

OPUS 2

INTERNATIONAL

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

Day 7

September 18, 2018

Opus 2 International - Official Court Reporters

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1 Tuesday, 18 September 2018
 2 (9.34 am)
 3 THE CHIEF CORONER: Good morning, Mr Hough.
 4 MR HOUGH: Good morning, sir. The proposal is that we now
 5 call Mr Poole and Mr Fegan—Earl —
 6 THE CHIEF CORONER: Yes.
 7 MR HOUGH: — two of the pathologists, effectively
 8 interposing them into PC Ashby's evidence, in order that
 9 they aren't made to wait too long, and because their
 10 evidence is both discrete and should not take very long.
 11 THE CHIEF CORONER: That seems a very sensible proposal.
 12 MR HOUGH: Mr Chapman, our third pathologist, will be with
 13 us at 2.00 pm, and we're likely to call him at or about
 14 that time.
 15 THE CHIEF CORONER: Thank you.
 16 MR HOUGH: I have spoken to affected counsel and have heard
 17 no objections. If, therefore, we can call Simon Poole.
 18 DR SIMON POOLE (Affirmed)
 19 Examination by MR HOUGH QC
 20 MR HOUGH: Mr Poole, you may sit or stand when giving
 21 evidence as you wish.
 22 A. Thank you.
 23 Q. Would you please give your full name for the court?
 24 A. Simon Maurice Poole.
 25 Q. Mr Poole, you understand I'm asking you questions first

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1 on behalf of the Coroner, then you may be asked
 2 questions by other lawyers?
 3 A. Yes, thank you.
 4 Q. By profession are you a Home Office pathologist?
 5 A. Yes.
 6 Q. Would you very briefly set out your qualifications?
 7 A. I hold the degrees bachelor of science, bachelor of
 8 medicine and surgery, the diploma in medical
 9 jurisprudence and pathology, and I'm a fellow of the
 10 Royal College of Pathologists.
 11 Q. Thank you. Did you perform a post mortem examination on
 12 Kurt Cochran, one of the victims of the Westminster
 13 Terror Attack?
 14 A. Yes.
 15 Q. You made a report on that examination and you may refer
 16 to it as you wish.
 17 A. Thank you.
 18 Q. It is inevitable during your evidence that we will be
 19 looking at some fairly graphic and detailed descriptions
 20 of the injuries, so I make that point in case any
 21 members of Kurt's family wish to leave at this time.
 22 Mr Poole, first of all, before your examination, is
 23 it right that you received basic information about Kurt
 24 having been injured as the result of a car being
 25 deliberately driven at him and other pedestrians?

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1 A. Yes, that's my understanding.
 2 Q. Did you perform an external examination first of Kurt's
 3 body to identify the principal signs and injuries?
 4 A. Yes, I did.
 5 Q. Now, we have what are called body maps, which are
 6 stylised images which identify the injuries found, and
 7 what I would like to do with your assistance is run
 8 through those and ask you to identify the principal
 9 signs which you noted. The first body map is
 10 {AV0086/1}.
 11 We're going to go through these one by one and if
 12 you just identify the main injuries. So next page,
 13 please. {AV0086/2}
 14 THE CHIEF CORONER: I've got nothing on my screen at all.
 15 MR HOUGH: I'm so sorry, it should be being ...
 16 A. Mine's blank as well.
 17 MR HOUGH: If that is the case then it may be best that we
 18 do this without the body maps, if others are amenable to
 19 that course.
 20 THE CHIEF CORONER: Yes. If we can get the technician
 21 called, because we may need them later on, but I think
 22 at the moment if we continue.
 23 MR HOUGH: Apparently there is a hard copy.
 24 THE CHIEF CORONER: Right.
 25 MR HOUGH: If I hand that to you, sir, and we bring — it

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1 occurs to me that if we hand that to you we can work
 2 with the body maps.
 3 A. Yes.
 4 MR HOUGH: I am grateful to Mr Patterson. (Pause).
 5 THE CHIEF CORONER: I think what's being suggested is that
 6 if you can put it on the screens for those people who
 7 can see a screen. I've got a hard copy, so at least we
 8 can continue for the time being.
 9 MR HOUGH: Now, Mr Poole, are you able to see the large
 10 screen to your left. As we go, if you can, as I say,
 11 identify the principal external injuries you found.
 12 So next page, please, operator {AV0086/3}. We are
 13 just seeing minor abrasions at the moment, are we?
 14 A. Yes, minor abrasions and bruises present.
 15 Q. Next page, please {AV0086/5}. And the next page
 16 {AV0086/6}. And the next. You've now identified
 17 instability of the shoulder joint. Is that a sign of
 18 an injury?
 19 A. Yes, it was. It was partially dislocated.
 20 Q. And the next page, please. {AV0086/7}.
 21 And the next page {AV0086/8}.
 22 And the next page {AV0086/9}.
 23 Next page {AV0086/10}.
 24 Next page {AV0086/11}.
 25 Next page {AV0086/12}.

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1 Next page {AV0086/13}.
 2 So a fair number of bruises and cuts over the limbs?
 3 A. Yes, and some lacerations.
 4 Q. Next page, please {AV0086/14}.
 5 And next page {AV0086/15}.
 6 Next page {AV0086/16}.
 7 Next page {AV0086/17}.
 8 Next page {AV0086/18}.
 9 Next page {AV0086/19}.
 10 Next page {AV0086/20}. We're now looking at quite a
 11 number of injuries to the head.
 12 A. Yes.
 13 Q. Can you describe those briefly?
 14 A. They all resulted from some form of blunt form trauma,
 15 the injury types include bruises, abrasions and
 16 lacerations. Perhaps the thing to note from this
 17 graphic is that the injuries have a predominantly
 18 left-sided distribution.
 19 Q. Next page, please. {AV0086/21}. What does this page
 20 show that you detected in your examination?
 21 A. The red line on the top of the skull bone indicates the
 22 position of a fracture, so the bone has been broken in
 23 this area.
 24 Q. So that's a skull fracture running across the top of the
 25 scalp?

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1 A. Yes, essentially, and towards the back as well.
 2 Q. Next page, please {AV0086/22}. You've identified here
 3 the principal fractures. Could you summarise those,
 4 please?
 5 A. In the positions shown, injuries to the lower limbs,
 6 around the knee joints and the right ankle, injuries to
 7 the backs of some of the ribs and in the upper
 8 right-hand panel that dislocation, or partial
 9 dislocation to the left shoulder joint is also
 10 indicated.
 11 Q. And just to be clear, the leg fractures were to the left
 12 leg; is that right?
 13 A. To both legs, in fact.
 14 Q. To both legs.
 15 A. And also the graphic shows pelvic fractures.
 16 Q. And the next page, please. That's the end, sorry.
 17 So those images -- we can take those off the screen
 18 now -- show, I think, serious head injury?
 19 A. Yes, certainly.
 20 Q. Diffuse bruising and some lacerations to the limbs?
 21 A. Yes.
 22 Q. And a dislocation of the left shoulder?
 23 A. That's correct.
 24 Q. And fractures to the legs?
 25 A. Yes.

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1 Q. Moving on to your internal examination, what were the
 2 principal findings that you made in relation to internal
 3 organs?
 4 A. With regards the scalp I noted that there were a large
 5 number of areas of bruising underneath the surface of
 6 the scalp. Covering the surface of the brain was
 7 a layer of blood, that's what I refer to as
 8 a subarachnoid haemorrhage in my statement. Given the
 9 circumstances of the incident I requested that the brain
 10 be formally examined by a neuropathologist,
 11 Professor Al-Sarraj. His statement confirms the
 12 bleeding on the surface of the brain but he was further
 13 able to indicate that there was bruising or contusion
 14 within the brain tissue itself.
 15 The skeletal injuries we've mentioned briefly in
 16 passing with reference to the graphics. Other internal
 17 injuries, injuries were found within the respiratory
 18 system, namely to the larynx or the voicebox and a bone,
 19 the hyoid bone which sits above that structure. I found
 20 bleeding within the airways which supply the lungs, and
 21 in my view that blood originated from trauma to the
 22 bones of the face, which were fractured. Pelvic
 23 fractures have been mentioned earlier, and there was
 24 a small amount of blood within the pelvic cavity, and
 25 there was also a very small amount of blood around the

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1 spleen.
 2 Q. You've referred to Professor Al-Sarraj providing
 3 a report --
 4 A. Yes.
 5 Q. -- based upon his examination of the brain. Is there
 6 anything more that you glean from that report which you
 7 summarise at page 9 of your report?
 8 A. In my view, they're the essential features to convey.
 9 Q. What were your principal conclusions as to the mode of
 10 injury and the cause of death?
 11 A. I wrote a series of nine comments at the end of my
 12 statement, the first of which was:
 13 "I note the apparent circumstances of death, as
 14 understood at the time of writing.
 15 Comment 2:
 16 "Multiple injuries were found on external and
 17 internal examination, the most severe of which were to
 18 the head and trunk.
 19 "3. In my opinion, all the recent injuries and
 20 marks can reasonably be attributed to the result of
 21 a strike against a moving car, throw, and impact(s)
 22 against a hard surface such as paving, carriageway, or
 23 street furniture.
 24 "4. Given the severity of the head injuries,
 25 I consider it likely that after coming to rest,

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1 Mr Cochran would have rapidly been rendered unconscious.
 2 I also regard it probable that the post-injury survival
 3 period would have been brief.
 4 "5. I found no patterned marks to suggest 'run
 5 over' by a vehicle.
 6 "6. The injuries and marks had a predominantly
 7 left-sided distribution. However, I understand that
 8 CCTV footage is available, and this should be considered
 9 (in addition to any independent eyewitness statements,
 10 car, clothing and scene examinations et cetera) when
 11 reconstructing the mechanics of the incident. I am
 12 unable, on the basis of the pathological findings alone,
 13 to reliably estimate the vehicle's speed at the point of
 14 primary impact.
 15 "7. The cause of death is given as; 1(a) multiple
 16 injuries.
 17 "8. I found no features of significant natural
 18 disease which could have directly caused, or contributed
 19 to, Mr Cochran's death.
 20 And finally:
 21 "9. To my knowledge, no analyses have been
 22 conducted on the post mortem blood sample (exhibit
 23 SMP/01). I therefore cannot indicate if Mr Cochran was
 24 intoxicated by the effects of drugs or alcohol when he
 25 died."

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1 Q. Thank you very much. Mr Poole, is this right from
 2 Professor Al-Sarraj's report, and I'm looking at page 10
 3 of your report, his point 5, that it was difficult to
 4 give a precise view as to the degree of traumatic brain
 5 injury which Kurt had suffered --
 6 A. Yes.
 7 Q. -- because he had had a short period of survival after
 8 injury?
 9 A. Yes.
 10 Q. And it is more difficult to determine exactly the
 11 effects on the brain when there has been such a short
 12 period of post-traumatic survival?
 13 A. That is the position, yes.
 14 Q. Now, we know that Kurt was struck by a vehicle, that it
 15 was, very roughly, travelling at around 30 miles
 16 an hour, that sort of speed, that he was struck directly
 17 and then projected over the parapet of a bridge.
 18 A. Yes.
 19 Q. We've heard evidence that he landed, effectively,
 20 directly on his head on the paving below.
 21 In your view, do the fractures to the lower limbs
 22 and the pelvis suggest the vehicular impact?
 23 A. Yes, that would be consistent with that scenario.
 24 Q. And is the head injury consistent, based on the evidence
 25 we've heard, with him striking the pavement below?

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1 A. Yes.
 2 Q. You've told us, based on your assessment, that the
 3 period of post-injury survival would have been brief.
 4 A. Yes.
 5 Q. In your view, with any medical attention which could
 6 practicably be given at the scene of an injury such as
 7 this, were these injuries survivable?
 8 A. In my view, no.
 9 MR HOUGH: Thank you very much. Those are all my questions.
 10 There will be others.
 11 THE CHIEF CORONER: Mr Patterson, would you like your file
 12 back?
 13 MR PATTERSON: That would be helpful, if it's available.
 14 Thank you. (Handed)
 15 Examination by MR PATTERSON QC
 16 MR PATTERSON: Dr Poole, I ask questions on behalf of the
 17 sister of Kurt Cochran. Just a few things, please, if
 18 you could --
 19 A. Of course.
 20 Q. -- help me with one or two topics. I don't think you've
 21 had an opportunity to see the video evidence and the
 22 police compilation of the moment of impact, have you?
 23 A. I don't think I have seen that.
 24 Q. No. We've seen that he was hit to his front, so the
 25 vehicle was coming towards him in the direction in which

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1 he was walking.
 2 A. Thank you.
 3 Q. And we've seen in the body graphics -- we can go there
 4 if necessary, it's pages 11, 12, 15, 16, 17 and 21 --
 5 that there were a number of injuries to his shins and to
 6 his knees and to his lower legs, many of them at the
 7 front.
 8 A. Yes.
 9 Q. So perhaps following on from the answer you gave
 10 a moment ago about the pelvis and the lower limbs, all
 11 of that would be consistent with that stage of the
 12 incident and the initial impact from the car?
 13 A. I agree.
 14 Q. Would you agree?
 15 Secondly, from the video, we see that he was thrown
 16 backwards against the wall, and we can see that he
 17 essentially pivots backwards over the top of the wall of
 18 the bridge, and pivots like this (indicates) so that his
 19 upper body spins round, his legs come up, and he pivots
 20 on the top of the wall.
 21 A. Yes.
 22 Q. And, again, that would explain, no doubt, the bruises
 23 that we see at pages 8 and 10 to the buttocks and the
 24 upper thigh area.
 25 A. That would be consistent with that scenario.

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1 Q. Would you agree?
 2 A. Yes.
 3 Q. The video evidence shows that there was no head impact
 4 against the wall, and it shows that he appears to have
 5 fallen head-first and to have been upended --
 6 A. Yes.
 7 Q. -- having pivoted on the wall, and we know that it was
 8 then a long drop down onto the pavement below, and
 9 I think, Dr Poole, you've seen a photograph of the
 10 position in which he fell, essentially on his left side
 11 with his left cheek against the ground.
 12 A. In contact with the ground, yes.
 13 Q. And, again, if we go to the body graphic, we have the
 14 image of the left side of distribution of injuries?
 15 A. Yes.
 16 Q. And so it seems as though it's your opinion that it's
 17 likely that the serious head injuries were caused by
 18 that impact onto the pavement?
 19 A. Yes, I agree.
 20 Q. And I'm not sure if you are aware, but there was no DNA
 21 material on the car or other evidence to suggest any
 22 significant head impact on the car.
 23 A. That would support that interpretation, thank you.
 24 Q. Thank you. You've described the gravity of that head
 25 injury. We heard that there came a time when the

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1 paramedic who was treating him noted that on the heart
 2 monitor he flatlined, in other words, we got to a stage
 3 where the reading dropped.
 4 A. Yes.
 5 Q. And we reached pulseless electrical activity, and we
 6 heard that although ordinarily chest compressions would
 7 then be carried out, because the paramedic was treating
 8 the incident as a major incident, different procedures
 9 were then followed and no chest compressions were
 10 commenced.
 11 If that had been done, might it have made
 12 a difference?
 13 A. I don't think so, and the reason I say that is because
 14 of the severity of the external trauma to the head, the
 15 presence of numerous fractures to the facial skeleton
 16 and the skull, and also the traumatic brain injury.
 17 Q. And so whatever would have been done, your view is that
 18 the injury, the head injury, was unsurvivable?
 19 A. That is my view.
 20 MR PATTERSON: Dr Poole, thank you for your help.
 21 MR HOUGH: Dr Poole, thank you very much. No further
 22 questions from me or from anyone else. Thank you for
 23 your evidence.
 24 THE CHIEF CORONER: Thank you very much, Dr Poole.
 25 A. Thank you.

