

OPUS 2

INTERNATIONAL

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

Day 5

September 14, 2018

Opus 2 International - Official Court Reporters

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1 Friday, 14 September 2018
2 (9.02 am)
3 Submissions by MS STEVENS
4 THE CHIEF CORONER: Good morning, Ms Stevens. I'm conscious
5 that we have a limited amount of time before we
6 continue, so what I had in mind was to say that you can
7 certainly have 20 minutes, because I need to give time
8 for other people to respond. Can I just say two things:
9 first of all, I have not seen -- I understood there was
10 going to be a written application in respect of your
11 application yesterday for a jury. I have not seen one.
12 Has one been prepared?
13 MS STEVENS: So a short note setting out the relevant law as
14 we see it was sent yesterday.
15 THE CHIEF CORONER: To whom?
16 MS STEVENS: To counsel to the Inquest.
17 THE CHIEF CORONER: I don't think it was, because I'm fairly
18 confident, knowing Mr Hough and Mr Moss, that it would
19 have been circulated to every single other IP and it
20 would have reached me, so I have not seen that.
21 MS STEVENS: I'm very sorry for that. It was certainly
22 sent. I don't doubt for a moment if we're being told
23 that it wasn't received that something went wrong, for
24 which I apologise. But as far as I knew, that had been
25 received, I am afraid.

1

1 MR HOUGH: Sir, Mr Moss has just checked his emails and it
2 wasn't received.
3 THE CHIEF CORONER: Right.
4 MS STEVENS: All right, I'll have to ask my junior,
5 Mr Coke--Smyth, to have a look at that.
6 THE CHIEF CORONER: I mean, if it's a serious application it
7 needs to be put in writing so that everyone has
8 an opportunity to answer it.
9 MS STEVENS: Yes, well moving on to the stage that we've now
10 reached, we have --
11 THE CHIEF CORONER: I'm sorry, but is it a serious
12 application?
13 MS STEVENS: It is, yes.
14 THE CHIEF CORONER: Right, then it should be sent, as
15 a matter of priority, to every IP so they have a chance
16 to answer it.
17 MS STEVENS: Yes.
18 THE CHIEF CORONER: It's not a case of just moving on to the
19 next point.
20 MS STEVENS: No, no, I wasn't meaning to do that at all. As
21 far as we were aware, that had been dealt with
22 yesterday. All I was moving on to deal with is the fact
23 that we have reduced submissions to writing, so in light
24 of what was said yesterday about the guillotine, and in
25 light of the seriousness of the issues raised, which we,

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1 of course, accept, we have reduced submissions to
2 writing overnight and, indeed, the early hours of this
3 morning, and I say that simply because we haven't been
4 able to provide the submissions in advance.
5 But we hope that they assist. They are submissions
6 that we would have made otherwise orally, but we can
7 take matters more quickly because of the fact that
8 they're in writing. So can I hand up a copy to you,
9 sir, now, and ensure that they are circulated.
10 THE CHIEF CORONER: Well, it would have been rather nice to
11 have had these to read before we came into court.
12 MS STEVENS: We're dealing with unbelievable time
13 constraints, so we --
14 THE CHIEF CORONER: I appreciate that, but I am afraid that
15 is a fact of life in cases such as this, and the other
16 work I do in this building. I'm quite often emailed
17 late at night and even in the early hours of the morning
18 by counsel who want to make a point in a hearing
19 I'm starting either at 9.00 or 9.30 or 10 o'clock.
20 I much prefer to have it, even if it is sent in the
21 small hours of the morning, so at least I can look at it
22 before I come into court.
23 Are these copies for everyone else to have too?
24 MS STEVENS: Yes, there are.
25 THE CHIEF CORONER: Right.

3

1 MS STEVENS: In terms of that, the document was literally
2 completed and printed out kindly by my junior at,
3 I think, 8.20 this morning, at which point he had to
4 join me at court. So I'm very sorry, but we have
5 literally been working on this throughout the night, and
6 throughout this morning, and ...
7 THE CHIEF CORONER: Mr Keith, I'm going to rise so that
8 everyone has a chance to read this. I am afraid in my
9 experience handing out a 14-page document and expecting
10 everyone to understand the points that are made like
11 this is simply unworkable.
12 MR KEITH: Sir, we do note that on the one hand this
13 document was apparently sent last night by email, but
14 then was "worked on all night". And also, Ms Jones,
15 your solicitor, solicitor to the Inquest team, of course
16 sent out at 20.07 the tracked version copy of the
17 disclosure request which had apparently come from
18 Ms Stevens. Ms Stevens is an IP, or a representative of
19 an IP. She would have seen at 20.07 that the note
20 apparently sent to the Inquest team with the submissions
21 related to section 7 was not attached. Despite the fact
22 that many people in this court would have been working
23 until the small hours -- we certainly were -- it would
24 have been absolutely apparent to her that the notes had
25 not been circulated, but no steps were taken to remedy

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1 the position.
 2 THE CHIEF CORONER: Yes.
 3 MS STEVENS: Can I just deal with that, because clearly
 4 there is criticism is being levelled. There are two
 5 separate documents that are being referred to here the
 6 first one was a short note that I proceeded on the basis
 7 was circulated yesterday. That dealt with the distinct
 8 issue of the jury being summoned. In relation to the
 9 other matters that are contained within this second
 10 document, they are matters that other parties have been
 11 on notice of since 10 September, and what we've done is
 12 we've reduced to writing submissions that could
 13 otherwise have been made orally.

14 So in our submission, none of this needed to be
 15 reduced to writing over and above the issue in relation
 16 to the jury, and we've done so simply to assist you,
 17 sir, bearing in mind the timetabling matters.
 18 THE CHIEF CORONER: Right. Well, as I say, I'm going to
 19 rise and read it, and I suspect everyone else will, and
 20 we'll sit again in ten minutes' time and see where we
 21 go.

22 (9.09 am)

23 (A short break)

24 (9.19 am)

25 THE CHIEF CORONER: Yes.

5

1 MS STEVENS: Thank you. Hopefully now that everyone has had
 2 an opportunity to read the submissions it can be seen
 3 that they do take the place of what otherwise would have
 4 been oral submissions and were prepared to assist you,
 5 sir, rather than amount to any attempt to ambush any
 6 interested persons, and if difficulty has been caused by
 7 reducing these matters to writing, we apologise.

8 Can we at the outset of these submissions make clear
 9 that those I represent acknowledge and accept the
 10 reality of the situation. It would be quite wrong to
 11 proceed on the basis that we are not fully aware of not
 12 just the reality of the situation but how unpopular this
 13 application to adjourn is.

14 THE CHIEF CORONER: Can I just make clear, I don't make
 15 decisions in court based upon popularity; I make
 16 decisions based upon what I think is fairness to
 17 everyone and applying legal principles. Very often
 18 I make decisions which everyone finds unpopular, but
 19 they have to be the right decisions.

20 MS STEVENS: Yes, but we're very aware of the fact that
 21 there is inevitably going to be an uphill struggle as
 22 a result, and, sir, we very much take on board what you
 23 said yesterday about needing to be persuaded, and it's
 24 very much been reflected upon. That's why we didn't
 25 make the application to adjourn straight off on Monday.

6

1 We submitted a full written note, so the issues were
 2 raised, however, we wished to see if we could make
 3 progress this week, if it was possible to make progress
 4 such that the family can effectively engage with this
 5 Inquest and participate, then that would have been to
 6 everybody's advantage.

7 But the position has now been reached, through no
 8 fault of the family, and I use that term for the reasons
 9 set out in paragraph 2, it's the most appropriate
 10 shorthand. The family make the application now because
 11 the situation is such that they cannot effectively
 12 engage and participate in this Inquest unless further
 13 time is given.

14 Rather than this week resolving issues, the issues,
 15 in fact, have increased. Can I deal straightaway with
 16 the question of funding? To put the matter in context,
 17 the family of Police Constable Palmer currently have no
 18 state funding for representation. Their application for
 19 funding so that they could have lawyers at this Inquest
 20 was refused by the Legal Aid Agency on Thursday of last
 21 week.

22 In relation to that, taking a step back, any
 23 objective bystander would, of course, readily appreciate
 24 that although the family of Police Constable Palmer are
 25 not provided with state funding for representation, the

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1 various agencies involved have been represented by
 2 experienced counsel, in the case of the Metropolitan
 3 Police Service, silk and junior, no doubt since the very
 4 beginning of this process.

5 The net effect of the family being deprived
 6 representation is that although they were recognised as
 7 interested persons right near the outset of the Inquest
 8 process, despite having signed a confidentiality
 9 agreement very shortly after Police Constable Palmer's
 10 death, so it was signed way back in 2017, the effect of
 11 the decision has been so grave that they have no access
 12 to any of the evidence that has been generated and
 13 placed on the digital system. Nobody approached them to
 14 make inquiries about access. They, of course, would not
 15 have the knowledge to ask.

16 That example evidences the fact that, firstly, their
 17 interests are not represented by any other legal team,
 18 the assistance of other legal representatives is not
 19 available to them, and but for Kingsley Napley, who
 20 instruct us, and, indeed, counsel agreeing to act
 21 entirely pro bono, the family of Police Constable Palmer
 22 would have come to this Inquest on Monday with no
 23 knowledge of the evidence or the relevant issues.

24 We raise that because that is a vital consideration,
 25 in our submission, to a number of the issues that need

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1 to be dealt with, not just the question of
2 an adjournment, but also whether or not it's right when
3 it's stated by others that there would be no benefit
4 whatsoever from dealing with the issue of whether or not
5 there are Article 2 breaches here in terms of the
6 relevant test, whether it's arguable and more than
7 fanciful.

8 Sir, can I just pause there for one moment in
9 relation to the issue of funding. The case of
10 Humberstone, as I know you will be very familiar with,
11 does make plain that the views of the Coroner are of
12 great assistance to the Legal Aid Agency, and bearing in
13 mind the complexity of this Inquest, the seriousness of
14 the issues that are involved, the fact that complicated
15 and sensitive matters of security at the
16 Palace of Westminster are involved, questioning of
17 a number of officers, including those of the most
18 serious rank, is required.

19 Lastly, it's absolutely clear now that there are
20 serious issues as far as the family of Police Constable
21 Palmer is concerned, with the approach that's being
22 adopted by the Metropolitan Police Service. Requests
23 that have been made are not being met with the type of
24 constructive approach that the family would have hoped
25 for.

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1 The fact that we're now on the Friday of the first
2 week of the Inquest and the family still have no clarity
3 as to the position with legal representation, is one
4 that's causing them huge distress at a time when they
5 should be able to focus on the facts and issues arising
6 from the death of their relative. They should not, at
7 this time, be in a position where they have no clarity
8 as to funding, and in light of what is made clear in the
9 authority, we do wonder, sir, if you would be kind
10 enough, if you felt it appropriate, to make any
11 observations about the need for them to be represented,
12 bearing in mind there is no other representative who is
13 able to act on their behalf.

14 THE CHIEF CORONER: They were represented by other lawyers
15 earlier on, were they?

16 MS STEVENS: Sorry, sir?

17 THE CHIEF CORONER: They were represented by other lawyers
18 earlier on?

19 MS STEVENS: They've never been represented by those who
20 appear on behalf of Police Constable Palmer's widow.

21 THE CHIEF CORONER: That wasn't my question. Were they not
22 represented by lawyers at an earlier stage?

23 MS STEVENS: They were represented by those who appear on
24 behalf of the victims on the bridge.

25 THE CHIEF CORONER: Yes.

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1 MS STEVENS: However, from -- and I'm very grateful to the
2 instructing solicitor in relation to this matter, she's
3 been good enough to show me the relevant
4 documentation -- from March of this year it was made
5 clear that they were not representing the family of
6 Police Constable Palmer, and that was dealt with in
7 correspondence to the Inquest team.

8 So as of March, which is the critical time, because
9 that's when evidence started to be uploaded on the Opus
10 system, it was plain that unless anybody approached the
11 family, they would have no access whatsoever to any of
12 the evidence. The position is that those who appeared
13 prior to March are not able, for professional reasons,
14 to represent the family any longer. I'm not entitled to
15 inquire of them what the reasons are for the conflict,
16 but we have sought clarification of that and they are
17 not able to deal with it.

18 Sir, that's what we would ask for, which would be of
19 great assistance, but even if you did feel able to make
20 observations in relation to funding, that doesn't take
21 away from the position that we find ourselves in at this
22 stage, and the position is such that we have no option
23 to do anything other than ask for an adjournment.

24 THE CHIEF CORONER: Yes.

25 MS STEVENS: The application is set out in full in Monday's

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1 note and then amplified in writing, and can we make
2 clear that we understand and take on board the fact that
3 the timetable has been set for some time, and there's
4 an understandable desire not to alter that any further.

5 However, the timetable was set at a time before the
6 relevant evidence was served, and in relation to the
7 relevant evidence, that, of course, in the case of
8 Police Constable Palmer is all the evidence that has
9 only been forthcoming in the weeks leading up to the
10 Inquest, dealing with security arrangements. That
11 evidence, it was always known, would be pivotal in his
12 case.

13 So when the timetable was set, the family, of
14 course, didn't make any representations because they
15 didn't have any representation at all until August, but
16 if we go back and look at what was made clear on behalf
17 of the widow on 2 July, and if anyone wishes to follow
18 this it's at page 23 of the transcript, sir, when you
19 asked if there were any representations that anyone
20 wanted to make about the topic of timetabling and
21 witnesses, it was made clear then on behalf of the widow
22 of Police Constable Palmer the following:

23 "Sir, without wanting to be unhelpful, for obvious
24 reasons we cannot provide a definitive response in
25 relation to the witness list at this stage until the

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1 relevant evidence that we seek has been finalised.”
 2 And in terms of the relevant evidence it was made
 3 clear that that was the outstanding material in relation
 4 to security.

5 So in terms of the timetable, it was known that the
 6 timetable wasn't set in stone until interested persons
 7 were able to consider and reflect on the evidence of
 8 Commander Usher, Mr Hepburn, Ms Morris, and the key
 9 statements of Police Constable Ashby and
 10 Police Constable Sanders.

11 Can we move on, please, to the chronology in
 12 relation to that, because hopefully when that's
 13 considered, the submissions may be more persuasive,
 14 because it's not as others would have it appear.

15 When we look at the statements of Commander Usher
 16 and, of course, there are three substantial statements,
 17 to use the wording of counsel to the Inquest from
 18 yesterday, when we look at those, those were not
 19 available to the family of Police Constable Palmer until
 20 10 August, and in case that was in issue, you'll have
 21 seen at appendix 1 of the note from Monday, that's been
 22 confirmed by Opus.

23 So it wasn't until four weeks before the Inquest --
 24 THE CHIEF CORONER: Well, four weeks is quite a long time.
 25 Sitting in the other jurisdiction that I have, very

13

1 often the most important statements are served on the
 2 eve of the trial.

3 MS STEVENS: If it stopped there in relation to that, and if
 4 they related to straightforward --

5 THE CHIEF CORONER: So that's four weeks you've got that
 6 material.

7 MS STEVENS: Yes, as I say, if they were straightforward
 8 statements and if they didn't trigger other issues, then
 9 that may be right. However, in our submission, what's
 10 highly relevant is why were they not provided until
 11 after all the pre-inquest review hearings. The family
 12 would ask that rather than the focus being on what they
 13 have done since, the focus returns to why it is that the
 14 Metropolitan Police Service, knowing full well in 2017
 15 that there were issues in relation to the location of
 16 the authorised firearms officers, did not bring that to
 17 the attention of counsel to the Inquest and, indeed,
 18 yourself, sir, because the evidence has obvious
 19 ramifications. It has obvious ramifications in relation
 20 to arguable Article 2 breaches, it has obvious
 21 ramifications in terms of funding, and it has obvious
 22 ramifications as, indeed, the Metropolitan Police
 23 Service stated in their response, for the issue of
 24 whether or not a jury should be summonsed in this case.

25 If we take a step back and look at the evidence,

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1 giving the most generous interpretation to all of this,
 2 Commander Usher was aware in the summer of 2017 that
 3 there was an issue in relation to authorised firearms
 4 officers not being in close proximity of
 5 Police Constable Palmer when he was stabbed to death.
 6 It was known, therefore, at that stage that this was
 7 an important issue.

8 Arguably, and we would say using common sense, it
 9 must have been appreciated by the Metropolitan Police
 10 Service way before then. Those officers charged with
 11 investigating what happened, upon watching the CCTV,
 12 would have appreciated that there was no armed support
 13 when Police Constable Palmer was attacked.

14 We heard from Detective Superintendent Crossley,
 15 albeit he had no recollection to assist as to any idea
 16 of timing, that he did notify the Gold Commander. Using
 17 basic knowledge of the system that operates in relation
 18 to Gold Commanders, that notification must have occurred
 19 prior to the summer of 2017.

20 We can see from the initial report of the Department
 21 of Professional Standards, that it's
 22 dated September 2017. That raises -- just that document
 23 raises arguable breaches of Article 2 because it is
 24 clear that there were issues as to the systems in place
 25 and the supervision of the armed firearms officers. It

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1 was recognised by the Department of Professional
 2 Standards in September 2017 that the systems that were
 3 in place and the supervision of those systems was
 4 inadequate, such that the firearms officers were not in
 5 close proximity to Police Constable Palmer when he died.

6 Notwithstanding that, the family of Police Constable
 7 Palmer were not told anything about there being an issue
 8 at any stage by the Metropolitan Police Service. None
 9 of their family liaison officers or, indeed, any other
 10 officer within the Metropolitan Police Service has said
 11 to the family: unfortunately there is an issue here, the
 12 authorised firearms officers who should have been there
 13 to protect Police Constable Palmer when we acknowledged
 14 that unarmed officers in high-visibility jackets at
 15 Carriage Gates, which we knew was a highly vulnerable
 16 area, open to target by terrorists, that unfortunately,
 17 despite all of that and despite the systems in place,
 18 there is an issue here, because we have watched the CCTV
 19 and for 15 minutes there were no authorised firearms
 20 officers anywhere near Carriage Gates.

21 The family are extremely distressed by the fact that
 22 nobody from the Metropolitan Police Service spoke to
 23 them to let them know there was any issue.

24 Turning, if I may, to what's said in the MPS
 25 response to the family's application to adjourn, which

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1 of course they strongly oppose, can I turn, please, to
 2 paragraph 6. It's said by the Metropolitan Police
 3 Service that:
 4 "All the IPs were aware, of course, from
 5 18 May 2018, that Police Constables Ashby and Sanders
 6 were to be called as witnesses."
 7 The fact that the family of Police Constable Palmer
 8 knew that those two individuals were going to be called
 9 as witnesses did not in any way assist them in terms of
 10 their preparation or application for funding. What they
 11 needed to know, and what they were entitled to know,
 12 before the start of the Inquest, in reasonable time to
 13 enable them to properly engage, was what those witnesses
 14 had to say, and, sir, you may not be aware of this
 15 because, of course, one could look at the dates on the
 16 statements and make what might be reasonable inferences
 17 but, in fact, would be incorrect assumptions, so the key
 18 statement of Police Constable Sanders is his fourth
 19 statement.
 20 The date on the fact of that statement is
 21 15 June 2018. If that statement was a straightforward
 22 one in the way that the Metropolitan Police Service
 23 suggest, why did it take until 3 September, the Monday
 24 before the Inquest, for that key statement to be
 25 uploaded?

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1 Looking at that statement, it would have been
 2 obvious that that was a statement that the interested
 3 persons would need to see as quickly as possible,
 4 because if we look at it, this is the statement that
 5 makes it clear that, far from Commander Usher
 6 suggesting, namely that the systems in place were
 7 sufficiently clear albeit not adequately supervised and
 8 dealt with, if we look at the second page of that
 9 statement, Police Constable Sanders says that, in fact,
 10 sector 3 involves a patrol within New Palace Yard.
 11 Therefore, as far as the armed firearms officers,
 12 authorised firearms officers are concerned — and he
 13 says he has been doing this for five years and that
 14 every other authorised firearms officer would support
 15 what he has to say — he says that sector 3 involves
 16 this patrol, which means that it's obvious if authorised
 17 firearms officers are patrolling other areas of
 18 New Palace Yard, they're not going to be in close
 19 proximity of those vulnerable officers at the open
 20 Carriage Gates.
 21 No explanation has been given for why it took that
 22 significant period of time to make the statement
 23 available, and of course if it's unfair for the
 24 Metropolitan Police Service to be given notice of
 25 arguments two days beforehand, it's absolutely plain

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1 that it's not fair to give interested persons such
 2 important information.
 3 And it doesn't stop there, because if we look at
 4 what followed, there was then an additional statement,
 5 and so I do ask you to consider the statement of
 6 Police Constable Sanders, dated 25 August —
 7 THE CHIEF CORONER: I will certainly look at them.
 8 I haven't got them in front of me because this material
 9 is not set out in your note that you handed round this
 10 morning, which I perhaps now wrongly assumed were your
 11 primary submissions which you were going to add on,
 12 because I said when we started this hearing I was going
 13 to give you 20 minutes.
 14 So far, Ms Stevens we haven't come onto — yesterday
 15 afternoon you asked me for 15 minutes to consider the
 16 disclosure response given by Mr Hough. At the moment,
 17 we haven't even touched upon why it is what he said that
 18 you said came to you fresh that you needed to respond
 19 to.
 20 At the moment you are dealing with a whole range of
 21 points, as I say, none of which are set out in your
 22 note. You haven't dealt with the reason why you asked
 23 for the 15 minutes yesterday, and I have other people
 24 who wish to respond to the points that you have made.
 25 MS STEVENS: Sir, yes. Just dealing with those matters, if

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1 we may. In relation to it not being in the note, this
 2 document isn't a note, as such. They are submissions
 3 that would otherwise be made orally, so they're written
 4 submissions that were to be amplified.
 5 THE CHIEF CORONER: But the point you are making about the
 6 importance of these statements and not having the time,
 7 I would have expected that, myself, to have been in the
 8 note, and I could have then looked myself and refreshed
 9 my memory of what it is that is contained in those
 10 statements.
 11 MS STEVENS: Well, we're aware of the guillotine and we have
 12 reduced matters in relation to disclosure to writing.
 13 Could I deal with the point in relation to the
 14 statement, please, because it assists in relation to
 15 a number of the interlinked issues. It assists as to
 16 why it's reasonable and fair to have an adjournment, and
 17 it also assists as to why it's not right when it's said
 18 that disclosure has been dealt with.
 19 If one looks at the statement, it's a statement
 20 which refers to a briefing that Police Constable —
 21 THE CHIEF CORONER: As I say, I don't have the statement in
 22 front of me, Ms Stevens. If you want me to refer to it,
 23 I either need to rise to get my copy of it —
 24 MR HOUGH: I can hand up a copy.
 25 THE CHIEF CORONER: Thank you.

20

1 MS STEVENS: I'm very grateful to my learned friend. Thank
2 you.

3 MR HOUGH: It's 25 August.

4 MS STEVENS: Thank you very much.

5 I'm very grateful to -- sorry, sir, I'm being spoken
6 to by my learned friend. (Pause).

7 Sir, in that we'll see that the statement refers to
8 a briefing that Police Constable Sanders was given on
9 20 February last year, and in that briefing, and he
10 names the person who gives it to him, Superintendent
11 Simon Causer. He says it was distributed by email on
12 20 February by Police Sergeant McDowell, and then in the
13 following week Superintendent Causer and
14 Superintendent Dellar:

15 "... attended the parade briefings to speak with us
16 about the changes ..."

17 With that briefing, and we haven't had disclosure of
18 the email, we haven't had disclosure of the briefing,
19 and none of the people named have been spoken to to give
20 evidence, notwithstanding the fact that this is a key
21 and significant issue, because he says that with that
22 email and in the various briefings, the patrol areas
23 were notified to authorised firearms officers, and the
24 notification given was that the patrol area by them was
25 to cover the entirety of New Palace Yard, which, of

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1 course, is completely contradictory to what
2 Commander Usher says in his statement.

3 That material is clearly significant and the
4 disclosure, in our submission, is important before any
5 of the officers who were present within New Palace Yard
6 give evidence.

7 In terms of the adjournment, the position has been
8 reached that the time that we have had we have been
9 having to grapple with issues that the widow has not,
10 and I don't say that in any way to diminish her
11 position; it's just the reality of the situation which
12 means that her position shouldn't be determinative, and
13 this is dealt with at paragraph 11(f) of the
14 submissions.

15 The difficulty and the extent of the difficulty for
16 the family is such that if no further time is provided
17 at all, and if evidence is called today that impacts on
18 Police Constable Palmer, we are going to have to very
19 carefully review our professional obligations, and I say
20 that not in any way to seek to influence you, sir, but
21 simply it shouldn't be assumed that we will be able to
22 represent the family's interest.

23 The amount of preparation that's been required and
24 the fact that the limited time has been taken up with
25 having to grapple with funding, having to deal with

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1 outstanding disclosure requests, having to respond to
2 the approach of the Metropolitan Police Service, all of
3 that has meant that we're simply not in a position to
4 question those witnesses who were present in
5 New Palace Yard.

6 It was said yesterday that reasonable accommodation
7 can be made. At this juncture, there is no suggestion
8 as to what that reasonable accommodation will be. Can
9 we make it clear, if it is possible to put the witness
10 evidence back that affects Police Constable Palmer to
11 the slot where Commander Usher is giving evidence, that
12 should, and would, provide adequate time to deal with
13 the funding issues, particularly, sir, if you are
14 willing to give any helpful observations, and it will
15 also enable us now, because we've dealt with the
16 Article 2 point, in that that's been reduced to writing,
17 we've dealt with outstanding disclosure, that's been
18 reduced to writing. We can now focus solely on the
19 question of preparation.

20 So if that is a viable alternative, that would
21 alleviate the need for an adjournment, but if it is
22 suggested that we have to start today with evidence that
23 impacts Police Constable Palmer, we are in no way able
24 to deal with that.

25 Of course we acknowledge there are competing

23

1 considerations. We've dealt with those competing views
2 in relation to the widow at paragraph (f).

3 Can we just deal briefly with the issues in relation
4 to the other matters that have been raised.

5 In terms of the other --

6 THE CHIEF CORONER: In brief you may. So far -- it is
7 nearly 10 o'clock, so anyone with a watch will know that
8 20 minutes isn't an hour, Ms Stevens, and as I say,
9 I understood what you were doing was simply to amplify
10 some bits in the note which you handed out this morning.

11 MS STEVENS: So be it. We'll move on then.

12 In relation to Article 2 we have reduced those
13 submissions into writing.

14 THE CHIEF CORONER: Is there anything you want to say in
15 addition to what is set out in the note and the comments
16 you've already made, because I have a number of other
17 people who I need to hear from.

18 MS STEVENS: Of course. That's understood. No, as long as
19 the matters that are contained within the note are taken
20 into consideration before any decision is made, there's
21 nothing further that we would wish to raise.

22 THE CHIEF CORONER: Thank you.

23 MS STEVENS: Sir, do you wish me to move on to Article 2 now
24 or are you going to hear from other interested persons
25 about the adjournment?

