staff what they should be doing
 8 over the course of their shift ?
 9 A. That's correct .
 10 Q. And you have a set of those which sit alongside , but
 11 separate from, the police officers ' post notes ?
 12 A. Yes .
 13 Q. Now, turning to the day-to-day business of the
 14 parliamentary estate . Is it right to say, as some
 15 others have told us, that a balance has to be struck
 16 between the openness and security of the parliamentary
 17 estate ?
 18 A. Yes, it is .
 19 Q. Is it regarded by the Parliamentary Authorities as
 20 important that visitors should be able to come to the
 21 Palace of Westminster with minimal disruption and with
 22 as much access as possible ?
 23 A. It 's an important democratic right for people to be able
 24 to come to Parliament, meet their Member of Parliament,
 25 and visit the organisation . Yes, that 's absolutely

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1 correct .
 2 In terms of minimal disruption, they would still
 3 have to come through security to do that .
 4 Q. In your witness statement you indicate as an estimate
 5 that the Palace has more than a million visitors a year ?
 6 A. That's correct .
 7 Q. And is it right that, as we've heard from others, that
 8 no advance permission is required for visiting ?
 9 A. That's correct, yes .
 10 Q. And that the only ticketing is for Prime Minister's
 11 Questions ?
 12 A. Yes .
 13 Q. Can we move on to the geography of New Palace Yard, that
 14 particular area of the parliamentary estate . We've
 15 heard about that from some other witnesses, but is it
 16 right to say that in March 2017 it had -- that area had
 17 a range of physical security barriers especially for
 18 vehicle access ?
 19 A. Yes, it did .
 20 Q. If we can bring up on screen {WS5100/32}. Now, I'm not
 21 going to go through all the details of this document,
 22 Mr Hepburn, but is this a document provided with your
 23 witness statement which shows the sheer number of
 24 different security features and barriers in the
 25 New Palace Yard area ?

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1 A. Yes, it is .
 2 Q. May I deal with one specific point about structures in
 3 the area of New Palace Yard, although outside it , and
 4 for this purpose I'll need to go to a different plan,
 5 {DC7989/80}. Now, this is another plan of
 6 New Palace Yard and at the very top of the page towards
 7 the right do you see a line of hostile vehicle
 8 mitigation barriers beyond the pavement and outside and
 9 at the base of the Elizabeth Tower ?
 10 A. I do, yes .
 11 Q. Now, the point has been made that they provided
 12 effective protection to quite a number of pedestrians
 13 who would otherwise have been hit by Khalid Masood's
 14 vehicle on the day of the attack ?
 15 A. That's correct .
 16 Q. Now, the Inquest team asked your department for
 17 an explanation for the rationale of these barriers in
 18 a form that can be disclosed , and we've been given
 19 a form of words which I'm going to quote and ask you to
 20 confirm .
 21 A. Thank you .
 22 Q. The form of words is :
 23 "The HVM barriers on Bridge Street were installed to
 24 held guard against assessed infrastructure risks to the
 25 parliamentary estate . They were not intended as

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1 a barrier to protect pedestrians ."
 2 A. That is correct .
 3 Q. We can take that plan down now .
 4 May we turn on to the arrangements for gates and
 5 barriers being opened and closed in New Palace Yard ?
 6 We have heard that as at March 2017, both the sets
 7 of vehicle gates at Carriage Gates, north and south,
 8 were open and left open while the House of Commons was
 9 sitting ?
 10 A. Yes .
 11 Q. We've also heard that the external crowd control
 12 barriers which had been introduced a little time before,
 13 were closed except when vehicles were being allowed to
 14 enter and leave, and except at times of high vehicle
 15 throughput, and except during divisions ; is that correct
 16 as a summary ?
 17 A. It is .
 18 Q. Looking at paragraph 32 of your witness statement, are
 19 you able to help us with the rationale behind all those
 20 practices ?
 21 A. I've done a search, actually , to see when a decision was
 22 made as to when we would leave the blockers and barriers
 23 up, or down in terms of if it was an eight-minute rule,
 24 and actually I can't find anything in our documentation
 25 to show that . So in my statement I've used the term

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1 "custom and practice", and that is, as far as I'm aware,
 2 it has always been custom and practice in that area.
 3 Q. If anyone, either anyone from your department or from
 4 the police, had wanted to express concern about the
 5 practice of leaving the external crowd control barriers
 6 open during divisions, how would they have done that?
 7 A. They would have raised it with my department and we
 8 would have taken that up through the House, if
 9 necessary. But actually, for crowd control barriers, it
 10 would have been a local decision and it would have been
 11 a decision that we could have taken in the Parliamentary
 12 Security Department.
 13 Q. Did anyone express concern about that as a security
 14 matter?
 15 A. No.
 16 Q. If an issue had arisen about the gates themselves being
 17 opened or closed, who would have taken that decision?
 18 A. It would have been raised by the Metropolitan Police, it
 19 would have come through my department as the
 20 Parliamentary Security Department. We would have then
 21 taken that through the House and it would ultimately
 22 have sat, I think, with both speakers of the House to
 23 make a decision.
 24 Q. Is it right to say that the opening and closing
 25 arrangements for these gates, and, indeed, for the

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1 barriers, can have an effect on the speed with which MPs
 2 can get into Parliament to vote?
 3 A. By opening and closing a gate it will, indeed, impede
 4 that, although it's a question as to whether that would
 5 be a problem with the eight minutes they have to do
 6 that.
 7 Q. Who would ultimately make the decision about whether
 8 a different practice of opening and closing the gates,
 9 which might cause serious inconvenience to MPs in
 10 voting, whether that should be adopted?
 11 A. I think that would go to the speakers. It would go to
 12 the commissions of both houses for their decision.
 13 Q. Are you aware of any decision of that kind having
 14 actually had to be considered and made?
 15 A. No.
 16 Q. May we turn, then, to the topic of the police and
 17 security personnel stationed in and around
 18 New Palace Yard. Now, is it right to say that on
 19 22 March there were four security officers from your
 20 department in the vehicle search area of
 21 New Palace Yard?
 22 A. There were actually three.
 23 Q. Were there any other staff in the New Palace Yard area?
 24 A. Not from the Parliamentary Security Department.
 25 Q. Would there have been a doorkeeper at members' entrance?

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1 A. There was, indeed, yes.
 2 Q. The gates, as we've heard, were manned entirely by
 3 police officers?
 4 A. Yes.
 5 Q. Do we take it from your previous answers that directions
 6 to them, and post notes to them, were entirely a police
 7 matter?
 8 A. That's correct.
 9 Q. Defensive equipment next, please. Is it right to say
 10 that officers of your department wear body armour
 11 approved by the Home Office?
 12 A. Yes.
 13 Q. And that they're issued with personal radios?
 14 A. Yes.
 15 Q. And that those personal radios are conventionally tuned
 16 to a channel which is shared with the police officers at
 17 the Palace?
 18 A. At that time, yes.
 19 Q. But is it also right that none of them carries weaponry
 20 of any kind?
 21 A. Correct.
 22 Q. Looking, then, specifically, at the numbers and
 23 locations of armed officers prior to the attack. Were
 24 you aware in March 2017 that Carriage Gates had been
 25 identified by the police, both in tactical assessments

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1 and in security reviews, as being a particularly
 2 vulnerable entry point for any attacker into the estate?
 3 A. I'm aware that previous reports had looked at that area,
 4 yes.
 5 Q. Were you aware that they had actually identified this
 6 entry point as representing a vulnerability?
 7 A. Yes, I am. I was.
 8 Q. Did you ever think, did it ever occur to you in your
 9 post, that adequate security at those gates would
 10 require or benefit from a visible presence of armed
 11 guards?
 12 A. I was very comfortable with the recommendation that
 13 I received from the Metropolitan Police to put armed
 14 police at the perimeter of our estate, including
 15 New Palace Yard.
 16 Q. You refer to a recommendation. What specific
 17 recommendation are you talking about there?
 18 A. It's, as I was explaining, we have perimeter security
 19 provided by the Metropolitan Police, they do both armed
 20 and unarmed police, they were the ones that make
 21 recommendations which then come to Parliament. I was
 22 comfortable with their recommendations.
 23 Q. In March 2017 did you have a specific understanding
 24 about where the armed officers in New Palace Yard ought
 25 to be when they were on duty during the working day?

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1 A. No, I didn't have that level of understanding.
 2 Q. Would any of your subordinates within your department
 3 have had that level of understanding as a matter of
 4 their job, rather than something that they just happened
 5 to notice?
 6 A. They may have been briefed but it wouldn't be their job
 7 to either decide on where deployment or how deployment
 8 happens, where officers stand or anything of that
 9 nature. They would be aware that the
 10 Metropolitan Police would be putting armed officers in
 11 that area, however.
 12 Q. Would you or any of your colleagues in your department
 13 have been aware whether firearms officers in
 14 New Palace Yard were acting in accordance with their
 15 post instructions?
 16 A. No, they wouldn't be, no.
 17 Q. Would you, or anyone in your department, be monitoring
 18 where police officers were in New Palace Yard or any
 19 other part of the estate?
 20 A. No, it wasn't their role to do that.
 21 Q. The suggestion might be made that in order to do your
 22 job properly, which involved liaising with the police,
 23 your department needed some awareness of the level of
 24 security, particularly armed security, at the main
 25 entrances to the Palace?