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1 MR HOUGH: Before I call Dr Fegan--Earl, may I just check
 2 that the screens are working?
 3 A. Certainly my screen is now back working. What I might
 4 do is just to ask the operator to put a document on the
 5 screen just to check that actually the --
 6 MR HOUGH: If we put on AV00 --
 7 THE CHIEF CORONER: I think we've got a test. So that's
 8 working. That's good, thank you.
 9 MR HOUGH: In that case, may we call Dr Fegan--Earl.
 10 DR ASHLEY FEGAN--EARL (Sworn)
 11 Examination by MR HOUGH QC
 12 MR HOUGH: Dr Fegan--Earl, you may sit or stand when giving
 13 your evidence as you are comfortable.
 14 A. Pathologists all stand, thank you.
 15 Q. Would you give your full name for the court.
 16 A. Ashley William Fegan--Earl.
 17 Q. Are you by profession a consultant forensic pathologist?
 18 A. Yes.
 19 Q. Could you please very briefly give your qualifications?
 20 A. I hold the degrees of bachelor of science, bachelor of
 21 medicine, bachelor of surgery, a diploma in medical
 22 jurisprudence, I am a fellow of the Royal College of
 23 Pathologists and a fellow of the Faculty of Forensic and
 24 Legal Medicine of the Royal College of Physicians.
 25 Q. Dr Fegan--Earl, did you perform post mortem examinations

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1 on three of the victims of the Westminster Terror
 2 Attack?
 3 A. I did, yes.
 4 Q. Those are, I think, Leslie Rhodes, Aysha Frade and
 5 Andreea Cristea?
 6 A. Yes.
 7 Q. You made reports on all of those and you may refer to
 8 them as you wish.
 9 A. Thank you.
 10 Q. I'm going to ask you about each of them separately, and
 11 then after I have asked you questions about each one,
 12 I will sit down and let Mr Patterson and anyone else ask
 13 you follow-up questions.
 14 A. Yes, of course.
 15 Q. And in each case as we come to the individual, once
 16 again, the evidence will necessarily include some
 17 graphic details of injuries, and families may wish to
 18 leave.
 19 If we can then begin with Mr Rhodes and your report
 20 on him. Were you given information, Dr Fegan--Earl, that
 21 Mr Rhodes had been struck by a vehicle in the course of
 22 the attack and taken to hospital where, despite
 23 treatment, he had very sadly died?
 24 A. Yes.
 25 Q. First of all, may we consider your external examination,

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1 and for that purpose, look at some body maps which were
 2 prepared once again with a stylised image to show the
 3 location of the injuries .
 4 A. Yes.
 5 Q. {AV0088/1} is the cover page, and as we go through these
 6 pages, Dr Fegan—Earl, can you point to and explain the
 7 principal injuries , or just say that we are seeing only
 8 minor abrasions —
 9 A. Yes, of course.
 10 Q. — and injuries of that kind. So next page, please
 11 {AV0088/2}. That's an overview page. And {AV0088/3}.
 12 A. This is an important image here. We see at number 1,
 13 an injury complex which comprises reddening, bruising
 14 and laceration — that is tearing of the scalp. It also
 15 shows evidence there of some of the medical treatment
 16 with the injury having been stitched. So that's a major
 17 tear associated with a skull fracture beneath, so
 18 central to this gentleman's cause of death.
 19 Q. You describe it in your report as a full thickness
 20 laceration which was a gaping wound and very deep?
 21 A. It was. So full thickness meaning it had passed through
 22 all of the different layers of the scalp and down to the
 23 skull .
 24 Q. Next page, please. {AV0088/4}
 25 A. So here we see further evidence of impact to the back of

1 the head with further reddening, bruising and laceration
 2 you can see in the centre.
 3 Q. So that's a second head injury —
 4 A. Yes, it is .
 5 Q. — or area of injury to the head?
 6 A. Yes.
 7 Q. Next page, please {AV0088/5}.
 8 A. These are various bruises and grazes around the ear.
 9 The most important feature there is that you can see
 10 blood in the ear itself , which is highly suggestive of
 11 major skull fracture .
 12 Q. Next page, please. {AV0088/6}.
 13 A. So a slightly different view revealing the extent of the
 14 injury to Mr Rhodes' head. So we're looking further
 15 forward now and we can see that reddening extending
 16 forward from the major injury to the side of the head
 17 down to the top of the right eyebrow.
 18 Q. Next page, please. {AV0088/7}.
 19 A. We see here black eyes, as you can see. This is in part
 20 due to fracturing at the base of the skull rather than
 21 direct impact itself , though it's a complication of the
 22 skull fractures that we will come on to discuss .
 23 Q. And page 7 {AV0088/8}.
 24 A. A number of minor scuffs around, so consistent with head
 25 injury , head impact where the gravest injuries lie .

1 Q. Page 9. {AV0088/9}.
 2 A. So left —sided black eye, bruising to the left ear and
 3 further bruising and grazing over the left side of the
 4 nose.
 5 Q. Page 10. {AV0088/10}.
 6 A. Moving away from the head and neck region now, bruising
 7 to the back, we're looking at the back there of the left
 8 leg, bruising to the back of the thigh and just beneath
 9 the knee joint .
 10 Q. Page 11. {AV0088/11}.
 11 A. Looking at his big toe, left —hand side, bruising and
 12 scuffing to that area.
 13 Q. Page 12. {AV0088/12}.
 14 A. A further area of heavy grazing over the front of the
 15 left knee.
 16 Q. Page 13. {AV0088/13}.
 17 A. Grazing over the outer part of the left hip.
 18 Q. Page 14. {AV0088/14}.
 19 A. Grazing over the outer part of the right hip and
 20 buttock.
 21 Q. Page 15. {AV0088/15}.
 22 A. Now moving to the right outer part of the right knee
 23 with further heavy areas of grazing over the knee joint .
 24 Q. Page 16. {AV0088/16}.
 25 A. Significant bruising overlying the outer part of the

1 lower right limb, which my subsequent examination
 2 demonstrated was associated with fractures of the bones
 3 of the leg, so instability around the right ankle joint .
 4 Q. Page 17. {AV0088/17}.
 5 A. Yes, so highlight there, so instability of the fibula
 6 and tibia , which are the two bones in the lower limb,
 7 and you see the displacement in the inset .
 8 Q. Page 18. {AV0088/18}.
 9 A. This demonstrates bruising and laceration , so a further
 10 tear in the skin surrounding the elbow joint and
 11 extending onto the forearm.
 12 Q. Page 19. {AV0088/19}.
 13 A. Bruising and grazing to the knuckles and the joints of
 14 the fingers, the ring and little fingers on the right
 15 hand.
 16 Q. 20. {AV0088/20}.
 17 A. A similar type of bruising and grazing, backs of the
 18 knuckles left hand, back of the hand and the lower left
 19 forearm.
 20 Q. 21. {AV0088/21}.
 21 A. Moving internally now, you will recall that there was
 22 a major laceration to the scalp. Beneath it is a muscle
 23 known as the temporalis muscle, the muscle you can feel
 24 when you open and close your mouth, that was heavily
 25 bruised and crushed, so again, confirming heavy and

1 significant impact to that region.
 2 Q. These are findings you made from your internal
 3 examination?
 4 A. These are all from the internal examination.
 5 Q. Page 22. {AV0088/22}.
 6 A. Bruising on the undersurface of the scalp there in
 7 relation to an injury that we've already seen externally
 8 on the back left –hand side of the head.
 9 Q. 23. {AV0088/23}.
 10 A. So we're now moving down a layer to the skull where we
 11 can see fracturing of the skull to the right parietal
 12 region, which is the side of the skull. You can see it
 13 highlighted there as a vaguely spherical and depressed
 14 fracture, so in other words, there has been an impact
 15 and part of the bone has been pushed inward, so a
 16 significant skull fracture once again in direct relation
 17 to the major injury to the right side of the gentleman's
 18 scalp.
 19 Q. 24. {AV0088/24}.
 20 A. The fracture has then extended downwards towards the
 21 base of the skull, pterion being part of the side of the
 22 skull itself.
 23 Q. 25. {AV0088/25}.
 24 A. We're now looking at an inside view of the base of the
 25 skull. There was a complex skull base fracture. The

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1 anatomy does not matter, the most important thing to
 2 understand is that the fracture passing across the
 3 middle cranial fossa, which is the middle section of the
 4 skull, would have been responsible for the bleeding that
 5 was seen at the ear. So confirming that initial
 6 observation of skull base fracture.
 7 Q. 26. {AV0088/26}.
 8 A. So fractures here of the zygomatic arches, which are the
 9 cheekbones. Fracture of the orbital wall, the right eye
 10 socket and the greater wing of the sphenoid which is one
 11 of the bones that make up the floor of the skull so
 12 really highlighting fractures not only of the skull but
 13 also of the facial skeleton.
 14 Q. Page 27. {AV0088/27}.
 15 A. This shows the kidneys. There was a perinephric
 16 haematoma, which, as the brackets explains, bleeding
 17 around the kidney itself.
 18 Q. Further findings from your internal examination?
 19 A. Yes, this is all internal now.
 20 Q. And page 28 {AV0088/28}, finally.
 21 A. As we've already seen, fractures of the fibula, the thin
 22 bone in the lower leg, and fracture to the tibia, which
 23 is the thicker bone, and instability of the right ankle
 24 joint.
 25 Q. We can take that down. So, in summary, very extensive

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1 and complex fracturing of the skull --
 2 A. Yes.
 3 Q. -- with associated injury to the brain with it?
 4 A. Yes, it was, yes.
 5 Q. In addition to that, fracturing to the lower limb?
 6 A. Yes.
 7 Q. And, as you've described, also internal injuries to the
 8 kidneys.
 9 A. To the kidney, yes.
 10 Q. Were there any other significant findings in your
 11 external or internal examinations?
 12 A. No, the most significant findings were undoubtedly those
 13 to the head and the brain, and additionally those to the
 14 right lower limb. There was no significant natural
 15 disease of relevance.
 16 Q. In the course of your work, I think you considered
 17 Mr Rhodes' medical notes and witness statements
 18 concerning his condition after the injury?
 19 A. I did, yes.
 20 Q. You also, I think, received neuropathology reports from
 21 Professor Al-Sarraj.
 22 A. Yes.
 23 Q. Dealing specifically with the traumatic brain injury?
 24 A. Yes, indeed.
 25 Q. Based on all that information, what principal

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1 conclusions did you reach?
 2 A. Having been provided with all of the additional
 3 information mentioned, I came to a number of
 4 conclusions. Firstly, Mr Rhodes was a well nourished
 5 elderly gentleman who showed no natural disease that
 6 could either have caused or could have contributed to
 7 his death. In my opinion, he died as a consequence of
 8 an act of violence.
 9 The external examination showed features of impact
 10 to an upright individual, probably to the right –hand
 11 side of the body. I make reference there to the
 12 injuries to his right lower limb with fractures and
 13 instability of the ankle joint, and the significant head
 14 injury to the right –hand side.
 15 There were no definitive features to indicate that
 16 he was actually run over.
 17 Next, he suffered a devastating head injury to the
 18 right side of the head. There was a somewhat rounded
 19 fracture, which may be relevant to impact against
 20 a patterned object. That could either be by impact
 21 against the vehicle, or as a result of his projection
 22 onto the road. I understand that there are witness
 23 statements that may support him being thrown hard
 24 against the road.
 25 He also suffered from bruising to the brain, caused

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1 by a moving head striking the ground. The injury was
2 devastating, unsurvivable, and in my opinion, it would
3 have rendered him deeply unconscious straightaway.

4 Professor Al-Sarraj found evidence of a particular
5 type of brain injury known as diffuse axonal injury.
6 That refers to shearing of nerve fibres caused by
7 violent application of force, it is graded out of three,
8 three being the most severe: this gentleman suffered
9 grade three diffuse axonal injury. That further
10 confirms my view both as to the unsurvivability of this
11 injury and the fact that he would have been rendered
12 immediately and deeply unconscious.

13 Various other injuries upon his body are consistent
14 with road contact, and the most relevant of those being
15 impact injury to the lower right leg.

16 There was no issue with the medical treatment that
17 he received, and the formal cause of death was given as
18 1(a), head injury.

19 Q. Thank you, doctor. You've indicated that the injuries
20 to the right side of Mr Rhodes, and particularly to his
21 lower limb, suggest that those injuries were caused by
22 the impact from the vehicle; is that right?

23 A. Yes.

24 Q. You're aware that after being impacted by the vehicle,
25 Mr Rhodes was thrown onto the road and carried forward

25

1 some distance?

2 A. Indeed, yes.

3 Q. And it's your view that he may have received a head
4 injury during that series of movements?

5 A. I think there is a combination of head injury in part
6 caused by primary impact with the vehicle, but
7 exacerbated by his subsequent projection onto
8 the roadway.

9 Q. I think in your conclusion number 4, you refer to signs
10 of injury to the brain suggesting that it was moved from
11 side to side within the skull?

12 A. Absolutely, and we see that when a head stops suddenly,
13 so if he was hit and then thrown onto the roadway, his
14 head would stop suddenly, and that can cause
15 a particular pattern of bruising that was identified.

16 Q. Doctor, a question has been raised about whether it
17 would have been possible to transport Mr Rhodes to
18 hospital more quickly, for example, through the actions
19 of HEMS.

20 A. Yes.

21 Q. Setting to one side whether that would have been
22 practicable, in your opinion, and as a matter of
23 probability, could or would Mr Rhodes have survived if
24 he had either been transported to hospital earlier or
25 received earlier medical intervention that would have

26

1 been in any way possible?

2 A. Taking into account the results of the neuropathology
3 examination, in my opinion, no.

4 MR HOUGH: Thank you, doctor. If you would wait there,
5 there will be some more questions.

6 Examination by MR PATTERSON QC

7 MR PATTERSON: Dr Fegan—Earl, I ask questions on behalf of
8 the family of Leslie Rhodes.

9 A. Yes.

10 Q. I don't know whether you have had an opportunity to see
11 the video evidence of the moments of impact in relation
12 to Mr Rhodes?

13 A. I have been provided with some of that footage, yes.

14 Q. And we know that the injuries that he suffered arose not
15 only of the initial impact from the car?

16 A. Yes.

17 Q. And secondly, the being propelled forward some
18 significant distance, but also, ultimately, being
19 overrun by the car, and I don't know if you're aware of
20 DNA findings underneath the car?

21 A. Yes.

22 Q. You've described the shearing effect on the brain, where
23 it's held in situ within the skull?

24 A. Yes.

25 Q. Is the problem caused by the swift acceleration and then

27

1 the immediate deceleration when a casualty in that sort
2 of situation comes to rest suddenly on the road, for
3 example?

4 A. Yes, the sheer energy of being initially accelerated and
5 then very suddenly decelerated to a halt is particularly
6 damaging to the brain, its rotation, its acceleration,
7 and this causes the shearing of the nerve fibres, the
8 diffuse axonal injury.

9 Q. You've described the gravity of the head injury in
10 particular —

11 A. Yes.

12 Q. — and what Professor Al-Sarraj found. We've heard from
13 Dr Lloyd, a specialist who happened to be passing by,
14 about how although he wasn't breathing initially, with
15 some jaw thrust manoeuvres that he described, he was
16 able to get some breathing started again, but he
17 explained that he was unconscious throughout, and we
18 know that although he received treatment at King's
19 College Hospital, sadly he died the next day, despite
20 all their efforts.

21 I think your view is that he would have been deeply
22 unconscious from the very start?

23 A. That is my view, yes, absolutely.

24 Q. And so from the family's perspective, is one thing that
25 we can say that Leslie would have suffered little or no

28

1 conscious pain or suffering?
 2 A. I say that without doubt in my mind.
 3 MR PATTERSON: Thank you very much.
 4 Examination by MR HOUGH QC
 5 MR HOUGH: Doctor, I now turn to your examination report on
 6 Aysha Frade. Once again, it's inevitable that we will
 7 be looking at some distressing, albeit stylised images.
 8 A. Yes.
 9 Q. And discussing injuries in reasonably graphic terms, and
 10 I make that clear for the benefit of the family, should
 11 anyone wish to leave.
 12 Doctor, were you informed before your examination of
 13 the mechanism of the injury, namely that Aysha had been
 14 struck by a vehicle, thrown into the air, and projected
 15 onto the wheels of a bus where she had suffered
 16 a catastrophic head injury?
 17 A. Yes.
 18 Q. Once again, may we look at the principal external and
 19 other injuries from your examination using the body
 20 maps, {AV0087/2}.
 21 So this is an overview set of images. I don't know
 22 whether you wish to comment by reference to this, or go
 23 through them --
 24 A. Simply to indicate that we have significant head
 25 injuries and then a further distribution of injuries

29

1 over the body, but highlighting, once again, injuries to
 2 the lower limbs.
 3 Q. And next page, please {AV0087/3}.
 4 A. So here we have evidence of scuffing and bruising
 5 passing up a significant part of the back of the leg.
 6 Q. Next, please {AV0087/4}.
 7 A. Bruising, grazing around the right ankle joint.
 8 Q. Page 5. {AV0087/5}.
 9 A. Grazing and bruising to the knee.
 10 Q. Page 6. {AV0087/6}.
 11 A. So further bruising to the foot and the lower parts of
 12 the right lower limb.
 13 Q. Page 7. {AV0087/7}.
 14 A. Then going higher, further bruising and injury to the
 15 outer part of the right thigh.
 16 Q. Page 8. {AV0087/8}.
 17 A. More of an overview, and now showing the back of the
 18 left leg with a split in the back of the knee.
 19 Q. Page 9. {AV0087/9}.
 20 A. Various scuffing types of grazing, particularly
 21 injury 10, as you see there, to the buttock and to the
 22 outer part of the left hip.
 23 Q. Page 10. {AV0087/10}.
 24 A. Instability of the elbow joint with associated bruising
 25 on the back of the left arm and also further higher up,

30

1 number 14, instability of the left shoulder joint.
 2 Q. Page 11. {AV0087/11}.
 3 A. Looking at the inner aspect of the left hand, bruising
 4 and grazing there.
 5 Q. Page 12. {AV0087/12}.
 6 A. And on the back of the hand, further bruising.
 7 Q. Page 13. {AV0087/13}.
 8 A. A band of bruising over the left upper chest and passing
 9 around the collar bones.
 10 Q. Page 14. {AV0087/14}.
 11 A. Extensive bruising to the lower part of the right side
 12 of the chest wall and extending onto the abdomen.
 13 Q. Page 15. {AV0087/15}.
 14 A. And a further view around from that, further scuffing.
 15 Q. Page 16. {AV0087/16}.
 16 A. And a view on the back, bruising and grazing occupying
 17 the majority of the back.
 18 Q. Page 17. {AV0087/17}, now focusing on the head?
 19 A. Yes, essentially showing a number of grazes around the
 20 face but, most critically, a catastrophic head injury.
 21 Q. That's to the upper part of the skull?
 22 A. To the upper part of the scalp, so the top of the skull,
 23 so a devastating and unsurvivable head injury associated
 24 there.
 25 Q. Page 18. {AV0087/18}.