24

1 THE CHIEF CORONER: I'm assuming that what you wanted to say
 2 about Article 2 was set out in the written note that you
 3 said was comprehensive, the points that you were
 4 raising. I am not inviting you to say anything further
 5 about it. I've got in mind the points that you say
 6 where Article 2 is engaged and you say I should make
 7 a decision now. I've understood all those points.
 8 MS STEVENS: Thank you. Can I just deal with one --
 9 THE CHIEF CORONER: Ms Stevens, you are at the risk of
 10 trying my patience. As I say, is there anything further
 11 to what you've already said, it's not an opportunity to
 12 re-echo things you have already said; this is a time for
 13 you to say if there are any other points that aren't in
 14 these documents.
 15 MS STEVENS: There was just one point, sir, about Article 2
 16 if I may. If that isn't considered appropriate, bearing
 17 in mind my sole focus is to represent the views of the
 18 family of Police Constable Palmer, if it's causing
 19 frustration that does not serve their interests well,
 20 and therefore I will leave the floor to the others that
 21 you need to hear from.
 22 THE CHIEF CORONER: Thank you.
 23 Mr Hough, can I, in relation to the four points that
 24 were on the deck yesterday, you responded and we then
 25 went into the position of dealing with the disclosure

25

1 requests and your response to that. I am aware that a
 2 further long list of disclosure requests, or perhaps
 3 they might be better phrased, a further inquiry list has
 4 been submitted, I think when you were on your feet
 5 yesterday afternoon in court. And I know, with the
 6 Inquest team, you will diligently look at that request,
 7 that list of inquiries, and I've little doubt that you
 8 will get such assistance as Mr Keith can give you in
 9 relation to the requests which turn on the material the
 10 Metropolitan Police may or may not have.
 11 I'm not going to invite you to respond to that this
 12 morning, because it seems to me that process has to take
 13 its turn.
 14 MR HOUGH: Yes, sir.
 15 THE CHIEF CORONER: In relation to the principal points
 16 which were raised yesterday, namely is this a case where
 17 I should adjourn the Inquest into Keith Palmer, does
 18 Article 2 bite, should I make a decision now or defer it
 19 to the conclusion of the evidence, those, it seems to
 20 me, are the two issues which you have addressed.
 21 The one which you didn't was in relation to whether
 22 a jury should now be summonsed, and it seems to me that
 23 is a fundamental issue that I need to hear from you in
 24 relation to, plus then any views that others may have.
 25 For my part, I don't require any further material

26

1 from you in relation to those other two questions.
 2 Submissions by MR HOUGH QC
 3 MR HOUGH: Thank you, sir. Let me deal with the jury point,
 4 the jury question, very briefly then.
 5 Section 7(1) of the Coroners and Justice Act 2009
 6 provides that:
 7 "An inquest ... must be held without a jury unless
 8 subsection (2) or (3) applies."
 9 So the starting point is under the statute that
 10 there should not be a jury in an inquest.
 11 Section 7(2)(b) provides that a jury should be
 12 summoned if the coroner has reason to suspect:
 13 "that the death resulted from an act or omission
 14 of --
 15 "(i) a police officer ...
 16 "... in the purported execution of his or her duty."
 17 We submit that this subsection does not apply in the
 18 present case and nobody suggested that it did until
 19 yesterday.
 20 So you have the slightly under one page of
 21 submissions from my learned friend Ms Stevens to the
 22 effect that it does in her note.
 23 As to the construction of section 7(2)(b) the
 24 predecessor section was 8(3)(b) of the Coroners Act 1988
 25 which provided that a jury should be summoned if there

27

1 was reason to suspect that a death had resulted from an
 2 injury caused by an officer in the purported execution
 3 of his duty.
 4 Sir, like the predecessor provision, section 7(2)(b)
 5 focuses attention on the question of whether the death
 6 resulted from the conduct of one or more specific police
 7 officers. However, it now extends to omissions causing
 8 death, as well as the actual infliction of injury.
 9 An example of an omission causing death is the culpable
 10 failure to summon medical attention for an obviously
 11 vulnerable individual in a police station, see R (on the
 12 application of Fullick) v Senior Coroner For Inner North
 13 London [2015] EWHC 3522 Admin.
 14 The policy underlying the section is that deaths
 15 caused by state agents require scrutiny by a tribunal
 16 which has the perceived additional independence of
 17 a jury, see Shafi v East London Senior Coroner [2016]
 18 1 WLR 640 at paragraph 60.
 19 However, this section must be applied in a common
 20 sense manner, as has been held with regard to the
 21 construction of the closely connected provision
 22 requiring a jury for deaths in state detention, see Ex
 23 Parte Linnane [1989] 1 WLR 395, applied in R (on the
 24 application of Ferreira) v Inner South London Senior
 25 Coroner [2018] QB 487 at paragraph 110.

28

1 So the question is whether there is reason to
2 suspect that a substantial cause of Keith Palmer's death
3 was an identifiable act or omission of one or more
4 specific police officers .

5 Finally on construction, we would observe that while
6 the test of reason to suspect sets a relatively low
7 evidential threshold, it does not mean that a coroner
8 should summon the jury on the basis of speculation. Nor
9 does it avoid the need to ask whether the facts can
10 really justify the conclusion that death in reality
11 resulted from an act or omission of an officer .

12 Looking at the matter, then, from a commonsense
13 perspective, our first submission is that applying that
14 robust approach suggested in Linnane and Ferreira,
15 nobody would say that the cause of Keith Palmer's death
16 was the act or omission of a police officer . He was
17 attacked without notice or provocation, savagely, by
18 a terrorist in a public place. His colleagues around
19 him obviously gave such assistance as they could.
20 Within seconds of the attack starting, Keith was fatally
21 injured. Within a few seconds more, armed officers
22 confronted and shot his attacker. To characterise his
23 death as the result of acts or omissions of police
24 officers would strike any non-lawyer in this room as
25 absurd.

1 But even looking at the matter more analytically and
2 focusing upon the terms of the section, the position we
3 say is clear: we don't accept that Keith Palmer's death
4 was caused by an omission of PCs Ashby and Sanders.
5 First the evidence, both their evidence and the evidence
6 of the DPS report, suggests that the patrolling they
7 conducted was in accordance with common practice.

8 Secondly, it is, and must be, entirely speculative
9 whether a different form of patrol or positioning of
10 these officers would have saved or even might have saved
11 Keith Palmer's life . We can't know, first of all,
12 whether even if positioned by Carriage Gates they, or
13 one of them, would have gone to the sound of the
14 collision with the railings, which sounded to many like
15 a bomb, just as they did in reality . If they had gone
16 there, to what many, as I say, thought was an explosion
17 outside Parliament, they would have been out of sight
18 and out of safe range for their weapons.

19 Secondly, we can't know, even if remaining by
20 Carriage Gates, they would have been able to fire on
21 Masood before he inflicted the fatal injuries on Keith.
22 After all, Masood engaged Keith immediately and was
23 close on him right up to the time he inflicted the fatal
24 injury. It would have been potentially fatal to Keith
25 to fire at Masood while the two were physically engaged.

1 When such matters remain wholly speculative, we say
2 that it is wrong to say that Keith Palmer's death
3 resulted from an omission by PC Ashby or by PC Sanders,
4 and furthermore we say it is very unfair to those
5 officers to suggest as much.

6 Neither do we accept that section 7(2)(b) can be
7 engaged merely because some systemic flaw in police
8 protective procedures may be found which may have
9 contributed to a death, and that's the nub of the
10 argument advanced in detail by Mr Adamson in his
11 submissions. An approach of that kind to the subsection
12 would radically, and we say wrongly expand its scope.
13 It would ignore the wording of the section, which is to
14 require that death should have resulted from the act or
15 omission of an officer .

16 So for all those reasons, sir, we submit that this
17 subsection does not apply in the present case. My
18 understanding, sir, is that the widow of PC Palmer will
19 not be submitting that it does.

20 THE CHIEF CORONER: Yes, can I just ask if anyone wishes to
21 make any submissions in respect of the jury point? It
22 may be people support what's been said by Mr Hough, but
23 it's really whether there are other points that need to
24 be made.

25 Mr Keith?

1 Submissions by MR KEITH QC
2 MR KEITH: Sir, we are in a position to respond extremely
3 briefly in relation to the section 7 application. We
4 note too that it's not supported by the widow of
5 PC Palmer. We note also that given the material which
6 forms the basis of this purported application was made
7 available in late August it is surprising that it has
8 not been made up until now.

9 The wording of section 7(2) in our submission also
10 differs from the wording in the predecessor section,
11 section 8, because the wording "caused or causing", has
12 been changed to one of "resulting from", and therefore
13 this section is different to the predecessor section and
14 different from the wording in section 7(3).

15 We too submit it would be absurd to proceed on the
16 basis that a causative system whereby any act or
17 omission of a police officer, however far derived from
18 the instant event could be said to generate a mandatory
19 requirement for a jury.

20 Is it, for example, to be suggested that a failure
21 to taser Masood, a failure to close Carriage Gates, the
22 failure of Parliamentary Authorities to shut the gate
23 even during division periods, are acts or omissions from
24 which the death of PC Keith Palmer resulted. Those
25 arguments are entirely speculative and they are contrary

1 to what we say is the proper construction to be given to
2 section 7(2). The application has no merit at all.

3 Submissions by MR N MOSS

4 MR N MOSS: Sir, if "resulted from an act or omission" in
5 section 7(2)(b) of the 2009 Act encompassed every type
6 of case where it is said that the police had failed to
7 intervene in a homicide or in a suicide, every inquest
8 where there is reason to suspect that the police perhaps
9 could have done more to prevent death at the hands of
10 somebody else would require a jury.

11 We respectfully doubt that could ever have been the
12 intention behind the revised wording in section 7 of the
13 2009 Act when compared to section 8 of the 1988 Act.
14 That earlier Act would most certainly not have required
15 a jury.

16 PC Keith Palmer's death resulted from Masood's evil
17 attack, full stop. Any question of missed opportunities
18 or other steps that might have been taken are properly
19 to be explored, but they do not require the calling of
20 a jury.

21 THE CHIEF CORONER: Yes.

22 Submissions by MR ADAMSON

23 MR ADAMSON: Sir, I associate myself with Mr Moss' final
24 point; I do not necessarily associate myself with all of
25 the submissions more generally. I have set out in

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1 landscape, in my submission, the way in which I will be
2 pursuing cross-examination of witnesses, and I wouldn't
3 want anything that's just been said in the context of
4 the jury to be seen as a way of constraining the likely
5 line of questioning that I will be pursuing with those
6 witnesses.

7 THE CHIEF CORONER: Yes.

8 MR ADAMSON: Can I also say in relation to the adjournment,
9 I reiterate what I say in relation to the note: we
10 simply do not support it.

11 THE CHIEF CORONER: Yes. So in relation to the adjournment,
12 Mr Adamson, I take the view that I've got people's
13 positions very clear in respect of that, I've got
14 people's positions very clear in respect of the issue
15 about when -- if I should deal with Article 2.

16 I indicated at the close of play yesterday that I would
17 need great persuasion about the adjournment, and
18 I indicated, I believe, what my current view is in
19 relation to Article 2.

20 MR ADAMSON: Yes, in relation to those points, again I hope
21 that I have set out my position in my note. I do
22 associate myself with the criticisms that Ms Stevens has
23 made about some of the timing of the disclosure of the
24 evidence in this case.

25 THE CHIEF CORONER: Yes.

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1 MR ADAMSON: But as I say in my note, we are where we are.

2 THE CHIEF CORONER: Yes.

3 MR ADAMSON: The reality is that in fact if one examines
4 what Ms Stevens said regarding the points she was
5 raising, in essence I say that she is essentially
6 articulating what I have said in my note about
7 criticisms which can be made about the system that was
8 in place.

9 So I think one can be confident that the question of
10 the adequacy of the system for security at
11 New Palace Yard, at those gates on that day, will be the
12 subject of scrutiny in the course of these proceedings.

13 THE CHIEF CORONER: Ms Stevens, it seems to me I should give
14 you the opportunity to reply to the points made by
15 Mr Hough and by Mr Keith in relation particularly to the
16 jury point and the points made by Mr Moss as well.

17 Submissions in reply by MS STEVENS

18 MS STEVENS: Thank you. Three short points to make which,
19 in our submission, do give sufficient for there to be
20 a proper foundation that omissions had the requisite
21 causative effect.

22 Number one, if there were armed police officers at
23 Carriage Gates and Carriage Gates was their sole focus,
24 then at the time that we will all remember on the CCTV
25 footage when the large swell of members of the public

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1 were running past and, indeed, one of the members of the
2 public indicates to the police backwards behind them in
3 the direction from which Mr Masood was to come, if there
4 had been armed firearms officers, then Police Constable
5 Palmer and his colleagues would have been able to
6 retreat, which is no doubt the training that's given in
7 relation to the combination of armed firearms officers
8 at Carriage Gates and unarmed officers. What should
9 occur, no doubt, is those who are unarmed retreat, and
10 those who are armed cover the gates. So that's point
11 number one. And, in fact, the second one can be made
12 very briefly, and it is this: rather than unarmed
13 colleagues being left utterly helpless whilst
14 Police Constable Palmer was being stabbed to death,
15 there would have been officers with firearms who would
16 have been able to deal with Mr Masood. We'll all
17 remember for a very long time to come the image of
18 Police Constable Palmer on his back being attacked by
19 Mr Masood. If there was armed support, there's a proper
20 evidential basis for the fact that that would not have
21 happened. Those are our submissions. Thank you for the
22 opportunity to respond.

23 Ruling

24 THE CHIEF CORONER: Well, Ms Stevens, I am afraid

25 I'm against your applications, first of all for this

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1 Inquest to be adjourned in relation to PC Keith Palmer.
2 I'm also against you in relation to your application
3 that a jury should be summonsed.

4 In relation to the issue as to whether I should at
5 this stage determine whether Article 2 is engaged or
6 not, I propose simply to defer that until the conclusion
7 of all the evidence.

8 Can I make clear that I will provide in due course
9 full written reasons in respect of those decisions that
10 everyone will have.

11 In relation to the issues over disclosure, I don't
12 propose at this stage to make a determination about the
13 specific points of disclosure which are raised. It
14 seems to me that in the course of what was said
15 yesterday afternoon by Mr Hough, he set out in some
16 detail the response to the specific requests for
17 disclosure, or indeed, for further information inquiry
18 where that is perhaps the more appropriate heading for
19 those matters, and it seems to me that has really
20 answered the points that were made in your document from
21 Monday.

22 But I am conscious, as I indicated to Mr Hough, that
23 there were further requests made during the course of
24 yesterday afternoon which I have no doubt, as I say,
25 that the Inquest team, they have so far been extremely

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1 impressive in dealing with all of the requests made by
2 all IPs in relation to any material which is sought, and
3 I have little doubt, Ms Stevens that they will do their
4 utmost to ensure that those requests made on behalf of
5 those you represent will be dealt with in exactly the
6 same way, seeking assistance where they need it, from
7 Mr Keith, and, again, knowing Mr Keith as I do, I have
8 little doubt that he will provide assistance even if it
9 means those who instruct him having to work long into
10 the night to deal with it, to ensure that such material
11 as is thought to be required is actually made available
12 to all IPs so that the investigation and this Inquest,
13 so far as PC Palmer is concerned, will be both thorough
14 and detailed.

15 MR HOUGH: Sir, we propose to deal with those in
16 correspondence, which is the usual way we've dealt with
17 the very many queries over disclosure that have been
18 made over a series of months.

19 So, of course, not every point in the list delivered
20 last night translates obviously into an inquiry for
21 specific documents. Some of them are points for
22 cross-examination of witnesses.

23 THE CHIEF CORONER: Mr Keith.

24 MR KEITH: Sir, may I say that, of course, we stand ready to
25 assist your Inquest in relation to the further requests

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1 which have been made, which we agree appear more to
2 resemble requests for further investigation in
3 an attempt to provide forensic footing for examination
4 of witnesses, and may I say in light of the criticism
5 which has been directed at the Metropolitan Police
6 Service, we don't accept for one moment the many things
7 that Ms Stevens has alleged in relation to alleged
8 non-disclosure. It's highly regrettable and unfortunate
9 that the submissions should have been put in that way
10 because, of course, the Metropolitan Police Service was
11 not asked until May or June to provide those statements,
12 the evidence, the investigative steps and everything
13 that was sought by the Inquest team, the bulk of it was
14 provided on 16 July in accordance with the direction of
15 you.

16 THE CHIEF CORONER: Yes.

17 MR KEITH: There was no obligation to put into the public
18 domain any of the matters concerning the disciplinary
19 conduct proceedings, anything to do with the armed
20 firearms officers, all of which was disclosed in
21 Mr Usher's witness statements and the submissions we
22 fear are more, we think to attempt to generate a footing
23 for a further application for funding, or perhaps to
24 generate headlines than is borne by the reality.

25 THE CHIEF CORONER: Can I just say in relation to the

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1 funding issue, Mr Keith, deliberately I haven't said
2 anything about it. I want to consider it. It seems to
3 me, again, if I am to say anything about it, it's
4 something I am likely to do in writing to the
5 appropriate authorities rather than say anything in the
6 course of this — openly in the course of this Inquest
7 hearing. I will, of course, if I write, provide a copy
8 of that letter to Ms Stevens and those instructing her.

9 MR KEITH: Indeed. Sir, you will obviously be aware, and it
10 is set out in detail in our written submissions that Mr
11 Usher's statement was provided to us on 16 July and
12 Ms Stevens and her team gained access to it when they
13 were given access to the Opus system, regrettably
14 delayed by a week, but nonetheless a week after they
15 applied for access and were instructed, which was
16 6 August. The further statements from Sanders and
17 Ashby, they were given immediate access to those
18 statements because by the time they were uploaded by the
19 Inquest team, they had access to the Opus system.

20 THE CHIEF CORONER: I sort of rather indicated in the course
21 of argument, Mr Keith, we are all familiar with getting
22 really quite chunky material sometimes in cases at the
23 last moment and we all have to do our best to deal with
24 it, for good reason or bad reason, sometimes material
25 comes that late.

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1 MR KEITH: Indeed.
 2 THE CHIEF CORONER: I haven't dealt with in the course of my
 3 very brief setting out what my decision is, the fact of
 4 the written documents that I've had, but the one thing,
 5 Mr Keith, I can normally be relied upon to do is to read
 6 any material that is sent to me, and I don't normally
 7 require people to amplify what is in a written document
 8 or to regurgitate it. I can be expected to read it, to
 9 understand it, hopefully, and to apply it. Thank you.
 10 Mr Hough, I'm going to suggest I rise simply so that
 11 we can get ourselves ready to embark on listening to the
 12 evidence which is timetabled to be listened to today.
 13 I ought to formally apologise to anyone who arrived
 14 expecting us to be sitting at 10.00 or 10.15 to start
 15 the Inquest hearing. For those who came in late, just
 16 to fill them in, at the end of yesterday it became
 17 apparent that there were certain issues that Ms Stevens
 18 quite rightly wished to bring to my attention, and the
 19 net effect was we adjourned the Inquest hearing quite
 20 late yesterday afternoon, I think at about 5.35, and
 21 I indicated that I would sit this morning at 9.00 to
 22 deal with the legal applications that were placed before
 23 me, and I appreciate at the time I made that decision
 24 many people who would have been in court had already
 25 left, so my apologies to anyone who wished to be here to

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1 hear the argument but they have not been able to do so.
 2 Of course, what was said will be fully transcribed
 3 and available on the daily transcript. As I say, my
 4 apologies to those who fear that they have lost out on
 5 part of the important issues that this hearing has been
 6 canvassing this morning.
 7 MS STEVENS: Before you rise, just to say we mean absolutely
 8 no discourtesy for the fact we won't be present when the
 9 Inquest resumes, just because we obviously need to have
 10 a conference now.
 11 THE CHIEF CORONER: Certainly. I'll rise.
 12 (10.21 am)
 13 (A short break)
 14 (10.35 am)
 15 MR HOUGH: Sir, just before we call the first witness, may
 16 I indicate what the order of witnesses will be today?
 17 THE CHIEF CORONER: Yes.
 18 MR HOUGH: DC Osland giving evidence as to the individual
 19 compilation concerning PC Keith Palmer. We then propose
 20 to read extracts of two witness statements of Mr Knight
 21 and Mr Campbell.
 22 THE CHIEF CORONER: Yes.
 23 MR HOUGH: Then the evidence of Antonia Kerridge, then that
 24 of James West, then that of PC Ross, then that of
 25 PC Glaze, and we will probably then, if time allows,

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1 turn to the evidence of DC Overall giving evidence as to
 2 the compilation and maps concerning movements of
 3 PCs Ashby and Sanders.
 4 THE CHIEF CORONER: Yes.
 5 MR HOUGH: If we finish his evidence we will start PC Ashby.
 6 So Mr Osland, please.
 7 DC SIMON OSLAND (Recalled)
 8 Examination by MR HOUGH QC
 9 MR HOUGH: DC Osland, you are still on oath and you have
 10 given your name and role in Operation Classific .
 11 A. Yes, sir .
 12 Q. I think you prepared for the Inquests an individual
 13 compilation of footage and other materials, audio visual
 14 materials, in relation to Keith Palmer?
 15 A. I did, yes.
 16 Q. Perhaps that can be brought onto the screen now, and it
 17 will open with a photograph of Keith.
 18 (Video played in court)
 19 Then next we see a photo of Keith taken with
 20 a member of the public?
 21 A. Yes.
 22 Q. Pause there. That was a photograph taken with the
 23 member of the public at the barrier to the
 24 Carriage Gates entrance?
 25 A. Yes.

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1 THE CHIEF CORONER: I've got a different picture on my
 2 screen.
 3 MR HOUGH: If we can bring back the picture at the barrier,
 4 please.
 5 THE CHIEF CORONER: Thank you.
 6 MR HOUGH: Pause there. DC Osland, this is to show Keith at
 7 his post at the entrance to Carriage Gates, I think?
 8 A. Yes.
 9 Q. And we heard in the pen portraits on Monday about Keith
 10 being the public face of Parliament in that way?
 11 A. Yes.
 12 Q. If we can now move to the first clip. Thank you, Oli.
 13 Pause here. Are we now looking at CCTV footage from
 14 a camera looking across Bridge Street and down at the
 15 north-west corner of the parliamentary estate?
 16 A. Yes, we are.
 17 Q. This is a few seconds after the Hyundai has crashed into
 18 the railings .
 19 A. Yes.
 20 Q. And he is out of shot to the left, I think.
 21 A. He's just in shot to the left there.
 22 Q. The car is slightly out of shot?
 23 A. Yes, that's correct, yes.
 24 Q. And we'll see Masood running around the perimeter. He
 25 will be circled. We'll then see him entering

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1 Carriage Gates attacking PC Palmer as he enters and
 2 driving Keith Palmer towards the low wall around the
 3 grassed area?
 4 A. Yes.
 5 Q. And we'll pause as Masood enters. So play on, please.
 6 Masood indicated there.
 7 A. Yes.
 8 Q. And pause there. Have we just seen Masood entering
 9 around the middle of the screen, driving Keith Palmer
 10 back towards the low wall where we see he is now
 11 stumbling?
 12 A. Yes.
 13 Q. Play on, please. We're seeing Masood continuing to stab
 14 Keith Palmer. Pause there. Have we just seen another
 15 officer come forward and Keith taking the opportunity in
 16 the moment's distraction to get away from the attack?
 17 A. Yes, that's correct.
 18 Q. And then in the moments that follow, we'll see the
 19 officers, including Keith, run through the vehicle
 20 barrier, which has risen to allow a car to exit, pursued
 21 by Masood?
 22 A. That's correct.
 23 Q. Play on, please. Masood is just going past the vehicle.
 24 Pause there. We just saw Masood confronted and shot?
 25 A. Yes.

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1 Q. Play on, please. And pause.
 2 Now here I think we're looking at footage from
 3 a fixed camera looking in towards New Palace Yard from
 4 the north-west corner?
 5 A. Yes.
 6 Q. We'll see Carriage Gates on the right of the shot with
 7 the security hut in the foreground, and we'll see the
 8 officers, including Keith Palmer, who are manning the
 9 gates behind the hut, just visible through the windows
 10 in their yellow vests?
 11 A. Yes.
 12 Q. Play on, please.
 13 And we see -- just pausing there, we see that at
 14 this point, the vehicle barrier has risen for the car to
 15 enter?
 16 A. Yes.
 17 Q. To exit, rather. Play on, please.
 18 We're now seeing some movement among the officers,
 19 and shortly after we'll see Keith Palmer backing away,
 20 forced back by Masood?
 21 A. Yes.
 22 Q. Pause there. This is probably the most vivid footage of
 23 the attack actually taking place?
 24 A. Yes, it is. Yes.
 25 Q. By the low wall. Play on, please.

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1 Pause there. So during that ferocious attack we've
 2 seen a colleague has run forward towards Masood and
 3 Keith has taken the opportunity to move away?
 4 A. Yes.
 5 Q. Play on, please.
 6 Pause there. We've just seen from this different
 7 perspective the officers running through the channel
 8 left open by the gate, the barrier having risen, and
 9 Masood pursuing them and Masood now being shot?
 10 A. Yes.
 11 Q. Play on, please.
 12 And pause. I think we're now looking at
 13 a photograph taken by a witness who will be giving
 14 evidence during Masood's Inquest,
 15 Christopher Shoebridge?
 16 A. Yes.
 17 Q. Taken from a window in Portcullis House, the building
 18 immediately opposite New Palace Yard across
 19 Bridge Street?
 20 A. That's correct, yes.
 21 Q. We can see the crashed Hyundai and this photograph,
 22 I think, is taken at the time of the attack on
 23 Keith Palmer?
 24 A. Yes, you can just about see in the top right-hand corner
 25 the attack.

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1 Q. And I think we'll see in a moment a close-up of that
 2 part of the photograph which shows the attack clearly?
 3 A. Yes.
 4 Q. And play on, please.
 5 Pause there. Are we now looking at a close-up
 6 showing Keith Palmer falling against the low wall and
 7 Masood advancing, holding the knives in both hands?
 8 A. Yes, so this is one of the -- a cropped-in version of
 9 one of the set of images from previously.
 10 Q. It's a chilling image.
 11 A. It is, indeed, yes.
 12 Q. Can we now move on, please.
 13 Pause there. I think this is another photograph
 14 taken by Mr Shoebridge?
 15 A. Yes.
 16 Q. And we'll see a close up in a moment with another view
 17 of the attack continuing.
 18 A. That's correct.
 19 Q. Play on, please. And pause. That's the close-up of the
 20 attack continuing with Masood standing over Keith,
 21 stabbing at him?
 22 A. Yes.
 23 Q. Play on, please.
 24 And pause. Now, is this right, the footage we're
 25 now about to see is from the phone of Anthony Davis, one

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1 of our witnesses, who was in New Palace Yard and
 2 provided first aid to Keith Palmer?
 3 A. Yes, that's correct, sir. At first you see the video,
 4 and then I believe it goes into his pocket, but the
 5 audio continues.
 6 Q. And in the first few seconds I think we'll hear the
 7 shots fired which killed Masood?
 8 A. Yes.
 9 Q. And after that stage we'll hear exchanges taking place
 10 during the first aid of Keith Palmer?
 11 A. Yes.
 12 Q. Obviously, just as the images that we have seen have
 13 been distressing, many of the sounds that we hear in
 14 this footage will also be distressing?
 15 A. Yes.
 16 Q. Play on, please.
 17 (Video played in court)
 18 Pause there, please. This is early in the medical
 19 treatment of PC Palmer and we've just heard a reference
 20 to his pulse being weak?
 21 A. Yes.
 22 Q. Play on, please.
 23 Pause there, please. Just to mention a couple of
 24 things that have been said. Early on there was
 25 reference to a head wound?