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1 A. We would certainly have a general awareness and
 2 understanding of the thinking of the
 3 Metropolitan Police, in terms of recommending having
 4 armed and unarmed police.
 5 As to the thinking in terms of where they precisely
 6 stand, no, that wouldn't be something we would have.
 7 Q. Training for security officers next, please. When the
 8 PSD was established, you've told us that security
 9 officers transferred from Metropolitan Police to
 10 House of Commons employment. Those officers who had
 11 come from the Metropolitan Police, may we take it that
 12 they had received police basic training?
 13 A. You can.
 14 Q. That included, I think, officer safety training?
 15 A. Yes.
 16 Q. Emergency life support?
 17 A. Yes.
 18 Q. And training on the layout of the parliamentary estate?
 19 A. Correct.
 20 Q. Would those security officers be required to familiarise
 21 themselves with only their own post notes or post notes
 22 across the estate generally?
 23 A. They would familiarise themselves with the post notes to
 24 the posts which they had been assigned to.
 25 Q. Briefings next, please. You've told us that briefings

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1 were delivered to security officers on a daily basis.
 2 Prior to the attack, were those briefings separate from
 3 the briefings delivered to police officers?
 4 A. They were, yes.
 5 Q. Now, I think you're aware that reviews since the attack
 6 have raised concern that three groups involved in
 7 providing security, that's to say your department's
 8 officers, police unarmed officers and police armed
 9 officers, tended to work in silos, an approach
 10 reinforced by them having separate briefings; do you
 11 understand?
 12 A. I'm aware of that, yes.
 13 Q. Has anything been done about that?
 14 A. Yes, they're now briefed jointly, on a daily basis, to
 15 counter that.
 16 Q. Do you consider, looking back, that it was a matter of
 17 concern that these groups were identified as working in
 18 silos?
 19 A. I don't -- I guess, yes, but I'm not sure that on the
 20 day of the attack it would have had any impact whether
 21 they'd been briefed together or not.
 22 Q. Exercises next, please. At the time of the attack, was
 23 it a regular practice for table-top security exercises
 24 to be carried out, involving both the
 25 Metropolitan Police and officers of your department?

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1 A. It was, yes.
 2 Q. So that involved an aspect of working together and
 3 practising together?
 4 A. Yes.
 5 Q. There have been, I think, numerous reviews of security
 6 of Parliament over the years?
 7 A. Yes.
 8 Q. And since the attack there has been, I think,
 9 a comprehensive review of security by Sir Jon Murphy,
 10 who has made further recommendations?
 11 A. Correct.
 12 Q. Now, the great majority of matters covered by these
 13 reviews aren't relevant for our purposes, but may we
 14 consider a few of them and ask for your assistance?
 15 A. Yes, of course.
 16 Q. First of all, at page 19 of your witness statement you
 17 address a report called Operation Standfast, based on
 18 a particular security exercise?
 19 A. Yes.
 20 Q. Did that exercise and the report on it, identify
 21 Carriage Gates as a method by which an attacker could
 22 enter the Palace?
 23 A. I understand it did, but no recommendations were made
 24 regarding the gates in that report.
 25 Q. Is it right to say that the recommendations made focused

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1 on the operation of the passholder system?
 2 A. It is, and vehicles as well.
 3 Q. Moving, then, to a review in 2013, a review of security
 4 of the parliamentary estate. Did this review make
 5 a recommendation of the effectiveness of vehicle
 6 barriers as a means of deterring pedestrians in the
 7 New Palace Yard area?
 8 A. It did, yes.
 9 Q. Was that recommendation implemented promptly?
 10 A. It was put into a longer term project to look at the
 11 whole of New Palace Yard.
 12 Q. Had that project been carried out in March 2017?
 13 A. No, it had not.
 14 Q. Has that project had to undergo a revision and re—think
 15 as a result of the attack?
 16 A. It has, yes.
 17 Q. Just to be clear about this recommendation, if it had
 18 been brought in with some changes to the infrastructure,
 19 would it have protected police officers at the gates?
 20 A. No, it would not. It didn't address the gates in terms
 21 of opening or closing.
 22 Q. Would it, however, potentially have prevented
 23 an attacker from penetrating beyond where we know the
 24 vehicle barriers were?
 25 A. That was the idea of that work, yes.

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1 Q. Now, of course, we know that Masood was stopped by other
 2 means, but it would have had that beneficial effect?
 3 A. Correct.
 4 Q. Then moving on to page 21 of your report, we know, we
 5 have heard from others, that there was a police review
 6 of security at Carriage Gates in May 2015. Did that
 7 review make recommendations about infrastructure?
 8 A. It did, yes.
 9 Q. Did it recommend in particular the installation of
 10 bollards as a protection against vehicle attack?
 11 A. It did.
 12 Q. In advance of that review, did one police officer
 13 recommend that the best protection for officers at
 14 Carriage Gates was to keep the gates closed and have
 15 officers operating behind them?
 16 A. Those comments were made in that report, yes, but it
 17 wasn't a recommendation at the end of that report.
 18 Q. Did the officer in question refer to the gates as
 19 a known, obvious vulnerability?
 20 A. I can't recall his words, no.
 21 Q. In your witness statement at paragraph 67, six lines
 22 down, you say PSD, your department:
 23 "... acknowledged that the gates had been known for
 24 many years to be one of the more obvious
 25 vulnerabilities."

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1 A. Yes, that's correct.
 2 Q. Was, to your knowledge, the possibility of having the
 3 gates closed seriously considered in your dealings with
 4 the police around that time?
 5 A. In my dealings in post, no, they were not. I am aware,
 6 though, that my predecessor looked at that issue, and
 7 discussed it internally and with the
 8 Metropolitan Police.
 9 Q. Are you aware what view was taken in those discussions?
 10 A. Yes, my predecessor, actually, who I would regard as one
 11 of the UK's security experts, did look at this issue of
 12 whether we should or should not close the gates, and
 13 discussions were held. His conclusion was that although
 14 closing the gates had benefits, it also had potential
 15 downsides because if the officers are opening and
 16 closing gates on a regular basis, it might well distract
 17 them from doing their day-to-day job, and I think on
 18 balance it was decided not to recommend the closing of
 19 those gates.
 20 Q. Now, we know from Commander Usher's evidence that this
 21 review recommended having authorised firearms officers
 22 stationed at Carriage Gates in fixed posts. Had you
 23 read this particular report before March 2017?
 24 A. Which report is that?
 25 Q. The report from this review, the report from the

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1 Carriage Gates security review?
 2 A. Not before 22 March.
 3 Q. Were you aware when you came into post, that this
 4 recommendation had been made to have armed officers
 5 stationed in fixed posts at Carriage Gates?
 6 A. No, I was aware that we had on—site armed and unarmed
 7 officers from the Metropolitan Police. As to their
 8 locations, no, I wasn't aware of that.
 9 Q. May we move on to another review and a report arising
 10 from it, a review of a theft from a restaurant on the
 11 estate, which you address from paragraph 68 of your
 12 report.
 13 A. Yes.
 14 Q. That was, I think, a report arising from a particular
 15 event of intrusion and theft?
 16 A. Yes.
 17 Q. The review, you tell us in your statement, noted that
 18 the police would review deployment at Carriage Gates and
 19 would look at the policy of keeping the gates open even
 20 when traffic volumes were low; is that right?
 21 A. That's correct.
 22 Q. In finalising the review, is it right that the police
 23 asked your department whether it would support the exit
 24 gate being closed?
 25 A. I think the recommendation was that at times of low

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1 volume of traffic could the gates be closed. I think
 2 that was the recommendation that I remember.
 3 Q. In paragraph 69 of your statement, the third line, you
 4 say:
 5 "In the lead up to the finalisation of the review,
 6 the MPS had asked whether PSD would support the exit
 7 gate being closed even when Parliament was sitting ..."
 8 Do you see that?
 9 A. You're quite right, yes.
 10 Q. And then you add:
 11 "... and had understood that the requirement to keep
 12 the gate open was one directed by Parliament."
 13 A. That's correct, yes.
 14 Q. Were you aware of what the reasoning of Parliament was
 15 behind that requirement?
 16 A. It goes back to the need or the principle that
 17 Parliament wants to be seen to be open and to
 18 demonstrate its openness and that the gates were a big
 19 symbol of that.
 20 Q. After the review, is it right that the police raised the
 21 possibility of closing the gates at times other than
 22 division?
 23 A. That's correct.
 24 Q. What was your predecessor's response to that suggestion?
 25 A. I think it goes back, again, to the question of whether

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1 actually although it had benefits, whether it also would
 2 be a distraction to the officers on duty.
 3 Q. And I think it's right to say that shortly after this
 4 review, crowd control barriers, the external crowd
 5 control barriers, were introduced?
 6 A. Absolutely, yes.
 7 Q. And I think it's fair to say that no actual
 8 recommendation for closure of the gates was made by the
 9 police?
 10 A. No, it was not.
 11 Q. In your report at --- in your statement at paragraph 56,
 12 you say this:
 13 "... by custom and practice Carriage Gates were kept
 14 open when the House was sitting. That was
 15 a vulnerability that we now consider should have been
 16 addressed at an earlier date."
 17 Do you see that?
 18 A. I did say that, yes.
 19 Q. Can you tell us why the vulnerability was of such
 20 a level that it required that change?
 21 A. The siting of New Palace Yard with Parliament Square
 22 outside attracts regular demonstrations and crowds, and
 23 one of the concerns was that if the crowds pushed
 24 forward, they may well be able to get through the open
 25 gates and into New Palace Yard.

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1 Q. The possibility of having the gates closed had been
 2 identified by the reviews that we have spoken about,
 3 before the attack. Looking back, do you consider that
 4 your predecessor's rationale for his views that you have
 5 explained was right or wrong?
 6 A. I think my predecessor made a very good argument and at
 7 the time I think he was happy in that and so were the
 8 team concerned. I think, in hindsight, knowing what
 9 I now know of 22 March, then no, I think we probably
 10 should have acted earlier and quicker to close those
 11 gates.
 12 Q. May we now move on to events of 22 March itself, and
 13 just address a few matters with you.
 14 First of all, is it right to say that on that date
 15 both Houses of Parliament were sitting?
 16 A. Yes, it was. Yes, they were.
 17 Q. And that the estate would have been very busy?
 18 A. It was extremely busy. It was a Wednesday, Prime
 19 Minister's Question Time, as well as lots of meetings
 20 going on.
 21 Q. Roughly how many people would have been on the
 22 parliamentary estate at the time of the attack?
 23 A. I've estimated about 5,000 people.
 24 Q. Was at any point during the events of that day control
 25 of the incident handed over to the police in the way

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1 that you have described could happen?
 2 A. Yes, as soon as the officer at the gate radioed the
 3 security operations centre to say an attack was taking
 4 place, the control immediately passed to the
 5 Metropolitan Police. That would have been about 14.41.
 6 Q. Now, we have heard about a number of the CCTV cameras
 7 around Parliament. It's right to say, I think, that
 8 there were hundreds of such cameras around the estate?
 9 A. There are, yes.
 10 Q. Have you ascertained whether the ones covering
 11 New Palace Yard were being specifically monitored at the
 12 time of the attack?
 13 A. I've looked into that and no, they weren't. There was
 14 no one actively monitoring the camera that would take in
 15 Bridge Street and New Palace Yard.
 16 Q. And, in simple terms, how have you been able to
 17 ascertain that fact?
 18 A. Because we have talked to the people in the security
 19 operations centre and found that.
 20 Q. You also say in your statement that there's no sign of
 21 an operator of the cameras taking control of the camera
 22 and focusing it?
 23 A. Correct.
 24 Q. So if we imagine a control room with a number of
 25 screens, but with access to very many more cameras,

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1 would that be a fair way of viewing it?
 2 A. I would have said so, yes.
 3 Q. And if an operator is looking on screen at an unfolding
 4 event and becomes concerned by it, you would expect them
 5 to use the focusing powers of the camera?
 6 A. Very much. That would have raised an alarm and they
 7 would have then raised that as an incident.
 8 Q. So you would know from viewing the footage, and it would
 9 be possible for the police to check by viewing the
 10 footage, whether somebody in the control room happened
 11 to have the camera, happened to be looking at the
 12 footage from that — from the cameras covering that area
 13 at the time?
 14 A. We would, yes.
 15 Q. And, finally, this: was the parliamentary estate placed
 16 on lockdown after the attack?
 17 A. It was.
 18 Q. What time did that take place?
 19 A. At 14.55.
 20 Q. What was the effect of that?
 21 A. The effect is that my security officers ensured that
 22 people were told to lock themselves in their rooms and
 23 to move away from the danger.
 24 Q. Is that a standard security measure in an emergency of
 25 that type?