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1 A. A further view there to the left-hand side confirming
 2 the gravity of the head injury with further bruising and
 3 grazing to the left jaw, back of the neck and ear, and
 4 a fracture of the left side of the jaw.
 5 Q. Page 19. {AV0087/19}, now looking to your internal
 6 examination?
 7 A. Yes, we do, showing some of the injuries to the skeleton
 8 now. There were multiple fractures to the bones of the
 9 face, fractures across the base of the skull, and
 10 a major crushing injury to the top of the skull.
 11 Q. Page 20. {AV0087/20}. Now the cardiovascular system.
 12 A. This shows an image showing that the heart had torn away
 13 from the major blood vessel and had been pushed down
 14 into the abdominal cavity. It's a devastating injury in
 15 itself.
 16 Q. Page 21. {AV0087/21}.
 17 A. This demonstrates a series of fractures passing down the
 18 ribs, and we see the location there, there were
 19 fractures to both right and left sided ribs.
 20 Q. Page 22. {AV0087/22}.
 21 A. So we're seeing a rearward view here, demonstrating that
 22 there were fractures not only to the front of the chest
 23 cage but also to the back of the chest cage, which is
 24 commonly seen in compression-type injuries.
 25 Q. And I think an injury to the vertebra as well?

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1 A. An injury to the seventh vertebra there, yes, which was
 2 disrupted very significantly. It's an injury to
 3 a substantial area of bone which requires significant
 4 force.
 5 Q. And page 23 finally. {AV0087/23}.
 6 A. Looking at the front there, the bones of the left lower
 7 limb, significant fractures to both of the lower limb
 8 bones, together with crushing of the fat, consistent
 9 with significant impact in that region.
 10 Q. So in summary, doctor, is this right: a devastating head
 11 injury?
 12 A. Yes.
 13 Q. An injury to the trunk, including associated fractures,
 14 and devastating internal injuries?
 15 A. Yes.
 16 Q. And also injuries and fractures to the lower limbs of
 17 the legs?
 18 A. Yes.
 19 Q. We can take that off the screen now.
 20 Did you also view CT scans and consider
 21 neuropathology?
 22 A. I did, indeed. No, not neuropathology, not in this
 23 case, no.
 24 Q. Did you consider medical notes kept by those who had
 25 given evidence?

33

1 A. Yes.
 2 Q. Did you reach, on the basis of all that information,
 3 a series of conclusions?
 4 A. I did, yes.
 5 Q. Could you run through the principal conclusions?
 6 A. Of course. Mrs Frade was a well nourished lady who
 7 showed no natural disease that could have caused or
 8 contributed to her death. She too has died as
 9 a consequence of an act of violence.
 10 My examination demonstrated multiple injuries and it
 11 can be stated that death would have been near
 12 instantaneous and, in my opinion, without suffering.
 13 The most crucial injuries are crush injuries to the
 14 head, which are entirely consistent with her having been
 15 projected beneath the wheels of the bus.
 16 Having considered the findings of my examination and
 17 the CCTV evidence, there are features in keeping with
 18 primary impact to an upright individual, probably to the
 19 left side, given the fracture patterns to the left lower
 20 leg. That has caused her to be violently projected,
 21 ultimately, beneath the wheels of a bus.
 22 While it is not possible to state definitively
 23 whether she would have suffered fatal injuries from the
 24 impact alone, because I cannot conduct neuropathology,
 25 it is, however, my view that there is a distinct chance

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1 of fatality given, first of all, the speed of the
 2 vehicle that I have viewed myself, and comparing that
 3 type of impact with my experience with other road
 4 traffic collisions which have proved fatal without, of
 5 course, that subsequent projection beneath the bus.
 6 My understanding is that there is evidence of
 7 identified contact with the vehicle in question to the
 8 offside windscreen confirming that there would have been
 9 primary impact of her head against the windscreen.
 10 The formal cause of death was given as 1(a) head and
 11 chest injuries.
 12 Q. So it was your conclusion that death was instantaneous
 13 so Aysha did not suffer?
 14 A. That is my view.
 15 Q. You aren't able to say for certain whether she would
 16 have died had she not been thrown under the bus?
 17 A. I have a very high suspicion that would be the case.
 18 I don't have the benefit of neuropathology, but I have
 19 certainly encountered many examples of similar impacts
 20 which have caused rapid fatalities.
 21 Q. Now, it's been said by a number of witnesses that it was
 22 obvious on the most cursory view of Aysha's head injury
 23 as she lay under the bus that she was dead. Is that
 24 likely to be correct?
 25 A. That is true, without doubt.

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1 MR HOUGH: Thank you, doctor, if you will wait there.
 2 Examination by MR PATTERSON QC
 3 MR PATTERSON: Dr Fegan—Earl, could I have your assistance,
 4 please, on behalf of the family of Aysha Frade?
 5 A. Yes, of course.
 6 Q. You've indicated that you have studied the CCTV footage.
 7 A. Yes.
 8 Q. And we've had assistance from Detective Constable
 9 Osland, who has studied it carefully.
 10 A. Yes.
 11 Q. And we know that in the moments before impact, Aysha was
 12 studying her phone, which was in her hand visible on the
 13 footage —
 14 A. Yes.
 15 Q. — and appeared to be completely unaware of what was
 16 about to occur?
 17 A. That's my interpretation, having viewed it myself, yes.
 18 Q. And we know from the footage that we had the initial
 19 impact, and you've referred to the left lower leg
 20 fractures.
 21 A. Yes.
 22 Q. It's likely that her head pivoted towards the
 23 windscreen, and you've referred to the DNA finding on
 24 the windscreen?
 25 A. Yes, that's an important finding in the overall

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1 consideration.
 2 Q. And in particular, that it was DNA found from her hair?
 3 A. Yes, quite.
 4 Q. And so help me, please, with your experience of road
 5 traffic accidents, that initial first impact from the
 6 car travelling at speed would have been a significant
 7 impact to the head; is that correct?
 8 A. Extremely significant by virtue of the fact that there
 9 is definitive evidence of projection against the
 10 windscreen and we must remember that there's not just
 11 one impact, there is a secondary impact when she's
 12 projected to the ground.
 13 Q. On that secondary impact when she landed on the ground,
 14 we know from the footage that that was just one second
 15 after the windscreen impact?
 16 A. Yes.
 17 Q. Would she have been rendered unconscious immediately?
 18 A. In my opinion, without doubt, given the velocity of the
 19 vehicle, given the fact there were two impacts, that is
 20 without doubt my opinion.
 21 Q. And if we focus on those two early impacts, the
 22 windscreen and onto the road, the hard surface of
 23 the road, even if there hadn't been the final injuries
 24 caused by the bus, the crushing injuries, even if that
 25 hadn't happened, the effects of those two earlier

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1 impacts by themselves may well have been unsurvivable;
 2 is that your opinion?
 3 A. Certainly that's from my experience of very similar road
 4 traffic collisions where there is restriction to the
 5 head striking the windscreen and projection onto
 6 the road, yes, I've dealt with many such fatalities.
 7 MR PATTERSON: Thank you very much for your help.
 8 Examination by MR HOUGH QC
 9 MR HOUGH: May we finally move to your examination of and
 10 report on Andreea Cristea.
 11 A. Yes.
 12 Q. Once again, your evidence will necessarily go into
 13 graphic matters.
 14 Were you given information before you conducted your
 15 examination that Andreea had been struck by a vehicle,
 16 thrown over the balustrade into the Thames, and later
 17 recovered from there?
 18 A. And I was provided with CCTV to that effect, yes.
 19 Q. Were you informed that she had been found face-down in
 20 the water before being recovered?
 21 A. Yes.
 22 Q. Were you informed that she had suffered a head injury
 23 and had been taken to hospital where, despite advanced
 24 treatment, she died on 6 April?
 25 A. Yes.

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1 Q. Once again, may we look at the body maps and identify
 2 your principal findings on examination, {AV0085/2}.
 3 First of all, an overview image. Is there anything
 4 you would like to identify by reference to?
 5 A. Again, there is evidence here of head injury and also
 6 lower limb injury, which is a commonality that we've
 7 seen with all of the victims.
 8 Q. And, indeed, I think a common injury in those who have
 9 been struck by a vehicle because it naturally connects
 10 against their lower person?
 11 A. Indeed, if one thinks of the height of vehicles, the
 12 lower limbs are in particular at risk of significant
 13 damage on primary impact.
 14 Q. And next page, page 3 please, {AV0085/3}, we are now
 15 looking at the head and neck?
 16 A. We see here double black eyes, not from direct injury
 17 but as a consequence of major fractures to the base of
 18 the skull.
 19 Q. And do we see also sign of an injury on the left side of
 20 the --
 21 A. Yes, on the left side a laceration which had been
 22 stitched, so a split in the skin, so once again, primary
 23 evidence of an impact of significance to this region.
 24 Q. Page 4, please. {AV0085/4}. Focusing on that injury.
 25 A. Shows detail of that injury, yes.

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1 Q. Page 5. {AV0085/5}.
 2 A. Bruising to the back of the hand and wrist.
 3 Q. Page 6. {AV0085/6}.
 4 A. This refers to the fact that the skin of the hand was
 5 coming away, it results from a consequence of placing of
 6 a drip. It's not a significant contributor to the
 7 death. It's a well recognised complication of placing
 8 certain drips.
 9 Q. Page 7, please. {AV0085/7}.
 10 A. Showing a degree of lack of oxygen to the fingers there.
 11 Q. Page 8. {AV0085/8}.
 12 A. Bruising, the outer left shoulder onto the upper arm.
 13 Q. Page 9. {AV0085/9}.
 14 A. Bruising to the front of the chest.
 15 Q. Page 10. {AV0085/10}.
 16 A. Then bruising at the top of the pelvis, passing across
 17 the lower part of the abdominal wall.
 18 Q. Page 11. {AV0085/11}.
 19 A. Moving towards the lower limbs, this is looking at the
 20 back of the legs, so bruising, grazing in the back of
 21 the right knee joint.
 22 Q. Page 12. {AV0085/12}.
 23 A. Looking at the front of the right lower leg, a series of
 24 bruises and grazes extending from the lower part of the
 25 shin up to and including the right knee.

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1 Q. Page 13. {AV0085/13}.
 2 A. Significant bruising surrounding the outer part of the
 3 left ankle.
 4 Q. Page 14. {AV0085/14}.
 5 A. Bruising just beneath the right buttock.
 6 Q. Page 15. {AV0085/15}.
 7 A. Further bruising with horizontal tearing to the outer
 8 part of the left thigh.
 9 Q. Page 16. {AV0085/16}.
 10 A. And further, more extensive bruising and grazing to that
 11 part of the limb, the outer part of the left lower
 12 leg -- upper leg, rather.
 13 Q. Page 17. {AV0085/17}.
 14 A. And further bruising on the front of the left shin,
 15 extending the whole length of that part.
 16 Q. Page 18. {AV0085/18}.
 17 A. Grazing which was healing at the top of the left hip
 18 crest.
 19 Q. And finally page 19. {AV0085/19}. Your internal
 20 examination?
 21 A. Yes, an internal examination showing the skull. There
 22 was evidence of fractures passing across the base of the
 23 skull, including the front portion, which explains the
 24 black eyes that were present. The base of the skull is
 25 a very thickened area of bone and is therefore evidence

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1 of application of high levels of force.
 2 Q. We can take that off the screen now.
 3 Focusing a little further on your examination of the
 4 central nervous system, what were the principal injuries
 5 you detected, distinguishing between signs of injury and
 6 signs of surgery and other medical treatment?
 7 A. Yes, we need to be aware that this lady, surviving as
 8 she did for a period of time, had undergone
 9 neurosurgery, including the opening of the skull to
 10 evacuate a collection of blood. There was bruising to
 11 the right side of the scalp, probably, in my view,
 12 a mixture of both injury and also the effects of the
 13 operation.
 14 We've seen evidence of the fractures passing across
 15 the base of the skull. When she was admitted to
 16 hospital she was found to have bleeding over the surface
 17 of the brain which necessitated an operation to remove
 18 that blood, and there remained patchy bleeding over the
 19 surface of the brain, which was later examined by
 20 Professor Al-Sarraj.
 21 Q. Were there any other significant findings in your
 22 internal examination? I'm looking in particular at your
 23 examination of the respiratory system?
 24 A. Yes, there was evidence of a pneumonia. Pneumonia is
 25 an extremely common terminal finding in patients who

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1 have suffered from a significant head injury. It may
 2 also -- she may also have been more vulnerable, given
 3 that she had been underwater and is, therefore, likely
 4 to have inhaled water into her airways, and given the
 5 various microbes present therein, you would be at
 6 increased risk of developing pneumonia.
 7 Q. Were there any other significant findings on internal
 8 examination?
 9 A. No, she was otherwise entirely fit and well at the time
 10 of the incident.
 11 Q. So the only injury to the bones was to the scalp?
 12 A. Yes.
 13 Q. Was to the skull? Did you have the benefit of a CT
 14 scan, and in this case, a report of Professor Al-Sarraj,
 15 the neuropathologist?
 16 A. Yes, the CT scan confirms the extensive fractures to the
 17 skull and also to the face and the jaw. The
 18 neuropathology confirmed a severe traumatic brain
 19 injury, this time amounting to diffuse axonal injury,
 20 which I've already discussed when we were considering
 21 Mr Rhodes. On this occasion, it is grade two diffuse
 22 axonal injury. So grade two out of a maximum three.
 23 Q. Again, when you refer to axonal injury, you're referring
 24 to damage to --
 25 A. The sheering of the nerve fibres that occurs when the

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1 brain is subjected to violent rotation, acceleration,
 2 and deceleration.
 3 Q. So while there were diffuse injuries over the body, the
 4 really serious injuries were all to the head?
 5 A. Yes.
 6 Q. You, I think, had the benefit of reviewing in writing
 7 the evidence of the doctors who have given evidence to
 8 us, Dr Sadek and Dr Bastin among others?
 9 A. Yes, I did.
 10 Q. Based on all that information, did you reach a number of
 11 conclusions?
 12 A. I did, yes.
 13 Q. Can you run through the principal ones?
 14 A. Yes, of course. I found that Ms Cristea was a well
 15 nourished lady showing no evidence of any natural
 16 disease that could have caused or have contributed to
 17 her death. Despite her surviving for some days, it is
 18 my opinion that she has died as a direct consequence of
 19 an act of violence.
 20 She sustained serious head injuries, I say that
 21 based on the neuropathology, and review of the medical
 22 notes indicating bleeding requiring an operation, and
 23 also the finding of multiple skull fractures.
 24 In my view, the nature and extent of those brain
 25 injuries, in concert with that severe trauma to the

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1 bones, are most consistent with vehicular impact as
2 compared to, for example, a fall into the water. I do
3 not believe that a fall from a height into the water
4 would give rise to that gravity of skull injury.

5 In my view, it is highly likely that she would have
6 died irrespective of whether she had entered into the
7 River Thames when I compare the extent of her injuries
8 with those of other vehicular collisions of a similar
9 type.