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1 A. Yes.
 2 Q. Then a reference to a back wound I think we heard?
 3 A. Yes.
 4 Q. And we've heard then comments that Keith was still
 5 breathing but losing blood?
 6 A. Yes, that's correct.
 7 Q. Play on, please.
 8 Pause now, please. Have we just heard, very
 9 faintly, reference to scissors being called for and
 10 clothing being removed in order to view the wounds?
 11 A. Yes, that's correct.
 12 Q. Play on, please.
 13 Pause there, please. Have we heard discussion of
 14 identifying wounds and reference to three wounds having
 15 been seen?
 16 A. Yes.
 17 Q. Play on, please.
 18 Pause there. So in those last moments we heard,
 19 I think, reference to keeping pressure on the wounds to
 20 stop blood loss?
 21 A. Yes, that's correct.
 22 Q. And I think we're now going to see footage from the
 23 mobile phone of another individual now on screen,
 24 somebody looking down on those who are working on
 25 PC Palmer. It will be a very short clip but it will

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1 give an impression of the initial efforts at medical
 2 care.
 3 A. Yes.
 4 Q. Play on, please.
 5 And pause.
 6 Then the final clip, I think, will be footage from
 7 a CCTV camera looking from the south-west corner of
 8 New Palace Yard into the yard, Carriage Gates are out of
 9 shot to the left?
 10 A. Yes.
 11 Q. We're looking down towards the colonnades at the other
 12 side, the opposite side from Carriage Gates, across
 13 New Palace Yard, and the footage will show events from
 14 immediately after the shooting of Masood, and what we'll
 15 see is footage of the care given to PC Palmer at the
 16 extreme left edge of the screen?
 17 A. Yes, that's correct.
 18 Q. Play on, please.
 19 (Video played in court)
 20 As we keep playing, we will see increasing numbers
 21 of officers and others coming into view, some of them
 22 apparently engaged with the efforts on PC Palmer?
 23 A. Yes.
 24 Q. Is this right: we will see some obscured figures, and
 25 they are the armed officers involved in the shooting of

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1 Masood, who have been given anonymity?
 2 A. Yes, that's correct.
 3 Q. Could you move forward on the counter by 8 minutes to
 4 14.52. Obviously footage from this compilation can be
 5 played by anyone as they wish during the evidence.
 6 So it's now 14.52, the efforts of care are
 7 continuing but obviously a limited amount can be seen
 8 from this footage?
 9 A. Yes, that's correct.
 10 Q. You can move forward by a minute, please, to 14.54.20.
 11 And pause here. So 14.54.30 we see some officers coming
 12 into view, accompanied by people in distinctive orange
 13 uniforms. Can you help us as to who they are?
 14 A. They're the HEMS crew.
 15 Q. So the HEMS crew arriving at 14.54.30. Play on, please.
 16 Then if we could skip forward by four minutes to
 17 14.59.30. We will see very shortly the arrival of
 18 an ambulance, but this is right, were paramedics on
 19 scene earlier than that?
 20 A. Yes.
 21 Q. It's now 3 o'clock. Through all this time efforts are
 22 being made on Keith?
 23 A. Yes, continuously, yes.
 24 Q. Now at 15.01, can we move forward almost to the end of
 25 the clip to 15.15.00, so by 14 minutes.

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1 We're now, I think, seeing at 15.15.30 signs of
 2 people having ceased efforts and packing away equipment?
 3 A. Yes, that's correct.
 4 Q. Pause. After that clip are we now looking at
 5 a photograph from a newspaper showing the treatment of
 6 PC Palmer at about the time that the HEMS team is
 7 starting to arrive?
 8 A. Yes, that's correct.
 9 Q. Then a further still image, please. Play on, please.
 10 Pause there. Another photograph from a newspaper
 11 showing treatment of PC Palmer at around the same time?
 12 A. Yes.
 13 Q. And within that we see somebody wearing the uniform of
 14 the London Ambulance Service, as well as police officers
 15 and the distinctive orange HEMS uniform just off to the
 16 left showing that they've just arrived?
 17 A. Yes, that's correct.
 18 Q. Then final image, please. Pause there. This is
 19 a photograph, again from a newspaper, and does this show
 20 the aftermath of the treatment of PC Palmer?
 21 A. It does, yes.
 22 MR HOUGH: Thank you, and that's, I think, the end of the
 23 compilation.
 24 A. Yes.
 25 THE CHIEF CORONER: Just on -- Mr Hough, in relation to the

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1 images that came from newspapers, I think some -- there
 2 was a dedicated site, I think, wasn't there, for members
 3 of the public to send images to.
 4 A. Yes, sir, the police, we call CSIPS, crowd sourced image
 5 processing software.
 6 THE CHIEF CORONER: Yes.
 7 A. And essentially we put up a link into the media where
 8 members of the public could upload their images, the
 9 video or pictures, and then they can leave their details
 10 and that was part of our investigation is to utilise all
 11 of those images, and some of them you see contained
 12 within these media, within the compilation, and some,
 13 for this one, was part of the trawl we did with the
 14 media, with their assistance to get the images that they
 15 were sent.
 16 THE CHIEF CORONER: Yes. Mr Hough, the only reason I've
 17 asked that question, I know that, I think Mr Patterson
 18 made the point the other day, that some images had been
 19 put on the internet separately to this very sensible
 20 approach taken by the police, and it was those
 21 unwarranted public images on the internet that caused
 22 additional distress to some of the families. Obviously
 23 that's entirely separate to the police carrying out
 24 a very sensible investigation in collating material of
 25 this type?

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1 MR HOUGH: Yes, of course, because reputable journalists and
 2 journalistic publications exercise restraint about what
 3 they will publish and the context for their published
 4 images, whereas people posting on the internet very
 5 regrettably do not.
 6 THE CHIEF CORONER: And I'm sure that sensible approach,
 7 Mr Hough, I hope that sensible approach is taken not
 8 only in relation to the images that have been shown in
 9 court but also in relation to those people who have come
 10 to this Inquest to give evidence both as they come to
 11 court and as they leave?
 12 MR HOUGH: Yes, of course.
 13 Of course, as you will be aware, sir, there has been
 14 a great deal of generally very well informed reporting
 15 of the first days of these Inquests.
 16 THE CHIEF CORONER: Yes, and I hope that continues.
 17 MR HOUGH: Thank you, Mr Osland, that's all the evidence we
 18 require from you now, and that may be your final
 19 evidence in these Inquests.
 20 Sir, what we propose to do --
 21 THE CHIEF CORONER: It may be there are some questions. In
 22 fact, I see --
 23 MR HOUGH: I'm so sorry.
 24 THE CHIEF CORONER: It was probably my intervention,
 25 Mr Hough, that put you off your stride.

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1 Examination by MR ADAMSON
 2 MR ADAMSON: Thank you, sir.
 3 DC Osland, could we just very briefly go back to the
 4 start of the compilation and it's the footage which
 5 shows the attack from the closest camera angle. I think
 6 it's about 1 minute and 26 seconds into the compilation.
 7 If we could roll back a bit, so just before the attack
 8 at the wall. Yes. Press play.
 9 (Video played in court)
 10 And pause. Now, DC Osland, when Police Constable
 11 Palmer is up against the wall and Masood embarks upon
 12 what was described the other day as the ferocious
 13 attack, undoubtedly a correct description, have you been
 14 able to ascertain how many blows of the knife took place
 15 at that juncture?
 16 A. No, I've looked at this footage many, many times and
 17 I don't think the footage allows you to definitively say
 18 how many blows were landed either at that point or at
 19 the Carriage Gates itself.
 20 Q. That was the point that I was driving at. What we can
 21 be clear about, can't we, when we watch the footage, and
 22 we'll have another look at it in a second, is that when
 23 PC Palmer is against the Corus barrier, there are
 24 multiple strikes and they are at a time when PC Palmer
 25 is in an exposed position, because he is lying on the

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1 floor?
 2 A. Yes.
 3 Q. So in a position where he is not effectively able to
 4 defend himself?
 5 A. No, you can see where PC Palmer is on the floor and his
 6 legs are in the air, so he appears to be trying to
 7 defend himself and move around on the floor in that
 8 sense, but he is obviously on the floor.
 9 Q. Yes. So if we just watch — everyone watch it for that
 10 point, and I appreciate this is gruesome footage, and
 11 I apologise for drawing attention to it, to illustrate
 12 that it's unclear how many strikes there were, but there
 13 are plainly multiple strikes at that juncture?
 14 A. Yes.
 15 (Video played in court)
 16 MR ADAMSON: Thank you very much.
 17 MR HOUGH: I'm very sorry for that unwitting offence on
 18 Mr Adamson.
 19 DC Osland, thank you for your evidence.
 20 THE CHIEF CORONER: It's clear to me, DC Osland, you have
 21 spent many hours not only poring over this material but
 22 putting it into a format in which we can watch it. It
 23 must have been quite distressing for you to watch this
 24 over and over again, but the way in which it has put
 25 together is very good, thank you very much indeed.

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1 A. Thank you, sir.
 2 MR HOUGH: Sir, what I propose to do now is to read extracts
 3 from two witness statements under Rule 23 of The
 4 Coroners (Inquests) Rules 2013. These are extracts from
 5 the statements of Carl Knight and John Campbell, and
 6 just so it is clear, the witnesses we are calling in
 7 relation to the attack viewed from outside the confines
 8 of New Palace Yard are the witnesses who we considered
 9 gave the fullest descriptions, but there are details in
 10 these two witness statements which provide added
 11 information, but we did not consider it was necessary to
 12 call these witnesses as well.
 13 Furthermore, we doubt that anything they say will be
 14 controversial. In particular, what these witnesses do
 15 is to make clear that PC Palmer challenged Masood at the
 16 entrance to Carriage Gates, and so you will understand
 17 why that is a matter of importance for the family.
 18 THE CHIEF CORONER: Yes.
 19 MR HOUGH: The Rules, 23(2), requires you to announce before
 20 admitting such evidence what it is, the names of the
 21 makers, the fact that any interested person may object,
 22 and that any interested person is entitled to see
 23 a copy. Well, all interested persons have had access to
 24 these statements, they are at {WS0008/1} and {WS0006/1}
 25 respectively, and I don't think there's any objection.

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1 MR CARL SCOTT KNIGHT (Read)
 2 The first statement is Carl Scott Knight. He says
 3 this:
 4 "On Wednesday 22 March 2017 I was travelling on the
 5 159 bus from Streatham. The bus's final destination is
 6 Marble Arch, however I intended to alight at Whitehall.
 7 I boarded the bus at approximately 1.45 pm alone.
 8 I went straight upstairs to the upper deck and sat in
 9 the third row from the front, on the left-hand side of
 10 the bus facing forward. At this point I don't know who
 11 was sat around me, however, nobody sat next to me for my
 12 entire journey. I put my headphones in, which were
 13 connected to my iPhone and listened to music."
 14 He identifies the album:
 15 "I could however hear traffic from the road through
 16 my ear phones. I don't remember thinking the roads were
 17 particularly busy. In fact, the bus wasn't busy either,
 18 as nobody was sat next to me. I catch the same bus five
 19 times a week and more often than not, somebody is next
 20 to me.
 21 "The traffic began to clog up as it always does as
 22 Westminster Bridge merges with the north side of the
 23 river on Westminster Bridge Road. The bus stopped at
 24 the traffic lights at the junction with
 25 Parliament Square. From how far we were from the

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1 traffic lights, I had assumed that one vehicle was in
 2 front of the bus. I remember looking at my phone, which
 3 was in front of me. I then heard a loud bang. The
 4 bang, I would liken it to a small explosion. It sounded
 5 like a back firing car. At this point I still had my
 6 headphones on. The bang came from my left.
 7 I immediately took my headphones out and turned to my
 8 left and looked out of the window. I could also see
 9 an older woman in front of me and a red haired woman in
 10 front of me turning to their left and looking out of the
 11 window towards the Palace of Westminster. I know it to
 12 be the Palace but I would usually refer to it as Big Ben
 13 and the Houses of Parliament.
 14 "I looked over my left shoulder and could see
 15 a small grey SUV crashed into one of the concrete
 16 pillars supporting the gates to the palace. The
 17 complete front end of the car was impacted. There
 18 wasn't much of the engine left. The driver's side
 19 airbag was deployed and was white in colour. The car
 20 was roughly 20 metres away from my viewpoint. I could
 21 see the whole vehicle and my view was unobstructed.
 22 "The driver's side was closest to me. I could see
 23 into the car. As I began looking into the car, the
 24 driver's door opened. It was a right-handed driver's
 25 car. This is when I first saw the male I would describe

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1 as the African male. The driver's door opened and I saw
2 the African male sitting in the driver's seat. I did
3 not see anybody else in the car. I saw the driver's arm
4 raised and he leaned over to the passenger seat front
5 for a second or two. He was either putting something
6 down or picking something up. I could see, as he
7 stepped out of the car, that he had something in his
8 hands. I thought it was a normal car accident and was
9 shocked. He remained still but seemed unsteady, exactly
10 how someone would look after a car accident.

11 "A pedestrian male walked across to him from behind
12 my bus. The pedestrian male said to the African male
13 'What are you doing?' to which the African male replied
14 'Fuck off, you don't want to mess with me'. He shouted
15 this response aggressively and dominantly. As he
16 shouted this, he raised his hands showing he was holding
17 a knife in each hand. The pedestrian immediately backed
18 off and slipped off the kerb into the cycle lane,
19 however didn't fall. He then ran away in the direction
20 he came.

21 "I could now hear screaming coming from downstairs
22 and women's voices shouting 'drive' and 'let me off the
23 bus'. The driver kept responding repeatedly 'I can't
24 leave, I have CCTV'. All the while I was still looking
25 towards the African male. Just before the African male

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1 held up the knives, there were five or six other people
2 walking towards him. As soon as the knives went up it
3 went from a car accident to an attack. I could see the
4 same group initially walking to him begin to turn and
5 run towards Parliament Square.

6 "Between the front of the grey small SUV there were
7 two people motionless on the floor, it was possibly one
8 woman and one man. As the group of people ran, the
9 African male began walking in their direction.
10 Simultaneously a male wheeling a bicycle had parked his
11 bicycle close to the vehicle and attended to the injured
12 people in front of the car. I believed they were
13 injured as they were motionless.

14 "The African male was still walking towards
15 Parliament Square. I noticed a woman and a young boy,
16 I assume her child, stood next to one of the gated
17 fences surrounding the Palace. The woman embraced the
18 child and said to the African male 'Please don't kill
19 me'. The African male ignores the woman and begins to
20 break out into a run. He runs past approximately 15 to
21 20 people who were stood at the junction and continued
22 to the gated entrance of the Palace. It was as if there
23 were no guards on the gate as the African male ran,
24 still wielding the knives, into the garden area of the
25 Palace. He made it 20 metres in, approximately, running

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1 to his left. I then remember seeing a high visibility
2 police officer. I'm not sure if he challenged the
3 African male or exactly what he did, but they both began
4 grabbing each other and then tumbling to the floor.

5 "The African male seemed to get the better of the
6 police officer and as they went to the floor, the
7 officer fell forward on his knees with the African male
8 behind him. The African male then began stabbing the
9 officer in the back. It looked as if the knives were
10 bouncing off the police officer's jacket.

11 "I believe the officer was stabbed around five times
12 until he sprinted off away from the African male. The
13 officer has ran towards the Palace, towards around 7 or
14 8 people gathered around together. Some had hi-vis
15 jackets on but I'm not sure if they were all police
16 officers or not. A lone officer was standing behind a
17 black impact barrier with his cosh out as if to defend
18 himself.

19 "The African male gave chase after the stabbed
20 officer, passing the officer with the cosh. I could
21 hear people shouting towards the African male. I assume
22 it was police shouting but I don't know what they were
23 saying. The African male was still running until
24 I heard what I would only describe as gun shots. There
25 were three in total, two immediately, a tiny delay, and

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1 then a third shot. I believe the shots came from the
2 group of people the stabbed police officer was amongst.
3 At this point the group were slowly approaching the
4 African male. There was too much going on at this point
5 for me to tell, but I didn't see the African male fall
6 to the floor.

7 "The group then crowded around the area where the
8 African male was stood. I couldn't be certain if he was
9 on the floor or not but after a couple of minutes
10 I could see people administering care to someone on the
11 floor. I could see people picking up things from
12 a first aid bag and putting it on the now one body
13 I could see on the floor."

14 Those are the relevant parts of Mr Knight's witness
15 statement.

16 Next is the statement of John Campbell who says that
17 he is providing this statement to police following on
18 from a serious incident he witnessed on that day at
19 approximately 2.30 pm by the Houses of Parliament.

20 He goes on:

21 MR JOHN CAMPBELL (Read)

22 "I was on my way to meet a friend at the Tate
23 Gallery and was on board route 88 bus, which heads
24 towards Clapham. Whilst writing this I have been
25 requested to record my statement on audio equipment

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1 which has been provided to me from other officers
2 dealing with this incident. After further discussions,
3 I've been asked to continue with my written statement in
4 addition to giving an audio account.

5 "My attention was drawn to unusual crowd movements
6 coming from the direction of the bridge, round the
7 corner to the road outside Parliament. I saw a crowd of
8 people running and scattering, and alarmed by something.
9 I couldn't see what had caused this commotion.

10 I watched and then became aware of a male who had run
11 through the security area and headed towards
12 a policeman, who seemed unaware of the events, until
13 this male went straight up to him, stabbing him three or
14 four times at least to the front of his body, using
15 a very large knife. The knife looked like a kitchen
16 knife and it had a very large blade, I would say about
17 10 inches to a foot long.

18 "The policeman was obviously injured but remained on
19 his feet, at which point a second officer rushed over.
20 This appeared to stop the male stabbing his colleague,
21 allowing both of them to back off. I think there may
22 have been a slight altercation between the second
23 officer and the knifeman, enough to stop him stabbing
24 his colleague further, and these officers appeared to
25 retreat back.

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1 "I would describe the knifeman continuing to be
2 animated and frenzied, like he was looking for another
3 victim. He looked like he was about to head off towards
4 potential victims in a crowd when I heard two shots
5 being fired from a direction unknown, and the knifeman
6 dropped to the floor.

7 "At that moment the bus I was on then started moving
8 and I was unable to see what happened to this male and
9 the police officers."

10 Then he gives a short description of the
11 individuals.

12 Sir, those are the two statements we're admitting in
13 writing. Our next witness is Antonia Kerridge.

14 THE CHIEF CORONER: Thank you.

15 MS ANTONIA KERRIDGE (Affirmed)

16 THE CHIEF CORONER: Feel free to sit or stand, whichever you
17 feel more comfortable with and if you would like a glass
18 of water I suspect my usher will provide you with one.

19 Examination by MR HOUGH QC

20 MR HOUGH: Would you please give your full name to the
21 court?

22 A. My name is Antonia Kerridge.

23 Q. I'm asking questions first on behalf of the Coroner and
24 then you will be asked questions by other lawyers.

25 I think you understand you are here to give evidence

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1 about events you witnessed at Westminster on 22 March
2 last year. You made a witness statement on 26 March,
3 just four days later, and you may refer to that as you
4 wish.

5 A. Thank you.

6 Q. On 22 March 2017 were you working in Portcullis House?

7 A. Yes, I was.

8 Q. May we bring up a photograph on the screen, {DC7989/1}.

9 Is Portcullis House the new building over to the left of
10 the screen opposite the Palace of Westminster across
11 Bridge Street?

12 A. Yes, with the chimneys on top.

13 Q. Can you tell us where your office in that building was?

14 A. So my office was on the third floor of Portcullis House,
15 and so on the bottom right-hand side of it as you see on
16 the image here. The office was a corner office, so the
17 windows went around the entire corner. So, yes, my
18 office was just sort of above the white building which
19 you can see clearly on the actual corner of Whitehall
20 there.

21 Q. Thank you. Were you working alone in the office that
22 day?

23 A. There were two other colleagues with me that day.

24 Q. And did you have an unobstructed view through large
25 windows out towards the Palace of Westminster and

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1 Parliament Square?

2 A. Yes.

3 Q. On the afternoon of 22 March 2017, shortly before
4 3.00 pm, was your attention caught by anything happening
5 outside?

6 A. So the first thing that drew my attention to something
7 happening outside was that we heard a loud crashing
8 sound outside, the windows are quite sound-insulated but
9 it was loud enough that we could hear it in the office,
10 and then the second thing that alerted my attention was
11 that there was what I thought was sort of the sound of
12 people cheering, so sort of loud shouting sort of
13 sounds, which we assumed that there was a protest
14 outside, but that was when we went to the window after
15 hearing the sort of bang or crash, and then the shouting
16 or the cheering, is what we thought it was.

17 Q. So those sounds that you have described caused you and
18 a colleague to go to the window; is that right?

19 A. Yes.

20 Q. What could you see out of the window?

21 A. The first thing we saw was across the road from the
22 office window a car had crashed, a silver car had
23 crashed into the -- over the pavement and into the
24 railings that go around New Palace Yard. It had crashed
25 into one of the -- not the railings itself, but one of

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1 the sort of concrete pillars in between the railings .
 2 So that's what first sort of drew my attention, and at
 3 that point also saw that there was a person who was sort
 4 of under the vehicle and then there was another person
 5 on the -- lying on the pavement to the right of where
 6 the car had crashed who was not moving and who was
 7 bleeding onto the floor .
 8 Q. Did you notice anything inside the car?
 9 A. Referring back to my witness statement, I could see that
 10 the airbag had opened, but there was no one in the car
 11 at that point. It was after the crash.
 12 Q. When you looked at the car, was the driver's door open
 13 or closed?
 14 A. It was open.
 15 Q. We can bring up on screen a photograph showing the
 16 vehicle in collision, {PH0403/1}. So does that image
 17 that we're seeing on screen show, albeit perhaps from
 18 a different perspective, your view of the scene that
 19 you're describing?
 20 A. Yes, it was a different angle because I was up a lot
 21 higher than that, but yes, that was what I could see,
 22 and more slightly to the right-hand side.
 23 Q. We can take that off screen now.
 24 What did you hear from outside at that point?
 25 A. At that point I realised that the cheering sound was

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1 people screaming, so that was the main thing I could
 2 hear.
 3 Q. What made you think that it was screaming?
 4 A. Because after seeing the car, one of my colleagues said
 5 that there was a man with a knife on the street, so then
 6 sort of attention was diverted to where the man was with
 7 the knife, and then obviously I could see the people and
 8 I could see that they were screaming.
 9 Q. So you say that your colleague drew your attention to
 10 somebody with a knife on the pavement. Where was he
 11 when you first saw him?
 12 A. So he was just sort of at the corner before turning
 13 left .
 14 Q. If we can bring up that photograph again that we had
 15 before, {DC7989/1}.
 16 A. So, yes, he was just on the corner of the square there.
 17 So just, I guess, sort of 4 or 5 metres away from the
 18 car, and running, running as if towards
 19 Parliament Square, and then subsequently turned left
 20 round the corner. But when I first saw him he hadn't
 21 yet got to the corner point.
 22 Q. What was his appearance?
 23 A. He was -- I remember thinking that he was very tall, he
 24 was bald, he had a beard. From what I could remember,
 25 dark clothing, sort of tanned, olive skin. That's from

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1 his appearance what I remember.
 2 Q. Could you see anything in his hands?
 3 A. Yes, so we could clearly see that he was holding
 4 a knife. Even from the distance that we were at, the
 5 knife was very visible .
 6 Q. How was he holding it?
 7 A. Again, referring to my witness statement, holding it in
 8 a sort of stabbing, sort of -- I don't know how to
 9 describe it .
 10 Q. Held downwards?
 11 A. Yes, yes, exactly .
 12 Q. What was the manner of his movement along the pavement?
 13 A. He was moving fairly quickly, not sprinting. There were
 14 quite a lot of people in front of him who were also
 15 running away from him towards Parliament Square, so he
 16 was -- I think I used the phrase "lumbering" quite a lot
 17 in my witness statement, but sort of moving around and
 18 looking. Although he was sort of -- the angle he was
 19 running away from our office there were moments when
 20 I saw him in profile and from the back, so in that very
 21 quick space of time he was looking around and I could
 22 see his profile and the back of his head.
 23 Q. What, if any, movements was he making with his upper
 24 body and his arms?
 25 A. I don't recall specifically .

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1 Q. In your witness statement, just to refresh your
 2 memory --
 3 A. Yes.
 4 Q. -- you describe him, this is towards the end of page 3,
 5 "waving the knife around" in what you described as
 6 "quite wild movements"?
 7 A. Yes, I think as he was running and just the moving, he
 8 was waving his knife around. I didn't see him
 9 attempting to sort of stab someone at that point, but
 10 obviously I was quite some distance away so I don't
 11 really know how close he was to the people on the
 12 street, and they were running away at the same time.
 13 But yes, he was waving the knife around as he naturally
 14 moved with his movement going forwards.
 15 Q. You've described there being people around him as he ran
 16 around the corner: how did they move as he came forward?
 17 A. So there was quite a large group of people who were
 18 running in front of him, so the people who were in the
 19 immediate kind of edge around him were looking over
 20 their shoulders, obviously because he was behind them,
 21 and then the people in front were just running and
 22 dispersing into the square, and then also running around
 23 to the right, down Whitehall.
 24 So, yes, they were sort of looking over their
 25 shoulders and I could see and hear that they were

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1 screaming and shouting.
 2 Q. I think at this point you also looked back to the
 3 crashed car and saw people now attending to the
 4 casualties around it.
 5 A. Yes.
 6 Q. We don't need to go into details about that. But as the
 7 man with the knife ran around the corner, were you able
 8 to maintain sight of him at all times?
 9 A. I think because of the view of the railings that go
 10 round the side, we didn't actually see him at the point
 11 of sort of confrontation at the gates. So we lost sight
 12 of him, and also at that point I was sort of flicking my
 13 eyesight between that and the people on the pavement,
 14 and it was all happening obviously very quickly and we
 15 weren't sure what was going on, and also we -- I think
 16 I say in my witness statement, because we knew he was
 17 rounding the corner, one of my colleagues tried to call
 18 the emergency number in the office, so I was sort of
 19 looking back into the office while he was on the phone
 20 trying to get through to say what was happening, which
 21 was obviously too late, but my attention was sort of
 22 diverted between lots of things different things, so
 23 I sort of lost sight of him until he entered past the
 24 gate.
 25 Q. Okay. So you saw him first of all moving out of the

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1 vehicle, or moving after he had come out of the vehicle
 2 through the crowds. You lose sight of him for a time,
 3 and then you refer to him being at the entrance of
 4 Parliament, the Carriage Gates entrance.
 5 When you caught sight of him there, what was he
 6 doing?
 7 A. So he had entered the gates at that point, so probably
 8 a step or so inside, and he was -- the police officers
 9 who had been at the gates, although I hadn't seen the
 10 sort of confrontation at the gates, had dispersed, and
 11 he was chasing them into the area where the cars would
 12 drive normally.
 13 Q. Now, we've seen CCTV footage which suggests that there
 14 was a confrontation at the gates during which and after
 15 which he effectively drove one of those officers back
 16 into New Palace Yard, having been challenged by that
 17 officer; is that something you saw and can comment on?
 18 A. So I didn't see -- I couldn't see the confrontation at
 19 the gates, so I don't know whether the officer had been
 20 injured or -- yes, I didn't see that moment.
 21 What I did see was the police officer ran sort of
 22 forwards and then towards the left, where there's -- the
 23 cars would drive into the left there's a kind of black
 24 barrier that curves around the side of the square, and
 25 the police officer collapsed just to the -- just next to

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1 the barrier. So that, to me, indicated that he may have
 2 already been hurt, but I didn't see the actual
 3 confrontation.
 4 Q. In your witness statement towards the bottom of page 5,
 5 you say that you had got a clear view of the attacker as
 6 he had entered, and then you say this:
 7 "The attacker went over to the policeman and leant
 8 down, that's when I saw him start to stab the policeman
 9 on the floor."
 10 That's right at the bottom of page 5.
 11 A. Yes, so ...
 12 Q. Just pause a second. At what point in the sequence of
 13 events do you see the attacker stabbing the policeman
 14 who has gone down on the floor?
 15 A. So the policeman ran in and another policeman ran in and
 16 they sort of dispersed. That policeman fell on the
 17 ground. The attacker was behind both of those
 18 policemen. And then when the policeman fell on the
 19 ground, that's when the attacker turned to the left and
 20 went over to him where he was on the floor.
 21 Q. Describe the attack, please.
 22 A. So the policeman had collapsed and the attacker ran over
 23 to him, and just sort of leant down towards him and
 24 raised the knife quite high and he just stabbed him.
 25 I think it was sort of two or three or four times.