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1 A. It is, but it's the first time it's ever happened, to my
 2 knowledge, in Parliament. It's probably worth noting,
 3 as well, that the members were in the House of Commons
 4 chamber, they were also locked down, and the same in the
 5 House of Lords, the people who were in the chamber
 6 there.
 7 Q. Finally this: we've made brief reference to Sir Jon
 8 Murphy's review and his report. Is it fair to say that
 9 a huge amount of work is being done both to address
 10 security issues arising from that report and also as
 11 part of longer term infrastructure projects which may
 12 also have security benefits?
 13 A. You're absolutely right to say that.
 14 MR HOUGH: Thank you very much. Those are my questions.
 15 Examination by MR ADAMSON
 16 MR ADAMSON: Mr Hepburn, my name is Dominic Adamson and
 17 I ask questions on behalf of the widow of PC Palmer.
 18 Mr Hepburn, can I start, if I may, by turning to
 19 paragraph 56 of your statement, this is a passage which
 20 Mr Hough has referred you to. And you say — perhaps it
 21 can be brought up on the screen for the benefit of those
 22 in court, it's {WS5100/18}. We see there:
 23 "As I note above, by custom and practice Carriage
 24 Gates were ... open when the House was sitting. That
 25 was a vulnerability that we now consider should have

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1 been addressed at an earlier date."
 2 And you've explained in answer to questions from
 3 Mr Hough that what that means is you would have expected
 4 the gates to have been shut at some stage earlier than
 5 they in fact were; is that right?
 6 A. I think what I've said there is that knowing what I now
 7 know happened on 22 March, that if we had had the chance
 8 again, we should have considered, or could have
 9 considered closing those gates earlier, but we didn't.
 10 Q. Yes. So you are saying that with the benefit of
 11 hindsight, are you?
 12 A. I am.
 13 Q. You go on to say:
 14 "As I explain above, it was and is a very important
 15 principle that Parliament should be, and seen to be,
 16 open."
 17 A. Correct.
 18 Q. Just help me with this: members of the public don't go
 19 through the Carriage Gates, do they?
 20 A. They don't.
 21 Q. Nor do they go through the pedestrian entrance next to
 22 the Carriage Gates?
 23 A. They don't.
 24 Q. They go through Cromwell Green?
 25 A. And other entrances, yes.

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1 Q. And so it's a bit of a red herring, isn't it, to say
 2 that shutting the gates would significantly impinge upon
 3 the very important principle that Parliament should be
 4 and be seen to be open; do you agree?
 5 A. No, I don't agree. It was very much the view of the
 6 House and its members that Carriage Gates represented
 7 an openness to the public, and it was an important
 8 principle to them.
 9 Q. Yes. Was that a principle that was ever debated in the
 10 context of the safety of unarmed police officers at the
 11 gate?
 12 A. No, it wasn't.
 13 Q. And so had they had that discussion, we can only imagine
 14 what the outcome would have been?
 15 A. I would suspect and I would state that had that
 16 discussion happened with members, and they understood
 17 the security risks involved post 22 March and what had
 18 happened, they would have absolutely agreed to close
 19 those gates.
 20 Q. Let's go back and imagine a discussion before that, and
 21 perhaps we'll go, if we can, in your statement to the
 22 discussion of the MPS review of Carriage Gates in 2015,
 23 and it's paragraph 66 of your statement, {WS5100/21}.
 24 Now, this was a review specifically in relation to
 25 Carriage Gates, and we know, because we can see it over

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1 the page, {WS5100/22}, paragraph 67, that:
 2 "In the course of exchanges before the review was
 3 carried out, one MPS officer had expressed the view that
 4 the most obvious mitigation to protect officers at the
 5 gates was to close Carriage Gates and operate from
 6 behind them ..."
 7 A. That's correct.
 8 Q. Now, in relation to that observation, you've explained
 9 that it never reached what one would call a formal
 10 recommendation. Was there active discussion between the
 11 Metropolitan Police Service and the Parliamentary
 12 Authority about that recommendation, about that
 13 suggestion by an officer?
 14 A. I am afraid that was before my time in post. So that
 15 would have been my predecessor. I assumed the report
 16 was read by my predecessor, and yes, there would have
 17 been an active discussion about that.
 18 Q. And do we know from the Parliamentary Authorities'
 19 records whether there was any specific consideration to
 20 reject that recommendation at that time?
 21 A. No, I don't think it went through the committee system
 22 at all on that. The reason being that it never turned
 23 into a formal recommendation, and formal recommendations
 24 would be the ones considered by the House.
 25 Q. Yes, because this was an opportunity, was it not, for

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1 there to be an active discussion about the adequacy of
 2 the security arrangements at the gates and, indeed, the
 3 practice of keeping the gates open?
 4 A. Yes.
 5 Q. And so this could have been an opportunity, could it
 6 not, where the consideration that you refer to in
 7 paragraph 56 of your statement could have actually been
 8 actioned upon?
 9 A. I don't disagree with that.
 10 Q. In paragraphs 68 and 69 of your statement {WS5100/23}
 11 you describe a review following an incident in
 12 Moncrieff's restaurant, that's a restaurant within the
 13 parliamentary premises; is that right?
 14 A. Yes, it is.
 15 Q. And, again, do I correctly understand that this was
 16 a review carried out before you were in post?
 17 A. Correct.
 18 Q. Do you know whether, in the context of this review,
 19 there was any reconsideration of the fact that in the
 20 2015 Carriage Gates review, a specific observation had
 21 been made by an MPS officer that the gates should be
 22 closed?
 23 A. A discussion, I think, was held around that, yes.
 24 Q. Yes. But the point that I'm driving at, perhaps not
 25 very clearly, I accept, is that in 2016 there is further

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1 consideration of the gates.
 2 A. Yes, there is.
 3 Q. There had been consideration of the gates in 2015?
 4 A. Yes, there had.
 5 Q. In the discussion in 2016, were those involved in it, so
 6 far as the records can inform you, referring back to the
 7 fact that this issue had been considered in 2015 as
 8 well?
 9 A. That I don't know.
 10 Q. Because I suggest to you that what it appears to show is
 11 that the concerns relating to the gates are being raised
 12 time and again.
 13 A. I think it's a known vulnerability, you're absolutely
 14 right, and I think they were discussed many times.
 15 Q. Yes. But in reality, nothing was being done about the
 16 fact that the gates were open from morning until night?
 17 A. I think in reality it is true that gates were left open
 18 at agreed times, but the reality is that no
 19 recommendation was ever made to close those gates.
 20 Q. Attached to your statement is a post instruction, and
 21 it's page 34 {WS5100/34}. Now, can you help us as to
 22 what this document is?
 23 A. This is a briefing document which is given to the
 24 security officers who are manning that post. It would
 25 explain what is required at that post.

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1 Q. So these are instructions issued to what I'll call your
 2 team of officers?
 3 A. Correct.
 4 Q. Who are within New Palace Yard but not at the gate?
 5 A. Correct.
 6 Q. Yes. And can I ask you just to cast your eye down to
 7 the bottom half, "Screening of vehicle", and second
 8 bullet point:
 9 "Ensure that when a Division is called, Members of
 10 Parliament have unobstructed access to the premises."
 11 A. That's right.
 12 Q. And does that reflect the prevailing view that so far as
 13 the Carriage Gates were concerned, they needed to be
 14 kept open so that MPs could be given unobstructed access
 15 when they required it?
 16 A. During a division, yes.
 17 Q. Nowhere within this document is there a recognition of
 18 the risks that unarmed officers would face at the gates,
 19 and presumably that's because, you would say, it's not
 20 the function of this document to articulate those
 21 concerns?
 22 A. That's right. The function of this document is to be
 23 very clear with the officer who is carrying out his
 24 duties or her duties as to what's required.
 25 Q. Yes. But was it within the knowledge of you and your

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1 department that by offering this unimpeded access, you
 2 were placing unarmed officers at the gate at risk?
 3 A. No. That wouldn't be -- it wouldn't be something that
 4 I think we would be aware of. The reason for that is
 5 that in the same way that we would look at our posts and
 6 do the risk assessments there, the responsibility, roles
 7 and responsibilities for unarmed and armed officers
 8 guarding the perimeter of the estate is with the
 9 Metropolitan Police. They will carry out their own risk
 10 assessment on those posts.
 11 Q. So to what extent was your department, then, aware of
 12 the locations of armed officers who are there within
 13 New Palace Yard not only to provide protection to the
 14 unarmed officers at the gate, but also more generally to
 15 people within the parliamentary estate?
 16 A. They would have been aware in general terms, but they
 17 wouldn't have been aware of precisely where they should
 18 be standing and what their position should be.
 19 Q. Was your department ever asked to identify, for the
 20 benefit of the Met Police, their understanding of the
 21 way in which armed officers carried out their patrol
 22 duties within New Palace Yard?
 23 A. Could you repeat the question, please?
 24 Q. Yes, it was a long question, I'm sorry.
 25 Was your department ever approached by the

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1 Met Police in the context of the investigation into this
 2 incident to provide their understanding, based on their
 3 experience of what they had seen, of the way in which
 4 armed officers within the New Palace Yard carried out
 5 their duties?
 6 A. No, I'm not aware of that.
 7 Q. So no officer has been approached by the Met Police in
 8 order to give a statement saying: well, when I was on
 9 duty carrying out my duties of screening vehicles,
 10 I would see AFOs here or there or down at the colonnades
 11 or up at the gates?
 12 A. Not that I'm aware of.
 13 Q. In relation to the document that we've got on screen,
 14 this is a -- I've called it a post instruction; is that
 15 a fair description of it?
 16 A. Yes, it is.
 17 Q. Yes. How do you ensure that your officers are aware of
 18 the content of this material?
 19 A. They're briefed by it and they have an oversight
 20 security officer manager who is responsible for various
 21 posts and he will go and check, that person will go and
 22 check to ensure those posts are being carried out in
 23 accordance with the notes.
 24 Q. Do you test your officers' understanding of their
 25 instructions?