10 Given the nature of that head injury, in my opinion
11 it would have rendered her unconscious, which in turn
12 would make her far more vulnerable once she was thrown
13 into the River Thames. In other words, in her
14 unconscious state, she would be incapable of attempting
15 to swim. She would therefore have been highly
16 vulnerable to inhalation of water, which has stopped her
17 breathing, and I take into account the finding of her
18 face-down in the river.

19 Nevertheless, attention at the scene restored her
20 circulation and she survived for some days. There are,
21 perhaps, two reasons for this: she was a young lady who
22 was fit and well prior to this incident, and that gives
23 her reserve. She has also had the benefit of extensive
24 and specialist medical and surgical treatment. There is
25 no error in that treatment, in my view, that has

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1 contributed to death in any way.

2 It's my view that the combination of prolonged
3 increases in intracranial pressure, so that's a raise of
4 pressure within the brain due to both injury and
5 collection of blood, in addition to the changes in the
6 lungs due to her immersion within the river, have
7 ultimately caused her major and important organs to
8 fail, and from which she has subsequently died. The
9 cause of death, then, was formally given as 1(a),
10 multiple organ failure due to 1(b) head injury
11 (operated) and immersion.

12 Q. Do we take it from your conclusion that Andreea suffered
13 a very serious head injury which made her instantly
14 unconscious?

15 A. Yes.

16 Q. And that she would not have suffered?

17 A. Correct.

18 Q. You have told us that it is likely, in your view, that
19 she would have died as a result of the primary impact,
20 irrespective of both the fall and her time in the water?

21 A. I compare her case with that of other cases of similar
22 type, many of which result in fatality, and if not
23 fatality, very significant degree of disability.

24 Q. We know that Andreea was in the water for around five
25 minutes, from around 14.40 to 14.45, and was lying

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1 face-down for most or all of that time.

2 Doctor, an issue has been raised as to whether she
3 could or would have survived if removed from the water
4 after a shorter time, say after two to three minutes.
5 Now, set aside whether that would have been reasonably
6 possible, in your opinion, is it probable that Andreea
7 would have survived had she been removed from the water
8 after such a time?

9 A. In my view, I suspect not, the reason being, she did not
10 simply fall into the water and become immersed; she
11 sustained a significant head injury from a vehicle
12 travelling at speed -- that's the first incident. The
13 second incident is that her projection up and over the
14 bridge has resulted in a significant fall from a height
15 before striking the water. So, in my view, there would
16 have been a very high chance that she would not have
17 survived this without either -- she might not have
18 survived it or, if she had, would have been
19 significantly disabled by the gravity of head injury
20 that she sustained.

21 Q. An issue has also been raised as to whether she could or
22 would have survived if she'd received intervention from
23 a more specialist team sooner. Once again, set to one
24 side whether that would have been possible. We know
25 that she received first aid from about 2.50 pm on board

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1 the fire boat, that she was at the jetty by about
2 3.00 pm, and she received treatment in an ambulance at
3 the scene, and that she was transported to hospital at
4 about 3.22 pm, arriving there at about 3.35 pm. Just to
5 ensure that you are fully informed, may we have on
6 screen {DC5257/1}, which is the patient report form, and
7 you will see in the middle of this form towards the
8 upper part of the page, a series of observations which
9 will be familiar to you, and which we have gone through,
10 first of all, taken at 15.03 when Andreea was at the
11 jetty, and then at 15.34, at around the time of her
12 arrival at hospital.

13 A. Yes.

14 Q. Now, with all that information, doctor, in your opinion,
15 is it probable that she would have survived if attended
16 to by a more specialist medical team at any point in the
17 sequence?

18 A. To an extent that's a clinical question. I would make
19 the observation that she was resuscitated and restored
20 to circulation, so there has been a successful element
21 to that resuscitation. I would have little doubt that
22 they have immediately provided her with a high
23 concentration of oxygen, and we can see that her oxygen
24 saturations, about third or fourth down in that middle
25 column, have gone from 93 per cent to 95 per cent,

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1 which, realistically is within normal limits.
 2 I do note that her Glasgow Coma Score, which is
 3 a score of how conscious, how reactive she is, remains,
 4 if I total those up, at 15.03, it's 4, 2 and 3, so 9,
 5 and then 3, 3 and 1, so 7. This indicates a significant
 6 degree of unconsciousness. I have the benefit of
 7 knowing the neuropathology showing that high degree of
 8 diffuse axonal injury.

9 It's difficult to see what more could be done that
 10 would have a significantly different outcome, in my
 11 view.

12 MR HOUGH: Thank you very much, doctor.

13 Examination by MR PATTERSON QC

14 MR PATTERSON: Dr Fegan—Earl, on behalf of the family of
 15 Andreea, may I have your assistance with one or two
 16 points.

17 First of all, I think you, as you always do at the
 18 beginning of one of your post mortem examinations, took
 19 a measurement of her height and her weight?

20 A. Yes.

21 Q. Help with that, please?

22 A. She was 1.65 metres, that's 5 foot 5 inches in height,
 23 and she weighed 74 kilograms, that's 11 stone and
 24 9 pounds.

25 Q. Her family are keen to try to find out as much as they

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1 can about her position at the point of impact, in which
 2 direction she was facing. In terms of the external
 3 injuries that you found and what they might help us with
 4 in terms of her positioning, we know that there was that
 5 perhaps rather revealing horizontal injury that we saw
 6 to the outside of her left leg.

7 A. Yes.

8 Q. Perhaps if we could look on the screen, please, at one
 9 or two of these. There were a number to the front of
 10 her legs, weren't there?

11 A. There were. I think you are referring to injury 16.

12 Q. If we go, please, to page 11 on the screen. {AV0085/11}.
 13 And to page 12. {AV0085/12}. So the front shin area of
 14 the right lower leg; is that right?

15 A. Yes, it is.

16 Q. And the next page, please. {AV0085/13}. The left lower
 17 leg to the front and to the side; yes?

18 A. Yes, indeed.

19 Q. To the next page, please {AV0085/14}, to the next page
 20 {AV0085/15}. Yes, so the left leg, is that to the front
 21 and perhaps round slightly to the side?

22 A. To the side. So what you have demonstrated in that
 23 series of images is a lateralisation of predominance of
 24 injuries to her left—hand side.

25 Q. So overall consistent with, broadly speaking, face—on

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1 impact, would you say, or slightly to the side?

2 A. It's difficult to be precise because there is a wide
 3 distribution of injuries. Face—on to left side
 4 presenting to the front of the vehicle, I would suggest.

5 Q. So perhaps suggesting pointed slightly to the right on
 6 the bridge?

7 A. Yes.

8 Q. We know she was walking towards the south bank.

9 A. Yes.

10 Q. Perhaps facing and looking into the river or something
 11 of that sort?

12 A. Yes, I think that's plausible, yes.

13 Q. And we know that the significant injury to the head was
 14 above the left eye, to the forehead?

15 A. Yes, it was. Yes.

16 Q. The CCTV footage, and I think you've seen it; is that
 17 right?

18 A. I have.

19 Q. Detective Constable Osland helped us with that.

20 Although it's not that clear when you consider the
 21 footage such as it is, and also we've had evidence from
 22 an eyewitness, Mr Brown, that she went something like
 23 10 feet into the air —

24 A. Yes.

25 Q. — all of that suggests that there was a movement over

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1 the wall of the bridge without any suggestion of
 2 connecting with the wall of the bridge?

3 A. There is nothing that I have seen either from CCTV
 4 evidence or from my post mortem examination that would
 5 support a secondary impact with part of the bridge.

6 Q. All of which would suggest that the significant head
 7 impact is from the car, from the vehicle?

8 A. And the extent of projection into the air is a function
 9 of velocity and force applied.

10 Q. And you have helped us with the series of fractures to
 11 the skull, of the head?

12 A. Yes.

13 Q. The drop into the water is also of some significance, is
 14 it not? We've checked the distance, it's something like
 15 12.5 metres which, by our calculation, is 41 feet.

16 A. Yes.

17 Q. The relevance of that, please, is what?

18 A. It's a significant drop from a height. Water can be
 19 surprisingly unyielding. In my view, it would have
 20 provided for further significant deceleration of her
 21 brain in the skull and then potentially exacerbated the
 22 head injury that she had already received.

23 Q. Now, we know that for over a fortnight the team at the
 24 hospital did everything they could at the hospital for
 25 Andreea.

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1 A. Yes.
 2 Q. And you've read the medical evidence, I think, and you
 3 have no concerns over any of the treatment at the
 4 hospital; is that correct?
 5 A. I think that there was application of extremely advanced
 6 therapies to try and save her life, including a very
 7 advanced mechanism to try and enrich the oxygen supply
 8 to her tissues, but she has died despite that. I think
 9 everything that could be done was done.
 10 Q. Yes. The direct cause of death you have given as
 11 multiple organ failure.
 12 A. Yes.
 13 Q. And then at 1(b), which is the cause or — that was due
 14 to what? You've said the head injury and the immersion?
 15 A. Yes.
 16 Q. So the immersion did play a part in the ultimate death;
 17 is that right?
 18 A. I think one has to consider that in that certainly there
 19 was a devastating head injury, but for an individual to
 20 then be immersed into water, which compromises clearly
 21 the flow of oxygen to the tissues and most specifically
 22 the brain, it must therefore be seen as a significant
 23 causative factor when we take into account the totality
 24 of what has happened to her.
 25 Q. Now, there are two distinct areas that I would like your

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1 help with, please, if you can give it. First, what
 2 happened in the water. Now, as Mr Hough has indicated,
 3 and as I think you have been made aware, she was hooked
 4 by a boatman after something like 2 minutes, 18 seconds.
 5 A. Yes.
 6 Q. However, she remained face-down in the water until she
 7 was pushed in the water over to a lifeboat and then she
 8 was lifted out by members of — forgive me, a fire boat,
 9 and then lifted out by members of the fire boat. And
 10 very shortly afterwards she began breathing, and there
 11 were some signs of responses, albeit the reading some
 12 time later showed that her Glasgow Coma Scale reading
 13 was 9 and then 7, and you've drawn attention to that.
 14 A. Yes.
 15 Q. And she arrived at hospital at 15.35, so nearly an hour
 16 after entry into the water, which was at 14.40. So 55
 17 minutes.
 18 So that total period of immersion in the water of
 19 something over five minutes, as opposed to the
 20 possibility of removal from the water after 2 minutes
 21 and 18 seconds, is what I would like your help with. If
 22 she had been removed after only 2 minutes—odd, and given
 23 first aid and resuscitation, which we were told was
 24 available on the first of the two boats, we heard from
 25 Dr Sadek and Dr Bastin from the hospital that that

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1 certainly wouldn't have worsened her condition and, no
 2 doubt, you would agree with that?
 3 A. Yes, I would.
 4 Q. Both of those clinicians were unsure as to whether it
 5 would have made a difference. You've indicated that you
 6 suspect that it wouldn't have made a difference if she
 7 had been removed earlier rather than later?
 8 A. Yes.
 9 Q. But can you rule out the possibility that it might have
 10 made a difference?
 11 A. My view would be that she had already suffered
 12 a significant head injury, as shown by the grade two
 13 diffuse axonal injury. Brains like that will tend to
 14 swell, and there's not an operation one can do for
 15 diffuse axonal injury. The operation that was done was
 16 to remove a clot of blood on the surface of the brain,
 17 which was done successfully.
 18 I suppose one would have to say that, in addition,
 19 brains deprived of oxygen swell, therefore the quicker
 20 one could remove her from the water and supply her with
 21 oxygen, potentially that may alter the level of swelling
 22 that may have occurred, but it is, to a degree,
 23 speculative. Overall I suspect that she had already
 24 suffered very significant brain injury due to primary
 25 impact with the vehicle, and secondary impact against

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1 the water following a fall from a height.
 2 Q. So your opinion is that it's unlikely that she would
 3 have survived. Can you rule out the possibility that
 4 she might have survived?
 5 A. I can't rule it out, but I think perhaps the rider
 6 I should add is what neurological state she would have
 7 been left in, whether she would have been left with
 8 significant functions allowing her to live a normal
 9 life, and I don't think I can answer that further.
 10 Q. So there would have been question marks as to quality of
 11 life?
 12 A. Quite.
 13 Q. And then the second issue, and again, Mr Hough has
 14 touched upon this, the speed with which she received
 15 intervention. In a case of drowning, one of the
 16 problems, as you've touched upon already, is the lack of
 17 oxygen into the lungs and the deprivation of oxygen to
 18 the brain; is that right?
 19 A. Yes.
 20 Q. And we've heard about the significant procedures that
 21 experienced air ambulance doctors can provide at the
 22 scene, which can include very early intubation and
 23 ventilation?
 24 A. Yes.
 25 Q. It didn't happen in this case, but if it had happened,

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1 if she had been intubated and ventilated at the scene
 2 before being driven to the hospital, again, the question
 3 that arises is, is it possible that she might have
 4 survived?
 5 A. I suppose one would have to know what it was that she
 6 was provided with in the absence of HEMS doctors,
 7 whether an airway was placed to provide her with oxygen.
 8 Q. She was provided with oxygen --
 9 A. Yes.
 10 Q. -- and there was an open airway, albeit that there were
 11 difficulties with vomiting --
 12 A. Yes.
 13 Q. -- and fluids and blood coming out of her airway.
 14 A. Again, we are moving to quite a clinical question.
 15 I would tend to expect that paramedics would suction the
 16 airway, put an airway in to facilitate breathing.
 17 Yes, the ideal, the gold standard, would be the
 18 placement of an intubation tube to secure the airway, to
 19 keep it safe from inhaling fluids and blood into the
 20 lungs. Whether that would have made a material
 21 difference, I suspect not. I can't be certain.
 22 Q. So, again, if I were to ask you the follow-up question:
 23 can you rule it out as a possibility that it would have
 24 resulted in survival, your opinion?
 25 A. I can't entirely rule it out, but I just make reference

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1 again to what level of disability she may have been left
 2 with had she survived.
 3 Q. Before we leave the topic of the air ambulance, I think
 4 given your extensive experience, you have seen, have
 5 you, the role that they play within this city, and the
 6 very real difference they can make, if they can get to
 7 the scene and assist casualties who have
 8 life-threatening injuries?
 9 A. Well, I can say that much of my work as a Home Office
 10 pathologist is in London. We will all be acutely aware
 11 of the numerous stabbings that occur on a daily basis.
 12 It is certainly the case that many of the individuals
 13 who would previously have died are now surviving. The
 14 result of that is, rather than doing post mortem
 15 examinations, we are now being asked to provide opinions
 16 in cases of attempted murder. So there is no doubt that
 17 the provision of early and expert care leads to survival
 18 of people who, even just a few short years ago, would
 19 have died at the scene.
 20 Q. We've heard about reference to the golden hour --
 21 A. Yes.
 22 Q. -- and the imperative of beginning procedures and
 23 interventions as soon as possible.
 24 A. Yes.
 25 Q. Would you echo those sorts of observations?

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1 A. Yes, it's a basic tenet that the faster expert medical
 2 and surgical support can be provided to a patient, the
 3 better their potential outcome. Much of this trickles
 4 down from military medicine, where you will even hear
 5 "platinum ten minutes" referred to. So refining that
 6 critical time for urgent treatment even further, so yes.
 7 Q. And no doubt, Dr Fegan-Earl, you would wish to encourage
 8 the continued good work and availability of assistance
 9 and intervention from the air ambulance service?
 10 A. Oh, of course. It undoubtedly makes a very significant
 11 difference over a very wide range of major trauma
 12 patients, ranging from falls from heights to stabbings
 13 to road traffic collisions, it is across the board.
 14 Q. And finally this: I've asked you about three specific
 15 post mortem examinations which you had the sad task to
 16 perform. All of these casualties and the various
 17 injuries that you have described this morning, would you
 18 agree that they show all too horrifically the
 19 significant nature of injuries that dangerous vehicles
 20 can cause?
 21 A. Without a shadow of a doubt. A vehicle driven at speed
 22 has weight, speed. The energy imparted to an individual
 23 who is hit is therefore tremendous.
 24 Q. So if a 4x4 like this Hyundai is deliberately used
 25 against the public as a weapon in busy public places,

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1 we've seen in these cases the range of serious injuries
 2 that can be caused?
 3 A. It is as lethal as a knife or a gun.
 4 Q. So again and again, you've described today the head
 5 injuries and the sheering of the nerve fibres to the
 6 brain?
 7 A. Yes.
 8 Q. Acceleration, deceleration effects.
 9 A. Yes.
 10 Q. Limbs propelling significant distances?
 11 A. Indeed.
 12 Q. And in one case, overrunning?
 13 A. Yes.
 14 MR PATTERSON: Thank you for your help.
 15 MR HOUGH: Those are all our questions for you,
 16 Dr Fegan-Earl. Thank you very much for giving evidence.
 17 A. Thank you.
 18 THE CHIEF CORONER: Thank you very much, Dr Fegan-Earl.
 19 Thank you. You are free to go.
 20 A. Thank you, sir.
 21 MR HOUGH: Sir, would that be a convenient moment for our
 22 mid-morning break?
 23 THE CHIEF CORONER: It certainly would, and I think,
 24 Mr Hough, we are then going to revert back to PC Ashby.
 25 MR HOUGH: Yes.