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1 I was sort of looking away and didn't necessarily see
 2 the exact number of times, but it was more than once
 3 because he raised the knife up a few times.
 4 Q. Forcefully?
 5 A. Yes.
 6 Q. Into what part of the officer's body?
 7 A. I couldn't really see from my angle, but it looked like
 8 it was on the yellow -- the yellow jacket area.
 9 Q. So the upper body?
 10 A. Yes. Yes.
 11 Q. How did the attack come to an end?
 12 A. So the attacker just moved away from the policeman on
 13 the ground, and then turned around and ran back towards
 14 the right-hand side of that barrier as you enter through
 15 Carriage Gates, so sort of round to the right. Then the
 16 policeman actually stood up after the attack and ran
 17 past and then collapsed out of my view, on the other
 18 side of the -- on the right-hand side of the grass in
 19 the middle.
 20 Q. As the attacker and the officer disengaged from each
 21 other, and you saw the attacker continuing to move
 22 around New Palace Yard, how did his movements seem at
 23 that point?
 24 A. The attacker?
 25 Q. The attacker.

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1 A. He still had the knife in his hand. He was looking
 2 around a lot, moving quite quickly. But I think sort of
 3 looking for where to go next is the sense I got from the
 4 style of his movements. But he was heading towards
 5 where the barrier is in front of Westminster Hall, so
 6 that curving round to the right, and he was moving,
 7 moving quite quickly and with the knife in his hand,
 8 waving it around.
 9 Q. In your statement, this is the middle of page 6, you
 10 refer to him "lumbering" without obvious intent or
 11 purpose and waving the knife?
 12 A. I think, yes, what I meant by that was that he wasn't
 13 running towards a person at that point: he was looking
 14 around, I think, and assessing where to go next. But
 15 always moving round the corner of the grass.
 16 Q. How far did he reach, as far as you saw?
 17 A. He reached -- he didn't get that far in, so on the image
 18 on the screen where sort of the tree is on the bottom
 19 right-hand corner, he was just sort of at that point.
 20 So just as the -- just sort of after the barrier had
 21 curved round to the right, he was about that area.
 22 Q. So he had followed a path round to the right after
 23 entering New Palace Yard, and he had gone past the
 24 vehicle entry barrier, the vehicle exit barrier, rather?
 25 A. Yes.

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1 Q. Over to the north-east corner?
 2 A. Yes.
 3 Q. What did you see next happening to him?
 4 A. So at that point a man in a grey suit ran out from -- he
 5 was in the restricted area, so not in the passholder
 6 area in front of Westminster Hall, but in the area where
 7 ministers would be dropped.
 8 Q. Sorry, just pausing there, is that, in general terms,
 9 the area of the cloisters which we see just beyond the
 10 grassed area, at the base of the Big Ben tower and
 11 extending across in this photograph?
 12 A. Yes, I think I used the word "cloisters" in my witness
 13 statement, yes. So from the back there he ran out, and
 14 had a -- drew a gun from -- I don't know where he drew
 15 it from, but he had a gun in his hand and ran towards
 16 where the attacker was.
 17 Q. How close did he come to the attacker, as far as you
 18 could see?
 19 A. He was still -- he was -- he'd probably got about to
 20 where the steps went down from the central grass
 21 section. So maybe four or five metres, I'm not
 22 100 per cent sure on the distance.
 23 Q. Did you hear him say or shout anything?
 24 A. No, I couldn't hear.
 25 Q. You couldn't hear one way or the other?

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1 A. No, I couldn't hear that.
 2 Q. What was the attacker doing at that stage?
 3 A. The attacker was still moving forward with the knife,
 4 still running towards, or moving towards the -- round to
 5 the right towards the Westminster Hall barrier, fence.
 6 Q. In your witness statement you say that he was still
 7 moving the knife, still waving it.
 8 A. Yes.
 9 Q. Is that something you recall?
 10 A. Yes.
 11 Q. What happened next?
 12 A. So next the man in the suit who was holding the gun shot
 13 the attacker, I think two or three times, I think, we
 14 could hear the gunshots, and then the attacker fell to
 15 the ground, sort of crumpled to the ground on the spot
 16 where he had got to.
 17 Q. And I think that you stayed in your office for a short
 18 time afterwards, and during that time, you saw medical
 19 assistance begin to be given to both the officer and the
 20 attacker?
 21 A. Yes.
 22 MR HOUGH: Thank you very much. Those are all my questions.
 23 Examination by MR ADAMSON
 24 MR ADAMSON: Ms Kerridge, my name is Dominic Adamson and
 25 I ask questions on behalf of the widow of PC Palmer.

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1 Ms Kerridge, you have given an account of what you
 2 saw, and I just want to ask you a few details about some
 3 of that evidence, if I may.
 4 First of all, in relation to the confrontation
 5 between PC Palmer and the attacker at or about the gates
 6 themselves. You couldn't see that from your position?
 7 A. No.
 8 Q. And is that because, if you imagine your position, you
 9 were to the left of the line of the fencing, which
 10 includes the gates at the front of Parliament?
 11 A. Yes. Yes.
 12 Q. And so it's only when they emerge into New Palace Yard
 13 that you then resume being able to see them?
 14 A. Yes. So the first thing, the first moment I'd realised
 15 he had entered was because the police had run into --
 16 towards New Palace Yard, and then the attacker was
 17 following.
 18 Q. Right, so the first thing that you saw was the police
 19 running away?
 20 A. Yes.
 21 Q. And then you saw the attacker follow?
 22 A. Yes.
 23 Q. At some stage thereafter we know that PC Palmer falls to
 24 the ground?
 25 A. Yes.

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1 Q. You are not able to say why he fell to the ground?
 2 A. No.
 3 Q. Whether he tripped or whether he was pushed or something
 4 of that nature?
 5 A. I know he wasn't pushed because there was no one round
 6 him when he fell.
 7 Q. Right. Yes.
 8 A. He was alone, like there was no one around him when he
 9 actually fell, but he sort of -- yes, he sort of
 10 collapsed or fell to the ground.
 11 Q. Yes. And he was plainly seeking to escape from the
 12 attacker?
 13 A. Yes.
 14 Q. Would you agree with that?
 15 A. So he was running round to the left and another police
 16 officer had run round to the right.
 17 Q. And having fallen, the attacker then continued towards
 18 him?
 19 A. Yes.
 20 Q. And you say at that point there was this violent attack,
 21 but you can't say how many stabs there were at that
 22 juncture?
 23 A. No, I can't.
 24 Q. It must have been a horrible thing to see, the scene
 25 that -- you almost looked away in order to avoid

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1 watching what was unfolding before you?
 2 A. Yes, which I think is why I couldn't determine exactly
 3 how many times he was stabbed because -- and there was
 4 also a lot of other movement on the ground as people
 5 were running --
 6 Q. There was a lot of information to take in?
 7 A. Yes. Yes.
 8 Q. At some stage thereafter PC Palmer managed to get up and
 9 run away, but he kept on going, the attacker?
 10 A. Yes. Yes.
 11 Q. Towards the members' entrance?
 12 A. Yes. Yes.
 13 MR ADAMSON: Thank you very much.
 14 Examination by MR PATTERSON QC
 15 MR PATTERSON: If he had made it to the members' entrance,
 16 does that allow access onwards in the direction of the
 17 chamber of the House?
 18 A. Not without passing through a number of other corridors
 19 and rooms, but eventually through the series of rooms
 20 that you have to get through and the corridors, yes
 21 eventually, but there's a number of doors and people
 22 that would have been in the way from there.
 23 Q. Yes.
 24 A. But you would be able to if the barrier that is in front
 25 of Westminster Hall, you would be able to jump over if

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1 you wanted to.
 2 Q. And so from the members' entrance you can gain access to
 3 offices that are beyond the entrance?
 4 A. Again, there are a series of doors that you would have
 5 to get through, and the design of Parliament is that
 6 there's lots of corridors and stairwells and things.
 7 But, yes, once you are through that point, you would be
 8 able to get into other -- through other doors.
 9 Q. We know that there had been Prime Minister's questions
 10 that day at 12 noon, and that Prime Minister's questions
 11 had finished by the time of this attack. Is it from
 12 that entrance that the Prime Minister leaves the
 13 courtyard?
 14 A. I wouldn't be able to say that for sure.
 15 Q. But she would no doubt have an office in the building
 16 beyond that entrance?
 17 A. Presumably, yes, as with other ministers.
 18 Q. Including cabinet ministers?
 19 A. Ministerial officers are there, but not directly through
 20 the sort of members' entrance. Again, you would have to
 21 go through a series of corridors and other areas to get
 22 to those offices.
 23 Q. Yes, I think you work there yourself as a senior
 24 parliamentary assistant; is that right?
 25 A. I was at the time working there.

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1 MR PATTERSON: At the time. Thank you very much.
 2 A. Thank you.
 3 MR HOUGH: Those are all the questions we have for you,
 4 thank you very much, Ms Kerridge.
 5 THE CHIEF CORONER: Thank you very much indeed for coming.
 6 Thank you.
 7 Mr Hough, it may be sensible for me to say at this
 8 stage, particularly in light of the questions
 9 Mr Patterson asked, I recently attended the
 10 New Palace Yard so I know the lie of the land, as it
 11 were, first hand. The photographs and the maps, the
 12 graphics we have, are very good, but it was, I have to
 13 say, useful to see it in the flesh to see actually the
 14 dimensions perhaps rather more easily with the human eye
 15 than you can sometimes tell by photograph or by graphic.
 16 Obviously I'm conscious that things have changed
 17 since March 2017, but I thought nonetheless in the light
 18 of those questions helpful to let people know that I had
 19 seen it myself.
 20 MR HOUGH: Sir, thank you.
 21 Would that be a convenient moment for our short
 22 mid-morning break?
 23 THE CHIEF CORONER: Certainly. We'll take our break then.
 24 (11.52 am)
 25 (A short break)

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1 (12.08 pm)
 2 MR HOUGH: Sir, before the next witness is called I've been
 3 asked by Ms Stevens who is in conference with her
 4 clients, to make you aware that she would like PCs Ross
 5 and Glaze not to be called today because she considers
 6 that she can't prepare for them properly and that would
 7 put her in difficulties, so we've anxiously considered
 8 this request and we don't urge you to take that course,
 9 and the reason is that PCs Ross and Glaze first of all
 10 are witnesses who are understandably anxious about the
 11 giving of their evidence.
 12 THE CHIEF CORONER: Yes.
 13 MR HOUGH: Pushing them back needlessly into next week would
 14 obviously cause distress and inconvenience to them.
 15 Additionally, their evidence has been timetabled in
 16 order to tell the story in a coherent way, completing
 17 the account of what happened to PC Palmer before we turn
 18 to consider what the firearms officers were or weren't
 19 doing at that time.
 20 THE CHIEF CORONER: Yes.
 21 MR HOUGH: So for those reasons primarily, and also because
 22 of the generally disruptive effects on the timetable, we
 23 don't urge you to accede to that request.
 24 THE CHIEF CORONER: We will keep them in the sequence in
 25 which they are currently listed to come, Mr Hough.

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1 MR HOUGH: Thank you, sir.
 2 Mr West, please.
 3 MR JAMES WEST (Affirmed)
 4 THE CHIEF CORONER: Mr West, if you would like to sit or
 5 stand, please make yourself comfortable.
 6 A. Thank you.
 7 Examination by MR HOUGH QC
 8 MR HOUGH: Would you please give your name to the court?
 9 A. James West.
 10 Q. Mr West, I'll ask you questions first on behalf of the
 11 Coroner, and then you will be asked questions by others.
 12 You are giving evidence today, I think you
 13 understand, about events you witnessed in Westminster on
 14 22 March last year?
 15 A. Yes.
 16 Q. And you made a witness statement about those events on
 17 4 April last year, to which you may refer?
 18 A. Yes.
 19 Q. On 22 March 2017, were you attending an event hosted in
 20 Portcullis House?
 21 A. Yes.
 22 Q. I believe that the location of that event was Room Q on
 23 the first floor of the building?
 24 A. That's correct.
 25 Q. And we understand from your statement that that was

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1 about five metres above ground level?
 2 A. Roughly, yes. It's above a row of shops.
 3 Q. May we put on screen a photograph, {DC7989/1}. We've
 4 had Portcullis House identified to us already today as
 5 the modern building opposite the Palace of Westminster
 6 across Bridge Street?
 7 A. Yes.
 8 Q. We see it there in the photograph. You, therefore, had
 9 a view from the first floor of that building out towards
 10 New Palace Yard?
 11 A. Yes.
 12 Q. Were there any blinds or curtains on the windows of that
 13 room?
 14 A. No.
 15 Q. How close were you to the windows when something
 16 happened to catch your attention?
 17 A. So I stood by the window but not looking out of it, when
 18 I heard a crashing sound, and then when I looked out
 19 I saw a black car parked -- well, not parked, but
 20 crashed into the railings on the pavement, front wheels
 21 on the pavement, back wheels kind of off the kerb.
 22 Q. Pause there. This was about 2.30 in the afternoon?
 23 A. A little after, yes.
 24 Q. You say that you saw the car crashed into the railings
 25 around New Palace Yard. Did you see any people near it?

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1 A. There was a body on the bonnet, and there was a body on
 2 the pavement, both male, I think, a number of other
 3 people stood around it. There was a cyclist who had his
 4 helmet off. Initially I thought there had been
 5 an accident with the cyclist, which you read about quite
 6 often in London.
 7 Q. May we put on the screen {PH0403/1}. This shows
 8 a photograph from Portcullis House, albeit a different
 9 part of Portcullis House, looking down at the vehicle
 10 after the collision, and that, I think, shows the scene,
 11 as I say, from a different perspective, from which you
 12 were looking?
 13 A. I actually took that photo.
 14 Q. Thank you very much.
 15 So we can see from this particular photograph, you
 16 think, precisely your perspective?
 17 A. Yes.
 18 THE CHIEF CORONER: I think in the centre we see the cyclist
 19 you are probably referring to with a helmet on, and
 20 a man on the pavement in front of him?
 21 A. That's correct, yes, with the red backpack, yes.
 22 MR HOUGH: So let's leave that on screen. As you watched,
 23 and just before I ask that question, at what point in
 24 the sequence of events did you take this photograph?
 25 A. This is taken, I think -- I don't recall, but I took it

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1 at 4.42 — sorry, 2.42 or 2.43, so I think this may be
 2 after the attacker has left the vehicle, possibly before
 3 they'd got into New Palace Yard.
 4 Q. As you look down first viewing the scene, did you notice
 5 people near the car reacting to anything?
 6 A. Initially people seemed to be going towards the car,
 7 I think to help the victims, the male on the pavement
 8 and the male on the bonnet, who in that picture is
 9 actually under the front left wheel, or by the front
 10 left wheel. That quickly changed and they quickly all
 11 started running in the opposite direction away from the
 12 car, at which point I noticed a man with a knife.
 13 Q. Where was he?
 14 A. He was close to the car moving, as we look at that
 15 picture, to the right down towards Parliament Square.
 16 Q. Did you associate him with the vehicle in any way? Did
 17 you think he was the driver?
 18 A. That was my assumption, yes. I didn't see him get out
 19 of the car, but I assumed it was related and he was the
 20 driver.
 21 Q. Can you describe him, please?
 22 A. The male?
 23 Q. Yes.
 24 A. Quite tall. Dark hair. Fairly dark clothing, kind of
 25 a range of colours, probably browns and greens. Quite

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1 stocky. He was obviously trying to run but he wasn't
 2 the most athletic of people. He kind of lumbered down
 3 towards Parliament Square.
 4 Q. So he was lumbering when you first saw him. How close
 5 to the vehicle was when you first saw him?
 6 A. Probably around where the person near the drain cover is
 7 in that photo, so, what's that, four to five metres?
 8 THE CHIEF CORONER: The drain cover, that's just to the
 9 right of the gentleman with the backpack?
 10 A. That's right, yes, by the person with the brown shoes.
 11 MR HOUGH: So you say he was moving in a lumbering way and
 12 you say that he was moving towards Parliament Square?
 13 A. Yes.
 14 Q. Was he holding anything that you could see?
 15 A. He was holding a big knife, a long straight silver
 16 blade, it looked like a large kitchen knife in his right
 17 hand.
 18 Q. How was he holding it? What direction?
 19 A. Kind of pointing it down towards the floor, sort of, as
 20 you're taught to hold a knife.
 21 Q. What did he do or where did he go next?
 22 A. He carried on down towards Parliament Square. At that
 23 point, as the pavement curves round into
 24 Parliament Square, there was a big crowd of people, some
 25 waiting to cross the road, some taking pictures of

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1 Big Ben, tourists in general, and he ran straight
 2 towards them, at which point I lost sight of him, partly
 3 because of the number of people, partly because of what
 4 was going on by the car.
 5 Q. Can we now put on screen, once again, photograph
 6 {DC7989/1}. So you were just telling us that he reached
 7 the corner, which we see at the foreground of this
 8 picture, the north-west corner of New Palace Yard?
 9 A. Yes.
 10 Q. And there were a large group of people there. How did
 11 they react as he came forward?
 12 A. A mixture, really. Some of them seemed to run away.
 13 A lot of them seemed fairly oblivious. They were taking
 14 pictures. I was — like I say, I lost sight of him but
 15 I was watching the crowd in general because I sort of
 16 expected, having seen the knife, them to be the next set
 17 of victims.
 18 Q. When did you next catch sight of him?
 19 A. The next time I saw him he was running through the gates
 20 of New Palace Yard, through the vehicle gate.
 21 Q. Were you aware of any police officers in the area of the
 22 gates?
 23 A. So the police officers, that's what actually drew my
 24 attention to it, they were running away from the gates.
 25 There were a couple of — probably two police officers

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1 in kind of fluorescent hi-vis jackets, and then a number
 2 in just white shirts, black trousers, kind of standard
 3 police or security attire. I'm not sure how many of
 4 them, maybe five or six.
 5 Q. Do you recall anything happening to a particular
 6 officer?
 7 A. Yes, so all of the officers bar one, all of the officers
 8 ran towards Westminster Hall apart from one officer in
 9 a hi-vis jacket, who ran round towards the left. They
 10 appeared to trip or stumble on — as you can see there's
 11 a kerb and the ground is cobbled. They appeared to trip
 12 as they reached the kerb and fell over, at which point
 13 the assailant, who was a short distance behind, started
 14 attacking the officer on the ground.
 15 Q. You say he started attacking him: is this right, you
 16 hadn't seen whether there was or wasn't an earlier
 17 attack or the attack starting at the gates themselves?
 18 A. I hadn't noticed anything at the gate. He was through
 19 the crowd and into New Palace Yard fairly swiftly, so
 20 I don't imagine there was much delay at the gate.
 21 I think — I don't know.
 22 Q. You say that the — as the officer fell back in the area
 23 of the low wall around the grassed area, that the
 24 assailant, the man with the knife, was attacking him.
 25 Can you describe that attack?

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1 A. So the officer was on the ground. His jacket was kind
 2 of over him, so I couldn't tell if he was sort of on his
 3 knees or on his side, but generally in a foetal
 4 position, I think you call that, curled up to make
 5 himself small.
 6 The attacker was sort of bent or knelt over him. He
 7 had, I think, one hand on him to almost partially
 8 support his own body weight, partially holding the
 9 officer in place, and the other hand was repeatedly
 10 stabbing the officer.
 11 Q. How many stabbing motions did you see?
 12 A. Quite a few. I would have said at least six, possibly
 13 more.
 14 Q. I think you put it in your statement as something
 15 between eight and ten.
 16 A. That sounds about right, yes.
 17 Q. Can you describe the stabbing motion?
 18 A. It was -- so he was, essentially, stabbing down.
 19 Q. Downwards?
 20 A. Sort of like you would see in a horror film, that kind
 21 of Hollywood stabbing motion.
 22 Q. Into which part of the officer's body?
 23 A. It was all along the upper body, so I would say it was
 24 kind of left-hand upper body, shoulders, possibly torso,
 25 neck, upper arm -- upper body. Sorry, on the officer's

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1 right-hand side, upper body.
 2 Q. In your statement you describe it as being "repeated and
 3 constant rather than frenzied"; that's the way you
 4 characterised it?
 5 A. Yes, he did it numerous times, but it was fairly
 6 repetitive rather than, you know, manic.
 7 Q. How did the attack come to an end?
 8 A. The officer somehow seemed to escape from under the
 9 weight of the attacker, and started running in the
 10 direction towards Westminster Hall where all of the
 11 other officers had originally ran to.
 12 I remember being amazed, because the officer had
 13 managed to get up after being attacked, stabbed so many
 14 times. My initial reaction was that maybe the knife
 15 hadn't made as significant contact as it looked to have
 16 done from a distance. So the officer ran in the
 17 opposite direction and then the attacker followed him in
 18 the direction of Westminster Hall.
 19 Q. How close behind did the attacker follow the officer?
 20 A. Four to five metres, a bit less, maybe.
 21 Q. How fast was the attacker moving?
 22 A. Not very fast. Similar to on the pavement outside the
 23 Palace Yard, lumbering fairly freely, but not quickly,
 24 particularly.
 25 Q. What did you see next?

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1 A. At that point my colleague, who was in the room with me,
 2 suggested that we should get away from the window
 3 because he said there could be a bomb in the car which
 4 was just over the road from us, which seemed like
 5 a sensible suggestion, so I moved away from the window.
 6 My colleague was a little slower to move from the window
 7 and he said "They've taken them down", or "He's down",
 8 or words to that effect, which I took to mean that the
 9 attacker had been shot.
 10 Q. After that, did you see anything of significance of this
 11 attack?
 12 A. No, the angle I was at was fairly low and there's trees
 13 and then the raised bit in the middle, so I couldn't see
 14 what was happening the other side of Palace Yard, and we
 15 shortly after we left the room, policemen came and
 16 escorted us out.
 17 MR HOUGH: Thank you very much for your evidence.
 18 A. Thank you.
 19 Examination by MR ADAMSON
 20 MR ADAMSON: Mr West, my name is Dominic Adamson and I ask
 21 questions on behalf of PC Palmer's widow.
 22 You've described the ferocity of the attack up
 23 against the wall. At the time of the attack, could you
 24 see if PC Palmer was moving?
 25 A. Yes, there was some movement. It's hard to tell how

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1 much was him, how much was -- it was quite a big, you
 2 know, hi-vis, yellow, sort of, winter jacket -- so how
 3 much that was the jacket moving under the attacker's
 4 movement, how much that was PC Palmer moving himself,
 5 but there was definitely movement under the jacket, yes.
 6 Q. And so from your viewpoint, are you able to say which
 7 parts of PC Palmer's body were being struck?
 8 A. Yes. I think it was the -- so my viewpoint was sort of
 9 a three-quarter angle of the back of PC Palmer, and he
 10 was being struck around the upper right quarter of the
 11 body, shoulders, back.
 12 Q. And you've said that you saw him in a foetal position?
 13 A. He was -- so he appeared to be curled up under the coat,
 14 trying to make himself small, I guess to reduce the area
 15 that the knife could make contact with.
 16 Q. And, amazingly, he managed to escape?
 17 A. Yes.
 18 MR ADAMSON: Thank you very much.
 19 A. Thank you.
 20 Examination by MR KEITH QC
 21 MR KEITH: I just want to ask a couple of questions, if
 22 I may, on behalf of the Metropolitan Police.
 23 A. Okay.
 24 Q. It is obvious from what you have told us that Masood was
 25 targeting PC Palmer, perhaps because he was the nearest

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1 to him, that he went after him deliberately?
 2 A. I don't know if that was the case. I -- when the police
 3 officers ran in, I think he was probably fairly
 4 equidistant from the group who ran to the right and
 5 PC Palmer who ran to the left. I don't recall exactly,
 6 but there was quite a short gap between him heading to
 7 PC Palmer and PC Palmer being on the floor. Whether he
 8 had already decided PC Palmer was the target or had seen
 9 him fall, you know, kind of went for him because he was
 10 on his own, I'm not sure. But I couldn't say for sure
 11 that he was -- that he'd predetermined it was going to
 12 be PC Palmer that he attacked.
 13 Q. No, no, yes, he wouldn't know, of course, PC Palmer and
 14 he wouldn't know which -- well, how many police officers
 15 he would find behind Carriage Gates.
 16 A. No.
 17 Q. In your statement you, I think, rightly observe that he
 18 was probably the nearest to him?
 19 A. Yes.
 20 Q. And it's obvious that he was a police officer --
 21 A. Yes.
 22 Q. -- because he was wearing a hi-vis jacket, and he was
 23 one of the uniformed and helmeted police officers behind
 24 the gate?
 25 A. Correct.

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1 Q. So it was obvious to Masood that he was attacking,
 2 deliberately, a police officer?
 3 A. Yes, I would have thought so. I don't know how it
 4 couldn't have been.
 5 Q. It couldn't have been otherwise, could it?
 6 A. No.
 7 Q. And the stabbing was repeated and constant?
 8 A. Yes.
 9 Q. Would you agree another way of describing that was it
 10 was very, very deliberate?
 11 A. Yes.
 12 Q. It wasn't wild, it wasn't frenzied, it was callous and
 13 calculated?
 14 A. I would agree with that, yes.
 15 MR KEITH: Thank you.
 16 MR HOUGH: Those are all the questions we have for you.
 17 Thank you very much, Mr West.
 18 A. Thank you.
 19 THE CHIEF CORONER: Thank you very much indeed for coming.
 20 A. Thank you, sir.
 21 MR HOUGH: Sir, the next witness is PC James Ross.
 22 PC JAMES ROSS (Sworn)
 23 A. Police Constable James Ross PC 2129 attached to
 24 Parliamentary and Diplomatic Protection.
 25 THE CHIEF CORONER: Good morning, officer.

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1 A. Good morning, sir.
 2 THE CHIEF CORONER: As with others, if you wish to sit or
 3 stand, whichever you feel comfortable doing, please make
 4 yourself feel comfortable.
 5 A. Okay, thank you.
 6 Examination by MR HOUGH QC
 7 MR HOUGH: PC Ross, you have given your name and your
 8 shoulder number and your rank. I ask questions first on
 9 behalf of the Coroner, then you will be asked questions
 10 by other lawyers.
 11 A. Sir.
 12 Q. You are giving evidence today about events you witnessed
 13 at the Palace of Westminster on 22 March last year?
 14 A. That's correct.
 15 Q. You've made witness statements on the day of those
 16 events and five days later. Your second one is more
 17 detailed. You may refer to that as you wish.
 18 A. Thank you very much.
 19 Q. PC Ross, I appreciate I will be asking questions about
 20 some very distressing events. If you want a break at
 21 any point, please say so.
 22 A. Thank you.
 23 Q. On that day, I think you were on duty at the
 24 Palace of Westminster in uniform?
 25 A. That's correct.

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1 Q. How long had you worked in the Palace grounds?
 2 A. On the day or in total?
 3 Q. Up to that time?
 4 A. Probably about eight years.
 5 Q. So were you very familiar with New Palace Yard and its
 6 layout?
 7 A. Yes.
 8 Q. What was your post that day?
 9 A. I was posted on post 8P, which is a pedestrian entrance
 10 to the Palace from -- off Parliament Square, which is
 11 mainly for passholders to the Palace, and it's also the
 12 main exit for pedestrians leaving the Palace.
 13 Q. We can bring up on screen a plan {DC7989/80}. So you
 14 should see a plan of New Palace Yard coming up in front
 15 of you, and if we put the cursor on the word "Hut" to
 16 the south of the two vehicle gates, can you identify
 17 your post for us, please?
 18 A. Yes, sir. Where you've got your cursor there's a little
 19 star just to the left of it.
 20 THE CHIEF CORONER: The purple star?
 21 A. Where the purple star is and there is a sort of a gated
 22 bit just above that. I was probably standing by the
 23 gate talking to the two officers on the south entrance.
 24 MR HOUGH: And that, as you have told us, is an entrance for
 25 passholders but used as an exit by many members of

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1 Parliament?
 2 A. That's correct.
 3 Q. If we look at some photographs, these aren't distressing
 4 photographs, they're just photographs of the area,
 5 {DC7989/51}. This is a photograph looking at the gates
 6 from Parliament Square. We see two large vehicle gates
 7 and over to the right on the pavement, is this correct,
 8 the pedestrian entrance you were manning?
 9 A. Yes, sir.
 10 Q. Then {DC7989/55}, are we now looking at the view from
 11 inside, with your post and that hut over to the left of
 12 the shot, with the gates on the pavement just obscured
 13 by the open vehicle gate?
 14 A. That's correct.
 15 Q. And which other officers were posted at the entrance to
 16 New Palace Yard on 22 March last year that you recall?
 17 A. On the south gate there was PCs Stephen Marsh and
 18 PC Doug Glaze, and on the north gate there was
 19 PC Keith Palmer and PC Kevin Tipple.
 20 Q. So PCs Glaze and Marsh would be on the gates we see in
 21 the left of this photograph, PCs Palmer and Tipple on
 22 the gates we see on the right?
 23 A. That's correct.
 24 Q. If we put the plan back on screen, {DC7989/80}, for
 25 further discussion.