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1 A. Yes, we do.
 2 Q. How often would you do that?
 3 A. I don't know that personally but I know it's on a
 4 regular basis.
 5 Q. I appreciate -- I apologise. How often would those
 6 responsible for supervising the officers carry out that
 7 sort of exercise?
 8 A. Again, I know it's on a regular basis but I can't say
 9 when or how often.
 10 Q. When your predecessor concluded that the -- and it may
 11 be that I'm overstating the nature of it, but when your
 12 predecessor concluded that the gates should not be
 13 closed during the course of the day, because it could
 14 constitute a distraction, was that because the gates
 15 were so heavy that they took a good deal of time to
 16 close?
 17 A. There's nothing which I've seen in documentation to show
 18 that, no. I don't think that was part of the
 19 consideration.
 20 Q. Because we now know that there are different gates at
 21 the Palace of Westminster, are there not?
 22 A. There are.
 23 Q. Yes. And they can be closed and opened relatively
 24 easily, can they not?
 25 A. They can.

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1 Q. And that means that the systems that are now in place
 2 are different in terms of the access that MPs have
 3 during division; is that right?
 4 A. So the gates remain closed and are opened when needed
 5 for access or egress.
 6 Q. So they're not opened when division is called?
 7 A. No.
 8 Q. And closed when the division ends?
 9 A. You're right, it has changed, yes.
 10 Q. Has the period of the division changed since
 11 22 March 2017?
 12 A. No.
 13 Q. It's still eight minutes?
 14 A. It is.
 15 Q. Yes. So this is a change which has been made which has
 16 impacted in no way, shape or form on the period of time
 17 that MPs are afforded to get to the chamber?
 18 A. Correct.
 19 Q. So a simple change has been made which has radically
 20 improved the security at the Carriage Gates; would you
 21 agree with that?
 22 A. I would agree with that.
 23 Q. And it was a simple change which was recommended by
 24 an officer back in 2015?
 25 THE CHIEF CORONER: I think suggested by an officer.

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1 MR ADAMSON: Suggested.
 2 A. I was going to -- yes, it was never a recommendation.
 3 Q. Well we can assume that because he was suggesting it, he
 4 thought it was a good idea?
 5 A. It was part of the report. If it had been a really good
 6 idea and he wanted to take that forward, it would have
 7 been a recommendation that the House would then have
 8 taken on board and considered.
 9 Q. We've heard from others that within a few days of this
 10 incident the gates were reopened?
 11 A. That's correct.
 12 Q. Was there a discussion before the gates were reopened
 13 about the security considerations of taking that step?
 14 A. No, there wasn't, actually. The rationale for keeping
 15 them closed for a period of time was that it was
 16 an active crime scene, and when we were given permission
 17 to reopen them, it was after the police had declared the
 18 crime scene as now finished, so that was on the Monday.
 19 Q. Were firearms officers put at the gates when they were
 20 reopened?
 21 A. I'd rather not go into precisely what changes have been
 22 made since then, but yes, we've improved or increased
 23 the provision of firearms.
 24 Q. Was there any recognition in the discussions that you
 25 had, presumably you had them with colleagues in the days

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1 after this incident, that authorised firearms officers
 2 had not been at the gates?
 3 A. No, not that I took part in.
 4 Q. Mr Hepburn, one more topic, if I may, and it's on
 5 a different aspect and it relates to the barriers
 6 outside the parliamentary premises, and I don't ask
 7 those questions on behalf of Michelle Palmer, I ask
 8 these questions on behalf of the widow of Kurt Cochran.
 9 You've explained that those barriers were put in
 10 place to protect the Elizabeth Tower, what we all refer
 11 to as Big Ben?
 12 A. Yes, the statement which you gave before was correct in
 13 terms of how we described it.
 14 MR MOSS: Sir, could I just rise to say that I'm very keen
 15 that that question is left there and that there's
 16 nothing more in terms of detail. It may well be that my
 17 learned friend doesn't intend to go into detail but a
 18 form of words was used for a reason.
 19 THE CHIEF CORONER: Yes, and just to make it clear,
 20 Mr Adamson, you've referred to it as "the barriers" and,
 21 again, we've had that phrase used a number of times, but
 22 here you are talking about the ...
 23 MR ADAMSON: The vehicle mitigation barriers, the hostile
 24 vehicle mitigation barriers on Bridge Street.
 25 THE CHIEF CORONER: Yes.

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1 MR ADAMSON: I apologise.
 2 When those hostile vehicle mitigation barriers were
 3 put there, was any consideration given as to the benefit
 4 to the safety of pedestrians on the pavement of
 5 Bridge Street considered at that time as well?
 6 A. I've spoken to the experts who specified and put those
 7 barriers in place in preparation for this Inquest, and
 8 the answer is no. They were there as very much hostile
 9 vehicle mitigations, and not pedestrians. The key point
 10 there is, I think it's a happy coincidence that actually
 11 they did fulfil that, I suppose, mitigation against more
 12 pedestrians having been killed on the bridge, but they
 13 weren't put there specifically to do that job.
 14 Q. So it was an ancillary benefit rather than the one which
 15 was the specific reason behind it?
 16 A. Correct.
 17 MR ADAMSON: Mr Hepburn, thank you very much for your time.
 18 MR HOUGH: Sir, just before Ms Stevens stands up, may I say
 19 I've indicated to her in response to a question that
 20 I can't see any difficulty with Mr Hepburn being asked
 21 whether there were armed police officers at the gates
 22 for the period that they were open in the aftermath of
 23 the attack on the basis that any member of the public
 24 could see, or could have seen at the time, whether they
 25 were there, and also because everything has changed

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1 since.
 2 THE CHIEF CORONER: Yes. I'm sure that's a help to
 3 Mr Hepburn to have that clarified.
 4 Ms Stevens.
 5 Examination by MS STEVENS
 6 MS STEVENS: Thank you, that's very kind. Thank you.
 7 My name is Susannah Stevens and I'm asking questions
 8 on behalf of the parents and the siblings of
 9 Police Constable Palmer.
 10 A. Okay.
 11 Q. In terms of the period that you were concerned with, so
 12 we're looking at September 2016 to March 2017, if
 13 anybody from the Metropolitan Police Service had come to
 14 you and said that the lives of people within the
 15 Palace of Westminster could be at risk unless the gates
 16 were closed, the principles of democracy would have been
 17 secondary to the importance of preserving human life; is
 18 that fair?
 19 A. That's fair, yes. Parliament always takes security
 20 extremely seriously.
 21 Q. Nobody came to you, or, indeed, anybody else within your
 22 team, and said that there were real concerns about human
 23 life and risks as a result of the gates being left open;
 24 is that right?
 25 A. No, they did not.

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1 Q. If the Metropolitan Police Service had come to you and
 2 said that there should only be armed police officers at
 3 Carriage Gates because otherwise there could be a risk
 4 to the life of an unarmed officer, you, the
 5 Parliamentary Authorities, would not have stood in the
 6 way of the Metropolitan Police Service, would you?
 7 A. The allocation and tactics around armed police is a very
 8 specialised area, which is very much the
 9 Metropolitan Police's expertise and not Parliament's, so
 10 we would have followed their recommendations.
 11 Q. If, therefore, the Metropolitan Police Service had
 12 decided to remove unarmed officers and replace them with
 13 only armed officers, the Parliamentary Authorities would
 14 not have objected; would they?
 15 A. No, we would not.
 16 Q. The question, then, that I was going to come on to which
 17 you have just heard, and no doubt will realise what
 18 I'm going to ask, is this: in terms of that period after
 19 22 March 2017, when the gates were left open --
 20 THE CHIEF CORONER: And, just to be clear, this is the
 21 period immediately after, so we're talking about the
 22 week or so afterwards, from the Monday onwards?
 23 MS STEVENS: I was going to ask, because you will remember,
 24 sir, that we had evidence of a longer period. So if
 25 I may, I will perhaps clarify that, that's the second

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1 question.
 2 THE CHIEF CORONER: It was really just for the benefit of
 3 the witness, you are talking about that period?
 4 MS STEVENS: Yes.
 5 THE CHIEF CORONER: We've heard that the gates were open on
 6 the Monday, I think that's what you have told us, so the
 7 questions are focusing on from the Monday onwards.
 8 MS STEVENS: Yes, perhaps we can clarify timing first,
 9 actually. We've heard evidence during this Inquest that
 10 it took some eight months to close Carriage Gates; can
 11 you help us with how long it did, in fact, take?
 12 A. The attack happened in March, and the gates, I think,
 13 were finally closed in October of the same year.
 14 Q. During that period, then, were there armed police
 15 officers present throughout to ensure that there was no
 16 risk to life in terms of people inside the
 17 Palace of Westminster?
 18 A. Yes. When we opened the gates on the Monday we received
 19 a recommendation from the Metropolitan Police as to how
 20 they would like to do their -- or what they would like
 21 to do in terms of resourcing their armed and unarmed
 22 police. We were happy to go along with that: they are
 23 the experts.
 24 Q. In relation to what happened during that period, is it
 25 right that in May 2017 Operation Temperer came into