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1 THE CHIEF CORONER: I was simply going to say to Mr Adamson
2 and Ms Stevens, I appreciate there are two of you
3 representing different parts of the Palmer family.
4 I suspect that you have many questions in common. For
5 my part I don't -- I would sort of welcome you either
6 sharing the load between the two of you or, at least,
7 not covering the same ground twice. I just thought
8 I would say that at this stage because it may help in
9 terms of planning the questions that you inevitably both
10 have for him.
11 MR ADAMSON: If it's any comfort to you, Ms Stevens and
12 I had a discussion last night --
13 THE CHIEF CORONER: Yes.
14 MR ADAMSON: -- in which I set out the topics that
15 I anticipated I would cover, so I hope that we will
16 avoid repetition.
17 THE CHIEF CORONER: Thank you very much.
18 MS STEVENS: And, sir, if there's any reference to a point
19 that my learned friend has dealt with, it will simply be
20 to put the matter in context, but I will ensure that the
21 question that flows from that covers a different angle
22 or a different point.
23 THE CHIEF CORONER: Thank you very much.
24 (11.09 am)
25 (A short break)

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1 (11.27 am)
2 PC LEE ASHBY (Continued)
3 THE CHIEF CORONER: Yes.
4 Examination by MR ADAMSON
5 MR ADAMSON: Police Constable Ashby, my name is
6 Dominic Adamson and I ask questions on behalf of the
7 widow of PC Palmer.
8 A. Yes, sir.
9 Q. PC Ashby you gave evidence yesterday and you spoke about
10 the instructions that you had received in relation to
11 your patrols of the New Palace Yard, and you were taken
12 to a diagram which was affixed to a wall next to the
13 base room; is that right?
14 A. Yes, sir.
15 Q. And we remember the diagram, it shows a blue shaded area
16 which covers the totality of New Palace Yard, does it
17 not?
18 A. That's correct.
19 Q. You also told the court that you had been on permanent
20 detail as an authorised firearms officer at the
21 Palace of Westminster for six years or so; is that
22 correct?
23 A. That's correct, sir.
24 Q. And so throughout that period, you had been utilising
25 that plan, had you, as the nature and instructions that

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1 applied to you so far as the scope of your patrols were
2 concerned?
3 A. Not throughout the entire period, sir, but when sectors
4 came in, yes.
5 Q. When sectors came in, that was what you used?
6 A. Yes, sir.
7 Q. And so you weren't -- and you were very candid about
8 this -- you weren't considering the content of the post
9 instructions, and Mr Hough took you to two of those
10 yesterday?
11 A. That's correct.
12 Q. Yes. We're going to go back to the post instructions in
13 a moment, but just so far as the diagram is concerned,
14 is it right that you had on your possession a small
15 laminated copy of that diagram?
16 A. That's correct, sir.
17 Q. And we've had it checked. The date of the laminate
18 suggests that the plan was prepared on 25 July 2012;
19 does that sound about right to you?
20 A. It could be, sir, yes.
21 Q. And we've also looked at the diagram that was affixed to
22 the wall, and my understanding is that that was dated,
23 in the bottom right-hand corner, on 12 July 2012.
24 A. Okay, sir.
25 Q. So it would appear that there was some sort of amendment

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1 in the 13-day period.
2 A. Okay.
3 Q. And that was the plan that you were operating from that
4 day forward?
5 A. Yes, sir.
6 Q. And you carried that at all times, did you?
7 A. They were left on the table and we were instructed to
8 pick them up as an aide-memoire.
9 Q. Right. So from whatever date one moved to sector
10 patrols, those plans were freely available in the base
11 room to act as an aide-memoire when you were on duty?
12 A. That's correct, sir.
13 Q. And that continued right up until 22 March 2017?
14 A. Yes, sir.
15 Q. We saw some CCTV footage of your movements yesterday,
16 and, indeed, the movements of PC Sanders who you were on
17 duty with at the time of the attack.
18 A. Yes, sir.
19 Q. And the footage that we saw yesterday spanned a period
20 of about 108 minutes.
21 A. Okay, sir.
22 Q. You had, in fact only been on duty, on sector 3 duty,
23 for about 46 minutes prior to the attack?
24 A. Yes, sir.
25 Q. In that 46 minutes you had never been to the gates?

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1 A. That's correct, sir .
 2 Q. And in the earlier period, before you came on duty, we
 3 know that there were officers in the vicinity of the
 4 gates for about 14 minutes.
 5 A. Okay, sir .
 6 Q. Over a 108-minute period.
 7 A. Yes, sir .
 8 Q. That patrol, patrols of that nature, was that
 9 commonplace in your experience?
 10 A. I think, as I said before, sir, we were told that -- to
 11 be within the blue shaded area, to have freedom of
 12 movement, we could stop in locations, we could move to
 13 different locations, as long as we were in that area to
 14 respond.
 15 Q. So what we see on the CCTV footage would be typical of
 16 any day prior to 22 March?
 17 A. Absolutely.
 18 Q. And that would have been the arrangement for several
 19 years prior to 22 March; would you agree with that?
 20 A. That's exactly what we was instructed to do, sir .
 21 Q. So in a nutshell, your understanding of your
 22 instructions was that you had that large blue area on
 23 the map, on the plan --
 24 A. Yes.
 25 Q. -- that was your responsibility to cover, to patrol?

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1 A. Yes.
 2 Q. You had no particular responsibility to be at a specific
 3 location within that area?
 4 A. That's correct.
 5 Q. And that had been the arrangement for several years
 6 prior to this incident?
 7 A. Yes, sir .
 8 Q. Can I ask you to look at the post instruction for the
 9 time in question. If you could call up on the screen
 10 {DC8032/1}. Now, you can see in the top left-hand
 11 corner that it's modified on 14 December 2015; yes?
 12 A. Yes, sir .
 13 Q. And it relates, it would appear, on the right-hand side,
 14 to a tactical assessment performed in June 2015?
 15 A. Yes, sir .
 16 Q. Then there's information provided about the roles, and
 17 then over the page {DC8032/2} we have sector 3?
 18 A. Yes, sir .
 19 Q. Now, again, I'm conscious that your evidence yesterday
 20 was very clear: you had never seen this document prior
 21 to 22 March?
 22 A. That is correct, sir .
 23 Q. The wording of the instructions for sector 3 -- well,
 24 first of all, in relation to sector 3, it identifies
 25 sector 3 as "Carriage Gate"?

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1 A. That's what it says, sir, yes.
 2 Q. That's what it says.
 3 A. Yes.
 4 Q. Is that what you understood sector 3 to be?
 5 A. Absolutely not.
 6 Q. You understood sector 3 to be the entirety of
 7 New Palace Yard?
 8 A. Yes, sir .
 9 Q. So the post instruction, on your understanding of what
 10 your role was, misdescribes sector 3?
 11 A. Yes, sir .
 12 Q. Then the next line:
 13 "Officers are to work together, working within
 14 proximity of each other but not specifically as a pair."
 15 Now, you told Mr Hough yesterday that you always
 16 worked as a pair; is that right?
 17 A. Yes, sir .
 18 Q. So, again, in relation to the period prior to
 19 22 March 2017, the instruction "Officers are to work
 20 together, working within proximity of each other but not
 21 specifically as a pair", was not an instruction that you
 22 followed?
 23 A. That's quite correct.
 24 Q. It goes on to say:
 25 "Officers to be positioned in close proximity to the

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1 gates when they are open, but not outside."
 2 A. Yes, sir .
 3 Q. Now, we know that the gates, whilst the House is
 4 sitting, are open the whole time.
 5 A. Yes, sir .
 6 Q. And we know from the CCTV footage that you were not in
 7 close proximity to the gates on 22 March 2017, don't we?
 8 A. That's correct, sir .
 9 Q. So is it right that that is an instruction which you
 10 didn't follow on 22 March 2017?
 11 A. I was not instructed to be at the gates. I was
 12 instructed to be within the blue area on the map.
 13 Q. Yes. So if these were your instructions, which you are
 14 quite clear that they weren't --
 15 A. Yes.
 16 Q. -- you did not, as a matter of fact, follow them?
 17 A. That's correct.
 18 Q. And prior to 22 March 2017, it would be fair to say that
 19 you never followed those instructions either?
 20 A. That's quite correct.
 21 Q. Yes. So you were working in New Palace Yard from
 22 14 December 2015; is that correct?
 23 A. Yes, sir .
 24 Q. And between 14 December 2015 and 22 March, you,
 25 an experienced firearms officer, never complied,

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1 therefore, with these post instructions?
 2 A. No, I complied with the instructions that I was told as
 3 per the maps in the base room.
 4 Q. You were always operating off the blue map?
 5 A. Yes, sir.
 6 Q. It goes on to say:
 7 "Both officers are to be positioned in line of sight
 8 of each other with the ability to respond to Cromwell
 9 Green Entrance search point and should include a short
 10 patrol into New Palace Yard towards the exit point of
 11 the Cromwell Green search area."
 12 Is that an instruction that you were ever informed
 13 about so far as the nature and scope of your patrols
 14 were concerned?
 15 A. As part of sector 3 on the maps, we were informed that
 16 we had to go into Cromwell Green, it was part of our
 17 sector, so it could include us going into the Cromwell
 18 Green search point, because there was no firearms
 19 officers in that search point.
 20 Q. So from time to time you would, in fact, do what is set
 21 out in that second paragraph of the description of
 22 sector 3, Carriage Gates duties; yes?
 23 A. Yes, sir.
 24 Q. But that was not something that you were aware of as
 25 being a specific responsibility for you as a sector 3

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1 authorised firearms officer on patrol?
 2 A. Not as per the post notes on the screen.
 3 Q. The second half of that sentence, from "and should
 4 include a short patrol into New Palace Yard towards the
 5 exit point of the Cromwell Green search area", was
 6 an addition to the sector 3 post instructions notes as
 7 of 14 December 2015.
 8 A. Yes, sir.
 9 Q. Is it fair to say that prior to 14 December 2015, and
 10 after 14 December 2015, there was no difference between
 11 the nature of your patrols?
 12 A. Well, both the map and these post notes include
 13 Cromwell Green. So they were both included.
 14 Q. Yes. It was a long question, for which I apologise.
 15 The point that I'm trying to make is that
 16 before December 2015 --
 17 A. Yes.
 18 Q. -- you were carrying out your patrols as per the
 19 diagram?
 20 A. I believe so, sir, yes.
 21 Q. After December 2015, you were carrying out your patrols
 22 as per the diagram?
 23 A. Yes, sir.
 24 Q. So there was no change between the practice that you
 25 adopted in December 2015 and the date of the incident,

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1 or, indeed, the period prior to the post note
 2 of December 2015?
 3 A. That's correct, sir. As soon as the maps were put on
 4 the board and we were told to be within that blue area,
 5 that's what I performed.
 6 Q. Now, I would like to move back in time, if I may, to the
 7 post instruction for January 2015. That can be found at
 8 {WS5103/9}. Again, we can see, top left-hand corner,
 9 this is a document dated 16 January 2015; yes?
 10 A. Yes, sir.
 11 Q. And it's relating to a tactical assessment, seemingly
 12 in October 2014?
 13 A. Yes, sir.
 14 Q. And over the page {WS5103/10}, sector 3, and the
 15 description of sector 3 duties is identical to the one
 16 that we've just seen, save for the absence of that
 17 passage relating to the search area towards the
 18 Cromwell Green exit point.
 19 A. I can see that, sir, yes.
 20 Q. So, same questions in relation to this document, and
 21 I appreciate, again, this is a document you haven't
 22 seen. Is the reality that from January 2015 onwards,
 23 when this document is produced, you are not utilising
 24 this as the basis for your patrol instructions?
 25 A. No, sir, always off the map.

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1 Q. Always with the map?
 2 A. Yes, sir.
 3 Q. And you weren't working not specifically as a pair in
 4 that period either, after January 2015?
 5 A. No. All firearms officers in sector 3 were working as
 6 a pair.
 7 Q. And nor were you working in close proximity to the
 8 gates?
 9 A. No, sir.
 10 Q. You, presumably, work in pairs with different officers
 11 on different days?
 12 A. That's correct.
 13 Q. And so the way in which you went about your duties would
 14 be the way in which you went about your duties with many
 15 other officers who performed similar duties to you at
 16 the Palace of Westminster?
 17 A. That's correct, sir.
 18 Q. At no stage in the period from January 2015 through to
 19 22 March 2017, did any of those officers say to you:
 20 look, Lee, what are we doing? We should be over at the
 21 gates?
 22 A. Sir, every firearms officer performed the patrol as per
 23 the map as they were instructed to do.
 24 Q. No officer said to you: look, Lee, we are not following
 25 our post instructions?

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1 A. Never.
 2 Q. So your experience of patrolling in New Palace Yard was
 3 never challenged by any of your colleagues of the same
 4 rank as you?
 5 A. It was never challenged by any of my colleagues of the
 6 same rank or any rank.
 7 Q. We'll come to that in a moment.
 8 So far as the difference between the January 2015
 9 post instruction and the December 2015 post instruction
 10 that we've just looked at, you were unaware of the
 11 difference and so does it follow you are unaware of why
 12 it was felt necessary to include that additional
 13 instruction within the post instruction?
 14 A. Yes, sir, that's correct.
 15 Q. And so if you're unaware of that additional information,
 16 would it be fair to say that nothing that you did in the
 17 performance of your duties could possibly have changed
 18 as a result of it?
 19 A. Yes, sir.
 20 Q. You've been working as an authorised firearms officer
 21 permanently at the Palace of Westminster, or you had
 22 been at the time of this incident, for six years?
 23 A. That's correct.
 24 Q. In all of that time, were you ever challenged about the
 25 way in which you performed your patrols?

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1 A. No, sir.
 2 Q. So nobody ever said to you, from a higher rank, that
 3 what you were doing was wrong in that period from,
 4 perhaps, 2011/2012?
 5 A. That's correct.
 6 Q. Were you ever told in 2015, in around January 2015, that
 7 there were concerns about authorised firearms officers
 8 not complying with their post instructions?
 9 A. No, sir.
 10 Q. Can we please call up on the screen an email trail,
 11 starting with {WS5103/13}. Can we zoom in on the bottom
 12 half of that page first of all, please. Now, we'll see
 13 there that that is an email from a Nick Aldworth, who
 14 was, I think at the time, the Chief Inspector of
 15 Operations at the Palace of Westminster.
 16 A. Yes, sir.
 17 Q. And the email commences:
 18 "Based on [a] verbal consultation with SCO19 earlier
 19 this week, now that the threat level has changed, it is
 20 our desire to change the position of armed officers to
 21 provide more proximate protection to our staff and
 22 visitors."
 23 Do you see that?
 24 A. Yes, sir.
 25 Q. Now, that is dated 16 January 2015.