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1 What equipment did you have as standard that day?
 2 A. All my appointments which is handcuffs, asp, and
 3 incapacity spray, CS incapacity spray.
 4 Q. And the asp is an extendable baton?
 5 A. Yes.
 6 Q. Were you and all your colleagues equipped with that
 7 equipment and a police radio?
 8 A. Yes, sir.
 9 Q. Is it right that you would have been tuned to the
 10 channel for the Palace of Westminster police and
 11 security staff?
 12 A. Yes, sir.
 13 Q. Called, I think, dispatch 1?
 14 A. Yes, sir.
 15 Q. Were you also, along with your colleagues, wearing
 16 standard issue police body armour?
 17 A. Yes, sir.
 18 Q. The gates we see on the plan, the vehicle gates,
 19 in March 2017, according to your understanding, when
 20 were they kept open and when were they closed?
 21 A. Depending on the time of day they will be kept open
 22 from -- I think more or less from 7 o'clock in the
 23 morning until nearly 10 o'clock at night. But the outer
 24 gates, which you've got drawn on as a red line, they
 25 would be opened and closed by the officers inside as and

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1 when the vehicles were entering or leaving?
 2 Q. Can we have a photograph to show some of these things
 3 more vividly {DC7989/57}. Now, do we see here on the
 4 pavement just outside the vehicle gates some movable
 5 crowd control barriers which could be wheeled around to
 6 act as a barrier on the pavement side of the large black
 7 vehicle gates?
 8 A. Yes, that's the gates that I'm talking about.
 9 Q. Then we can see another photograph of them, {DC7989/56}.
 10 We can just see them in view on the left-hand side of
 11 this photograph?
 12 A. Yes. They came in as a temporary measure and I don't
 13 know if they're still there, to be honest.
 14 Q. We can leave that photograph on screen. You've told us
 15 that the large vehicle gates were left open, essentially
 16 through the day. How easy or difficult were they to
 17 open and close?
 18 A. I think the gates that you've got in the picture there,
 19 they're the gates which actually replaced the originals
 20 while they were being mended, but they were very hard to
 21 actually open and close because they weigh an awful lot,
 22 and especially the north gate, the right-hand gate,
 23 which came in two parts, there was a hinge to it. So
 24 that one almost took two people to be able to close
 25 that.

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1 Q. Now, turning, then, to the crowd control barriers on the
 2 outside of those gates, those movable metal crowd
 3 control barriers that we're looking at, is this right:
 4 they could be wheeled around to act as a barrier and
 5 a metal catch thrown across the top?
 6 A. Yes. Yes, sir.
 7 Q. When were they opened and when were they closed as
 8 a matter of practice?
 9 A. They would be opened or closed as and when vehicles or
 10 cyclists had to enter the premises, or if there was
 11 a vote in Parliament. If there was a vote in Parliament
 12 they had to be open for at least eight minutes so that
 13 you wouldn't impede any MPs or Lords coming in to vote.
 14 Q. Just so everybody knows, the eight minutes is the length
 15 of time between the division bell and the vote?
 16 A. And the time when they can actually get in and -- get in
 17 to actually vote, so it's 15 minutes for each division.
 18 Q. Now, on 22 March 2017 at shortly after 2.30 pm, were you
 19 at your post at the pedestrian entrance you've
 20 identified?
 21 A. Yes, sir.
 22 Q. And at that time were the main vehicle entry and exit
 23 gates, the large black gates, open or closed?
 24 A. Open, sir.
 25 Q. And were the external crowd control security barriers

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1 open or closed?
 2 A. Don't know. Don't know, sir.
 3 Q. According to footage we've seen, they were open, and we
 4 may hear that they were open because there was
 5 a division?
 6 A. Yes.
 7 Q. If we put on screen {DC7989/55}, this is the photograph
 8 we were looking at earlier. When events began to
 9 unfold, where were you standing in relation to the gates
 10 we can see on the left of the photograph?
 11 A. Is this photograph taken from that day, just before?
 12 Q. This is more recent. It shows new vehicle gates, not
 13 the ones that you were describing earlier.
 14 A. Certainly. I think I was probably standing where the
 15 officer is standing there, so I was engaged in
 16 conversation with my two colleagues on the south gate.
 17 THE CHIEF CORONER: So that's by the hut we see on the left
 18 of the photograph?
 19 A. Yes, there's an officer stood there.
 20 THE CHIEF CORONER: I wonder, Mr Hough, if we might just
 21 have the cursor put on that, just for clarification,
 22 because there are a number of gates.
 23 MR HOUGH: If we look at the left-hand set of gates, the
 24 ones that are open, and we see an officer, if we just
 25 move the cursor slightly to the right, you identified

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1 that officer, and that's where you say, I think, you
 2 would have been standing?
 3 A. There or thereabouts, within a foot or two.
 4 Q. At this time were your colleagues, whom you've described
 5 as having particular postings at the vehicle gates, were
 6 they in position at those gates?
 7 A. When you're on the gates you don't have to be stood
 8 right up against them. I think at the time, both Steve
 9 and Doug were stood close to me, and then as the
 10 vehicles needed to be opened you would fan out and then
 11 fan back in.
 12 Q. If we bring up {DC7989/76}. I'm grateful to Mr Moss.
 13 This photograph, I think, Mr Ross, shows the vehicle
 14 gates, the black vehicle gates, as they were at the time
 15 of the attack, just slightly different in appearance
 16 from the ones we saw in the last photographs. We can
 17 take that off screen, please.
 18 We know that there were two armed officers on duty
 19 in New Palace Yard at the time of the attack, but that
 20 they were not by the New Palace Yard entrance. At the
 21 time of the events with which we're concerned, were you
 22 aware where they were?
 23 A. No, sir.
 24 Q. So far as you were aware, what was the patrolling
 25 practice of the armed officers who were on duty in

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1 New Palace Yard around that time?
 2 A. I actually used to work at the Palace as an armed
 3 officer, so from my recollection and memory of doing
 4 that post, it's a roving patrol, so you can be at the
 5 gates or you can be down by the colonnades, down by the
 6 members' entrance. It's a roving patrol all round. So
 7 it's not static at any one point.
 8 Q. At what time were you an armed officer, between what
 9 dates?
 10 A. Between, let me think, dates ...
 11 Q. You don't have to be very precise.
 12 A. I was an armed officer for five years on DPG and during
 13 that time I spent about three and a half years at the
 14 Palace.
 15 Q. How recently, how close to the times of this event?
 16 A. Five years ago.
 17 Q. Now, you say that at that time you recall
 18 New Palace Yard being a patrol which was mobile?
 19 A. Yes.
 20 Q. Were there any particular areas in New Palace Yard that
 21 you were instructed to focus upon or stay by at any
 22 particular times?
 23 A. Just to be aware of certain situations where, if you've
 24 got any people coming in or out, because a lot of people
 25 get dropped off by the members' entrance, so you would

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1 be aware of those in and around there, and be mindful of
 2 that. Those areas, like during an entrance or an exit.
 3 Q. Did you have instructions to be in any particular place
 4 when the vehicle gates were open?
 5 A. No.
 6 Q. Were you aware that it was the practice of any of your
 7 colleagues to be at the vehicle gates when they were
 8 open?
 9 A. Not -- not for a vote.
 10 Q. On 22 March 2017 what first drew your attention to
 11 something unusual or of concern happening?
 12 A. There was a very loud bang and crash in -- on
 13 Bridge Street.
 14 Q. If we put on our plan again, {DC7989/80}. So you've
 15 described a bang coming from the direction of
 16 Bridge Street, so the north wall at the top of the
 17 screen. What did it sound like?
 18 A. I thought it was a car crash, but I wasn't certain.
 19 Q. What did you hear or see next?
 20 A. Straightaway there was screaming, like people were
 21 screaming, and I didn't know if it was some sort of
 22 demonstration just been started off by using a loud
 23 banger or whatever, but there was people running,
 24 screaming, and they were coming round the corner and
 25 turning left down towards the gates.

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1 Q. Were you aware of any of your colleagues using his
2 radio?
3 A. Yes, I was aware of PC Glaze using his radio.
4 Q. Can you recall what he was saying?
5 A. From -- what he said and what I think I heard are two
6 completely different things, because in my original
7 statement I said that I thought he put up saying it was
8 a car crash, and I've since heard that he said no, he
9 definitely thought it was an IED.
10 Q. That's a bomb, effectively?
11 A. A bomb, yes.
12 Q. What did you see or hear next as events unfolded?
13 A. There were people running past, screaming and running
14 past my entrance, so I went to my entrance at the gate
15 to actually stop people trying to get in on the gated
16 area.
17 Q. What were you using to bar your entrance?
18 A. Me, at the time.
19 Q. Did anyone try to gain access to your entrance?
20 A. There was a couple of people who tried to run in and
21 I sort of barred their entrance because I didn't know
22 who they were and what their intentions were, or
23 anything like that, and somebody shouted in my face --
24 I'll get the words right.
25 Q. I think it's page 2 of your statement.

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1 A. Thank you.
2 Q. Top of the page.
3 A. Thank you.
4 "There's a man with bloody big knives running this
5 way".
6 Q. Do you recall how you reacted to that?
7 A. Yes. I stepped back and closed the gate. I'm almost
8 sure I closed the gate. I can't think of anything else
9 I would have done. It's a bit of a blur, I apologise.
10 Q. No. What did you see or hear next?
11 A. There was some noise to my right and I saw a PC, who
12 I now know to be Keith Palmer, he was on the floor on
13 his back, up against the metal barrier of the down ramp
14 going down to the underground car park, and standing
15 right over him, facing away from me, was the suspect.
16 Q. So using this plan, can you just point out where you say
17 you saw that taking place?
18 A. Sorry ...
19 Q. If we put the cursor on the curved marking of the low
20 wall around the grassed area, please.
21 A. Is this like The Golden Shot?
22 Q. If we move that around, that cursor.
23 A. If you go further north. If you come down a bit. If
24 you come in line with the north gate and go straight
25 back from the north gate, if you go where you are now

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1 just to the right a bit. In fact, that's probably it
2 there actually, you were spot on, that's the actual
3 wall, the metal wall there.
4 Q. So that's the location, and what did you see there?
5 A. I saw the suspect, he had a knife in each hand, blades
6 about a foot long, and he was stabbing PC Palmer in and
7 around the head area.
8 Q. How forceful were the blows so far as you could see?
9 A. He was hitting him with such force that the blades were
10 bending on impact.
11 Q. What were your fellow officers doing at this point?
12 A. I noticed that there was two officers standing in front
13 of me with asps drawn.
14 Q. What did you do? What was your reaction?
15 A. I went behind them and I thought that maybe possibly --
16 without having getting so close to use an asp, you can
17 use CS incapacity spray from a slightly longer distance,
18 so I was trying to get that from underneath my coat and
19 my belt when things changed again.
20 Q. What happened next?
21 A. Next, when I next looked up I was also distracted by
22 a car which was leaving the estate, which in turn had
23 lifted the security barriers.
24 Q. So if we look at our plan, towards the bottom left, not
25 far from your hut, we see the words "Vehicle barrier

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1 raised". Is that the vehicle barrier you are referring
2 to --
3 A. Yes.
4 Q. -- that had risen to allow a car to leave. Did that
5 draw your attention?
6 A. Yes, not so much the barrier drawing up, but the car,
7 the black car.
8 Q. After your attention had been drawn by that, did you
9 then look back towards the area where Keith Palmer was?
10 A. Yes, I looked back to the area and there was no officers
11 there. Keith and the other officers had all gone and
12 had managed to run round in an arc around towards the
13 members' entrance, past the car.
14 Q. Now, members' entrance is on the -- towards the bottom
15 right-hand side of this plan, isn't it?
16 A. Yes, it is.
17 Q. So they were running, is this right, through the area
18 where the vehicle barrier had risen?
19 A. That's correct, sir.
20 Q. And towards the members' entrance. Just to be clear, if
21 the vehicle barrier is down, is it possible to run
22 through that area?
23 A. You wouldn't be able to run through it but you could
24 maybe get over it at a push, but it would be very
25 difficult.

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1 Q. So both their ability to get away through that channel
2 and the attacker's ability to follow them, was due to
3 the vehicle barrier being raised?
4 A. Yes, sir.
5 Q. And that was just because a car happened to have been
6 going through?
7 A. Just -- absolutely.
8 Q. Where was the attacker as you saw the officers moving
9 away, and what was he doing?
10 A. He was walking towards me.
11 Q. Could you see whether he was still carrying the knives
12 in his hands?
13 A. Yes, he had the knives in his hands and -- I apologise
14 to the court, but I had a moment at that time which I've
15 never been able to actually remember from when he was
16 walking towards me until -- I've still got no
17 recollection of it, but I've since seen CCTV, which the
18 CCTV footage doesn't -- isn't involved in my statement,
19 and I've run to the gate and then stopped and then I've
20 turned round and I've been running at the suspect with
21 some sort of plan -- mad plan in my head to try and
22 attack him before he got to anybody else.
23 Q. So just let's take that in stages, if we may. I'm not
24 planning to go through lots of CCTV footage with you
25 now, officer --

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1 A. No.
2 Q. -- for reasons you'll understand.
3 A. Absolutely.
4 Q. But when you first saw the officers running away, where
5 were you?
6 A. I didn't see them run away.
7 Q. When you saw them heading towards members' entrance,
8 where were you?
9 A. I was still stood where I'd been stood behind the
10 officers when I was trying to get my CS out. Then
11 I looked up and there was nobody there, apart from the
12 suspect.
13 Q. Where did you go from that point?
14 A. I ran back towards the gate to the left. Not my gate.
15 Q. The vehicle gate?
16 A. The south vehicle gate.
17 Q. Meanwhile, while you were doing that, where was the
18 attacker going?
19 A. The suspect, he walked round and followed the officers
20 round.
21 Q. So effectively passing the position you had reached?
22 A. Yes.
23 Q. And did you then see him continuing after the officers?
24 A. Yes, he -- well, he was walking -- he was walking, like,
25 towards the officers, and it was then I noticed a plain

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1 clothes officer.
2 Q. Just pausing there. We're not going to name that
3 officer, if you do know his name. You saw a plain
4 clothes officer.
5 A. Whom I only know as -- by his codename, SA74.
6 Q. Yes. What was that officer doing?
7 A. He was challenging the suspect. He had a Glock drawn
8 and he was challenging the suspect.
9 Q. So he had --
10 A. His words were -- he shouted at him, "Armed police", and
11 the suspect continued towards him with his knives in his
12 hands.
13 Q. Where was the officer either in relation to this plan,
14 or in relation to the suspect, when he confronted him?
15 A. I couldn't -- I couldn't say for certain, although
16 I know that he was very close to the suspect, and I was
17 in a direct line behind the suspect.
18 Q. So he raised his Glock firearm, he shouted "Armed
19 police"?
20 A. I think he was actually off-aim, and then he -- when he
21 first challenged him, and he continued on towards him
22 and then he shot him.
23 Q. Just to be clear, the path the suspect was following was
24 on a down slope, I think, towards the officer?
25 A. Yes.

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1 Q. Do you recall how many shots the officer fired towards
2 the suspect?
3 A. At the time all I could say was a number of shots, but
4 it wasn't until I saw the footage on the news later that
5 I actually heard it was three shots.
6 Q. Was the suspect hit in your sight?
7 A. I couldn't see any bullets enter him but he did fall
8 down right in front of me.
9 Q. After the shooting of the suspects, did you then have
10 words with the occupants of the car?
11 A. Yes, I turned immediately, because I realised I was
12 in -- I was the backdrop for the suspect, so I got out
13 the way sharpish and ran back, and then I realised that
14 the car that was there -- because the car hadn't really
15 fixed on any of our imaginations at any point, we were
16 too focused on other things at the time, and then
17 somebody was trying to get out of the car, I didn't know
18 who it was, it could have been the head of the Salvation
19 Army as far as I was concerned, so I asked the people in
20 the car, in case there was any more suspects, to leave
21 the area and leave the crime scene.
22 Q. You then, I think, remained on the scene, securing the
23 gates and giving access to emergency services personnel?
24 A. Yes, sir.
25 MR HOUGH: Thank you very much, officer. Those are my

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1 questions. There will be questions from others but it
 2 may make sense for them to be after lunch.
 3 THE CHIEF CORONER: I think, Mr Ross, we'll take any further
 4 questions there may be from you at 2 o'clock.
 5 A. Okay, sir.
 6 THE CHIEF CORONER: Thank you very much. I'll rise there.
 7 (12.56 pm)
 8 (The Luncheon Adjournment)
 9 (2.03 pm)
 10 THE CHIEF CORONER: Mr Adamson.
 11 Examination by MR ADAMSON
 12 MR ADAMSON: Mr Ross, my name is Dominic Adamson and I ask
 13 questions on behalf of the widow of PC Palmer.
 14 A. Certainly.
 15 Q. Mr Ross, you gave evidence this morning that you had
 16 previously been on AFO, authorised firearms officer,
 17 duty at this location?
 18 A. Yes, sir.
 19 Q. And your evidence was that, to the best of your
 20 recollection, you had those responsibilities for about
 21 three and a half years?
 22 A. Yes, sir.
 23 Q. And that period ended about five years ago?
 24 A. Yes, sir.
 25 Q. So we're talking about in mid-2013 or so, and I know

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1 that efforts are being made to check those dates.
 2 Can I ask you a little bit about your understanding
 3 of the role of AFOs at that time?
 4 A. When I first went to work at the Houses of Parliament as
 5 an AFO, one of our roles was -- that was one of the
 6 postings at Carriage Gates and it was actually at
 7 Carriage Gates. It was a fixed post some eight years
 8 ago, eight, nine years ago, and then it was deemed that
 9 to give you more reaction gap in case of any attack,
 10 that you were actually moved further away from the
 11 gates. And then --
 12 Q. Sorry, please finish.
 13 A. Sorry?
 14 Q. Please finish, sorry.
 15 A. And then it became a roving patrol.
 16 Q. Right, so let's just unpack that a little bit?
 17 A. Okay.
 18 Q. Eight years ago, or thereabouts, you were an AFO?
 19 A. Yes.
 20 Q. And at that time, AFOs were in a fixed post at the
 21 gates?
 22 A. Yes, it was a single post, Glock-only.
 23 Q. And you were armed with weapons, guns, at that time?
 24 A. Yes.
 25 Q. Subsequent to that, there was a change in the

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1 arrangements and you were moved back from that location.
 2 A. To give you a reactionary gap.
 3 Q. To give you a reactionary gap?
 4 A. Yes, sir.
 5 Q. And were police officers who were unarmed placed at the
 6 gates?
 7 A. Yes, sir.
 8 Q. So it was a shift from armed officers to unarmed
 9 officers at the gates?
 10 A. There was always unarmed officers at the gates because
 11 they were opening and closing the gates, but the armed
 12 officers were moved further back.
 13 Q. Moved further back. So as to provide them with cover?
 14 A. A reactionary gap, we were told.
 15 Q. Yes, a reactionary gap?
 16 A. Yes, sir.
 17 Q. So by stepping back a little bit, you would be in
 18 a better position to see what was going on in front of
 19 you?
 20 A. To give you time to react, sir.
 21 Q. Yes. At that time were you issued with post
 22 instructions?
 23 A. I think on all the posts you've always been issued with
 24 post instructions, whether it's the Saudi Arabian
 25 Embassy, Lady Thatcher's -- wherever you may be, you

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1 always have post instructions.
 2 Q. Yes. I would like to show you, if I may, a document,
 3 which is dated 16 January 2015 which is a post
 4 instruction at that time. That's 2015, which
 5 I appreciate is after you ceased to be an AFO. The
 6 reference is {WS5103/9}. Is this the sort of document
 7 that you would be familiar with?
 8 A. Yes, sir.
 9 Q. Yes. And we can see that this is a post instruction,
 10 the location top right-hand corner,
 11 Palace of Westminster, and it was modified, left-hand
 12 side, top of the page, 16 January 2015; yes?
 13 A. Yes, sir.
 14 Q. Now, if we could please move forward a page.
 15 {WS5103/10}, there's a section there called "Sector 3 --
 16 Carriage Gate"?
 17 A. Yes, sir.
 18 Q. In your time as an AFO was that area known as sector 3?
 19 A. Yes, sir.
 20 Q. And we can see the instructions given in relation to
 21 sector 3, and it says:
 22 "2 Post -- 1xG36 and 1xTri Carriage."
 23 That's the two officers and a reference to the --
 24 A. Weaponry.
 25 Q. -- weaponry. Then it goes on to say:

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1 "Officers are to work together, working within
2 [close] proximity of each other, but not specifically as
3 a pair. Officers to be positioned in close proximity to
4 the gates when they are open, but not outside."

5 Now, is that an instruction, or a post instruction,
6 which reflected the sort of instructions you had in your
7 time as an AFO?

8 A. I believe it was quite similar. I think you were
9 allowed to be as a pair, in an AFO working relationship
10 you do actually work as a pair, as opposed to
11 separately. That's how you're trained, as a pair. But
12 it was -- the actual area, it wasn't just
13 Carriage Gates, it was the whole area, the whole -- the
14 map that you showed me earlier, sorry, it was that whole
15 area which was the roving patrol.

16 Q. Before we leave this document, do you recall -- if you
17 don't, I understand -- do you recall whether the
18 relevant post instruction at your time at an AFO
19 included the requirement for you to operate in close
20 proximity to the gates?

21 A. The gates obviously are there, but you weren't required
22 to be in close proximity of the two of them all the
23 time, no.

24 Q. Right.

25 A. You could be having to be, for whatever reason, nearer

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1 to members' entrance, for whatever reason, or the
2 colonnades, depending on what was happening or what the
3 intelligence was.

4 Q. So if they did receive that instruction when you were
5 an AFO, it was routine for you to patrol the entire area
6 of New Palace Yard?

7 A. Yes, sir.

8 Q. Is that right?

9 A. Yes, sir, that's correct.

10 Q. May I call up a further reference {WS1633/5}. Now, this
11 is a diagram headed "Ranger Sector 3", and I gather that
12 this was in laminated form and kept in the officers'
13 mess. In the base. Is it a document that you are
14 familiar with?

15 A. Yes, there was a big map of the whole estate downstairs
16 and there was obviously -- there was areas which were
17 different sectors going from different areas of the
18 estate.

19 Q. And the shaded blue area, as I understand it, represents
20 sector 3?

21 A. Yes, sir.

22 Q. So when you were an AFO in 2013, was that diagram
23 reflective of what you regarded as the scope of AFO
24 patrol duties at that time?

25 A. From what I remember, sir, yes.

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1 Q. And so the patrol involved the whole area.

2 A. Yes, sir.

3 Q. Would it involve going into the colonnade?

4 A. You could walk along the colonnade, just ... and also
5 you could even go into the search area, which is off to
6 the left, 1157.

7 Q. Just so we understand, on the diagram, the search area
8 is where?

9 A. It's Cromwell Green entrance, it's called on there.

10 Q. So if a cursor could be put on the page?

11 THE CHIEF CORONER: You mentioned the number 1157, which we
12 can see just below "Cromwell Green Entrance".

13 A. That's the search area. So you could actually go in
14 there, make sure they were okay in there, and wander
15 through.

16 MR ADAMSON: And at some stage you transferred from AFO
17 duties to being an officer who was not equipped with
18 firearms.

19 A. That's correct.

20 Q. But you would have been familiar with the scope and
21 range of patrols by AFOs; presumably?

22 A. Yes, sir.

23 Q. Was there any difference between the way in which AFOs
24 were executing their duties in 2017, to the way in which
25 you executed those duties back in 2013?

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1 A. There were -- there were differences on different posts,
2 definitely, and over time there are changes all over the
3 estate, there's subtle little changes here and there,
4 and when you're focusing on your own job you don't take
5 an awful lot of notice of what they are getting up to.

6 Q. Right. Are you able to say whether in your experience
7 as an officer at the gate you would expect armed
8 officers to be present in the -- in close proximity of
9 the gate regularly?

10 A. Not at all, no. Just every now and again you might see
11 them passing by, but you weren't -- it wasn't
12 an everyday thing, they weren't expected to be there all
13 the time because they had quite a large area to cover.

14 Q. Every now and then you would see them?

15 A. Possibly, possibly. You'd have your back to them
16 because you're watching the gate so you're not really
17 focusing on what's happening behind you.

18 Q. I understand that, but over time, presumably you would
19 get some sense of how often they were there?

20 A. Certainly, because you would actually know the people
21 who were carrying and you would actually say hello to
22 them.

23 Q. Yes. So how long might you go between seeing an officer
24 at the gate before you saw him again?

25 A. It's -- I can't put a time on it because they're there,

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1 they're not there, and your focus is elsewhere. Your
 2 focus is on what's going on in front of you, so
 3 I couldn't say, I am afraid, sir.

4 Q. But ever since your time as an AFO through to 2017, it
 5 would be routine --

6 A. Yes.

7 Q. -- for AFOs not to be present at the gates, or within
 8 close proximity of the gates?

9 A. It would be routine for them to be there, it would be
 10 routine for them to be elsewhere along that blueprint.

11 Q. Was there any instruction that they had to be in close
 12 proximity when the gates were open in 2017, to your
 13 knowledge?

14 A. I don't know, sir. You would have to ask an AFO.

15 Q. In your experience as an officer at the gate, were you
 16 aware that AFOs were present when the gates were open?

17 A. I ... when the gates were open, that's -- the gates are
 18 open all the time. The actual big, large gates are open
 19 all the time when the House is doing business.

20 Q. Yes.

21 A. And they're only closed if there's a nearby
 22 demonstration or it's very early in the morning or very
 23 late at night.

24 Q. So if we think back to the wording of the post
 25 instruction that we referred to before, which says

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1 "Officers to be positioned in close proximity to the
 2 gates when they are open", that would effectively mean
 3 there all day, if they were to be in close proximity
 4 when the gates were open, because you're saying that the
 5 gates were open from morning until night?

6 A. It would depend upon your definition of "close
 7 proximity", sir.

8 Q. I think you said that you can't recall whether there was
 9 a requirement for you to be in close proximity when you
 10 were an AFO, is there?

11 A. Absolutely.

12 Q. When you were an AFO, were you required to access post
 13 instructions through a system known as ADAM?

14 A. No, that's quite a new system from what I understand.
 15 They were all done -- it was done by a completely
 16 different system when I was on DPG. I don't think ADAM
 17 existed in them days.

18 Q. Thank you. I'll move on.

19 In terms of the events of the day, do you recall
 20 when you last saw AFOs in the vicinity of the gates?

21 A. No, sir.

22 Q. In due course, this Inquest is going to hear evidence of
 23 the movements of the armed officers on the day, and
 24 unless I've misunderstood it, the evidence will show
 25 that for at least 46 minutes, there is no evidence of

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1 AFOs being present at or in close proximity to the gates
 2 on the CCTV footage. Is that the sort of period of time
 3 which you would regard as normal for AFOs to be absent
 4 from an area in close proximity to the gates?