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1 being, which was an operation whereby static armed
 2 guards at the Palace of Westminster, that position was
 3 undertaken by army officers to free up armed police
 4 officers?
 5 A. It coincided with the national threat level coming up
 6 from severe to critical for a period of time, and under
 7 those circumstances you're right, we received soldiers
 8 onto the Palace estate, and they worked alongside armed
 9 police officers.
 10 Q. Were you aware that that was to free up armed police
 11 officers so that they could work elsewhere?
 12 A. Yes, it was a national decision taken, and we followed
 13 that decision.
 14 Q. Were you aware that in terms of that decision being
 15 taken to free up armed officers through, unusually, the
 16 employment of the army, that a factor in relation to
 17 that was that in the last 15 years, the number of armed
 18 police officers has halved?
 19 A. I wasn't aware of that, no.
 20 Q. Can you help with this, and I make it clear the question
 21 arises from a Sunday Times newspaper article dated
 22 27 March, we don't have disclosure of any material, but
 23 were you aware that there was a table-top exercise that
 24 took place at the Palace of Westminster in which
 25 Metropolitan Police Service officers and, indeed,

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1 security staff from the Parliamentary Authorities; are
 2 you aware of that exercise?
 3 A. We have run several table-top exercises jointly with the
 4 Metropolitan Police.
 5 Q. Was there an exercise before March 2017 where during
 6 a table-top exercise to test parliamentary defences,
 7 four "terrorists" -- and that's obviously in speech
 8 marks, because it's an exercise -- four "terrorists"
 9 stormed the Houses of Parliament?
 10 A. I'm aware of the exercise that's been run. I'd rather
 11 not go into the detail of what was a confidential
 12 exercise at the time.
 13 Q. Are you aware that there were deficiencies though in
 14 relation to the security systems in place?
 15 A. When table-top exercises are run, there are always
 16 lessons learnt. We learnt lessons from that one as
 17 well.
 18 Q. Can you help us as to when that exercise took place?
 19 A. No, I am afraid I can't remember the exact date.
 20 Q. Can you help with whether or not it was 2017 or 2016?
 21 A. I think it was late 2016.
 22 Q. Certainly, then, before the events of March 2017 it
 23 would have been clear as a result of that exercise that
 24 extreme caution had to be taken to ensure that the
 25 entrances into the Houses of Parliament were protected?

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1 A. I can tell you that the exercise you're referring to did
 2 not go into the New Palace Yard, Carriage Gates area.
 3 Q. However, would it have been clear as a result of that
 4 exercise that caution had to be taken to ensure that the
 5 entrances into the ministers' chambers and the areas
 6 within the Houses of Parliament had to be properly
 7 protected?
 8 A. That has always been the case.
 9 Q. However, if there's an exercise which takes place and
 10 there are issues that flow from that, it's going to be
 11 even clearer, isn't it, that nobody should leave
 12 entrances to the Houses of Parliament unguarded?
 13 A. As I've said before, the exercise I think you're
 14 referring to didn't go into the area of New Palace Yard
 15 or Carriage Gates. It looked at other areas in the
 16 Palace.
 17 Q. In terms of the exercise, will documentation exist in
 18 terms of it?
 19 A. Yes, it will.
 20 Q. Yes. So we would be able to see when it occurred?
 21 A. Yes.
 22 Q. Should be able to determine who was involved?
 23 A. In general terms, yes.
 24 Q. Yes. Do you know if a record was kept of the officers
 25 who were involved?

1 A. I don't know. That would be a question, probably, for
 2 the Metropolitan Police.
 3 Q. Would we be able to see the lessons arising from any of
 4 the security breaches?
 5 A. They would be of a confidential nature.
 6 Q. Moving on, then, if I may, were you aware that there was
 7 a review of armed officers in early 2017?
 8 A. I am afraid you will need to give me some more details.
 9 Q. Yes, I'll certainly give you the details that the family
 10 have. Perhaps if we could bring up on to the screen
 11 {WS5132/9}, please. Thank you. What we know, looking
 12 at this document is, we can see it's an email dated
 13 6 January last year, subject "Armed briefing paper".
 14 The author is Simon Causer, a superintendent within the
 15 Parliamentary and Diplomatic Protection; can you see
 16 that?
 17 A. I can, yes.
 18 Q. The subject is "Armed briefing paper". Perhaps if
 19 I take you through the emails and then see if you can
 20 give us any assistance once you have read them.
 21 The email, then, reads:
 22 "John,
 23 "Please take a look at this, I have kept it as brief
 24 as I can. It makes no mention of changing the model due
 25 to financial reasons. I genuinely believe that what

1 will get is a better level of protection when we need it
 2 most. Let me have your thoughts as we need to get
 3 terminology correct before we start to brief upwards."
 4 If we then look at the email in response, so we'll
 5 go to {WS5132/8}, please.
 6 10 January, John Groves, the Deputy Director of
 7 Security and Head of Security Operations, the same
 8 subject "Re Armed briefing paper". Do you want to,
 9 perhaps in fairness to you, because you haven't seen
 10 this before, do you want to just read the email and then
 11 I'll just put into the record the particular part of it.
 12 MR MOSS: He has seen it.
 13 MS STEVENS: Oh, he has seen it.
 14 MR MOSS: He has seen it but if you could read the full
 15 passage.
 16 A. I recognise this one, yes.
 17 MS STEVENS: Do you want me to read the entire ...
 18 MR MOSS: Not the entire -- the full passage in context.
 19 MS STEVENS: All right, of course.
 20 So I'll read out the two paragraphs. It says:
 21 "Simon,
 22 "Many thanks for this. I've used your wording as
 23 a basis for a paper to be used here (it may be a number
 24 of papers given the Committees who need to be
 25 consulted). It's written for an MP/Peer audience and

1 I've omitted a few references that you used around
 2 posts/ efficiencies and costs -- they will not be
 3 interested. Can we meet later this week to discuss
 4 please?"
 5 Then, forgive me, I'm just going to turn behind me.
 6 (Pause).
 7 Then you can see the second paragraph:
 8 "On your presentation, would you be able to amend it
 9 so that I can use it as the annex to the paper."
 10 Then there are bullet points in terms of a number of
 11 suggestions. I'm not asked to read them all, but can
 12 you see that there is a bullet point that says:
 13 "Delete the 'financial differential'..."
 14 A. Yes, I can.
 15 Q. Do you know, then, if there was an armed briefing,
 16 a review of the armed protection, within the
 17 Palace of Westminster that was carried out in January of
 18 this year?
 19 A. Yes --
 20 Q. Sorry, of last year?
 21 A. I am aware of that.
 22 Q. You are. Did you know that there was a suggestion that
 23 the financial element of that review should be deleted
 24 because "they will not be interested"?
 25 A. I think I can probably help you there. When Parliament

1 looks at security it will always look for the advice and
 2 guidance of experts. In this case, armed police, it
 3 will be experts who are the Metropolitan Police, and
 4 they were the ones who will then say what they require,
 5 what they think they need to keep Parliament safe. So
 6 the comment there regarding "they will not be
 7 interested" is merely, I think, the fact that decisions
 8 will not be based on the money, it will be based on the
 9 best model that's been put to us.

10 Q. Were any decisions that were made as to the systems in
 11 place for the protection of people inside the
 12 Palace of Westminster ever made on the basis of cost?
 13 A. No, not in my -- not in my experience.

14 Q. If the Metropolitan Police Service had come to you and
 15 said that they needed an increase in their budget in
 16 order to have more than two armed officers within
 17 New Palace Yard, is that something that you would have
 18 carefully considered?
 19 A. Absolutely, yes. Indeed, the budgets in my two years as
 20 Director of Security for Parliament, for the
 21 Metropolitan Police have increased significantly over
 22 that period.

23 Q. Did anybody from the Metropolitan Police Service ever
 24 come to you and say anything as to two armed officers in
 25 New Palace Yard being insufficient and them requiring

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1 more funds?
 2 A. No, we would always act on the Metropolitan Police's
 3 advice.

4 MS STEVENS: I have no further questions. Thank you very
 5 much.

6 Examination by MR BUTT

7 MR BUTT: Mr Hepburn, I represent the Metropolitan Police
 8 Service. Just two very brief topics from me, please.
 9 You mentioned a police officer who told, I think, your
 10 predecessor that the most obvious mitigation to the risk
 11 at Carriage Gates was to close the gates; do you recall
 12 saying that?
 13 A. I do, yes.

14 Q. That was a senior officer who said that, wasn't it?
 15 A. Yes, I understand, yes.

16 Q. And he was acting within his area of responsibility,
 17 wasn't he?
 18 A. Yes, he would have been.

19 Q. It was put to you by Ms Stevens that the police never
 20 warned Parliament about the risk to life at
 21 Carriage Gates. Your predecessor was informed in 2015
 22 by a senior officer that police officers at the gates
 23 were uniquely vulnerable, and he explained why; do you
 24 recall seeing that email?
 25 A. I've seen the email, yes.

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1 Q. And that officer concluded:
 2 "I am adamant the protection of our people should
 3 override most constraints."
 4 Do you recall language like that?
 5 A. I do, indeed.

6 Q. And that was the same officer who had earlier
 7 recommended closing the gates?
 8 A. No, it was the same officer who I think in the report
 9 had discussed closing the gates, but the recommendation
 10 was never made.

11 Q. Sorry, it was the same officer who had sent the email
 12 advising the most obvious mitigation was to close the
 13 gates?
 14 A. Making that comment, yes.

15 MR BUTT: Thank you very much, nothing further.

16 Examination by MR MOSS

17 MR MOSS: Thank you, sir.

18 Mr Hepburn, may I just briefly revisit the topic of
 19 the security reviews that have taken place over the
 20 years. Is it right, first of all, that in order to
 21 assist with the request that was made by counsel to the
 22 Inquest on behalf of the Chief Coroner, that you have
 23 gone back through reviews dating back, I think, the
 24 first, nearly some 50 years ago in 1969; is that right?
 25 A. It is, yes.

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1 Q. And is it right that the last of those reviews that you
 2 have looked at, and indeed all of them, took place
 3 before September 2016 when you became the Director of
 4 Security for Parliament?
 5 A. That is correct.

6 Q. Have you done your best, therefore, but have you been
 7 reliant upon the written record?
 8 A. Yes, when I have been in post, then I've been able to
 9 talk from personal experience. Otherwise I have gone
 10 back over the written records.