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1 A. Yes, sir.
 2 Q. Yes? Which is exactly the same date as the post
 3 instructions that we just looked at, January 16, 2015.
 4 A. Yes, sir.
 5 Q. And what appears to be being said is that there needed
 6 to be a change in the way that patrols were carried out
 7 because of a change in the threat level.
 8 A. Yes, sir.
 9 Q. Were you told about that?
 10 A. Not to the best of my knowledge, sir, no.
 11 Q. And so it follows that the change which had been
 12 identified as being required because of a change in the
 13 threat level was never implemented by you?
 14 A. I just did what I was told, which was to be off to the
 15 back(?).
 16 Q. You kept on doing what you'd been doing before?
 17 A. Yes, sir.
 18 Q. As did everyone else?
 19 A. Yes, sir.
 20 Q. Could we please move forward to {WS5103/16}. Sorry,
 21 could we move on to {WS5103/17} first. Just to give you
 22 a bit of context here, this is an email seemingly to
 23 Mr Aldworth, and it says:
 24 "On my way through Westminster Hall following jcos
 25 1715ish -- there was a DPG officer on the flats. I said

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1 I thought this post had been moved -- give him his due
 2 he said he wasn't sure ...
 3 "There was one other walking alone in the hall ...
 4 "Can we please confirm our understanding."
 5 Then moving up the page, if we may, back to page 16.
 6 THE CHIEF CORONER: That's 24 February 2015.
 7 MR ADAMSON: 24 February, {WS5103/16}, there is an email
 8 from Nick Aldworth saying:
 9 "Claire/Neil
 10 "This is getting a bit too frequent for our liking.
 11 Below is an incident from yesterday ... that came to the
 12 boss's attention. I experienced similar on the evening
 13 of Thursday 12 Feb when the 2 cops who were meant to be
 14 in [New Palace Yard] were inside [College Green
 15 Entrance] (and inside for some time) and there were no
 16 cops at (St Stephen's Entrance). I phoned the duty
 17 sergeant ... who acknowledged that he was a visitor and
 18 didn't really know what the deployment plan was.
 19 "How do we stop this from happening ... I think
 20 there is a bit of frustration creeping in on our side."
 21 So there appears to have been an awareness, based on
 22 this email chain, that post instructions were not being
 23 followed.
 24 A. It suggests so, sir, yes.
 25 Q. And to your recollection, because I'm sure you must have

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1 thought about these matters considerably --
 2 A. Mm--hm.
 3 Q. -- was that ever communicated to you in or around 2015?
 4 A. No, sir.
 5 Q. If we could go back further up the trail, please,
 6 {WS5103/15}, and the next email says -- this is
 7 24 February 2015:
 8 "Nick
 9 "This is tiresome as you say, and our Sergeants seem
 10 to be failing us all!
 11 "Is there any way your Duty Officer can oversee
 12 officers are where they should be? The duty officer has
 13 ultimate say over [the Palace of Westminster] and the
 14 deployments are simple to understand. The resources are
 15 yours/theirs and that will put in the correct management
 16 structure, plus help to reduce the 'us and them' we have
 17 at the moment?"
 18 In terms of your understanding of the structure,
 19 above you would be sergeants; is that right?
 20 A. That's correct, sir.
 21 Q. So they would issue you instructions on a daily basis?
 22 A. Yes, sir.
 23 Q. Do you remember who your sergeant was in 2015?
 24 A. I can name various sergeants I've had, but exactly who
 25 it was in 2015, no.

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1 Q. But, again, the fact that sergeants were thought to be
 2 failing, was that something that you were aware of in
 3 2015?
 4 A. No, sir.
 5 Q. So no sergeant ever said to you words along the lines
 6 of: I'm getting trouble from upstairs, we're not doing
 7 what we should be doing, so pull your socks up and start
 8 following the post instructions?
 9 A. No, sir.
 10 Q. Then finally on this trail, top of the page:
 11 "Neil
 12 "This is definitely part of the solution and is
 13 an action in progress ... however, like SO6 inspectors,
 14 our duty officers are line managing over 100 people
 15 each, which means that opportunities to be checking that
 16 people are in the right place all the time on an 8-acre
 17 estate is challenging for them ... we rely heavily on
 18 our sergeants and security managers to choreograph what
 19 happens on the ground ... I'd rather we get this right
 20 at sergeant level so it doesn't need to be checked and
 21 chased by Inspectors."
 22 Now, in your experience of carrying out duties, were
 23 sergeants after February 2015 more keen to impress upon
 24 you the importance of the scope of your duties or not?
 25 A. I didn't notice a change, sir.

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1 Q. Didn't notice a change. So whatever the problems were
 2 in 2015, which are referred to in these emails, from the
 3 benefit of your experience, it didn't result in any
 4 change at all?
 5 A. No, sir.
 6 Q. Your sergeants weren't watching you more closely?
 7 A. Sergeants would come around to your sectors, as they do,
 8 par for the course, you'd see them, but that happened
 9 regularly.
 10 Q. Yes. Did you ever see inspectors doing similar duties?
 11 A. Sir, we're approached by inspectors, chief inspectors,
 12 at all ranks.
 13 Q. But inspectors with specific knowledge of the
 14 arrangements at the Palace of Westminster?
 15 A. I was approached on my sectors by inspectors that were
 16 there every day.
 17 Q. Yes. And none of them ever challenged you either?
 18 A. To the best of my knowledge, no firearms officer was
 19 challenged, sir.
 20 Q. So we can be sure, therefore, based on your evidence,
 21 that the system set out in the post instructions was
 22 never, in fact, implemented?
 23 A. Yes, sir.
 24 Q. And that had been the case since before January 2015?
 25 A. As I say, sir, I was told every day to -- the map on the

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1 wall is my sector, and I patrolled it as I was told to.
 2 Q. Were you aware that there were reviews carried out from
 3 time to time called tactical planning reviews?
 4 A. I think I would have heard that such a thing was going
 5 on, yes.
 6 Q. But you wouldn't be privy to the content of those
 7 documents?
 8 A. No, sir.
 9 Q. And so insofar as there was anything important in the
 10 tactical planning review, it would be necessary for
 11 somebody above you in rank to tell you what were the
 12 important points that you needed to bear in mind?
 13 A. Yes, I wouldn't have been involved in that process.
 14 Q. The most recent tactical planning review that we're
 15 aware of, call it up on screen, {WS5099/31}, we see
 16 there there's a review date -- sorry, it was created,
 17 rather, on 1 June 2015, I apologise. It was supposed to
 18 be reviewed in November 2016, but it was created
 19 in June 2015.
 20 Now, can I ask you just to look at one or two
 21 passages of that, just so that I understand whether this
 22 information was conveyed to you in some way, shape or
 23 form. Look at paragraph 49, which is on {WS5099/35}.
 24 Here we see a reference to "Ranger Sector 3", and it's
 25 got an expanded definition of sector 3:

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1 "Carriage Gates, New Palace Yard, Members' Entrance,
2 Cromwell Green Public Entrance."
3 Which I expect you would say is more consistent with
4 what your understanding of what sector 3 entailed?
5 A. Yes, sir.
6 Q. Yes. And it says:
7 "These features sit within a secure area which
8 borders the perimeter fence line of the
9 Parliament Square aspect of the estate. It is a busy
10 vehicular and pedestrian access point (different
11 entrance formats for pedestrians) and frequent route
12 used by Protected Persons. Carriage Gates, when open,
13 represent one of the weakest points in the physical
14 perimeter."
15 The fact that Carriage Gates were one of the weakest
16 points in the physical perimeter, was that something
17 that you, as officers doing the job on the ground, were
18 told?
19 A. Carriage Gates wasn't given priority over
20 Cromwell Green, members' entrance, other entrance sites.
21 We were never told that that was particularly
22 vulnerable.
23 Q. Yes, and would it be fair to say that if you are told
24 that an area is a particular weakness, that would affect
25 your decisions about what you're going to do in

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1 a particular patrol?
2 A. Yes, sir.
3 Q. And so if you are told that something is a particular
4 weakness, you will focus upon it more closely?
5 A. Yes, sir.
6 Q. Because that is an area where there is a vulnerability
7 to attack, and you are there to try and prevent the
8 consequences of an attack, are you not?
9 A. That's correct.
10 Q. So the document goes on:
11 "The whole area is covered by x2 AFOs whose primary
12 focus is Carriage Gates and the exit point of
13 Cromwell Green Public Entrance."
14 It must follow from what you have told us that your
15 primary focus was not the Carriage Gates and the exit
16 point of Cromwell Green public entrance?
17 A. Our primary focus was the entire sector 3 on the map.
18 Q. So these concepts which are set out in this tactical
19 planning review were, in fact, never implemented?
20 A. No, sir.
21 Q. And it's also right that the fact that the primary focus
22 should be in that particular location is not
23 an expression set out in the post instructions, is it?
24 A. No, sir.
25 Q. You've seen that?

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1 A. Yes.
2 Q. And it's not on the plan that you were referring to?
3 A. That's correct.
4 Q. And it wasn't part of daily instructions that you were
5 being issued by your superiors?
6 A. That's correct.
7 Q. Over the page, please {WS5099/36}. There's
8 a recommendation that Carriage Gates should continue to
9 be the focus of armed policing when the gates are open.
10 Given what you've described, and it may be that it's for
11 others to say, but Carriage Gates were not the focus of
12 authorised firearms officers' patrols prior
13 to June 2015, were they?
14 A. No, not the sole focus, sir, no.
15 Q. So would you agree with me that the use of the word
16 "continue" is completely misleading?
17 A. On this, yes.
18 Q. And then it goes on further down paragraph 54:
19 "Carriage Gates ... any committed intruder could
20 realistically be over the physical barriers of the
21 vehicle barriers/fence and be directly into
22 New Palace Yard and subsequently the Palace itself
23 without being challenged by police if these posts were
24 not in situ."
25 And so the reality is that the threat of a committed

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1 intruder seeking to gain access through the gates was
2 something that they were aware of, whoever prepared this
3 review?
4 A. Yes, sir.
5 Q. But that wasn't communicated to you as an important
6 factor to bear in mind in the way in which you went
7 about your patrols of New Palace Yard?
8 A. We were aware of, obviously, the gates being a threat
9 but, as I say, in our sector, it included Cromwell Green
10 and other areas which were also a threat.
11 Q. You were asked yesterday about the ability of
12 an authorised firearms officer to provide support and
13 protection to those unarmed officers at the gates from
14 the colonnade area?
15 A. Yes, sir.
16 Q. And you agreed that it was not a location from which you
17 could provide protection?
18 A. That's correct.
19 Q. So the result is that the unarmed officers at the gate
20 were, more often than not, based on what we know about
21 the patrols that you performed, more often than not they
22 were simply left unprotected?
23 A. Yes, sir.
24 Q. You said yesterday that in your view there should have
25 been four sets of authorised firearms officers on patrol

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1 in your sector.
 2 A. Not on patrol, sir, I said on fixed post.
 3 Q. On fixed post.
 4 A. That's what I said.
 5 Q. I apologise, you're quite right. You were being told to
 6 patrol the whole area. The post instructions say you
 7 should be in close proximity to the gates. Based on
 8 your understanding of the area that you were patrolling,
 9 do you think it's even possible for you to provide
 10 effective cover for the gates based on your
 11 understanding of sector 3 patrol?
 12 A. No, sir.
 13 Q. It would have been quite straightforward, would it not,
 14 for you to be informed that during division you had to
 15 be at the gates?
 16 A. It would be straightforward to say that, yes.
 17 Q. That wouldn't have represented any difficulty for you in
 18 terms of being there at that time because you had
 19 a radio and you would be aware of when the division was
 20 sounded?
 21 A. Correct.
 22 Q. Can I ask you to look at the misconduct process that was
 23 commenced but did not result in any formal action,
 24 {WS5099/39}.

25 Now, the initial review of the evidence that brought

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1 about this report suggests that there was about 15 or 16
 2 minutes of CCTV footage shown to the person carrying out
 3 the review, and it showed that neither you nor
 4 PC Sanders were in proximity of the gates, and the
 5 person carrying out the review also looked at the
 6 relevant post instruction, which we looked at earlier
 7 today.
 8 A. Yes, sir.
 9 Q. You were never asked about your explanation for why you
 10 were where you were for the purposes of this review; is
 11 that correct?
 12 A. That's correct, sir.
 13 Q. And can we turn to page 42 {WS5099/42}, and the fourth
 14 paragraph from the bottom says there:
 15 "It is clear on the basic facts that the officers
 16 appear not to have complied with the post notes."
 17 Well, you would agree with that, wouldn't you?
 18 A. That's correct, yes.
 19 Q. And can we turn to page {WS5099/44}, and it's the middle
 20 paragraph of that that I'm interested in, it's "In
 21 assessing the culpability ..." it is that paragraph; do
 22 you see it?
 23 A. I do, yes.
 24 Q. Can I ask you to -- and it says:
 25 "In assessing the culpability therefore of officers

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1 Sanders and Ashby ..."
 2 And then it goes on, but the passage I want to refer
 3 you to is three lines down:
 4 "It is simply a case of poor practice arising from
 5 a misjudged and misguided interpretation of what they
 6 were allowed to do within their patrol area in terms of
 7 the area covered."
 8 Now, that's the view that's been taken by the person
 9 carrying out this assessment, and I wanted to give you
 10 an opportunity to comment upon it.
 11 A. Well, like I've said, sir, every day I was instructed to
 12 act as per the maps. To my knowledge, I was inside the
 13 area that I was told to be in, and that's why I was
 14 there.
 15 Q. Has anyone told you since that what you were doing
 16 represented poor practice?
 17 A. No.
 18 Q. Has anyone told you since that what you were doing
 19 represents a misjudged and misguided interpretation of
 20 what your responsibilities were?
 21 A. No, sir.
 22 Q. So in the 18 months that have passed since this terror,
 23 nobody has explained to you what you were doing wrong?
 24 A. No one has explained this to me on this screen, sir.
 25 THE CHIEF CORONER: Just before we leave that page,

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1 Mr Adamson, it might be worth just reading the rest of
 2 that paragraph.
 3 MR ADAMSON: "The officers were patrolling at the time
 4 within the area therefore engaged in security patrols in
 5 that area, the issue being this went over a more
 6 extended area. In addition, it is clear that this
 7 practice is not unique to these officers, and that wider
 8 command practice was reflective of the same
 9 misunderstanding. What is key is that the officers
 10 concerned and wider [staff] learn from this poor
 11 practice and immediate remedial briefing and training is
 12 undertaken to address the issue."
 13 So a couple of points: first of all, that seems to
 14 confirm what you've said that what you were doing was
 15 exactly the same as what everyone else was doing?
 16 A. Yes, sir.
 17 Q. And that it was a problem that was not confined to
 18 police constable rank, but went further up the chain?
 19 A. It would seem so, sir.
 20 Q. And so this poor practice, as it's described --
 21 A. Yes, sir.
 22 Q. -- had persisted for years?
 23 A. That's what it says, sir.
 24 Q. And even now you, as an authorised firearms officer,
 25 have not had it explained to you what you were doing

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1 wrong?
 2 A. No.
 3 Q. It's a pretty extraordinary state of affairs, is it not,
 4 where the authorised firearms officers on duty
 5 collectively have no idea what they're supposed to be
 6 doing?
 7 A. I knew what I should be doing, sir, I was told to do it
 8 every day.
 9 Q. Well, forgive me, you're quite right, PC Ashby. You
 10 knew what you were doing because you were following the
 11 diagram, but if you were following the diagram, you were
 12 following the wrong instructions?
 13 A. I can only do what I'm told to do every day, sir.
 14 Q. And so for a period of years, the security measures at
 15 the Palace of Westminster which, as you have pointed out
 16 in your evidence yesterday, and is obviously
 17 self-evident, routinely contains the Prime Minister,
 18 members of the cabinet, the state of the security
 19 arrangements for that area were so lax that the relevant
 20 post instructions were not being performed, or acted
 21 upon, over a period of years?
 22 A. I just feel that the sector area, sector 3, was too big,
 23 too large for two officers.
 24 Q. As an authorised firearms officer you are, I'm quite
 25 sure, provided with a great deal of training about when

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1 and in what circumstances you must use your weapon.
 2 A. Yes, sir.
 3 Q. And it's undoubtedly a very heavy responsibility which
 4 rests on your shoulders?
 5 A. Yes, sir.
 6 Q. You are expected, in your position, to be able to assess
 7 and process information quickly?
 8 A. Correct.
 9 Q. And make decisions quickly?
 10 A. Yes, sir.
 11 Q. Because it's not always going to be the case, is it,
 12 that you are able to warn somebody that you are about to
 13 shoot?
 14 A. That's correct.
 15 Q. And so whilst your instructions indicate that you should
 16 identify yourself as an armed officer --
 17 A. Yes, sir.
 18 Q. -- to a person who you are considering using your weapon
 19 against --
 20 A. Yes.
 21 Q. -- that's not necessary if you judge that by waiting for
 22 the person that you are pointing your gun at to
 23 acknowledge who you are, you're going to place yourself
 24 or others at risk?
 25 A. That's correct.

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1 Q. And you, as an experienced firearms officer, would back
 2 your judgment to make the right decision when the moment
 3 arose?
 4 A. Yes, sir.
 5 Q. And that could involve making decisions within a second?
 6 A. Could do, yes, sir.
 7 Q. You said both yesterday and today that you would, if you
 8 were making decisions, have had fixed positions and you
 9 would have had firearms officers fixed at the
 10 Carriage Gates.
 11 A. I would.
 12 Q. When you had done fixed post work before you had been in
 13 a position slightly removed from the gates; is that
 14 right?
 15 A. Yes, sir, towards the hardstanding area, just behind
 16 there.
 17 Q. Yes. You are set back, are you not, in order to give
 18 yourself reaction time?
 19 A. That's quite correct.
 20 Q. And if you are told that the gates are a particular
 21 weakness, and that the gates should be your focus, and
 22 you are there, then you would be in the best possible
 23 position, would you not, to take action if there was
 24 an unauthorised intruder coming through the gates?
 25 A. Yes, sir.