5 A. It depends on your point of view, sir, because they
 6 could be standing on the other side over towards the
 7 north wall, and they're in close proximity to the gates
 8 but we wouldn't see them because they're standing over
 9 the other side.

10 So you can be in close proximity but be stood in
 11 a number of different positions, and I think that was
 12 the reason why it was put in place, it was a roving
 13 patrol, so if anybody was watching the estate you're not
 14 stood in one position all the time. So if they were
 15 going to attack you at that position, you're not there
 16 all the time, you're always moving around, and I thought
 17 that was the reason behind it, but I'm possibly not the
 18 right pay grade to know.

19 Q. You, as an unarmed officer at the gate, would be left in
 20 a position whereby you were exposed to any attack,
 21 should one occur, without the support of AFOs unless
 22 they were nearby. Were you aware that that was a factor
 23 being considered in the way in which AFOs would go about
 24 their duties?

25 A. When are we talking about now?

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1 Q. In 2017.

2 A. It's -- I don't understand the question, sorry.

3 Q. Well, in 2017 you were an unarmed officer at the gates
 4 of the Palace of Westminster.

5 A. Yes, sir.

6 Q. You had previously been an AFO.

7 A. Yes, sir.

8 Q. And one of the reasons why you had been moved from
 9 a position at the gates when you were an AFO was to give
 10 you more reaction time?

11 A. Yes, sir.

12 Q. You were replaced at the gates, or rather there was, at
 13 that time, subsequent to that, only unarmed officers at
 14 the gates?

15 A. Yes, sir.

16 Q. Did the fact that there were unarmed officers at the
 17 gates have any bearing, as far as you were concerned, in
 18 the positioning of AFOs within the area behind them?

19 A. I don't know, sir. You'd have to ask the people who
 20 assess the estate.

21 Q. You were equipped with an asp and CS spray; is that
 22 right?

23 A. Yes, sir.

24 Q. Where did you keep your spray?

25 A. They were on -- it was in a holder on the left-hand side

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1 of my belt, the CS. My asp was in a holder on the
 2 right—hand side of my belt, with my handcuffs.
 3 Q. And if an armed officer at the gate required reaction
 4 time in order to be able to respond to any attack,
 5 an unarmed officer would be in no different position,
 6 would they? They would also need reaction time in order
 7 to respond to any attack?
 8 A. Unfortunately your reaction time is a lot less, because
 9 you're a lot closer to where the general public are.
 10 Q. So it's right, isn't it, that the arrangements for
 11 security at the gates, for the security of officers at
 12 the gates, would have been far better if the armed
 13 officers were in close proximity at all times?
 14 A. That's a matter for the people who do attack assessing,
 15 I believe, sir.
 16 Q. Were you ever consulted about the security arrangements?
 17 A. No, sir.
 18 Q. We will hear evidence in due course of reviews of Palace
 19 security, and in 2015 an MPS officer told a review of
 20 Palace security that one way of improving security at
 21 the gates was to shut them. Was that something that had
 22 been discussed amongst officers?
 23 A. There was certain times when the gates were supposed to
 24 be shut, but because of the amount of traffic coming in
 25 and out you had to keep opening them, and it's the north

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1 gate is, as I say, the right—hand gate was so heavy it
 2 took you two people just to open the right—hand gate
 3 because it was so heavy and cumbersome. So it wasn't
 4 something that was always adhered to, but the times when
 5 they were shut at night, they were both shut and you
 6 only worked on the south gate.
 7 Q. Were you told, as officers, that as a result of reviews
 8 of Palace security, that these gates were regarded as
 9 one of the most vulnerable areas of the New Palace Yard
 10 to an attack?
 11 A. I don't recall, sir.
 12 Q. Were you told that it was one of the most clearly
 13 identifiable and exploitable weaknesses?
 14 A. No, sir.
 15 Q. Do you think that if you had been given that
 16 information, that that would have affected the way in
 17 which you went about your duties as an AFO?
 18 A. Sir, I wasn't an AFO on the day of the attack.
 19 I was ...
 20 Q. Let me ask you this: if you know that a particular area
 21 represents a particular weakness, do you think, from
 22 your time as an AFO, that that would have influenced the
 23 way in which you went about your patrols?
 24 A. Certainly, sir. On top of what you yourself are
 25 actually — what you believe and what you believe to be

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1 the weakest points, you also have post notes and
 2 directions to actually follow. So you can't always lead
 3 with what you believe to be "what you have to do you
 4 have to do", what the book tells you and what your
 5 senior officers tell you.
 6 Q. And in your time as an AFO, would it be the case that
 7 you would essentially follow your instinct about where
 8 you were carrying out your patrols at that time?
 9 A. You would go where you were directed to, and you would
 10 do the patrols in the areas which you were told to do
 11 them.
 12 Q. And on a roving patrol that would involve spending time
 13 down towards the colonnade?
 14 A. Down towards the colonnade, towards the members'
 15 entrance, up at 187, which was the vehicle blocker where
 16 the security officers are, along the north wall, all
 17 round there.
 18 Q. Can I show you a photograph? It's {DC7989/58}. Now,
 19 that is a view from the north gate back down towards the
 20 colonnade; is that right?
 21 A. Yes, it goes down towards the security officers'
 22 blocker.
 23 Q. And so through the fencing and through the trees, beyond
 24 the fountain, we can see some arches towards the — to
 25 the right; is that right?

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1 A. They're all the way along, below Big Ben. Yes.
 2 Q. And this is a photograph which was taken when the trees
 3 are not in leaf, so it's probably as good a view as it
 4 would ever be. So in the summer it would be rather
 5 worse?
 6 A. Sir.
 7 Q. Now, if you, as an AFO, were positioned down towards the
 8 colonnade, you would have no effective way of protecting
 9 anyone at the gate, would you?
 10 A. It's — I appreciate where you're going with this, but
 11 if you're told to patrol the whole area, you have to
 12 patrol the whole area, sir.
 13 Q. I appreciate your answer: if you are told to patrol the
 14 whole area, you've got to patrol the whole area, you
 15 have to follow your instructions.
 16 A. Absolutely.
 17 Q. But you would agree with me that if you look at that
 18 photograph if you are on the far side of New Palace Yard
 19 you are in no position whatsoever to provide any
 20 effective protection to officers at the gate; would you
 21 agree with that?
 22 A. It's not really my — it's above my pay grade, sir.
 23 It's all been set in place by people who are tactical
 24 assessors, who are firearms trained at a lot higher
 25 level than I am.

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1 Q. You are an officer who has been patrolling this yard for
2 eight years?
3 A. Absolutely.
4 Q. And you have the benefit of experience as a firearms
5 officer and as an unarmed officer?
6 A. Yes, sir.
7 Q. Do you agree with me that an armed officer on the far
8 side of the yard, as we look at that photograph, is in
9 a hopeless position to provide protection to those at
10 the gate?
11 A. I can't disagree with you, sir.
12 Q. And just so we can get a sense of what the view is from
13 the other side, could you turn to {DC7989/71}. Now,
14 that's a view back across from the eastern aspect of
15 New Palace Yard, and the photograph seems to be pointed
16 in the direction of where the pedestrian entrance is; do
17 you agree?
18 A. Yes, sir.
19 Q. And you can't see the pedestrian entrance at all, can
20 you?
21 A. No, because you've got the hut in front of it from that
22 angle.
23 Q. And there are any number of obstructions in the way,
24 aren't there?
25 A. Yes, sir.

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1 Q. And so since the change, whenever it occurred, from
2 a fixed armed guard at the gates, the arrangements have
3 been, to your knowledge, for AFOs to patrol the entire
4 area --
5 A. Yes, sir.
6 Q. -- in a way which would include them spending
7 significant amounts of time in areas from which they
8 could provide no effective protection to those at the
9 gates?
10 A. Yes, sir.
11 Q. And so from a position where there used to be armed
12 officers protecting unarmed officers at the gates, we
13 moved to a position where unarmed officers would be
14 left, as a matter of routine, unprotected?
15 A. Yes, sir.
16 Q. Which meant that if an attack, such as the one that
17 occurred, happened, an officer would be left with
18 a spray and a baton against a large man armed with two
19 knives?
20 A. Yes, sir.
21 Q. The footage shows that when Masood came round the corner
22 towards the gates of New Palace Yard, the reaction of
23 officers in the area was to run away; did you see that?
24 A. No, sir.
25 Q. It's an entirely understandable reaction in the

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1 circumstances, is it not?
2 A. I would imagine so, sir, because when he walked towards
3 me I ran back towards the gates.
4 Q. Yes. Because, to put it bluntly, it's not an equal
5 fight, is it?
6 A. No, sir.
7 Q. A spray against knives?
8 A. No, sir.
9 Q. Did you hear Doug Glaze shout, "Where's the firearms?
10 Where's the firearms?"
11 A. I don't recall, sir.
12 Q. Because at that time you needed them there, did you not?
13 A. Yes, sir.
14 Q. And they were, to put it bluntly, nowhere to be seen?
15 A. Not at that time, no.
16 Q. When the division bell sounds, is everyone aware of it?
17 A. Yes, sir, it's usually announced on your radio link.
18 Q. So all officers would know?
19 A. Yes, sir.
20 Q. Including firearms officers?
21 A. Yes, sir. If it was announced, because you do have
22 occasions where there's a division and it's not always
23 announced but it's not always put out over the air, it
24 gets missed by the control room and they forget to put
25 it out. But more often than not it is put out.

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1 Q. When the division sounds, the movable gate is taken out
2 of the way; is that right?
3 A. That's right.
4 Q. And that's to enable MPs free passage so that they can
5 get into the chamber to vote?
6 A. That's it.
7 THE CHIEF CORONER: Just to be clear, I think we have had it
8 called a movable barrier.
9 MR ADAMSON: Movable barriers.
10 THE CHIEF CORONER: And it may be sensible to use that to
11 distinguish between that and "the gates".
12 MR ADAMSON: I will do so, thank you, sir.
13 So the movable barriers are absent during
14 a division?
15 A. Yes, sir.
16 Q. The barriers, when in position, would provide, would
17 they not, an obstacle to an intruder?
18 A. Yes, sir.
19 Q. They would provide an unarmed officer with more reaction
20 time?
21 A. Yes, sir.
22 Q. If they're in place and an intruder attacks at that
23 time?
24 A. If the officers aren't in the process of opening and
25 closing the gates, yes.

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1 Q. Point taken. But in general terms, if they are present,
2 the barriers provide —
3 A. A reactionary gap.
4 Q. — officers at the gate with a degree of protection
5 which is absent when they're gone?
6 A. That's it.
7 Q. And to your knowledge, there was no instruction that
8 during division, AFOs had to be present at the gates?
9 A. Not to my knowledge, sir, no.
10 Q. So at that time, officers were particularly vulnerable;
11 would you agree?
12 A. Yes, sir.
13 Q. Because there was nothing to prevent them from coming
14 into direct contact with the public, or a would-be
15 attacker?
16 A. Whenever you open or close the gates, when you're
17 holding the crowds back to let cars go in or out of the
18 premises, you have your backs to the crowds, you have
19 no — no protection at all if you've got your backs to
20 the crowds, and they're virtually touching you. So
21 that's happening all day, every day. So when you say
22 about more protection, it's a bit of a thin scope,
23 really, because you don't have any protection there at
24 all.
25 Q. But what you're actually saying is you're essentially

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1 unprotected the whole time?
2 A. More or less, apart from a little bit of metal stood in
3 front of you when it is closed. Whenever you're opening
4 and closing the gates, there's no protection at all.
5 And if you went to — at the same time, if you went down
6 to Black Rod's or Curtis Green or wherever else, there
7 was no gates there and you're stood in front of them, so
8 you've got no protection. Any member of the public at
9 any time who has got the right mindset could attack any
10 officer at the time. I believe it's changed now for the
11 better so there's more protection.
12 Q. It's changed now for the better?
13 A. From what I understand. For other reasons I'm not there
14 at the moment.
15 Q. But none of these risks that we've been discussing are
16 particularly difficult to conceive, are they? They're
17 the sorts of things that you would expect those
18 responsible for making decisions about security at the
19 gates to have at the forefront of their minds?
20 A. Again, you are talking about way above my pay grade,
21 sir. Sorry.
22 MR ADAMSON: It's not rocket science.
23 MR KEITH: Well, I rise to my feet with due deference and
24 a little hesitation. We are hearing evidence in due
25 course from Commander Usher who, of course, will address

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1 these important issues with the technical expertise that
2 he obviously has as the Commander of the Parliamentary
3 and Diplomatic Protection Command, and perhaps he is the
4 better witness to make points about complex tactical
5 awareness.
6 MR ADAMSON: PC Ross, thank you for your time.
7 A. Thank you, sir.
8 THE CHIEF CORONER: Mr Keith.
9 Examination by MR KEITH QC
10 MR KEITH: PC Ross, you, together with PC Palmer, were one
11 of the brave unarmed officers at the gate, so I don't
12 intend to ask you detailed questions about your previous
13 service as an authorised firearms officer.
14 You yourself have made plain, quite rightly, that
15 you're not a trained firearms tactical advisor or
16 a security coordinator.
17 A. No, sir.
18 Q. Nor did you play any role in the setting up of the
19 complex security arrangements at the
20 Palace of Westminster?
21 A. No, sir.
22 Q. But that said, officer, may I just deal with one or two
23 points that you made concerning your own experience in
24 New Palace Yard.
25 You mentioned something called a reaction, or

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1 a reaction gap?
2 A. Yes, sir.
3 Q. Because you were being asked about why even an armed
4 officer on a static post might become vulnerable.
5 A. Absolutely.
6 Q. And why they might need space and time within which to
7 react?
8 A. Yes, sir.
9 Q. What do you understand as an AFO is the reaction gap?
10 A. I've never been told. I mean, if somebody's trying to
11 grab your weapon, that's why they don't have firearms
12 officers in public order situations, and if they do
13 happen at any — at the embassies or so forth, you're
14 always told to retreat and get out of grabbable
15 distance, and what have you.
16 But from what I understand when that was put in
17 place at the gates was the post used to be at the gates
18 as a Glock-only single officer, and then you were moved
19 back and you were told the reason why you're going to
20 get moved back from the gates is to give you more of
21 a reactionary gap.
22 Q. Because it's a matter of obvious human reaction, and
23 human nature, that if you are suddenly confronted with
24 a state of affairs, an incident, a criminal attack,
25 an act of violence, whatever it may be, you need time to

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1 react?
 2 A. Yes, sir.
 3 Q. If, as an authorised firearms officers, you were
 4 confronted with a position where an armed individual ran
 5 at you completely out of the blue, is it a difficult
 6 thing or an easy thing to react instantaneously and
 7 appropriately in order to respond to that prospective
 8 act of violence?
 9 A. Luckily I've never been in that position to actually --
 10 whilst carrying a gun -- to have to make that decision.
 11 But I'd like to think that if I was carrying a gun that
 12 I would be able to make that decision and act
 13 accordingly.
 14 Q. You have told us how armed firearms officers were moved
 15 from the static post to a mobile patrol?
 16 A. Yes, sir.
 17 Q. To an obligation to move around the area subject
 18 to patrol. What did you perceive was the vulnerability,
 19 if any, or the disadvantage, in being at a static post?
 20 What is wrong with a static post, as far as you can
 21 tell?
 22 A. If you're always in the same place, people know that you
 23 are supposed to be there, and/or if any attacker knows,
 24 that's where they would target, possibly. So I know
 25 that that's why they always say to mix it up, make it

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1 different, keep people on their toes by not being in the
 2 same place all the time.
 3 Q. And if you were to be standing as an authorised firearms
 4 officers between north or south Carriage Gates and the
 5 low barrier, the Corus barrier, inside New Palace Yard,
 6 you are plainly visible, are you not, to anybody outside
 7 Parliament Square?
 8 A. Yes.
 9 Q. At what time do you recall you came on duty that
 10 terrible afternoon?
 11 A. I was probably at work at just after 6 o'clock in the
 12 morning.
 13 Q. So would you have been on your post, which was post 8P,
 14 the pedestrian gate, an hour or so before these events?
 15 A. The post 8P is also linked in -- at the time it was
 16 linked in with the subway entrance. So you would do 45
 17 minutes on one and 45 minutes at 8P, and then 45 minutes
 18 break time, patrolling, and then start round again.
 19 Q. As you told us, you wouldn't necessarily be aware of
 20 where the authorised firearms officers were?
 21 A. No.
 22 Q. And, of course, you're not privy, because it cannot be
 23 anticipated, when and at what time and in what way they
 24 will patrol the area?
 25 A. No, sir.

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1 Q. So you were asked in addition, were you not aware of
 2 them not being present at Carriage Gates, so may I ask
 3 you this: were you aware that around about an hour
 4 before, in fact from 13.29 to 13.43, two firearms
 5 officers were positioned just behind Carriage Gates?
 6 A. I can't remember, sir.
 7 Q. Because it's not something, of course, that you are
 8 required to look at?
 9 A. No. If they're there, yes, you would notice them every
 10 now and again, but I do know some of them of old, and
 11 yes, sometimes you would talk to them, other times you
 12 would say hello, other times they're there to do a job,
 13 you're doing your job and you let them do their job.
 14 Q. Now, could you tell us, please, and assist the
 15 Chief Coroner, with a description of the use of the
 16 gates and what the atmosphere was like at the gates.
 17 These were the gates for Parliament. Were they the
 18 primary gates, as you stood there as an unarmed officer,
 19 for Parliament, or a secondary or an unimportant
 20 entrance?
 21 A. They are the primary vehicle gates for the whole of
 22 Parliament.
 23 Q. Would it be fair to say that they are very busy?
 24 A. Extremely busy; vehicles both in and out.
 25 Q. And a division bell having been called, of course

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1 vehicles containing parliamentarians and ministers and
 2 the like were required to enter the parliamentary estate
 3 in order to respond to a division bell?
 4 A. Yes, sir.
 5 Q. So do you recall not just that the barriers were open,
 6 the pedestrian barriers, and that the gates were open,
 7 as they always were during the daytime, but that the
 8 vehicle entrance was being heavily used at that time?
 9 A. No, sir, I don't recall the vehicle entrance being used,
 10 because I was nearer the vehicle exit and I was engaged
 11 with the two officers.
 12 Q. And because next to your post, the pedestrian post is
 13 the south Carriage Gate, which is the exit.
 14 A. Yes, sir.
 15 Q. Which is why there's that car waiting by the vehicle
 16 measures, the hostile vehicle measures, in order to come
 17 out, and the other gate, PC Palmer's gate, was the
 18 entrance gate?
 19 A. Yes, sir.
 20 Q. So he was on the entrance gate at a time when, the
 21 division bell having been called, people would have been
 22 coming in?
 23 A. Yes, sir.
 24 Q. You have told us how you were on your radio, I think
 25 dispatch 1 was the channel; is that correct?

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1 A. Yes, sir.
 2 Q. You've told us how you believed initially that PC Glaze
 3 may have reported a possible RTA, a road traffic
 4 accident, but that you have come to understand that he
 5 reported a possible explosion?
 6 A. Yes, sir.
 7 Q. Could we just have up on the screen the written
 8 transcript of what he said, it's {DC1393K/1}, I hope,
 9 and at 03.37, the second entry down, you will see there
 10 on the right-hand column the words "Patriot"; is
 11 "Patriot" the call sign for that channel?
 12 A. Yes, sir.
 13 Q. "... Carriage Gates, just had some sort of explosion
 14 down near Portcullis House."
 15 So that's PC Glaze.
 16 They shortly after that, having been told that there
 17 was a man with "bloody big knives" running your way, you
 18 realised --
 19 THE CHIEF CORONER: Have we finished with this document?
 20 MR KEITH: Yes, that may leave the screen, thank you.
 21 You realised that PC Palmer was up against the metal
 22 barrier with Masood over him, stabbing him?
 23 A. Yes, sir.
 24 Q. Forgive me for asking you about something which is
 25 plainly obvious, but it seems that only seconds, or

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1 fractions of seconds passed between the point at which
 2 you were told there was a man with bloody knives, or
 3 bloody big knives coming your way, and Masood being on
 4 to PC Palmer?
 5 A. Yes, sir.
 6 Q. It happened extremely quickly, did it not?
 7 A. I didn't see any of the initial attack. All I saw was
 8 where they were on the floor.
 9 Q. You didn't, I think, see Masood come in?
 10 A. No, sir.
 11 Q. Once he had come in, you immediately realised that he
 12 was attacking Keith Palmer?
 13 A. I heard a noise to my right and I looked in that
 14 direction where the attack was taking place.
 15 Q. You're an officer trained to deal with incidents and
 16 possible violence from crowds outside, criminal and
 17 potential criminal acts of others, trained to respond to
 18 unfolding and sometimes frightening, alarming events.
 19 A. Yes, sir.
 20 Q. But even you weren't able to see Masood come across and
 21 chase PC Palmer up against the low barrier --
 22 A. I was --
 23 Q. -- it happened in a flash?
 24 A. -- I was securing my gate.
 25 Q. You tried to get your CS spray from out under your coat?

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1 A. Yes, sir.
 2 Q. Were you able to do so?
 3 A. I believe I did, but it's not a memory that's -- that
 4 I can remember, to be honest.
 5 Q. Presumably that was something you were attempting to do
 6 at speed because urgent action was required?
 7 A. Absolutely.
 8 Q. But it was difficult to do that, perhaps? Immediately
 9 to bring the CS spray out?
 10 A. Yes, sir, it was underneath my coat. I was struggling
 11 to locate it and get hold of it.
 12 Q. You said that you saw Masood walking after the other
 13 officers.
 14 A. Yes, sir.
 15 Q. I'm not going to play, or have played the CCTV because
 16 it is distressing, and we want to keep that to
 17 a minimum, but would you accept, because I believe that
 18 you have been shown parts of the CCTV, that it shows
 19 Masood running towards the unarmed officers who were
 20 moving towards the members' entrance and away from
 21 Carriage Gates?
 22 A. I didn't know where they were to start with, and
 23 I looked up and I just saw him coming towards me. And
 24 that's where I have my sort of, like, black spot where
 25 I have run, from CCTV, I've seen that I've run from in

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1 front of him, he's almost veered towards me, from CCTV,
 2 and I've stopped at the gates and then turned round and
 3 I've run at him, back past the car.
 4 Q. Then he went after PC Palmer, who with great courage and
 5 strength had been able to get to his feet and run
 6 towards the members' entrance, PC Glaze, PC Marsh and
 7 possibly PC Carlisle.
 8 A. Yes, sir.
 9 Q. But it's clear, isn't it, that he ran after them and
 10 then alongside the car that was parked in the exit lane?
 11 A. Yes, sir.
 12 Q. Yes. He wasn't walking, he was running.
 13 Do you recall the manner in which, or rather the
 14 direction in which he went after the other officers?
 15 A. When I turned round and ran back towards him, he was
 16 walking directly towards the firearms officer.
 17 Q. Did he change direction?
 18 A. All I can remember, he was walking in a line straight
 19 down towards the firearms officer.
 20 Q. Was he still waving the knives that you had described?
 21 A. He had them in his hands.
 22 Q. And you had no doubt, did you, that the armed police
 23 officer, SA74, challenged --
 24 A. Absolutely.
 25 Q. -- Masood before he was shot?

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1 A. Absolutely.
 2 Q. And indeed he shouted "Armed police", but Masood carried
 3 on?
 4 A. Yes, he walked -- he carried on directly towards him.
 5 MR KEITH: Thank you very much, PC Ross.
 6 A. Certainly.
 7 Examination by MR N MOSS
 8 MR N MOSS: PC Ross, my name is Moss and I ask questions on
 9 behalf of the Parliamentary Authorities. Just one point
 10 from me, if we may.
 11 A. Certainly.
 12 Q. Can we have on the screen {WS1393N/3}. I think this is
 13 the most up-to-date version of that same transcript you
 14 were shown a moment ago. Do you remember, PC Ross that
 15 in your evidence answering questions from my learned
 16 friend, Mr Adamson, you said sometimes a division might
 17 not come across on the radio? Do you remember saying
 18 that?
 19 A. Yes, sir, sometimes you hear it, sometimes it doesn't
 20 and if you are on a post where it is dependable that you
 21 do hear it, you're more likely to listen out for it.
 22 Q. Thank you.
 23 A. At the time, I was not on a post that depended on me
 24 hearing it so ...
 25 Q. I understand. Just so we have it, though, just the very

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1 first entry on this transcript, before what your
 2 colleague PC Glaze says, I think we can see that this
 3 division was called out on the radio. Do you see that,
 4 the first entry?
 5 A. Yes, sir, I wasn't shown that on the -- on the --
 6 I wasn't shown that or the audio for that. I was only
 7 shown the parts which were part of the attack.
 8 MR N MOSS: I understand. That's all I ask.
 9 Further examination by MR HOUGH QC
 10 MR HOUGH: Finally, one point from me, please, officer.
 11 Please tell me if you can't answer this question: you
 12 have experience of being, as you've told us, an armed
 13 and an unarmed officer at the gates of Parliament.
 14 A. Yes, sir.
 15 Q. From your perspective, relatively close to those vehicle
 16 gates on the day of the attack, do you think if you had
 17 been armed that you would have been able to take
 18 an effective shot at the attacker?
 19 A. From where I was when I first saw the attacker, there
 20 was two officers stood in front of me, so no for that
 21 one, and I think from where I was the attacker was too
 22 close to Keith. So it's very hard to say.
 23 MR HOUGH: Thank you very much, officer.
 24 Sir, those are all my questions.
 25 THE CHIEF CORONER: Yes.

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1 MR HOUGH: And I think all the questions from all the
 2 advocates.
 3 THE CHIEF CORONER: Can I simply again thank you very much
 4 for coming, you've been giving evidence for quite some
 5 time, it has been extremely helpful. Thank you very
 6 much indeed for doing so. I appreciate it couldn't have
 7 been particularly easy to do so, but thank you very much
 8 indeed for doing that.
 9 A. Sir. Am I released from court, sir?
 10 THE CHIEF CORONER: Certainly.
 11 A. Thank you very much.
 12 THE CHIEF CORONER: Thank you.
 13 MR HOUGH: Sir, the next witness is PC Glaze.
 14 THE CHIEF CORONER: Yes. Would it be sensible, Mr Hough, to
 15 take our mid-afternoon break there and then we'll
 16 hopefully be able to take the next officer through
 17 without needing to take a break mid-way through his
 18 evidence?
 19 MR HOUGH: Absolutely.
 20 (2.57 pm)
 21 (A short break)
 22 (3.15 pm)
 23 MR HOUGH: PC Glaze, please.
 24 PC DOUGLAS GLAZE (Sworn)
 25 THE CHIEF CORONER: Good afternoon.

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1 Examination by MR HOUGH QC
 2 MR HOUGH: Would you please give your name and rank to the
 3 court?
 4 A. Police Constable Douglas Glaze, 2141SO attached to
 5 Parliamentary and Diplomatic Protection.
 6 THE CHIEF CORONER: And, officer, please feel free to sit or
 7 stand, whichever you would prefer to do.
 8 A. Thank you, sir.
 9 MR HOUGH: Officer, I'll ask questions first on behalf of
 10 the Coroner and then you will be asked questions by some
 11 other lawyers.
 12 A. Sir.
 13 Q. You know you're giving evidence about events you
 14 witnessed at the Palace of Westminster on 22 March of
 15 last year?
 16 A. That's correct, sir.
 17 Q. You made witness statements on 22 March and 27 March
 18 last year. The second one is more detailed and you may
 19 refer to that.
 20 We all know that I shall be asking about some very
 21 distressing events, so if you would like a break at any
 22 stage, please say so.
 23 A. Thank you, sir.
 24 Q. On that date, 22 March last year, you, I think, were on
 25 duty at the Palace of Westminster in uniform?