11 Q. And as well as looking at the written record, in order
 12 to assist the process of this important inquest into
 13 PC Palmer's death, did you also speak to your
 14 predecessor, Mr Martin, to see if he could offer
 15 assistance on some of the reviews, given that he was the
 16 director at the time.
 17 A. That's correct.

18 Q. Can I ask you about the 2013 review, and you will
 19 remember that that was the review in December of that
 20 year that made recommendations about improving the
 21 continuity and effectiveness of the vehicle barrier that
 22 rises up and down within New Palace Yard itself; do you
 23 follow?
 24 A. I do.

25 Q. And you have set out in your statement, and you have

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1 mentioned today, that in due course, that gave rise to
 2 a plan for what you described as a multi-million plan to
 3 improve the infrastructure within New Palace Yard?
 4 A. That's correct.
 5 Q. I don't want you to go into detail, it's probably not
 6 necessary and it may be at this time inappropriate, but
 7 could you just give the learned Chief Coroner a broad
 8 indication of the sort of change that is envisaged for
 9 the inside of New Palace Yard with the area of where the
 10 blockers and the rising and falling vehicle barriers
 11 currently are?
 12 A. As part of that programme, Parliament was concerned that
 13 if crowds rushed through the gates that they would then
 14 be stopped before they were able to enter the main
 15 parliamentary buildings, so the project is putting
 16 mitigations in place in New Palace Yard so that if
 17 people did run through those gates, they would be
 18 stopped at a very early part rather than then being able
 19 to have unimpeded access to the rest of the estate; is
 20 that helpful?
 21 Q. Thank you. And you have mentioned in your report and
 22 accepted that there was some delay in the real planning
 23 for that starting; is that right?
 24 A. Yes, it is.
 25 Q. In terms of the complexity of that project, is it right

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1 that as well as all the usual public procurement matters
 2 of that kind, that you were also having to deal with the
 3 fact that Parliament is a World Heritage Site and
 4 listed?
 5 A. I think, in my experience, Parliament is probably the
 6 most complicated site I have worked on in security
 7 terms. As you quite rightly say, it is both an UNESCO
 8 World Heritage Site, we have to deal with Westminster
 9 City Council, Transport for London, the Mayor of
 10 London's office, and so on and so forth. There are
 11 a huge number of stakeholders who are interested in
 12 Parliament, and that necessarily takes time.
 13 Q. Thank you. And, again, I don't want you to go into
 14 detail, but is it right that even now you are still
 15 having to deal with obtaining some of the appropriate
 16 consents for the full nature of those works?
 17 A. It is correct, yes.
 18 Q. Turning next, please, to the May 2015 review, several of
 19 my learned friends have asked you questions, have
 20 referred to the comment by Chief Inspector Aldworth, as
 21 he was at the time. I think this is right, isn't it,
 22 you know from your reading that it was he, because he
 23 was the Chief Inspector of Operations at the time, who
 24 actually asked for that review to take place?
 25 A. It was, yes.

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1 Q. And is it right that he was somebody who was, therefore,
 2 commissioning the report rather than actually carrying
 3 out the study on the ground?
 4 A. Correct.
 5 Q. I think we know that the report was actually carried out
 6 by Mr Pearce of the Metropolitan Police Service; is that
 7 right?
 8 A. That's correct.
 9 Q. With input from the CPNI and with support from your
 10 department, although you weren't in post at that time?
 11 A. That's correct.
 12 Q. And is it right, and it's not a criticism of him at all,
 13 but that in the course of discussions by email, even
 14 before that review was completed, that Chief Inspector
 15 Aldworth said something slightly different, that the
 16 most obvious solution was pop-up blockers rather than
 17 closing the gates?
 18 A. Yes, that was a recommendation, yes.
 19 Q. And it was that matter that he discussed, as you
 20 mentioned, that turned into the formal recommendation;
 21 is that right?
 22 A. Correct, and that's part of the current project we're
 23 running.
 24 Q. My learned friend Mr Adamson suggested to you that what
 25 in fact happened after the dreadful attack was something

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1 that Chief Inspector Aldworth was suggesting at the
 2 time, but I just want to explore whether that is
 3 actually quite right. Is it right that after the
 4 attack, Carriage Gates, the listed ornate gates, were
 5 completely taken down and replaced with upgraded modern,
 6 lighter gates?
 7 A. The old heritage gates were taken off to be refurbished,
 8 and they were replaced on a temporary measure by the
 9 lighter-weight gates that are there at the moment.
 10 Q. So far as you have been able to see from the emails, was
 11 it ever suggested in May 2015 that the heritage gates
 12 should be completely removed and replaced with different
 13 gates that should be closed?
 14 A. No.
 15 Q. Turning then to the review in 2016, and I think you know
 16 of which I speak, that's the review in early March 2016,
 17 the Moncrieff restaurant incident. Again, my learned
 18 friend Mr Adamson suggested to you it was being raised
 19 again, the issue of the gates. I don't want you to go
 20 into inappropriate detail that you may be aware of, but
 21 is it right that the May 2015 review had followed some
 22 specific pieces of intelligence relating to the risks
 23 arising from vehicle attacks?
 24 A. That's correct.
 25 Q. Is it right that the 2016 review looking at Carriage

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1 Gates was dealing with something rather different , was
 2 that an unfortunate incident had occurred whereby
 3 a pedestrian had tailgated his way into New Palace Yard
 4 behind a vehicle?
 5 A. That's correct.
 6 Q. So is it fair that the context of those two reviews was
 7 actually entirely different?
 8 A. Yes, it was.
 9 Q. You've mentioned that you are aware that your
 10 predecessor, Mr Martin, did have discussions with the
 11 MPS about closing the gates, and I think you know from
 12 the records of emails that those discussions were around
 13 about the time of this review in March 2016; is that
 14 right?
 15 A. Yes.
 16 Q. And, in fact, it's paragraph 68 of your statement, if we
 17 need it, but I think you'll be able to confirm that the
 18 recommendation in the review was not the closure of
 19 Carriage Gates at all times, but at quiet times?
 20 A. That's correct.
 21 Q. And was it in that context that your predecessor,
 22 Mr Martin, was having the exchanges?
 23 A. Yes, it was.
 24 Q. And would that ever have included in the thinking at the
 25 time the closure of Carriage Gates when there was

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1 a division?
 2 A. No, it would not.
 3 Q. Mr Hepburn, I don't want to ask you about the rights and
 4 wrongs of it, or whether the judgment call was right at
 5 the time or with hindsight, but as you have been able to
 6 look at those exchanges, is it right that there was
 7 a genuine concern being expressed by your predecessor,
 8 amongst others, about the risks of police officers being
 9 distracted from their tasks if they were continuously
 10 having to open and close the gates?
 11 A. I've looked at the documentation and that's precisely
 12 what was worrying my predecessor.
 13 Q. And is it right that there is also a genuine concern,
 14 again, please, without going into detail, a genuine
 15 concern that closure of the gates might transfer the
 16 risk to elsewhere, or increase other existing risks?
 17 A. That's what the documentation shows.
 18 Q. And do you have any reason to doubt the good faith with
 19 which those matters were being raised by your
 20 predecessor?
 21 A. No, I've made the point that my predecessor, in my
 22 opinion, is a national expert in security matters and
 23 highly competent in his job.
 24 Q. My learned friend Ms Stevens took you to some emails
 25 which I think you probably had the opportunity to see

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1 overnight from Inspector Rose and some emails that he
 2 has exhibited. Do you recall being asked about those?
 3 A. I do.
 4 Q. Has it ever been your experience that the Parliamentary
 5 Security Department has sought cost savings in relation
 6 to armed policing?
 7 A. Absolutely not.
 8 Q. Where it is said, and we can turn them up if you wish,
 9 but where it is said by Mr Groves, who I think was
 10 formerly the Deputy Director of Security to your
 11 predecessor, is that right?
 12 A. John Groves, yes.
 13 Q. When Mr Groves refers to deleting references to
 14 financial matters, do you read that comment being made
 15 in the context that since Parliament and the PSD wasn't
 16 seeking cost savings, neither he nor those to whom he
 17 was reporting would be interested in the financial
 18 details because it was not what they were interested in
 19 relation to armed policing?
 20 A. Correct. The House would want to have the best possible
 21 advice on how it could keep itself secure and safe.
 22 Q. Again, perhaps we don't need to go into unnecessary
 23 technical detail, but is it right that in the course of
 24 those exchanges at about that time, there were some
 25 different financial issues that had arisen in relation

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1 to perhaps an under, or a miscalculation about the
 2 costs, an under-invoicing which had to be put right, and
 3 so there was a financial committee that would need to
 4 approve that, that, perhaps, was a context to some
 5 extent in which finances were being discussed as well?
 6 A. Yes, it was a completely separate issue where the
 7 invoicing for Metropolitan Police showed a shortfall, it
 8 was an error on their part, and they were seeking to
 9 take those costs from the Palace.
 10 Q. Can I try my luck with the system, please, could we
 11 have -- WS132 -- actually, I'm sure that's not right.
 12 Just give me one moment. {WS5132/13}.
 13 The briefing materials which are exhibited to this
 14 series of emails since the issue of costs has arisen,
 15 appears, and it may be that others will be better placed
 16 than you, Mr Hepburn, but so that the context isn't
 17 lost, is it right that in the context of this
 18 presentation that was being circulated by email that
 19 certainly so far as Carriage Gates is concerned there
 20 appears to be no change to the resourcing, no change to
 21 the number of police officers on that post?
 22 A. That's how I read that.
 23 Q. You were asked about table-top exercises. Is it right
 24 that so far as provision of materials to the Inquest
 25 team is concerned, who have vetted lawyers, that you

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1 have provided all of the information that you've been
 2 asked to provide?
 3 A. I have, yes.
 4 Q. Is it the case that by the very nature of table—top
 5 exercises that test the security of Parliament, that
 6 insofar as they may have demonstrated weaknesses, that
 7 the detail of those documents may by their very nature
 8 tend to be very sensitive?
 9 A. Absolutely right.
 10 Q. If we look at paragraph 52 of your statement, is it
 11 right that you were providing again in request to issues
 12 raised about training volunteering information about the
 13 last table—top exercise before the dreadful attack,
 14 which had simulated a marauding knife attack?
 15 A. That's correct.
 16 Q. And is it right in relation to that, that following
 17 a request, again, from the Inquest team, that you have
 18 provided the underlying documentation in relation to
 19 that attack —
 20 A. Yes, I have.
 21 Q. — to the Inquest team?
 22 A. Yes.
 23 Q. I don't wish or need to labour the point, but could we
 24 have {WS5100/1} on the screen, it's the first page of
 25 your witness statement. Mr Hepburn, did you