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1 Q. So the reason why you say it should be there is because
 2 that's the best place?
 3 A. Absolutely.
 4 Q. As an authorised firearms officer, looking to identify
 5 a threat, you will have regard to what is going on
 6 around you?
 7 A. Yes, sir.
 8 Q. And so, for example, if you saw members of the public
 9 running in a particular direction, that would give you
 10 an indication, would it not, that they perceived
 11 a threat behind them?
 12 A. It would give me an indication of that, yes, sir.
 13 Q. If I'm running that way (indicates) --
 14 A. You're trying to get away from something behind you.
 15 Q. -- it suggests that the problem that I'm running from is
 16 behind me. It doesn't take a genius to work that out --
 17 A. Yes, sir.
 18 Q. -- I know, but it's obvious, isn't it?
 19 A. Yes, sir.
 20 Q. If you're standing at the gates and you saw people
 21 running past the gates, that would be a factor that you
 22 would take into account, would it not, in terms of your
 23 assessment of where the threat was?
 24 A. Of course, sir.
 25 Q. And if you are in that location and you hear somebody

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1 shouting "There's a man with bloody big knives", that,
 2 again, is something that you would take into account?
 3 A. Of course, sir.
 4 Q. Now, of course, from your position on the day of this
 5 incident, down at the colonnade, that's information that
 6 you would never, ever be aware of?
 7 A. Yes, sir.
 8 Q. Which demonstrates why it's -- and this is not to
 9 criticise you -- why it's a hopeless place from which to
 10 provide protection to the gates?
 11 A. Absolutely.
 12 Q. If you were standing in the fixed position that you had
 13 previously stood inside the Carriage Gates, and you saw
 14 a large man, armed with two knives, bearing down on
 15 a colleague --
 16 A. Yes, sir.
 17 Q. -- that would not be a difficult set of circumstances
 18 for you to determine as to whether or not it was
 19 appropriate to use your weapon, would it?
 20 A. Absolutely not.
 21 Q. That would be the clearest possible set of circumstances
 22 in which it would be appropriate to fire?
 23 A. Yes, sir.
 24 Q. And so we know that Masood came through the gates
 25 bearing these two knives, and we know that he moved upon

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1 PC Palmer. Because you weren't there, that opportunity
 2 to save PC Palmer's life was lost, wasn't it?
 3 A. I wouldn't have had the opportunity from where I was to
 4 shoot Masood, that's correct.
 5 Q. You wouldn't have?
 6 A. Not from where I was standing, no.
 7 Q. No. But if you'd been at the gates, you would have had
 8 a chance, wouldn't you?
 9 A. Possibly, sir, there's obviously factors you had to take
 10 into account.
 11 Q. Of course. But you would back yourself, wouldn't you?
 12 A. If I had a clear shot, I would have taken a shot, yes,
 13 sir.
 14 Q. Standing at the gates, you would have had a clear shot,
 15 wouldn't you?
 16 A. I had to be mindful of my backdrop, the weaponry
 17 I'm carrying, but yes, sir, I would have taken a shot.
 18 Q. You would have taken a shot?
 19 A. Yes, sir.
 20 Q. And you can make those decisions quickly, can't you,
 21 because you've got to, because that's your job?
 22 A. It is sir, yes.
 23 Q. It's what you're trained for?
 24 A. Yes.
 25 Q. And you weren't there because you weren't expected to be

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1 there?
 2 A. That's correct.
 3 Q. The system of security at the Palace of Westminster
 4 completely failed to protect PC Palmer, did it not, on
 5 that day?
 6 A. It would appear so, sir.
 7 Q. Because it had not been functioning for years, based on
 8 what we've addressed this morning; would you agree?
 9 A. Based on the sector 3 map that I was responsible for,
 10 it -- yes.
 11 MR ADAMSON: Thank you, PC Ashby.
 12 A. Thank you, sir.
 13 Examination by MS STEVENS
 14 MS STEVENS: Police Constable Ashby, my name is
 15 Susannah Stevens and I'm going to ask you some
 16 questions, please, on behalf of the family of Police
 17 Constable Palmer, in terms of his parents and his
 18 siblings --
 19 A. Okay, madam.
 20 Q. -- all right. You've been asked a number of questions
 21 about your experience. Can I just ask you this: in
 22 terms of your role there at the Palace of Westminster,
 23 it was a role that you took seriously, was it?
 24 A. Yes, sir -- yes, madam, sorry. Yes, madam.
 25 Q. It was a role that you were committed to?

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1 A. Yes, madam.
 2 Q. You say in your statement, and it's the second statement
 3 that you gave, and I'll quote directly from it, your
 4 principal role was to provide protection to others,
 5 including fellow police officers. Is that right?
 6 A. That's correct.
 7 Q. You would not take that responsibility towards your
 8 unarmed colleagues lightly, would you?
 9 A. No, madam.
 10 Q. No. In terms of you being able to effectively undertake
 11 that responsibility, knowledge of the location where you
 12 are meant to be is key, isn't it?
 13 A. That's correct, madam.
 14 Q. What you're meant to do at that location is also
 15 important, isn't it?
 16 A. Yes, madam.
 17 Q. If you are in the wrong place as an authorised firearms
 18 officer, that's not going to help you to achieve that
 19 objective of guarding your unarmed colleagues, is it?
 20 A. No, madam.
 21 Q. So in relation to that location, it would be quite
 22 unfair and wrong, wouldn't it, to say that you were in
 23 any way careless or negligent about your
 24 responsibilities?
 25 A. That would be unfair, madam, yes.

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1 Q. It would be quite wrong and unfair, wouldn't it, to try
2 and blame you as an individual for the fact that you
3 weren't present at Carriage Gates, wouldn't it?
4 A. I think so, madam.
5 Q. It would be equally unfair to blame
6 Police Constable Sanders, wouldn't it?
7 A. Yes, madam.
8 Q. It would be wrong and unfair to categorise what happened
9 in terms of your part in it, as a mistake, wouldn't it?
10 A. Yes, madam.
11 Q. It was a deliberate decision on both of your parts,
12 yours and Police Constable Sanders, to patrol away from
13 Carriage Gates, wasn't it?
14 A. Yes, madam.
15 Q. It was a deliberate decision which you made based on
16 a number of pieces of information, wasn't it?
17 A. Yes, madam.
18 Q. We've been referred to the misconduct report that the
19 Department of Professional Standards undertook. Before
20 that was put on the screen, we've heard that none of
21 your supervisors have spoken to you about it. What
22 about anybody from the Department of Professional
23 Standards?
24 A. No, madam.
25 Q. Not a single officer from the Department of Professional

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1 Standards has approached you to ask for your version of
2 events?
3 A. No.
4 Q. So when we look at the passages that you have been taken
5 to, where an officer within the Department of
6 Professional Standards has come to conclusions about
7 there being mistakes and misunderstanding in relation to
8 post notes, those conclusions were reached without you
9 having any opportunity to give your version of events?
10 A. Yes, madam.
11 Q. If you had been given that opportunity, would you have
12 told the Department of Professional Standards that far
13 from this being a mistake, you were following the sector
14 map?
15 A. Yes, madam.
16 Q. In terms of that sector map, we know that it was up in
17 the base area, and can we just have a look, please, back
18 at the post note that you were taken to. So that's
19 {DC8032/1}. If we just have a look first of all,
20 please, at the fourth page {DC8032/4}. If you would be
21 good enough, please, Police Constable Ashby, if you have
22 a look we can see just above halfway down the page
23 "Directed patrols"; can you see that?
24 A. I can, madam.
25 Q. Then there's a paragraph under the bold of "2 posts".

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1 If you count down three after that, can you see that
2 this is written within the post note itself:
3 "All relevant maps and post times are displayed
4 within the base room at [the Palace of Westminster]."
5 A. Yes, madam.
6 Q. Right. The post note itself, then, makes reference to
7 maps within the base room, doesn't it?
8 A. It does, madam.
9 Q. In terms of the maps within the base room, were there
10 any other maps that dealt with sector 3 other than the
11 maps that you have provided?
12 A. No, madam.
13 Q. In terms of that map, and can we just have a look at it,
14 please. It is -- a clearer version is {WS1633/5}. At
15 the top we can see "Ranger Sector 3". Was there
16 anything within this map that would make you think that
17 it was a historic, old map that was no longer
18 applicable?
19 A. Only that I've been made aware of the date in the bottom
20 right-hand corner, but other than that, no.
21 Q. Yes. Nothing to say, though, that it's no longer in
22 force?
23 A. No, it was up on the wall in the base room.
24 Q. Yes. And you would expect, wouldn't you, that if it was
25 no longer in force, if it was no longer applicable, that

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1 it would be taken down?
2 A. Absolutely.
3 Q. You would also expect that in its place, the correct map
4 would be put up, wouldn't you?
5 A. Yes, madam.
6 Q. With clearly defined area of blue shading for the new
7 sector 3?
8 A. Yes, madam.
9 Q. And in terms of that being something you would expect,
10 that's a pretty basic expectation, isn't it?
11 A. I think so, madam.
12 Q. That in relation to discharging such a serious
13 responsibility at the Palace of Westminster, that the
14 correct and current map is going to be up on the wall?
15 A. Yes, madam.
16 Q. There's nothing about this map, is there, to make you
17 think that rather than it defining sector 3, that it's
18 a map to do with alarm activations?
19 A. No, madam.
20 Q. No. So you, as an authorised firearms officer looking
21 at this map, you're not going to think that it's to do
22 with the police response to an alarm going off within
23 the Palace of Westminster?
24 A. Obviously there are points on there which show alarms,
25 but we were told they were to be included in our sector.

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1 Q. Yes. Nothing on the document, though, is there, to say:
2 this is just for the event of an alarm, it's got nothing
3 to do with your patrol map?
4 A. No, madam.
5 Q. And, in fact, when you look at it, it looks like it is
6 to do with your patrol because it looks like it's
7 defining the area of sector 3, doesn't it?
8 A. Well, it says "Sector 3" at the top, madam.
9 Q. Quite. You don't just go, do you, on your own
10 interpretation of what that map means; you also relied
11 on the briefings that you were given?
12 A. Yes, madam.
13 Q. Can you help us, please, a little bit more as to these
14 briefings. Did they ever take the form of written
15 briefings as to what your responsibilities as a sector 3
16 AFO were?
17 A. No, it was verbal, madam.
18 Q. Always verbal?
19 A. To the best of my knowledge, yes, madam.
20 Q. Verbal, then, in terms of how that briefing is given to
21 you; yes?
22 A. Yes, madam.
23 Q. You don't know, of course, whether or not the senior
24 officers had a briefing in written form?
25 A. No, madam.

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1 Q. The briefings that you were given included, did they,
2 the area of your patrol?
3 A. Yes, madam.
4 Q. They also included further detail as to what you should
5 do in the patrol. So you said, for example, you were
6 told to stop, wait a bit, be unpredictable?
7 A. Unpredictable was something I remember very well, madam,
8 yes.
9 Q. That detail of being unpredictable doesn't feature in
10 the post note that you were taken to; that came, then,
11 from these oral briefings?
12 A. Yes, madam.
13 Q. Over the time that you were working as an AFO --
14 I'm going to use the shorthand -- at the
15 Palace of Westminster, can you give us a rough idea of
16 how many briefings you had where it was made clear to
17 you that your responsibility was the whole of
18 New Palace Yard?
19 A. Every day it was made clear to you that on the wall the
20 four sectors were shown, and the area shaded in blue is
21 where you should patrol, be unpredictable in your
22 movements and, as you can see, we were told that we had
23 to be in the area so we can respond to members'
24 entrance, Cromwell Green, Carriage Gates and the alarm
25 point should we be required to do so.

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1 Q. Were you ever given any guidance in terms of further
2 specifics? So, for example, you were asked questions
3 yesterday about why did you stay in one place for that
4 period of time. Were you ever told "Don't stay in one
5 place for longer than ten minutes" or anything like
6 that?
7 A. No, there was no specifics, but as I mentioned
8 yesterday, we were, on Wednesdays, encouraged to be
9 within the members' entrance area because of PMQs and
10 the people that were in that area.
11 Q. I'm going to come onto that, if I may, but just dealing
12 with the guidance and information that you were given by
13 more senior officers. You weren't ever told that there
14 was a maximum period of time that you should remain in
15 any location?
16 A. No, madam.
17 Q. If you had been told you mustn't stay at a given
18 location for more than 20 minutes, half an hour, you
19 would have done that, wouldn't you?
20 A. Absolutely.
21 Q. The police service is a service that has ranks, and it's
22 very much a hierarchical system, isn't it?
23 A. It is, madam.
24 Q. You may have your personal views about what's right and
25 wrong, but you have to follow what you're told to do by

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1 your supervisors and more senior officers, don't you?
2 A. Yes, madam.
3 Q. If you are told what to do, that amounts to a lawful
4 order, doesn't it?
5 A. Yes, madam.
6 Q. If somebody of a more junior rank doesn't follow
7 a lawful order, that can be misconduct, can't it --
8 A. Yes, madam.
9 Q. -- on the part of a police officer? So you may have had
10 your personal views about what security system would be
11 effective, but you had to act on the basis of what was
12 decided by others?
13 A. Yes, madam.
14 Q. Right. Can we look at the issue of supervisors, please.
15 You've said that there were police sergeants on the
16 ground. Can you give us an idea of whether or not there
17 would every day be a police sergeant checking what was
18 going on?
19 A. Out on the sectors, actually ...?
20 Q. Yes.
21 A. Yes.
22 Q. Daily checks then by supervisors. Can you give us any
23 further assistance as to whether or not it would be once
24 a day, more than once?
25 A. I mean, I would pretty much always see them when I was

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1 on sector.

2 Q. We've also heard about the inspectors. Would you see

3 the inspectors daily?

4 A. Yes, you would.

5 Q. We've heard about the Chief Inspector of Operations of

6 the Palace of Westminster, now Chief Superintendent

7 Aldworth. During the time that you were on patrol, did

8 you ever see him?

9 A. Yes, madam.

10 Q. A difficult question, I know, just a rough answer to

11 give us some assistance: during the time that you were

12 carrying out these patrols of New Palace Yard, very

13 roughly, how many times do you think you saw Chief

14 Superintendent Aldworth?

15 A. 10, 20 times.

16 Q. Bearing in mind you are patrolling all of

17 New Palace Yard, at least one of those 10 or 20 times

18 you wouldn't have been positioned at the Carriage Gates?

19 A. That's possible, madam.

20 Q. Commander Usher, the person in overall charge of

21 security on behalf of the Metropolitan Police Service;

22 did you ever see him over this period of time,

23 before March 2017?

24 A. No, because the first time I met Commander Usher was

25 after that.

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1 Q. Right. We know that on the day you saw the then Acting

2 Commissioner, now Deputy Commissioner. You spent some

3 time speaking to him in the area of the colonnades,

4 didn't you?

5 A. Yes, madam.

6 Q. Did he ever say anything to you about: you'd better get

7 back on duty to Carriage Gates?

8 A. No, madam.

9 Q. In fact, you being present in the colonnades for

10 a significant period of time was you following the

11 direction that you had been given by your more senior

12 officers?

13 A. Yes, madam.

14 Q. Yes. Because, as you've told us yesterday, you were

15 told that on Wednesdays and other certain days that you

16 had to be in the area of the colonnades to protect

17 cabinet ministers and high-profile MPs; is that right?

18 A. I wasn't told I had to be; we were encouraged to be in

19 that area, madam.

20 Q. Encouraged as in that should be a priority?

21 A. Yes, madam.

22 Q. If you are making that your priority, bearing in mind

23 what we've heard about that location, that means,

24 doesn't it, that you cannot make the unarmed officers at

25 Carriage Gates your priority?

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1 A. That's quite correct.

2 Q. So the direction that you were being given from on high

3 is to prioritise the cabinet ministers and the senior

4 MPs?

5 A. Like I say, I was encouraged to be in that area, madam,

6 yes.

7 Q. Yes, to prioritise them. Can you help us with who it

8 was that gave you that instruction, or encouraged you in

9 that way?

10 A. Several supervisor sergeants, madam, would have made

11 that comment.

12 Q. Several supervisors. So it was something that was

13 repeated to you, it wasn't just a one-off instruction?

14 A. It was common knowledge amongst firearms officers,

15 madam.

16 Q. Was anything said, when you were told this by several

17 supervisors, about what was meant to happen to your

18 unarmed colleagues at Carriage Gates?

19 A. No, madam.

20 Q. Nothing?

21 A. No.

22 Q. Did they factor -- as far as you were aware in terms of

23 what was said -- did they factor at all?