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1 A. That's correct, sir.

2 Q. For how long had you worked in one or more posts in the
3 Palace grounds?

4 A. I've been on the unarmed side of the
5 Palace of Westminster since 2014.

6 Q. So about three years before the --

7 A. That's correct, sir.

8 Q. -- before the attack. Prior to that, had you been
9 posted to the Palace of Westminster in any other
10 capacity?

11 A. I was an armed firearms officers on what was then the
12 Diplomatic Protection Group posted to
13 Palace of Westminster.

14 Q. Between what dates or years did you have that posting?

15 A. 2007, I started on the DPG and I finished -- I left the
16 DPG but it was still what was then called the "Borough
17 Short" (?) in 2012. I then went to Lewisham.

18 Q. So you have been firearms trained in your professional
19 career?

20 A. I have, sir.

21 Q. I'm going to ask you a little bit about the postings you
22 had as a firearms officer, as an AFO, later in my
23 questions.

24 On 22 March 2017, which post did you have?

25 A. I was on post 3, what we called post 3SR, which is the

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1 south gate, or the exit gate at Carriage Gates, and the
2 R is simply for "reliever". I was one of three officers
3 doing what we would then call a circuit.

4 Q. If we can bring up a plan of New Palace Yard, which will
5 appear on the screen next to you, {DC7989/80}. So
6 you're referring to the south vehicle exit gates that we
7 see over to the left of the screen, the lower set of
8 gates.

9 A. That's correct, sir.

10 Q. We can leave that plan on the screen. Those gates were
11 for vehicles leaving New Palace Yard; is that right?

12 A. That is correct, sir.

13 Q. At the -- in the period prior to the attack, how close
14 would you have been standing, in general terms, when you
15 were doing that job, to the gates?

16 A. I'd have been more or less on -- the gates were open, so
17 more or less just stepped back from the boundary within
18 the Palace grounds. So a few metres back inside onto
19 the cobbled terrace at the exit gate.

20 Q. We can bring up a couple of photographs, one after the
21 other. First {DC7989/51}. So the gates you would have
22 been posted on are the right-hand side of the two
23 vehicle exit gates shown on this plan.

24 A. That's correct, sir, the one with the barrier, and you
25 can see the yellow ...

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1 THE CHIEF CORONER: It's where the gates are open, in fact,
2 isn't it?

3 A. That's correct, sir, the main gates.

4 MR HOUGH: And then {DC7989/55}. So your post would have
5 been manning the gates we see to the left of the shot
6 open?

7 A. That is correct, sir.

8 Q. Now, just to be clear, and this has been clarified with
9 the last witness, this is showing the gates as they have
10 been replaced since the incident?

11 A. They have, sir.

12 Q. The gates were slightly different in appearance at the
13 time, and I think we saw them in the last photograph.

14 Then {DC7989/56}, we see here just beyond these exit
15 gates the crowd control barriers, which could be moved
16 into position to provide another lower barrier to the
17 entrance. We've heard that the gates in March 2017, the
18 large gates, would be kept open normally during office
19 hours.

20 A. That is correct, sir.

21 Q. And we've also heard that the crowd control barriers,
22 one of which we see over to the left of this shot, would
23 have been kept often closed but opened at certain times?

24 A. That is correct, sir, to allow vehicles to exit.

25 Q. With the exception of divisions, and I'll ask you about

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1 those in a second, and when you were actually allowing
2 a vehicle to enter or exit, would there have been any
3 other occasions when those crowd control barriers would
4 have been closed?

5 A. They were closed on --

6 Q. Sorry, open, rather. I'm sorry, open.

7 A. There was a common sense sort of attitude, if we had
8 several cars leaving in, we wouldn't shut the gate to
9 stop another vehicle: they would be kept open and cars
10 coming out until the traffic, for want of a better word,
11 had slowed down.

12 Q. We can take that photograph off the screen.

13 Which other officers were posted at the entrance to
14 New Palace Yard with you as you recall on 22 March last
15 year?

16 A. Police Constable Steve Marsh.

17 Q. So he was with you on the south vehicle gates, was he?

18 A. He was, sir.

19 Q. And on the north vehicle gates?

20 A. I believe there was three officers up there at the time
21 of the incident, but there was three doing a circuit.
22 I'm not sure at which point they are relieved, but it
23 would have been PC Palmer, PC Nick Carlisle --

24 Q. And I think PC Tipple.

25 A. And PC Kevin Tipple.

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1 Q. And we've heard that PC Ross was at the pedestrian gate
2 next to your post to the left as you were looking out.
3 Now, you and your colleagues, we know, were not
4 armed with firearms or with tasers.
5 A. That is correct, sir, we weren't.
6 Q. Did you, like PC Ross, have an asp, an extendable baton,
7 and a CS spray?
8 A. I did, sir.
9 Q. Did you, like him, have a police radio?
10 A. I did, sir.
11 Q. And in your case, was that also tuned to the dispatch 1
12 channel, which was for Palace of Westminster security
13 staff and police?
14 A. That is correct, sir, Patriot channel.
15 Q. Known as "Patriot" because that's the call sign?
16 A. That's correct, sir.
17 Q. You also, I think, would have been wearing standard
18 issue body armour?
19 A. I on the day had the ballistic body armour on because
20 I was awaiting new standard -- the Met vest, as we call
21 it. That still hadn't been delivered and I was wearing
22 my old body armour, or my body armour -- my ballistic
23 body armour.
24 Q. So that was your ballistic body armour from when you
25 were a firearms officer?

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1 A. From when I was a firearms officer.
2 Q. We'll hear in detail about the different sort of body
3 armour in due course.
4 Now, before we move to the events of the attack, may
5 I ask you about your duties when you were an armed
6 firearms officer and when you were on duty, and
7 specifically in the Palace of Westminster area.
8 A. Yes, sir.
9 Q. Now, you've told us the dates between which you were
10 an AFO there. Did you sometimes, in the course of that
11 duty, patrol, or were stationed at, New Palace Yard?
12 A. I was, sir.
13 Q. What were your responsibilities in terms of patrolling?
14 Were you instructed to remain in one place or to move
15 around?
16 A. When I was there, sir, it was a static position.
17 Q. It was a static position. Was that throughout the time
18 that you were an AFO with duties taking you into
19 New Palace Yard?
20 A. At Carriage Gates it would have been two officers on
21 a static post at Carriage Gates. Behind the officers,
22 obviously, but at that post.
23 Q. So you say behind the officers, you're referring to
24 unarmed --
25 A. To unarmed officers, behind where I would have been

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1 stood.
2 Q. So just to be clear, when you were an AFO, as you've
3 told us, and you would sometimes work in
4 New Palace Yard, there would be unarmed officers at the
5 front, Carriage Gates. Both of the gates?
6 A. Both gates, sir.
7 Q. And you and how many other firearms officers would be
8 stationed a little back?
9 A. It was two firearms officers, a pair, sir, would be
10 posted there.
11 Q. How many unarmed officers in front? The same number as
12 subsequently?
13 A. It's always been the same number: two on the south
14 gates, two on the north gate, and one manning the
15 pedestrian gate, with the obvious relievers coming up at
16 various times.
17 Q. And you say it was a static post at Carriage Gates. Was
18 there any freedom to move at all or were you absolutely
19 fixed there throughout your shift?
20 A. Then it was fixed. You waited to be relieved by other
21 officers or until the firearms cover came off, but that
22 was quite a few years ago, sir.
23 Q. Now, were you an AFO when anything changed about that
24 patrolling responsibility?
25 A. No, sir.

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1 THE CHIEF CORONER: I think, just so I've got the date
2 right, it was 2012 that you stopped being an AFO and
3 I think you described yourself going to Lewisham?
4 A. I did, sir.
5 THE CHIEF CORONER: Thank you.
6 MR HOUGH: After ceasing to be an AFO with
7 Palace of Westminster responsibilities in 2012, when did
8 you next find yourself in the Palace of Westminster in
9 a professional capacity?
10 A. That would have been when I joined what was then SO17,
11 which was its own unit, which was Palace of Westminster
12 police officers.
13 Q. And the date for that, please?
14 A. April or May 2014, so I think it was April 2014.
15 Q. By that time, had anything changed about the AFO's
16 responsibilities or practices? Was it still a static
17 post?
18 A. I can't -- I can't -- I honestly can't remember.
19 I don't know if it had changed then, sir, or it was
20 changed subsequently.
21 Q. Did a time come when it did change so that the firearms
22 officers started patrolling in a different way?
23 A. Yes, sir, obviously not being a firearms officer, I had
24 my own roles and responsibilities, so I didn't get
25 involved with their side, but my understanding was the

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1 firearms officers were meant to patrol.
 2 Q. Did you understand that from discussions with people or
 3 from just what you saw?
 4 A. No, what we were told, basically, by all the other
 5 firearms officers. I believe they had routes, certain
 6 areas, sectors I think they were calling them then.
 7 Q. Now, in March 2017, did you have any understanding of
 8 where precisely the firearms officers would be at any
 9 given time of day?
 10 A. I knew they'd be, depending, again, on what time it was,
 11 if the House was sitting that they would be in a certain
 12 area within a certain sector.
 13 Q. Would you expect there always to be firearms officers in
 14 New Palace Yard, in the area of New Palace Yard?
 15 A. If -- it depends what you mean by "New Palace Yard",
 16 sir. I mean, it goes all the way down to the
 17 colonnades.
 18 Q. Yes.
 19 A. My understanding was that was all part of their patrol
 20 area, their sector.
 21 Q. So they would be somewhere in that area?
 22 A. Somewhere, sir, yes.
 23 Q. But as you stood at the gates on 22 March 2017, you
 24 wouldn't know at any one moment where, precisely, they
 25 would be?

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1 A. No, sir, we'd be busy dealing -- doing our own job.
 2 Q. And for much of that time, of course, they would be
 3 behind you?
 4 A. They would be behind us, sir.
 5 Q. Turning then to the events of 22 March last year, at
 6 shortly after 2.30 that afternoon, were you on duty at
 7 the gates where you have indicated your post was?
 8 A. I was, sir.
 9 Q. Were the gates open at that time, because office hours?
 10 A. The main gates were open, sir.
 11 Q. Were the security barriers open or closed?
 12 A. I couldn't honestly say, sir. I believe they were
 13 closed, but I couldn't say 100 per cent.
 14 Q. We can correct that because we've seen CCTV footage
 15 indicating that they were open and we know that there
 16 was a division at the time, and that would tally with
 17 your evidence that they were open at times of divisions.
 18 Now, when events began to unfold, where were you
 19 standing in relation to the gates?
 20 A. If I remember correctly, I was at the south gate,
 21 obviously, the --
 22 Q. Yes.
 23 A. -- other gate, and I think I was on the left-hand side
 24 of the gate. I think.
 25 Q. Now, we know there were two armed officers on duty in

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1 New Palace Yard at that time, but that they weren't by
 2 the New Palace Yard entrance. Did you have any
 3 awareness at that moment of where they were?
 4 A. No, sir.
 5 Q. What first drew your attention to something unusual or
 6 concerning happening?
 7 A. I heard what I can only describe -- I now know it was
 8 the car crashing -- but what I could only describe at
 9 the time as an explosion.
 10 Q. From which direction?
 11 A. From over my right-hand side, which I believe
 12 I transmitted straightaway.
 13 Q. So that's the Bridge Street area?
 14 A. The Bridge Street, Portcullis House side.
 15 Q. We can bring up your transmission, we've already looked
 16 at it today {DC1393K/1}.
 17 Now, we have a message attributed to you at 2.40
 18 that afternoon:
 19 "Patriot, Carriage Gates, just had some sort of
 20 explosion ... down near Portcullis House."
 21 We can leave that on the screen for the moment.
 22 What next did you hear or see that you recall?
 23 A. I heard the explosion and there was, in my mind, an
 24 almost eerie millisecond, and that's all I could
 25 describe it because I couldn't quantify it, of silence,

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1 and then screaming.
 2 Q. Screaming from the area of the impact, or the explosion
 3 as you saw it?
 4 A. From the area of the ...
 5 Q. What next?
 6 A. I'd started -- I couldn't see anything obvious, if
 7 I recollect, and I'd started moving backwards trying to
 8 see what was happening from over to my right-hand side,
 9 over on Bridge Street, looking over my right shoulder,
 10 which would be -- Bridge Street would be elevated from
 11 there, and then I just remember screaming and shouting
 12 coming round past Carriage Gates, lots of people
 13 hysterical, shouting, crying, screaming.
 14 Q. Did you see any people moving?
 15 A. It was a mass -- I remember a mass of people running
 16 round, running around.
 17 Q. So round the corner from --
 18 A. Sorry, round the corner from Bridge Street onto
 19 Parliament Square, heading towards our locations, the
 20 north gate first, and south gate.
 21 Q. What did you do in response?
 22 A. I heard my colleague, PC Marsh, shouting "What's
 23 happening?" and I remember shouting something similar,
 24 "What's going on?". I just then heard -- I'll never
 25 forget, it was a female voice, someone shouted "They're

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1 throwing grenades.”
 2 Q. From where was that voice coming?
 3 A. That was more or less directly beside the south gate,
 4 I believe. I couldn't pinpoint who it was.
 5 Q. Were people coming past the gates?
 6 A. People were running past the gate across
 7 Parliament Square, congregating round the north gate as
 8 well. It was just chaos, and the speed, it was just too
 9 fast for me to take in, to comprehend what was happening
 10 at that time.
 11 Q. What was the next sight that you remember?
 12 A. I -- I can't remember if I -- I think I started moving
 13 back towards the gate and I'm thinking: we've got to
 14 shut this gate. And as I looked over my right shoulder,
 15 I saw who I now know to be Masood was inside, not just
 16 approaching, was inside already the grounds.
 17 Q. What did you notice about him straightaway?
 18 A. He was -- I noticed a very large man but I was
 19 just fixated -- two extremely large knives, one in each
 20 hand.
 21 Q. So a very large man with knives in both hands. Doing
 22 what and moving in what way?
 23 A. I described it the only way I could: he was -- that
 24 I can still recollect. I have seen the CCTV since, but
 25 he was walking like a robot with his arms -- arm moving

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1 up and down.
 2 Q. You described it in your statement as him:
 3 "... repeatedly swinging his knives in exaggerated
 4 movements."
 5 A. Could I just refer to my statement?
 6 Q. Certainly, officer. I think it's page 2 of your longer
 7 statement.
 8 A. That's correct, sir.
 9 Q. Did you think it was a solitary attacker?
 10 A. I didn't, sir. I remember thinking at the time --
 11 I remember them saying "they", and there was
 12 something -- and I didn't put it in my statement, but
 13 what I would now describe as -- I thought it was
 14 multiple attackers in what I can only describe as
 15 a Mumbai-style attack was going on, even though I only
 16 saw the one person, but with lots of other people
 17 running about the gates.
 18 Q. So you had seen one but you had heard the words "they're
 19 throwing grenades". Did you make a radio transmission
 20 at any time?
 21 A. I don't remember making -- I remember trying to make --
 22 everything just happened so quickly. I believe I was
 23 trying to make a radio statement, or a radio -- letting
 24 them know what was happening. I don't really remember
 25 doing that.

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1 Q. Now, we can see on the screen that just 17 seconds or so
 2 after the end of your message about the explosion --
 3 actually less than that, 12 seconds after the end of
 4 that message, we have a message attributed to you:
 5 "Knives attacking, people with knives attacking."
 6 Do you recall saying anything like that?
 7 A. Not at all, sir.
 8 Q. We can take that off the screen now.
 9 How did you react, then, to the situation beyond
 10 possibly making that radio message?
 11 A. Well, I remember thinking we are under multiple --
 12 I remember thinking we're going to die, what was my
 13 mindset of what was happening then, I thought --
 14 I thought I'd started to move back straightaway, but
 15 I think I was still looking -- on the CC -- I was still
 16 looking over at Masood and looking at my gate for
 17 a second or two.
 18 Q. Did you say or shout anything not on the radio, but to
 19 those around you?
 20 A. I remember shouting "Firearms", but I can't remember the
 21 exact -- and I know one of my colleagues did say he
 22 remembers someone shouting those words, shouting
 23 "Where's the firearms? We need firearms."
 24 Q. So you think you recall at some point shouting for the
 25 firearms officers or firearms support?

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1 A. I'm not sure it was then or as I was -- a second or so
 2 later, I can only describe as being pursued backwards
 3 into the estate.
 4 Q. If we can bring up the plan again, {DC7989/80}, can you
 5 recall which direction you went in?
 6 A. I went, sir, in -- you can see where the carriage gate
 7 is, and then the lane.
 8 Q. Where we see --
 9 A. Where it says "Vehicle barrier raised", and I believe
 10 I was stood there at some point, for a second or so,
 11 looking still at the gates.
 12 Q. Did you, while you were there, see what the other
 13 officers were doing?
 14 A. I don't initially remember, because -- I remember
 15 someone running across me, I couldn't be sure of that,
 16 I was just totally fixated on that point at what was
 17 happening over to my right-hand side and my gate.
 18 I do then remember people -- the other officers
 19 running towards me.
 20 Q. What was happening to your right-hand side that you say
 21 that was fixating you?
 22 A. It was Masood with the knives.
 23 Q. Could you see what he was doing?
 24 A. I didn't, sir.
 25 Q. Did you see anyone coming to assist you?

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1 A. Not at that point, sir, no.
 2 Q. So what happened then?
 3 A. I then remember PC Carlisle, and I think it was
 4 PC Marsh, but I'm not -- but definitely PC Carlisle
 5 running over in that direction towards Masood, and then
 6 Masood started chasing -- he stood up and started
 7 swinging the knife at PC Carlisle and everyone started
 8 running into my direction.
 9 Q. Did you move at that point at all?
 10 A. I did, sir.
 11 Q. Which direction?
 12 A. Down -- out through the vehicle barrier, which I don't
 13 know how I -- I don't know how I got through the vehicle
 14 barrier. I do know, but I didn't know how I got through
 15 the vehicle barrier.
 16 Q. We know it had risen for a car. How far did you move,
 17 having gone through the vehicle barrier? How far did
 18 you go into the yard?
 19 A. I'd say down to where it says "Lamppost", round about
 20 the lamppost, the second one. Not the one in green.
 21 Q. If we put a cursor on the screen, about the middle of
 22 the screen at the bottom, and then move up.
 23 A. Down, sir, and I think it's left, it's where it says
 24 "Lamppost", I think, round about there.
 25 THE CHIEF CORONER: So we've got, I think, one lamppost on

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1 the green and we've got three on the grey, but it's one
 2 of those on the grey area, is that right?
 3 A. It's the grey area, sir.
 4 MR HOUGH: We've got a cursor on it now, sir.
 5 A. That area--ish.
 6 Q. What did you see when you finally came to a stop around
 7 there?
 8 A. Well, when I was running down that way, that's when
 9 I saw the protection officer.
 10 Q. We don't need his name.
 11 A. No.
 12 Q. But a protection officer in plain clothes?
 13 A. In plain clothes.
 14 Q. And where was he coming from and where was he going to?
 15 A. He was coming up from the bottom -- he was running up
 16 the middle of the cobbles.
 17 Q. So from the direction of members' entrance?
 18 A. From the direction of members' entrance towards us.
 19 Q. Were you aware at that time that close protection
 20 officers might be expected to be around that area?
 21 A. Close protection officers very often wait there with the
 22 vehicles for their principals.
 23 Q. Did he go past you?
 24 A. I think when he drew level, or more or less level as he
 25 was running past, that's when I turned to face back up

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1 again.
 2 Q. Did you hear or see what happened next?
 3 A. I heard at the time, and even though I've played it back
 4 in my head, I heard what I thought was two shots.
 5 Q. Did you see either the officer or the attacker, the
 6 intruder, at the time that you heard the shots?
 7 A. I saw, I believe, Nick Carlisle -- PC Nick Carlisle in
 8 the corner near the green shaded area, pointing, this is
 9 what's in my head, pointing at the attacker.
 10 Q. So that was where you were focused when you heard those
 11 shots fired.
 12 After you had heard the shots fired, did you see the
 13 intruder and what had happened to him?
 14 A. I then saw him on the floor. I'd turned round sir and
 15 just -- I don't -- I have no memory of it. I've seen
 16 photographs and I've seen the video since. I'd drawn my
 17 baton and turned round. It was over my shoulder.
 18 Q. Were you aware where the other officers and, in
 19 particular, Keith Palmer, were at this point?
 20 A. I think PC Marsh was more or less level with me,
 21 I believe, and PC Palmer was running down the barrier
 22 for the garden entrance at New Palace Yard.
 23 Q. Did you see anything happen to him?
 24 A. PC Palmer then just -- he fell over opposite me.
 25 Q. So looking at the plan, is that near the blue dot that

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1 we see at the bottom left-hand side, the bottom
 2 left-hand corner of the grassed area?
 3 A. That's it, sir. I think that's where I was directly
 4 opposite.
 5 Q. And did you -- could you see what had happened to him,
 6 or what state he was in?
 7 A. Initially, no, sir. I just then ran over.
 8 Q. As you got close to him, could you see what his
 9 condition was?
 10 A. I could see injuries, sir.
 11 Q. Did you then hear anything said about him from others
 12 around about?
 13 A. There were people shouting and screaming. In particular
 14 I remember who I now know a quite broad, what I can only
 15 describe as a geordie accent, and he was shouting "No,
 16 no, he's been stabbed".
 17 Q. Did you then go to get first aid equipment?
 18 A. I initially went straight to PC Palmer to see what
 19 I could -- see what I could do, and then I believe
 20 I transmitted and I was joined instantaneously by
 21 members of the public, and I believe other officers were
 22 then filtering in at that stage.
 23 Q. What did you do to provide help for Keith?
 24 A. I initially got down and we started having a look and
 25 I noticed the wound, and I thought: we need first aid

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1 kits, not just my personal protective, so I started
 2 shouting for first aid kits, at which point other people
 3 had joined me and were trying to assist PC Palmer.
 4 Q. Did you obtain a first aid kit, or was one given to you?
 5 A. When we started trying to do a survey, what we call
 6 a survey, we could see where the injuries were, and
 7 someone said -- I said "Have you got this?" or words to
 8 that effect, and other people -- and I ran up then
 9 shouting, or screaming, I believe, for first aid kits,
 10 "Get me first aid kits", running up towards the barrier, and
 11 I knew there was a first aid kit in the barrier, and
 12 first aid kits did start to appear. I don't really
 13 know -- I think they were being thrown from all over the
 14 place.
 15 Q. What were the first steps you took with Keith to try to
 16 help him?
 17 A. Initially I went to have a look at -- well, the head
 18 wound, and I don't think we -- I noticed it wasn't
 19 bleeding what I would class as profusely, and then
 20 I noticed blood coming out from the side onto the
 21 cobbles, and we started trying to get his clothes off.
 22 Q. And that's to look for other wounds?
 23 A. To look for other wounds.
 24 Q. Did you remove your own body armour, your ballistic
 25 armour to give you more movement?

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1 A. I don't remember if it was at that point or afterwards
 2 but I said "We're going to need scissors". It was quite
 3 a cold day and everyone was wrapped up and I needed
 4 tough-cut scissors to just get the clothes off so we
 5 could find wounds as quickly as possible.
 6 Q. We heard on some audio footage of the event somebody
 7 shouting for scissors. That could have been you, then?
 8 A. That was possibly me, sir. I then went and got a set.
 9 Q. Did a time come when you saw other wounds on Keith?
 10 A. There was, sir. I was then joined by -- there was then
 11 plenty of officers around, and the two civilians, the
 12 two soldiers who were helping. There must have been six
 13 or seven of us round there, and I noticed, I saw other
 14 wounds straightaway as we were trying to get his coat
 15 off, and hi-vis jacket.
 16 Q. At that time you had officers helping him and some
 17 members of the public, two of whom you understood had
 18 military background?
 19 A. That's correct, sir.
 20 Q. Were you making calls for paramedics?
 21 A. I was, sir, I was shouting, I was "paramedic" -- I was
 22 trying to get it on the radio, I didn't know how
 23 successful I was. I believe I was repeating myself,
 24 saying "We need ambulances, we need paramedics here".
 25 Q. Did you become aware of a London Ambulance Service crew

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1 arriving on the scene?
 2 A. I was aware of a crew, sir, yes.
 3 Q. Can you remember at what point in time, or how long you
 4 seemed to be with Keith before they arrived?
 5 A. It seemed like ages, sir. A long time. I can't
 6 remember, it just seemed a long, long time.
 7 Q. Before they arrived, what were you doing to help him?
 8 A. I then had got -- I remember emptying the first aid
 9 kits, getting bandages, I was showing people to open
 10 bandages, don't just bring us bandages. By that time
 11 other people had sort of started working on Keith then.
 12 Q. So trying to get more bandages, and I think you also
 13 called for a defibrillator at one stage?
 14 A. I'm sorry, sir, yes, I remember shouting for a defib,
 15 and other officers were as well.
 16 Q. Did you hear somebody saying that there was a risk of
 17 further suspects or intruders around?
 18 A. Someone did say that, sir, yes.
 19 Q. And how did you react to that? I think you --
 20 A. Well, it almost confirmed what I'd thought in the first
 21 place.
 22 Q. I think you put your body armour back on?
 23 A. And I put the body armour, which is really the ballistic
 24 one, it's just -- it's literally just a throw over --
 25 throw over the head.

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1 Q. After the paramedics had arrived, were you continuing to
 2 provide assistance with Keith?
 3 A. I think other people had then taken over. There was
 4 people there instantaneous. I was collecting the
 5 scissors, the tough-cut scissors, there were other
 6 officers around who were starting to assist and carry
 7 out first aid.
 8 Q. Did a time come when the Helicopter Emergency Medical
 9 Service arrived in Parliament Square?
 10 A. I was aware of the helicopter flying over our heads,
 11 sir.
 12 Q. Did you then go with one of the army people to brief the
 13 HEMS personnel?
 14 A. We did, sir. I said: let's go and brief the HEMS, get
 15 them in here and get them to PC Palmer as quick as we
 16 can, and I relayed this by voice. There was no point
 17 trying to get on the radio, you couldn't. The radio was
 18 just going frantic.
 19 Q. Did you then lead the HEMS team back to Keith?
 20 A. Straight to Keith.
 21 Q. Did you see them beginning to work on him?
 22 A. I did sir. If I could say, the paramedic -- when we
 23 left, four paramedics had turned up then and they had
 24 started with the other officers.
 25 MR HOUGH: Thank you very much, officer, those are my

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1 questions. There will be others.
 2 A. Thank you, sir.
 3 Examination by MR ADAMSON
 4 MR ADAMSON: Good afternoon, PC Glaze, my name is
 5 Dominic Adamson and I ask questions on behalf of the
 6 widow of PC Palmer.
 7 I want to start, if I may, by asking about your
 8 experience as an authorised firearms officers and you
 9 have explained that you had those duties some time ago
 10 and so I recognise that I'm asking you to reflect back
 11 on events of many years ago.
 12 When you were an AFO in New Palace Yard, you were in
 13 a specific position, it was a fixed location posting;
 14 that's correct?
 15 A. That's correct, sir.
 16 Q. Yes. And I think you said when answering questions from
 17 Mr Hough, that you were stationed behind those officers
 18 who were operating at the gates?
 19 A. That is correct, sir.
 20 Q. And so can I ask for {DC7989/55} to be put up on the
 21 screen, please. That's not what I was after.
 22 {DC7989/55}.
 23 Now, if that photograph helps, could you identify
 24 where you recall you would routinely stand whilst on
 25 that fixed post?