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1 particularly want that content at paragraph 1 to be the
 2 first thing that people would read in your statement?
 3 A. It's enormously important to recognise the sacrifice
 4 that PC Palmer gave to Parliament. The Speaker and the
 5 House all pay tribute to his bravery in keeping
 6 Parliament safe on that day and it was very important
 7 for us to put that in as our first and opening
 8 statement.
 9 Q. And if we go, please, to {WS5100/18}, you've been asked
 10 a lot about the content of that statement, but again,
 11 that self—reflection, as it were, of PSD, the department
 12 that you head, is that something that you wanted to be
 13 clear about in your statement?
 14 A. Yes, it was something which I was extremely keen to put
 15 in.
 16 MR MOSS: Thank you. That's all I ask.
 17 MR ADAMSON: Mr Hepburn, can I thank you on behalf of the
 18 widow of PC Palmer for the sentiment you have just
 19 expressed.
 20 MR HOUGH: Nothing further from me, Mr Hepburn, thank you
 21 very much for coming to give your evidence today.
 22 THE CHIEF CORONER: Thank you very much indeed, Mr Hepburn.
 23 MR HOUGH: Sir, I wonder if we could have five minutes for
 24 the benefit of the shorthand writers.
 25 THE CHIEF CORONER: We will have a five—minute break, which

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1 I am sure everyone will welcome, and sit again in five
 2 minutes' time.
 3 (3.42 pm)
 4 (A short break)
 5 (3.53 pm)
 6 MR HOUGH: Sir, the final witness is Chief Superintendent
 7 Morris.
 8 CHIEF SUPERINTENDENT DAWN MORRIS (Sworn)
 9 Examination by MR HOUGH QC
 10 MR HOUGH: Please stand or sit as you feel most comfortable.
 11 Could you please give your full name and rank for the
 12 court?
 13 A. Good afternoon, sir. It's Chief Superintendent Dawn
 14 Morris, I'm in charge of Protective Security Operations
 15 for the Metropolitan Police.
 16 Q. That, I think, is the current role, the one you have
 17 held since June of this year?
 18 A. That's correct.
 19 Q. What was your last role before that?
 20 A. For four years prior to that I was a superintendent on
 21 the Public Order and Resources Command.
 22 Q. In that capacity I think you had lead for the Prepare
 23 strand of the government's anti—terrorist CONTEST
 24 strategy?
 25 A. That's right.

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1 Q. I think you understand that the purpose of your evidence
 2 is to explain the training given to MPS officers
 3 concerning terrorist attacks in the period running up
 4 to March 2017?
 5 A. Yes, that's right.
 6 Q. In your recent roles have you been responsible for
 7 a document called the MPS Response to Terrorist Attack
 8 Guidance/Doctrine?
 9 A. Yes, I currently own that document.
 10 Q. In summary form, what is that document and what is its
 11 purpose?
 12 A. It's a collated version of the MPS response to an attack
 13 to ensure that we have coordinated multi—agency
 14 response.
 15 Q. When was that document first produced?
 16 A. It was first produced back in January 2016, and then the
 17 latest revision was September of last year.
 18 Q. Has it been revised to take account of events and
 19 experiences from time to time?
 20 A. Absolutely. Yes.
 21 Q. In particular, has it been revised following the
 22 Westminster attack and again following the London Bridge
 23 attack?
 24 A. Yes, it has.
 25 Q. In the versions of that document predating March 2017,

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1 what types of attack specifically were considered it
 2 addressed?
 3 A. It was for marauding terrorist firearms attacks, but
 4 also knife attacks.
 5 Q. In a sentence or two, how would you have defined, then,
 6 and how would you define now, a marauding terrorist
 7 attack?
 8 A. It's a multi-seated marauding attack of -- and it can be
 9 an ambiguous tactic, but it was to account for our
 10 response to any type of attack.
 11 Q. We can all understand what a multi-seated attack is;
 12 what about attacks involving ambiguous tactics, what
 13 does that mean?
 14 A. So not just firearms, but it could be knives, vehicles
 15 or explosive devices.
 16 Q. And on what previous events and experiences had that set
 17 of scenarios been based in the period before March 2017?
 18 A. It was all primarily based on the Paris attacks
 19 from November 2015, and then the more recent attacks in
 20 Nice in 2016.
 21 Q. Turning to training, is it right to say that in the
 22 police and other emergency services generally, there is
 23 a command structure for significant events divided into
 24 gold, silver and bronze?
 25 A. Yes, that's correct.

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1 Q. So gold for strategic lead, silver for tactical lead,
 2 and bronze for on the ground command?
 3 A. Yes, it is. Yes.
 4 Q. Does the guidance provide indications of the roles to be
 5 taken by those at the different command levels in
 6 dealing with an attack once command and control has been
 7 established?
 8 A. Yes, it does.
 9 Q. How is training delivered to give effect to the guidance
 10 on these command and control roles?
 11 A. It's done in a number of different ways to ensure that
 12 we have a specifically trained cadre of people that can
 13 take those command roles and then we ensure that they
 14 receive both immersive training through a Hydra
 15 programme, seminars, inputs, and then taking part in
 16 live exercises.
 17 Q. Now, you refer to a cadre. Are you referring
 18 specifically there to a group called the MTA, marauding
 19 terrorist attack cadre?
 20 A. Yes, I am.
 21 Q. I think that was introduced in 2015 to be specially
 22 trained to deal with that type of attack?
 23 A. That's correct, it's a cadre of the silver command, it
 24 is the tactical level command that is specially trained
 25 for that.

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1 Q. Was specific training devised for them for that purpose?
 2 A. Yes, absolutely.
 3 Q. How was training delivered at the start of this
 4 initiative?
 5 A. They were initially given a specific input around the
 6 detail of the guidance and the required response. Those
 7 were done in groups to get us to about 19 people
 8 immediately trained, and then the programme through
 9 seminars and continuous professional development after
 10 that.
 11 Q. How many officers were initially trained?
 12 A. Initially 19.
 13 Q. Have other officers been added to the cadre as time has
 14 gone by?
 15 A. Yes, we're now at 26, and in order to do that they've
 16 had one-to-one training input from myself before then
 17 taking part in the other aspects of the training that
 18 I've mentioned.
 19 Q. Since the cadre was introduced, have there been a number
 20 of seminars involving not just the Metropolitan Police
 21 but other emergency services and partner groups?
 22 A. There have been three seminars, yes: those for emergency
 23 planners on boroughs, those for our borough commanders,
 24 and then also for the Counter Terrorism Command.
 25 Q. What sort of topics have they covered?

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1 A. I've attended all three and ensured that it's been
 2 detailed explanation of what that response guidance was
 3 about in order to ensure that we have a coordinated
 4 understanding of what that response would be.
 5 Q. Have a number of live exercises been carried out over
 6 the recent years to test and enhance preparedness for
 7 attacks?
 8 A. Yes, there has.
 9 Q. Looking specifically at paragraphs 20 to 21 of your
 10 witness statement, was one such exercise carried out on
 11 19 March 2017, just a few days before the attack?
 12 A. Yes, it was.
 13 Q. To the extent you can, could you briefly describe the
 14 scenario and method of testing?
 15 A. It was a test of our capability to respond to a threat
 16 on the River Thames, so we ensured that there was
 17 a suspect vessel on the Thames and then we exercised our
 18 armed response in order to mitigate that threat.
 19 Q. So was that exercise testing both a set of armed
 20 officers as well as the command and control structure?
 21 A. You're absolutely right. So it was our Marine Policing
 22 Unit, all of the armed response and then full command
 23 and control, as well as the partner agencies that are
 24 involved in our response to the River Thames.
 25 Q. Have there also been a number of live exercises at

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1 Heathrow Airport?

2 A. Yes, there's been a total of five large-scale exercises

3 at Heathrow, which were a marauding terrorist attack

4 using firearms.

5 Q. What's been, in broad terms, the purpose of those live

6 exercises?

7 A. It's to ensure we have tested our aviation policing

8 response with our wider armed response, full

9 multi-agency response to that type of environment with

10 the volume and size that you would deal, as well as

11 working with our partners that are specific to aviation.

12 Q. Would that, again, involve officers at all levels,

13 including armed officers at an operational level?

14 A. Yes, armed officers at operational level as well as

15 dogs, London Fire Brigade, LAS, and full command and

16 control.

17 Q. In broad terms is it right that these exercises have

18 involved hundreds of officers of the kinds who would be

19 in practice required to deal with terrorist incidents?

20 A. Yes, that's right.

21 Q. Have there also been table-top exercises to test and

22 practise potential responses to attacks?

23 A. Yes, there has.

24 Q. In paragraph 24 of your statement you refer to such

25 an exercise on 9 February 2017, involving a preplanned

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1 vehicle attack.

2 A. That's correct, yes. It was to look at -- to coordinate

3 our understanding of what we could do if we had some

4 notice of a vehicle attack and how we would coordinate

5 our response.

6 Q. Separately, at paragraph 25, you refer to another

7 specific exercise in the Palace of Westminster, of which

8 you're aware?

9 A. Yes, that's right.

10 Q. Was that limited to or focused on a particular branch?

11 A. That was purely limited to firearms officers, no wider

12 units took part, or command and control.

13 Q. You referred earlier to immersive training. Are you

14 able to help us with what that is and what it involves?

15 A. That's correct. We called it Hydra training. It's run

16 by our training unit. It involves approximately 80

17 people at each session and it means that the teams are

18 presented with a range of audio, video and different

19 text-based materials in order to immerse them into

20 a scenario and work through their decision-making as

21 a coordinated group with the aim of fully understanding

22 how those different groups would work together in order

23 to respond to an attack.

24 Q. What ranks or levels of officers are involved in that

25 sort of training exercise?

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1 A. It works through the bronze, the operational level, up

2 to full gold, as well as our partner agencies as well.