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1 A. Generally, sir, it was just -- you can't see it there,
 2 but just round the corner from where the fence bends.
 3 So directly in the middle of the two gates on that
 4 corner.
 5 Q. I see. So we know that there is that curved fence,
 6 which is, I think, a hostile vehicle barrier. You are
 7 talking about a location slap-bang between the north and
 8 south gate, effectively with your back to that barrier?
 9 A. Back to that -- looking to the front. I mean, you could
 10 move about within that area but you didn't go out of
 11 that area at all.
 12 Q. Yes, so you might be a little to the left, you might be
 13 a little to the right --
 14 A. That's correct, sir.
 15 Q. -- but the idea was you were there in a slightly
 16 withdrawn position so that you could see any attempt to
 17 come through the gates which was unauthorised?
 18 A. That's correct, sir.
 19 Q. Yes. And that was the position up until 2012 when you
 20 moved to a different detail, and then you returned to
 21 the Palace of Westminster in about 2014 on unarmed
 22 duties.
 23 A. That is correct, sir.
 24 Q. And in the intervening period, or shortly thereafter,
 25 there was a change in the way that patrols of authorised

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1 firearms officers took place in the New Palace Yard?
 2 A. That is correct, sir.
 3 Q. But you don't specifically remember when that occurred?
 4 A. I couldn't say, sir, because it ...
 5 Q. I appreciate it's difficult.
 6 From your time as an unarmed officer at the gates,
 7 were you aware that there was routinely no firearm
 8 officer presence within the vicinity of the gates?
 9 A. I was aware that firearms officers were patrolling
 10 within their sector.
 11 Q. Yes.
 12 A. I knew they'd be within that sector.
 13 Q. And did you know what the sector was?
 14 A. Roughly, through speaking to the firearms and seeing the
 15 plans, it was the whole of New Palace Yard and down to
 16 what I'd call the colonnades.
 17 Q. And so it would be routine for officers to be patrolling
 18 the eastern aspect of the New Palace Yard down towards
 19 the colonnade?
 20 A. That was my understanding of it, sir, yes.
 21 Q. And when they were patrolling that area, they would be
 22 far removed from the gates, you would agree?
 23 A. Yes, sir.
 24 Q. And you wouldn't be able to see them?
 25 A. Possibly not, sir, depending on where they were.

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1 Q. Depending on their position, but we've seen some
 2 photographs earlier, we'll have a look at them in
 3 a moment, but there's a lot of obstacles between the
 4 gates and the colonnade, aren't there?
 5 A. Yes, sir.
 6 Q. That impede vision between one point and the other.
 7 Is it right that when they were on these patrols,
 8 the AFOs might be away from the gate area for prolonged
 9 periods of time?
 10 A. I couldn't say how long they were there for, sir, or how
 11 long they would be there, or how long they wouldn't. My
 12 understanding, it was frequent movement about of roving
 13 patrol, sir.
 14 Q. Frequent moving about of roving patrol?
 15 A. Roving patrol, sir.
 16 Q. But no specific responsibility to focus on the gates?
 17 A. They had a responsibility for the gates but that was
 18 part of the sector, sir. But again, I'm not a firearms
 19 officer so I can't comment on theirs.
 20 Q. I appreciate that, but you are, as an unarmed officer at
 21 the gates, able to comment about to what extent you were
 22 aware of them being there?
 23 A. That's correct.
 24 Q. And is it right that they were very frequently not
 25 there?

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1 A. They would not be there sometimes, sir, they were on
2 patrol.
3 Q. Yes. And so as an unarmed officer at the gates, you
4 were in a much more vulnerable position in 2017 than the
5 officers performing those duties when you were
6 a firearms officer in 2012?
7 A. You could say, sir, that was the case, but that was,
8 I believe, the tactical advice given at the time and for
9 that present threat.
10 Q. So just we're clear about the point that I'm putting, in
11 2012 you were providing protection to unarmed officers
12 at that gate?
13 A. About that time, sir, yes.
14 Q. And you were doing it throughout the time you were on
15 duty?
16 A. Throughout -- there was hours, sir, which I couldn't
17 tell you now. While the House was sitting.
18 Q. Yes, whilst the House was sitting and whilst you were
19 stationed there and that's where you remained, you were
20 providing that protection to officers who were standing
21 at the gates?
22 A. That's correct, sir.
23 Q. In 2017, when you were one of those officers at the
24 gates, there might be from time to time an officer
25 positioned where you had been, but most of the time

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1 there was not?
2 A. I couldn't say most of the time, sir. It must have
3 been -- I can't pick out times. It must have been
4 equal.
5 Q. It must have been equal?
6 A. Equal -- the -- or -- I couldn't say they were away from
7 the gates most of the time.
8 Q. So you would expect, would you, that half of the time
9 that an officer was on duty, on patrol, with firearms,
10 would be spent by the gates, and the other half they
11 would spend around the yard?
12 A. Possibly, sir, depending on individual officers. I know
13 they patrolled.
14 Q. Can I show you photograph {DC7989/71}. Now, that is
15 a photograph taken on the eastern side of
16 New Palace Yard; yes?
17 A. That's correct, sir.
18 Q. And one can see the statue and fountain in the middle;
19 yes?
20 A. Sir.
21 Q. And there are obviously trees, I think if you look
22 carefully you can see the fencing, which is the curved
23 fencing that you used to stand up against when you were
24 on firearms duties yourself; yes?
25 A. Yes, sir.

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1 Q. And then you can see one of the gates, but you can't see
2 very clearly the pedestrian entrance, can you?
3 A. No, sir, not from there.
4 Q. No. So a firearms officer in that position is unable to
5 provide any effective protection, is he, for officers at
6 the gate?
7 A. If the firearms officers were there it would take
8 a matter of time to get to the gates if something
9 happened at the gates from that position. Assuming
10 there was just the two firearms officers patrolling.
11 Q. Assuming there were two -- I think we know that there
12 were only two firearms officers on sector 3 patrol on
13 22 March 2017. Officers in that position cannot provide
14 any protection, can they, to officers at the gate?
15 A. Probably not, sir.
16 Q. Sorry?
17 A. Probably not, sir.
18 Q. Probably not. And that would be obvious to you, as
19 a former firearms officer?
20 A. Sir.
21 Q. But if that's the patrol you've got to do, that's the
22 patrol you've got to do?
23 A. Or they've got to do, sir, if that's ...
24 Q. Yes, if that is what they are told to do, then those are
25 the orders?

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1 A. That's correct, sir.
2 Q. It's not for you to question the orders; you've got to
3 follow them?
4 A. That's correct, sir.
5 Q. And so the reality is, isn't it, that in 2017 when this
6 heinous attack occurred, on your guess, half the time
7 the officers at the gates would be effectively
8 unsupported by firearms officers during the course of
9 their work?
10 A. If you put it like that, sir, yes.
11 Q. I appreciate I put it like that: do you agree?
12 A. Sir, they wouldn't be effective down there for
13 Carriage Gates, with an incident at Carriage Gates.
14 Q. And that was the system that was operating at that time;
15 do you agree?
16 A. Again, I believe so, sir. I didn't follow the post
17 notes.
18 Q. I appreciate the post notes for the AFOs were not
19 something that you would have to consider because you
20 were not an AFO at that time, but the reality is that
21 that's what was happening on a daily basis; do you
22 agree?
23 A. Sir.
24 Q. Yes. And anyone who was reviewing security in the
25 New Palace Yard at a given time, knew, or ought to have

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1 known, that that's what was happening; do you agree?
 2 A. That's right, sir.
 3 Q. Because it wouldn't come as a surprise to anybody that
 4 that's what was happening because your recollection is
 5 that that's what all AFOs did; is that right?
 6 A. That's correct, sir.
 7 Q. And if we think about it for a moment, if there was
 8 an altercation at the gate, and an AFO is positioned
 9 where we see that photograph taken from, there is no
 10 way, is there, that an AFO in that position could
 11 actually discharge his weapon?
 12 A. No, sir.
 13 Q. Because he would have no clue whatsoever as to what the
 14 outcome would be?
 15 A. That's it, sir.
 16 Q. So he might as well be unarmed because the reality is he
 17 can't do anything and the weapon he's got, he can't use;
 18 is that fair?
 19 A. From that position, sir.
 20 Q. From that position.
 21 You've spoken vividly about the events of the day,
 22 and I understand it's a very difficult memory to have to
 23 regurgitate in this environment. Your recollection is
 24 that of a man who was placed in this situation where he
 25 had a spray and a stick against an attacker who came in

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1 with two large knives, and that must have been a pretty
 2 terrifying thing to see?
 3 A. It was, sir.
 4 Q. Yes. Firearms officers are trained, are they not, to
 5 take decisions often in difficult circumstances with
 6 little time to process the information before them; is
 7 that fair?
 8 A. Yes, sir.
 9 Q. Because the reality is that attacks can happen quickly,
 10 but they are trained to be able to respond quickly to
 11 dangerous situations; do you agree with that?
 12 A. Sir.
 13 Q. And so if a firearms officer had been positioned in the
 14 place that you used to stand, he would have been in
 15 a far better place, would he not, to protect PC Palmer's
 16 life?
 17 A. A better place.
 18 Q. And that officer, if it had been you in 2012, would have
 19 had that extra bit of time, would they not, in that
 20 withdrawn position to take in what was going on in front
 21 of them; do you agree?
 22 A. Yes, sir, yes.
 23 Q. Whereas you were in an unsatisfactory position to
 24 observe what was going on because you were at the gate
 25 and you were trying to work out what was going on around

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1 you; is that fair?
 2 A. Yes, sir.
 3 Q. You did not have that space to assess what was going on?
 4 A. Not initially, sir, no.
 5 Q. No. But if a firearms officer had been placed where you
 6 used to be, they would have had a better opportunity to
 7 take it all in, would they not?
 8 A. Sir, yes, possibly, sir, yes --
 9 Q. Possibly. And they have the opportunity, then, to
 10 assess the threat, and if necessary, take very quick
 11 action to neutralise it; is that fair?
 12 A. Sir.
 13 Q. When you say "Sir", do you mean "Yes"?
 14 A. Yes, sir, sorry, sir.
 15 Q. If you, as an authorised firearms officer, as you were
 16 in 2012, had been standing where you used to stand, and
 17 you saw an attacker like Masood following Keith Palmer
 18 as he fell to the floor, you would have discharged your
 19 weapon, would you not? You would have shot him?
 20 A. I would like to think I would have made the correct
 21 assessment. There are other options, backdrop, for
 22 example, and things, but yes, sir.
 23 Q. Have you heard of the armed deployment communication?
 24 A. ADAM?
 25 Q. No, no, I'm talking about -- it may be that

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1 I'm misdescribing it. The rules that apply regarding
 2 when you are permitted as a firearms officer to
 3 discharge your weapon?
 4 A. Yes, sir.
 5 Q. And what they say is:
 6 "Where circumstances permit, AFOs should identify
 7 themselves as armed officers and give a clear direction
 8 to the subject, allowing sufficient time to be observed,
 9 unless to do so would unduly place any person at risk or
 10 would clearly be inappropriate or pointless."
 11 A. That is correct, sir.
 12 Q. So the rules that are explained to AFOs specifically
 13 anticipate them making decisions in fractions of
 14 seconds?
 15 A. That's correct, sir.
 16 Q. And that would include when a colleague was stricken, as
 17 a man with two knives approached him. There would be
 18 time, would there not?
 19 A. Possibly time to --
 20 Q. There would be a chance?
 21 A. There would be a chance, sir.
 22 Q. So what we know is that by having officers patrol the
 23 whole of the yard, as opposed to having them by the
 24 gates in the place where you used to be, the chance to
 25 save PC Palmer's life was lost, was it not?

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1 A. Certainly if firearms officers had been there the threat
2 could have been, maybe or could have been neutralised
3 quicker, a lot quicker.
4 Q. And that makes complete sense, doesn't it, because
5 they're there for a reason. They're there to counter
6 a specific threat that might occur at that location?
7 A. That is.
8 Q. Were you told that the gates were regarded in security
9 reviews as one of the weakest points of the physical
10 perimeter?
11 A. I was never told that personally, sir.
12 Q. You were never told that. So when they did a tactical
13 planning review in February 2015 and they identified it
14 as one of the weakest points, they didn't tell you that?
15 A. I hadn't been told that, sir. I didn't know it had been
16 written down, or was an official ...
17 Q. Were you told that it had been identified as a clearly
18 identifiable and exploitable weakness?
19 A. No, sir.
20 Q. As had been determined in a review in 2013. Were you
21 consulted in 2015 when there was a review of Palace
22 security about ways in which --
23 MR KEITH: I'm sorry to rise to my feet. Mr Adamson is not
24 in front of a jury at the moment --
25 THE CHIEF CORONER: No.

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1 MR KEITH: -- and given that this officer was no longer
2 an AFO at that time --
3 THE CHIEF CORONER: Yes.
4 MR KEITH: -- this repetitive putting of whether or not the
5 officer was aware of observations, tactical assessments
6 and reports to which he would never in the course of his
7 duty have been privy, serves, it seems to us,
8 respectfully, very little.
9 THE CHIEF CORONER: Yes.
10 MR ADAMSON: Sir, very briefly --
11 THE CHIEF CORONER: What I think you can ask is whether he
12 was asked about taking part in a review, which I think
13 might be a precursor to the question that might give you
14 an answer that, Mr Keith -- if the answer is what
15 I suspect it would be, would mean that you couldn't go
16 further. But I don't see any difficulty in you asking
17 that question.
18 MR ADAMSON: Were you asked to comment upon the security
19 arrangements in May 2015 during a review of Palace
20 security?
21 A. No, sir. (Pause).
22 Q. PC Glaze, on the day of this incident, we know that you
23 say in your statement that as events unfolded you were
24 shouting "Where's the firearms?", and I think that's
25 been confirmed by other witnesses as well. When had you

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1 last seen them, to your recollection?
2 A. I couldn't give you a specific time. I knew they'd been
3 there, sir, but I couldn't give a time. I don't know.
4 MR ADAMSON: PC Glaze, those are my questions. Thank you
5 very much for answering them. I appreciate that you
6 came to PC Palmer's assistance and for that I thank you
7 on behalf of his widow.
8 A. Thank you, sir.
9 Examination by MR PATTERSON QC
10 MR PATTERSON: Mr Glaze, could I ask for your assistance,
11 please, on one topic. I ask questions on behalf of the
12 families of those who were killed on the bridge, and
13 it's the topic of the briefing of HEMS. Now, you have
14 told us that you went to try to get assistance for your
15 colleague from the HEMS doctors, who you had seen
16 landing in the square; is that correct?
17 A. That's correct, sir.
18 Q. You told us that you were accompanied by one other
19 person, who was the ex-military person who had also been
20 assisting Keith?
21 A. That is correct, sir.
22 Q. Was it just the two of you who went to speak to the
23 doctors, or were there others who accompanied you?
24 A. Just me and him, sir. I presumed the helicopter was
25 coming for us, for PC Palmer.

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1 Q. Yes. And you were understandably, and quite properly,
2 trying to get Keith urgent medical help. But when you
3 spoke to the doctor, I think there were two doctors and
4 one assistant, so three in that team; is that correct?
5 A. I think so, sir.
6 Q. Did they say anything when they first spoke with you as
7 to why they had been called, or which casualties they
8 had been summonsed for?
9 A. I don't recollect that, sir. I think we were telling
10 him my colleague, PC Palmer, was in dire trouble.
11 Q. Yes. Was there any discussion about other casualties
12 elsewhere, on the bridge?
13 A. There was afterwards, sir. I distinctly remember
14 someone asking and I didn't know anything about any
15 casualties on the bridge.
16 Q. When you spoke to the doctors with your colleague, the
17 ex-military individual, was there any mention made of
18 other casualties who it was being suggested had only
19 minor injuries?
20 A. There was, I seem to remember after --
21 Q. At a later stage?
22 A. At a later stage. I didn't know anything about that,
23 I asked someone and someone -- I was told there were
24 minor injuries but, again, I knew nothing about the
25 bridge, or Bridge Street, and that was just information

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1 that was relayed.
 2 Q. Some time after you had returned to Keith and events had
 3 continued back in the courtyard?
 4 A. I believe when the HEMS was going to leave, if my
 5 recollection serves me right. I couldn't tell him --
 6 I didn't know literally what had gone on there.
 7 Q. We know, and we'll hear from Dr Hudson of HEMS on,
 8 I think, Monday, that it was at 2.56 that they landed,
 9 and we know that on the bridge there was a very
 10 seriously injured casualty who wasn't removed from the
 11 bridge until something like 3.08, Mr Rhodes, and we also
 12 know that at around about the time that the helicopter
 13 landed, a young woman was being removed from the water
 14 in the river. At that initial briefing of HEMS in the
 15 square, was it indicated that there were three people
 16 believed injured on the bridge with only minor injuries?
 17 A. No, sir.
 18 Q. You don't remember anything of that sort being discussed
 19 at that initial meeting?
 20 A. No, sir.
 21 MR PATTERSON: Thank you very much.
 22 THE CHIEF CORONER: Mr Keith.
 23 Examination by MR KEITH QC
 24 MR KEITH: PC Glaze, you have been asked some questions
 25 about the change from a static patrol to a mobile

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1 patrol. With your experience as an AFO, was there any
 2 vulnerability or disadvantage to a static patrol, one
 3 that remained at the same place?
 4 A. I don't think so, sir.
 5 Q. Can you think of any?
 6 A. There is -- from -- attack advisors might say a static
 7 patrol then itself become -- sorry, a static position
 8 then I think this is what reason we were given for
 9 roving patrols, it becomes vulnerable in itself.
 10 Q. And what is the point of a mobile patrol?
 11 A. Unpredictability.
 12 Q. Unpredictability, because it's always on the move. Yes.
 13 Were Carriage Gates the only potential place of
 14 threat in New Palace Yard?
 15 A. It was probably the main threat to New Palace Yard, but
 16 someone determined could get over the railings.
 17 Q. Yes, it wasn't the only place of threat, was it?
 18 A. No, sir.
 19 Q. So, for example, there was always the possibility of
 20 an attack from Bridge Street over the railings, or
 21 through the railings?
 22 A. That's correct, sir.
 23 Q. There might be an attacker or a terrorist having entered
 24 the estate, coming through Speaker's Court, through the
 25 colonnades and into New Palace Yard, or from the other

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1 entrances to New Palace Yard; correct?
 2 A. I wouldn't say necessarily from Speaker's Court unless
 3 they'd entered at another side of the estate.
 4 Q. That's what I mean.
 5 A. Oh, there are other entrances, sir, other gates to the
 6 estate: Black Rod's Garden entrance for one.
 7 Q. So a static firearms patrol -- I say patrol but it can't
 8 really be a patrol if it's static -- a static post on
 9 Carriage Gates entirely deprives the
 10 Bridge Street/colonnades corner of New Palace Yard from
 11 protection, does it not?
 12 A. Sir.
 13 Q. Do you know why the gates were generally open, those
 14 big, heavy, ornate gates?
 15 A. They've always been open, sir, during working hours.
 16 Q. They were always open in the daytime?
 17 A. It was standard procedure: the gates were ridiculously
 18 heavy to shut and close at that time.
 19 Q. Were they emblematic, did they signify anything, as far
 20 as you were aware? Was there a sense in which they were
 21 required to be kept open as a symbol of the openness of
 22 the democratic institution of which they were part?
 23 A. There was that, yes.
 24 Q. Yes. And you, of course, were a trained AFO, and if
 25 you'll allow me to say so, obviously a very experienced

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1 trained unarmed officer on post at Carriage Gates as
 2 well. This terrible attack lasted but three seconds or
 3 so before PC Palmer was being stabbed up against the low
 4 barriers, wasn't it?
 5 A. Sure.
 6 Q. And no officer was able to use their asp, or CS spray to
 7 stop Masood before he deliberately and dreadfully
 8 stabbed PC Palmer?
 9 A. No, sir, he was on -- as I say, he was in and on top
 10 before I knew, at that point, what was happening.
 11 Q. No officer on that gate, however observant, and I'm sure
 12 you were very observant, had a chance to stop him
 13 because it was just too quick?
 14 A. Sir.
 15 Q. Isn't that right?
 16 A. Sir.
 17 Q. You were able to make your first report on the radio at
 18 14.41.14, just four seconds after Masood came through
 19 the gate, a second after he was already beginning to
 20 attack PC Palmer, who was falling to the floor. But the
 21 speed with which he came through the open gate meant
 22 that you had no chance to stop him, did you?
 23 A. No, sir.
 24 Q. And no officer was able to stop him from being stabbed,
 25 and thereafter it's obvious, isn't it, that Masood

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1 chased the other unarmed police officers towards the
 2 members' entrance, including yourself?
 3 A. That's correct, sir.
 4 Q. Forgive me for asking this question: as you were being
 5 chased by this fixated individual with his knives, what
 6 did you think was going to happen to you?
 7 A. I just knew I had to create some space to -- I in all
 8 honesty believed we were -- I in all honesty believed
 9 I was possibly going to die that day.
 10 Q. And you had to create space because although you had
 11 been not, in fact, absolutely on the point of the open
 12 gates, you were behind the gates, even behind the gates
 13 you had not had enough space, had you?
 14 A. No, sir.
 15 Q. The two AFOs who were on duty in New Palace Yard at that
 16 time had been patrolling round New Palace Yard, hadn't
 17 they?
 18 A. They had, sir.
 19 Q. What time had you come on to your post --
 20 A. I'm --
 21 Q. -- at the gates?
 22 A. I'm not sure, sir.
 23 Q. Do you know roughly that day what time you had started?
 24 A. At the beginning of the day, do you mean, sir?
 25 Q. Yes, let's start with --

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1 A. About 07.00 hours on the gate.
 2 Q. And you had obviously been rotated and there had been
 3 refreshment breaks, and yourself and Mr Marsh, PC Marsh,
 4 had no doubt moved around?
 5 A. We had, sir.
 6 Q. Were you aware that an hour before, for at least
 7 14 minutes, two AFOs had, in fact, been behind the
 8 unarmed officers at Carriage Gates?
 9 A. They would have been there, sir. I had seen them at
 10 some point but I couldn't give times, or ...
 11 MR KEITH: Thank you very much, officer, I have no further
 12 questions.
 13 Examination by MR NAUGHTON
 14 MR NAUGHTON: PC Glaze, my name is Sebastian Naughton, I ask
 15 questions on behalf of Barts Health NHS Trust which
 16 employed the two doctors who you spoke to in the HEMS
 17 team. I just wanted to clarify: your witness statement
 18 is dated 27 March, just five days after the attack.
 19 I imagine events were a bit fresher in your mind then
 20 than they are now?
 21 A. Sir.
 22 Q. The end of your statement on the third page of four,
 23 says that you escorted the HEMS doctor, or the team, to
 24 PC Palmer; is that right?
 25 A. That's correct, sir.

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1 Q. Your statement also says that the HEMS doctor was asking
 2 about casualties on Westminster Bridge, but you couldn't
 3 update the doctors about that?
 4 A. No, sir, it was afterwards.
 5 Q. The way your statement is prepared suggests, doesn't it,
 6 that it was perhaps before PC Palmer was treated? I say
 7 that because you say:
 8 "I remained on the scene with Keith and all the
 9 other people who were trying to save him."
 10 Do you think perhaps that conversation was on the
 11 way to PC Palmer?
 12 A. No, sir, definitely, it was afterwards, sir, because
 13 I asked -- I believe I asked another officer, "What's
 14 happening on the bridge?" and they radioed and no one's
 15 seen -- I remember the words "Casualties", but I ...
 16 MR NAUGHTON: Thank you, PC Glaze, those are all the
 17 questions I have.
 18 Further examination by MR HOUGH QC
 19 MR HOUGH: PC Glaze, just a couple of final points from me.
 20 Mr Adamson, who sits to my left, asked you what would or
 21 could have been done to save PC Palmer if an AFO had
 22 been present at the gates. I would just like to ask you
 23 one or two questions about that.
 24 First of all, did you actually see the attack on
 25 Keith Palmer?

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1 A. I didn't, sir. I had no -- I was -- I had no
 2 recollection of it at all until I saw the CCTV
 3 afterwards, under SO15 supervision.
 4 Q. Help us with this: as an AFO, in deciding to take
 5 a shot, making that assessment of whether a shot can and
 6 should be fired, quite a lot of considerations need to
 7 be taken into account, don't they?
 8 A. Yes, sir.
 9 Q. Whether you are in a position to take the shot; yes?
 10 A. Sir.
 11 Q. Whether taking that shot might endanger other people
 12 nearby?
 13 A. That's correct, sir.
 14 Q. Including other officers?
 15 A. Correct, sir.
 16 Q. So if considering firing on a subject who is physically
 17 very close to a police officer, that can be a very
 18 difficult decision, a very difficult dilemma, can't it?
 19 A. Sir.
 20 Q. And in the heat of a moving incident, perfect
 21 marksmanship isn't always possible, is it?
 22 A. No, sir.
 23 Q. So is it fair to say that -- or do you feel able to say,
 24 having not, yourself, seen the attack on Keith Palmer,
 25 and with all those considerations, are you able to say

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1 whether an AFO would have been able to take a clear shot
 2 on Masood?
 3 A. May have, sir. May have. I cannot speak for others.
 4 They may have been able to have taken a shot, I don't
 5 know about a clear shot.
 6 Q. And are you able to say whether an armed officer in that
 7 situation would have chosen to take that shot, taking
 8 into account all the considerations that you have
 9 referred to?
 10 A. They may have done, sir. Some would, sir. Again,
 11 I can't say, it would have been a difficult shot, but
 12 officers -- some officers would have taken that.
 13 Q. It all depends on where they were and what they were
 14 seeing in that moment.
 15 A. That's it, sir.
 16 Q. Secondly, and finally, this point: you thought that what
 17 had happened on Bridge Street was an explosion?
 18 A. That is correct, sir.
 19 Q. You may not be able to answer this question, if you
 20 think it's an unfair question, please say so. If you
 21 had been an AFO in a static position, as you had been,
 22 at Carriage Gates and you had heard what you thought was
 23 an explosion from Bridge Street, what would you have
 24 done?
 25 A. I would have certainly read -- certainly readied myself,

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1 the carbine or the MP5 or G36, whichever, I'm not sure
 2 what was being carried, would have possibly gone and had
 3 a look to where the explosion was from the information
 4 I put up.
 5 MR HOUGH: Yes. Thank you very much. Those are all my
 6 questions.
 7 THE CHIEF CORONER: Officer, can I do two things: can
 8 I thank you very much indeed for coming and giving
 9 evidence, but also to echo the comments that have been
 10 made earlier on about the efforts you made to help your
 11 colleague who had been stabbed, and everything you did
 12 on that day. Thank you very much.
 13 A. Thank you very much, sir.
 14 MR HOUGH: Sir, it may assist if I just indicate who we'll
 15 be hearing from on Monday for the benefit of the
 16 interested persons.
 17 We have on Monday at least two witnesses relating to
 18 the care of PC Palmer whom we have to call on Monday,
 19 and that's the Right Honourable Tobias Ellwood MP and
 20 Dr Anthony Hudson of HEMS.
 21 THE CHIEF CORONER: Yes.
 22 MR HOUGH: We also will be hearing from DC Overall
 23 concerning video footage of the armed officers and maps
 24 showing their movements over the course of time leading
 25 up to the attack, and we should be hearing from also the

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1 first of those armed officers, at least, and possibly
 2 starting up on the second as well on Monday.
 3 THE CHIEF CORONER: Yes, and it sounds, Mr Hough, as if the
 4 sensible thing is to start with the two who need to be
 5 away on Monday morning, either with the MP or with the
 6 doctor, so that we can deal with them even if it means
 7 taking things slightly out of the order that we might
 8 otherwise have done.
 9 MR HOUGH: Yes.
 10 THE CHIEF CORONER: We will resume on Monday morning at
 11 10.15. Can I simply thank everyone, as it were, on the
 12 legal teams for all the assistance they've given me this
 13 week, and we will resume on Monday morning at 10.15.
 14 (4.40 pm)

(The court adjourned until 10.15 am on
 Monday, 17 September 2018)

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