3 Q. Operation Plato next, please, what is Operation Plato?

4 A. It's a national codename that is used to activate an

5 enhanced multi-agency response to a terrorist attack.

6 Q. What's the range of forms of terrorist attack covered by

7 the Operation Plato term?

8 A. It now ensures that it covers what is referred to as

9 an ambiguous attack, so that it allows for it to be

10 anything from vehicle-borne or explosive device or

11 a lone actor and will cover all types of attacks that we

12 believe a response is required to.

13 Q. So a wide range from very low to reasonably high

14 sophistication?

15 A. Yes.

16 Q. What is an Operation Plato response? Is this a form of

17 response given to all forms of terrorist attack?

18 A. It is an escalated, enhanced response that is

19 multi-agency: police, fire brigade and ambulance, but it

20 is an coordinated, enhanced response.

21 Q. In practical terms, does one have a declaration of

22 Operation Plato that then triggers a particular plan or

23 form of response?

24 A. Absolutely right, yes, it's very clear about who can

25 make that declaration but upon it there is then a full

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1 activation process that takes place.

2 Q. Is it right to say that the criteria for

3 an Operation Plato declaration are sensitive?

4 A. Yes.

5 Q. Was the attack on 22 March 2017 the subject of

6 an Operation Plato declaration?

7 A. Yes, it was.

8 Q. At what time?

9 A. 14.55.

10 Q. Now, is it right that a fair amount of the guidance to

11 which you've referred is necessarily concerned with

12 command and control arrangements?

13 A. Yes, it is.

14 Q. The type of arrangements which can be the subject of

15 fairly detailed textbook-type guidance?

16 A. Yes, very much so.

17 Q. Is it right that guidance in training -- guidance and

18 training in command and control is very important?

19 A. Yes, it is.

20 Q. And right, for example, that events such as the Mumbai

21 attack and the London bombings show the importance of

22 command and control and multi-agency working?

23 A. It does, as well as the importance of the learning from

24 those to ensure that we continually improve by using

25 those as examples.

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1 Q. But is it also right to say that the response to a very
2 unsophisticated attack, such as that by Khalid Masood,
3 must necessarily be governed by a certain amount of
4 ordinary police training and resources?
5 A. Indeed, it does, yes.
6 MR HOUGH: Thank you very much. Those are all my questions.
7 Examination by MR ADAMSON
8 MR ADAMSON: Chief Superintendent Morris, my name is
9 Dominic Adamson, I ask questions on behalf of the widow
10 of PC Palmer. Paragraph 25 of your statement, you deal
11 with a table-top exercise which was undertaken jointly
12 with the Houses of Parliament and was based on
13 a specific attack scenario.
14 A. Yes.
15 Q. Are you able to tell us what that scenario was?
16 A. I wasn't part of it, but that's why I wrote in the
17 statement I am aware of it. It was to test the armed
18 response to an attack on the Houses of Parliament.
19 Q. Are you able to tell us what the attack scenario was?
20 A. It was firearms, a suspect with firearms entering the
21 Palace of Westminster.
22 Q. A single firearms suspect or multi-seated?
23 A. Numerous. Not multi-seated, but numerous entered and it
24 was for the armed response to it.
25 Q. And under this scenario, where did they enter the

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1 Palace of Westminster?
2 A. From the river.
3 Q. From the river?
4 A. Yes.
5 Q. Has there ever been a scenario of somebody going through
6 the front gates?
7 A. I don't know.
8 Q. Does the scenario or the learning from this table-top
9 exercise assist us in understanding what an officer
10 should do if they become aware of an incident at
11 a different location from the one that they are
12 principally there to guard?
13 A. That exercise was purely for the armed officers, so it
14 was about the armed response. So it would assist other
15 armed officers, yes, but it was only for them.
16 Q. Well, the point that I'm trying to get at is, if you are
17 tasked with the responsibility of protecting unarmed
18 officers at the Carriage Gates in New Palace Yard, does
19 this table-top exercise, or any other table-top exercise
20 that you're aware of, assist us as to whether or not
21 they should go to the incident, whatever it may be,
22 thereby abandoning officers who are unarmed at the
23 gates, or whether they should remain there?
24 A. It would reiterate the training they are given as
25 firearms officers. I'm not a trained firearms officer,

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1 but it would reiterate their training with how they
2 should respond to an armed incident.
3 Q. So does it follow from your answer that you are unable
4 to assist us as to whether or not officers at the gates
5 would have to protect the unarmed officers at the gates
6 or move towards any distraction that they've become
7 aware of?
8 A. I can't help you with that.
9 MR ADAMSON: Thank you.
10 Examination by MS STEVENS
11 MS STEVENS: My name is Susannah Stevens and I'm asking
12 questions on behalf of Police Constable Palmer's parents
13 and his siblings.
14 Can I just ask you this: so you have been heavily
15 involved in counter terrorism strategy, particularly
16 focusing on lessons to be learned since Mumbai, Paris
17 and Nice; is that right?
18 A. That's right.
19 Q. You can, then, help us with the fact that marauding
20 terrorist attacks do pose, don't they, particular
21 difficulties in terms of policing the risks posed?
22 A. Yes, they're very complex incidents to deal with, yes.
23 Q. One of the most obvious difficulties in terms of
24 policing such attacks is that they can involve multiple
25 locations; is that correct?

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1 A. That's correct, yes.
2 Q. Therefore, bearing in mind an armed officer can't be in
3 two places at once, they call into question issues of
4 resources, don't they?
5 A. It would, you would need coordination, yes.
6 Q. Coordination, exactly.
7 They also require greater numbers of police officers
8 to ensure that you're able to effectively deal with
9 different locations?
10 A. There's a clear firearms plan for the
11 Metropolitan Police that they activate in order to
12 ensure resources are sent to an attack.
13 Q. Also by March 2017, anyone involved in policing would be
14 aware of terrorists using distraction techniques, is
15 that fair?
16 A. I would expect so, but I don't know for definite if
17 everyone was aware.
18 Q. Can you help us at all with the training that armed
19 officers would be given as to how they should respond to
20 something that may be a distraction?
21 A. I'm not a trained firearms officer, so my training was
22 around the command and control, and the coordination
23 that included firearms, but I wasn't -- I'm not trained
24 in the way that firearms officers are trained
25 themselves.

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1 Q. That's what I wanted to ask you because, for example, in
 2 terms of your statement and what you've been taken
 3 through, the MPS guidance document that you are
 4 responsible for, is that document given to police
 5 constables or is that document given to command level?
 6 A. Command level.
 7 Q. In relation to the training that you have experience of,
 8 that training is in relation to command level, isn't it?
 9 A. Yes, it is.
 10 Q. The seminars that you have given a statement about and
 11 been asked questions concerning, those seminars are for
 12 command level, aren't they?
 13 A. Yes, they are, yes.
 14 Q. The table-top exercise, you have very fairly said you
 15 can't help us in relation to the one at the
 16 Palace of Westminster. Moving on, then, to Hydra
 17 immersive training events, the statement you've given as
 18 to that, the questions you've been asked as to that, all
 19 of the training involved was for command level, wasn't
 20 it?
 21 A. It was, yes.
 22 Q. Therefore, if I were to ask you any question about the
 23 training given to police constables, you are not really
 24 able to assist, are you?
 25 A. No.

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1 Q. We know though, don't we, that any officer who works at
 2 the Palace of Westminster is going to have undertaken
 3 training. It's self-evident?
 4 A. It would be the responsibility of the command they work
 5 for, yes.
 6 Q. Yes. You must know that armed police constables go
 7 through extensive and significant training, don't they?
 8 A. Yes, they do.
 9 Q. There will be documentation as to that training, won't
 10 there, because, let me ask you this question: in
 11 relation to the training that you give, do you have
 12 documentation as to the seminars that you have
 13 undertaken?
 14 A. Yes.
 15 Q. Do you have class plans in respect of the training that
 16 you have given?
 17 A. Yes.
 18 Q. Do you sometimes give handouts to the people you're
 19 training?
 20 A. Yes.
 21 Q. Do they sometimes have access to training online?
 22 A. Documents are held online for them to access, yes.
 23 Q. Thank you. In relation to the table-top exercise that
 24 you were involved in, was there documentation that was
 25 created with regards to that?

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1 A. Yes.
 2 Q. So if anybody asked you to assist with providing
 3 documentation as to the training given to command level
 4 police officers, you would be able to help, wouldn't
 5 you?
 6 A. Yes, I would.
 7 MS STEVENS: No further questions, thank you.
 8 MR HOUGH: Thank you very much, Chief Superintendent Morris.
 9 Those are all the questions we have for you. Thank you
 10 for your evidence.
 11 THE CHIEF CORONER: Thank you. I'm sorry if you have had
 12 a long wait to start your evidence. But thank you.
 13 A. Quite all right, sir. Thank you.
 14 MR HOUGH: That's all the evidence for today and, indeed,
 15 this week.
 16 THE CHIEF CORONER: Can I just check on Monday, Mr Hough,
 17 what time we should start, because, again, I am
 18 conscious we have got ...
 19 MR HOUGH: We have a reasonably heavy day. We have
 20 Ms Siwan Hayward for TFL.
 21 THE CHIEF CORONER: Yes.
 22 MR HOUGH: We have Superintendent Holdcroft giving evidence
 23 as to the post-attack investigation, I think his
 24 evidence will be relatively brief. We have Mr Fenne
 25 dealing with body armour, and we have PCs Keen and

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1 Clarke dealing with the accident reconstruction, or the
 2 incident reconstruction, the vehicle movement on the
 3 bridge.
 4 THE CHIEF CORONER: Yes.
 5 MR HOUGH: So a reasonably full day.
 6 THE CHIEF CORONER: Yes. Shall we aim to start at 9.45 am
 7 again on Monday?
 8 MR HOUGH: Yes.
 9 THE CHIEF CORONER: And we will endeavour to take reasonable
 10 breaks. My apologies we didn't take a break before
 11 we were able to, but this morning we obviously needed to
 12 get through, if we could, the evidence of
 13 Commander Usher, and this afternoon again. But we will
 14 sit at 9.45 again on Monday. Thank you.
 15 (4.17 pm)
 16 (The court adjourned until 9.45 am on
 17 Monday, 1 October 2018)

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