24 A. Two officers were told to patrol that area, madam, so we

25 only had two officers there that could be in one place.

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1 Q. Yes, and you say two officers can't be in one place.

2 That's self-evident, isn't it?

3 A. Yes, madam.

4 Q. And anybody who has any knowledge of the

5 Palace of Westminster, it would be obvious that if you

6 can't be in two places at once --

7 A. That's correct, madam.

8 Q. -- and if you can't see and hear at the colonnades,

9 telling authorised firearms officers to prioritise MPs

10 and cabinet ministers, is going to leave those unarmed

11 officers at Carriage Gates vulnerable, isn't it?

12 A. Yes, madam.

13 Q. Yes. You were asked about whether or not you were ever

14 told about the vulnerability of Carriage Gates as

15 a location, and you said that you weren't. Does it

16 follow, then, that you were never told about the

17 particular vulnerability of unarmed officers at that

18 already vulnerable location? Were you ever told that?

19 A. I was never told to give priority over unarmed officers.

20 So you had MPs, public, staff. We were never told to

21 give priority to certain people, madam.

22 Q. Priority to certain people. Could you have a look

23 again, please, at the post instruction. Sorry, do we

24 need the reference number? It's {DC8032/1}, thank you

25 very much. Could I ask you to look now at page 1. We

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1 can see there:
 2 "The primary role and responsibilities for firearms
 3 officers posted to the Estate are to protect the people
 4 contained within it."
 5 Can you see that?
 6 A. I can, madam, yes.
 7 Q. Then further detail is given:
 8 "This will be achieved by:"
 9 Then there's then a series of bullet points as to
 10 how you will achieve that overall goal. Do you see?
 11 A. I do, madam, yes.
 12 Q. The bullet points, then, of how you are going to achieve
 13 this, are as follows:
 14 "Immediately containing or confronting a deadly
 15 threat.
 16 "Providing a visible deterrent.
 17 "Providing reassurance to Members, staff and
 18 visitors.
 19 "Assist unarmed Officers to protect assets contained
 20 within the Parliamentary Estate.
 21 "Identifying and challenging individuals or groups
 22 who breach security protocols.
 23 "Provide armed support to PAB alarms if
 24 directed ..."
 25 There's reference, then, to assisting unarmed

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1 officers to protect the assets contained within the
 2 parliamentary estate. Is there any reference to the
 3 need to assist unarmed officers in terms of their own
 4 personal safety and vulnerability?
 5 A. No, madam.
 6 THE CHIEF CORONER: The first point, Ms Stevens, might be
 7 thought to cover some of that.
 8 MS STEVENS: It would be hoped in terms of the bullet
 9 points, though, that reference would be made to their
 10 physical well-being rather than assets, but that's why
 11 I read the first part --
 12 THE CHIEF CORONER: Yes.
 13 MS STEVENS: -- because absolutely --
 14 THE CHIEF CORONER: I was thinking more of the "Immediately
 15 containing or confronting a deadly threat", presumably
 16 if that deadly threat was to an unarmed police officer.
 17 MS STEVENS: Yes, but what we know is that they were of
 18 a particularly vulnerable category, and so one would
 19 have hoped in relation to the families' submissions that
 20 there would be particular reference to their physical
 21 well-being, bearing in mind that was well known.
 22 Can I ask you to look, whilst we are on the
 23 document, to page 5, please, which is the last page that
 24 I'll ask you to look at in terms of the post note
 25 {DC8032/5}. If you see the box that says

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1 "Administration".
 2 A. Yes, madam.
 3 Q. If you would be good enough, please, to have a look at
 4 the penultimate paragraph there that starts
 5 "Supervision", it says as follows:
 6 "Supervision of this post is the responsibility of
 7 the Duty Officer / Patrolling Sergeant. Recorded periodic
 8 checks are to be carried out to ensure compliance with
 9 these instructions."
 10 You've told us about the daily checks. Can you help
 11 us with how those checks were recorded by the patrolling
 12 sergeant/duty officer?
 13 A. All I can say, madam, is when you are on your sector you
 14 would be approached by a sergeant who would stop and
 15 talk to you.
 16 Q. But you don't know whether or not, for instance, there
 17 was a particular book or there was a particular item of
 18 computer software where these checks would be put?
 19 A. No, madam.
 20 Q. Can we move on, please, to what was said after the
 21 attack. You've clarified that nobody at any stage said
 22 to you before the attack that you were ever patrolling
 23 in the wrong way or ever in the wrong location. Can we
 24 look at what happened afterwards. You've said that the
 25 Department of Professional Standards didn't speak to

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1 you. When you gave your formal statement in relation to
 2 this Inquest, you were quite open, weren't you, about
 3 your understanding of sector 3?
 4 A. Yes, madam.
 5 Q. It would have been clear from your statement of 31 May
 6 that you saw sector 3 as comprising the members'
 7 entrance to the Houses of Parliament, Carriage Gates,
 8 and New Palace Gate; that's right?
 9 A. New Palace Gate, it should say New Palace Yard, madam.
 10 Q. New Palace Yard.
 11 A. Yes.
 12 Q. You were very open in your statements because you had
 13 nothing to hide, did you?
 14 A. No, madam.
 15 Q. Can you help us with when you were first spoken to after
 16 the events of 22 March by anybody who said: well,
 17 actually you should have been near Carriage Gates?
 18 A. The first time I was made aware that there was
 19 a suggestion was when I was asked for a meeting with
 20 Superintendent Shannon.
 21 Q. Superintendent?
 22 A. Shannon.
 23 Q. Shannon. When was that, please?
 24 A. I don't know, four or five months ago, I think. The
 25 start of this year, I believe.

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1 Q. All right. Thank you. That was the first time that you
2 were made aware?
3 A. Yes.
4 Q. Has Commander Usher ever spoken to you and said that you
5 shouldn't have been where you were, you should have been
6 at Carriage Gates?
7 A. I apologise, I was invited to a meeting with
8 Commander Usher, yes.
9 Q. When you were invited to the meeting, were you told what
10 the meeting was about?
11 A. No, I wasn't told what it was about prior to the invite.
12 Q. Who invited you?
13 A. I believe I got an email with a date to attend his
14 office, madam, myself and PC Sanders.
15 Q. Sorry?
16 A. Myself and PC Sanders, we were both at the meeting
17 together.
18 Q. So you're both there at the meeting at the same time?
19 A. That's correct.
20 Q. When was this meeting, please?
21 A. It was several months after the incident.
22 Q. Still 2017 though?
23 A. Yes, madam.
24 Q. Where was the meeting?
25 A. In New Scotland Yard, in his office, I believe, madam.

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1 Q. Was anybody else present?
2 A. Just Commander Usher, myself and PC Sanders, madam.
3 Q. So just you three?
4 A. That's correct.
5 Q. Was anyone making notes of this meeting?
6 A. I don't know if Mr Usher was, madam, but no.
7 Q. As far as you understood, as this meeting developed,
8 what was the purpose of it?
9 A. Mr Usher said initially that he didn't know what our
10 role was on the day, so myself and PC Sanders informed
11 him. It was then that he said — told us what his
12 understanding of the post notes was, and I produced the
13 laminated copy of the post notes as I understood them as
14 I had in my pocket.
15 Q. So at this meeting you three together, you produced the
16 map and you yourself showed it to Commander Usher?
17 A. Yes, madam.
18 Q. The start of the meeting, then, was to talk to you about
19 your role and the post notes?
20 A. That's correct.
21 Q. Was there any discussion about occupational health?
22 A. No, madam.
23 Q. No?
24 A. I don't believe so, not from recollection.
25 Q. How did the conversation then develop? You show him the

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1 map; did you tell him what you have told the court,
2 namely that the map shows sector 3 and this is what you
3 did?
4 A. So he informed me that he understood the post notes to
5 be one thing, and I said: sir, that's not what
6 I understand them to be, and I took out the laminated
7 copy that I have in my beat duty trousers and I put it
8 in front of him.
9 Q. When you showed him the map, what did he say?
10 A. Not a lot, madam.
11 Q. Not a lot?
12 A. No, we just continued talking about the incident and
13 whatever else we were talking about.
14 Q. So he didn't say to you: no, you've got that completely
15 wrong, that's a historic map from 2012?
16 A. No, madam.
17 Q. He didn't say to you: no, you've got that completely
18 wrong, that's a map to help officers as to how they
19 should respond to alarms?
20 A. No, madam.
21 Q. Did he say anything that challenged your — the
22 information you gave him about this map?
23 A. No, madam. No, madam.
24 Q. He didn't challenge it to you at all?
25 A. No, madam.

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1 Q. What about Police Constable Sanders; what was he saying
2 during the meeting?
3 A. I can't recall what he was saying, but he was sitting
4 next to me.
5 Q. Did he support what you had to say in relation to
6 sector 3 and the patrol?
7 A. Yes, madam.
8 Q. Did Commander Usher challenge or dispute anything that
9 Police Constable Sanders said in your presence?
10 A. No, madam.
11 THE CHIEF CORONER: Ms Stevens, would that be a convenient
12 moment to break?
13 MS STEVENS: Yes, absolutely. Thank you, sir.
14 THE CHIEF CORONER: We'll pick up where we've got to at
15 2 o'clock.
16 (1.00 pm)
17 (The Luncheon Adjournment)
18 (2.05 pm)
19 THE CHIEF CORONER: Yes.
20 MS STEVENS: Thank you. Police Constable Ashby could we
21 deal with a further issue. I am just going to ask you
22 some questions about the ADAM system, please. In
23 relation to that, we know that you last checked it on
24 14 December 2015. Have you been told that since?
25 A. Yes, madam.

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1 Q. In relation to Police Constable Sanders are you aware
2 that he never used the ADAM system?
3 A. I'm not aware of that madam, no.
4 Q. You're not aware of that. Have you been told that
5 a number of other AFOs didn't register on the system at
6 all?
7 A. No, I didn't know that, madam, no.
8 Q. Hadn't logged on for a considerable period of time, any
9 idea about that?
10 A. No, madam.
11 Q. Dealing, then, with what you were aware of, if anyone
12 had said to you it's really important that you check the
13 ADAM system because information about your sector 3
14 responsibility that's different to the map could be put
15 on there, you would have checked it, wouldn't you?
16 A. Yes, madam.
17 Q. If you had been given any guidance, any training, any
18 instruction about how important the ADAM system was, you
19 would have followed it, wouldn't you?
20 A. Yes, madam.
21 Q. In terms of other AFOs, there was never any discussion
22 or conversation, was there, that led you to understand
23 that the information that was on the ADAM system was
24 different to the map and your daily briefing?
25 A. Never, madam.

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1 Q. That's the position in relation to other AFOs. In terms
2 of your sergeants and inspectors, there was nothing said
3 by them, was there, to give you any hint that the
4 information on the ADAM system was different to the map
5 or your briefing?
6 A. No, madam.
7 Q. If you had been given any indication of that, you would
8 have looked on the ADAM system, wouldn't you?
9 A. Yes, madam.
10 Q. Can we move on, please, to what you've told us about the
11 fact that previously there was a fixed post at
12 Carriage Gates. Can you help us as to when that was?
13 A. I can just tell you that prior to the sectors coming in
14 it was a fixed post, but I can't remember the exact
15 time, I am afraid.
16 Q. All right. You can't give us an idea, as far as you
17 recollect, a year?
18 A. I wouldn't want to speculate. I wouldn't want to
19 speculate.
20 Q. Okay. When the post was a fixed post, was there also
21 a patrol?
22 A. Not as far as I'm aware.
23 Q. Right. Has there — during the time that you've worked
24 at New Palace Yard and the Palace of Westminster, has
25 there ever been a static post, a fixed post, and

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1 a patrol within New Palace Yard?
2 A. Together?
3 Q. Yes.
4 A. Not that I can recall, madam.
5 Q. In relation to your experience, the fixed post is the
6 best solution, as you've described, because it ensures
7 that you are able to adequately protect Carriage Gates;
8 that's right, isn't it?
9 A. Yes, madam. Yes, that's correct.
10 Q. If you had a patrol as well, that would have the benefit
11 of the unpredictability, wouldn't it?
12 A. That's correct.
13 Q. Have you ever been given or heard any reason for why you
14 couldn't just have both?
15 A. No, madam.
16 Q. In relation to the aspect of the patrol, you may be able
17 to help with this, you may not, but could you have
18 a look, please, at {WS5103/13}, which is an email that
19 you were taken to previously. Thank you.
20 If you just have a look, do you recognise that as
21 the email that you were taken to by counsel for the
22 widow, going through the changes that were suggested?
23 A. Yes, madam.
24 Q. Thank you. Could you just have a look at the second
25 page of that email, so moving on to 14 {WS5103/14}. Do

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1 you see a reference there to "Dedicated Patrol" in bold?
2 A. Yes.
3 Q. The dedicated patrol, then, I don't need to ask what
4 areas it covers, but that isn't a reference to any
5 patrol within New Palace Yard?
6 A. No, madam, that's correct.
7 Q. In terms of a fixed post, you had the benefit of working
8 when that was the security system in place, haven't you?
9 A. That's correct.
10 Q. Looking at the factors that would be relevant, and in
11 terms of that can I just ask you this: your training as
12 an AFO, you're given very regular training, aren't you?
13 A. Yes, that's correct.
14 Q. Are you given exercises so that you're able to practice
15 and adapt to situations such as this, a terrorist
16 attack?
17 A. Yes, madam, at our tactical refreshers.
18 Q. And tactical refreshers?
19 A. At our tactical refreshers we would be faced with such
20 scenarios.
21 Q. You, then, as an AFO, have experience of being taught
22 and practising yourself how to deal with such
23 an incident as occurred at Carriage Gates?
24 A. Yes, madam.
25 Q. What you're taught is that you have to conduct a dynamic

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1 process of constantly reassessing the risks and
 2 reassessing how best to deal with that risk; is that
 3 right?
 4 A. That's correct.
 5 Q. In terms of the relevant factors, it would be relevant,
 6 wouldn't it, if you were on a fixed post with
 7 responsibility for a set area, or whether or not you
 8 were on a patrol. That would be a relevant
 9 consideration?
 10 A. Yes, madam.
 11 Q. You went to the sound of what you thought was a car
 12 collision because that area was within your patrol,
 13 wasn't it?
 14 A. Yes, madam, I went to that area because I thought
 15 I might be able to help, to ascertain what was going on.
 16 Q. It was an area within your patrol?
 17 A. The vehicle impacted in gates that were just outside the
 18 patrol.
 19 Q. Yes.
 20 A. Yes.
 21 Q. But the direction you went and where you walked was
 22 within your patrol?
 23 A. It was, madam, yes.
 24 Q. If you were on a fixed post it would be a relevant
 25 consideration, wouldn't it, that you're meant to be

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1 responsible for that fixed area?
 2 A. Yes, madam.
 3 Q. On top of that, of course, you would, if you had been on
 4 the fixed post, you would have been able to take into
 5 account the matters that have been referred to already,
 6 the hundreds of people rushing past, the fear, the
 7 screaming, and being told about somebody stabbing using
 8 knives?
 9 A. Yes, madam.
 10 Q. You would be told during your training about the fact
 11 that terrorists can use diversion tactics, can't they?
 12 A. Yes, madam.
 13 Q. That's something you would be fully familiar with?
 14 A. Yes.
 15 Q. If you had been at Carriage Gates and seen and heard
 16 everything that's just been listed, it would have been
 17 clear, wouldn't it, that this was no ordinary car crash?
 18 A. Yes, madam.
 19 Q. It would, then, have been a relevant factor, wouldn't
 20 it, that you wouldn't want to leave your fixed post and
 21 your responsibility to safeguard that entrance to the
 22 Houses of Parliament by being diverted off somewhere
 23 else?
 24 A. Yes, madam.
 25 Q. In terms of your experience, and we know, of course,

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1 that Police Constable Palmer was an AFO, wasn't he?
 2 A. I don't know.
 3 Q. You didn't know that?
 4 A. I didn't know that, madam, no.
 5 Q. You didn't know, all right. Well, he was. So in terms
 6 of your experience, you are taught, aren't you, at the
 7 training, that it's absolutely essential that you can be
 8 in a position to deal with matters immediately?
 9 A. Yes, madam.
 10 Q. In terms of that, you would be taught, wouldn't you,
 11 about the importance of ensuring a line of fire?
 12 A. Yes, madam.
 13 Q. In terms of the risk assessment, one of the matters to
 14 take into account is whether or not you're going to be
 15 able to effectively deal with the risks --
 16 A. Yes, madam.
 17 Q. -- is that fair?
 18 A. That is fair, yes.
 19 Q. You have the benefit, of course, of your experience as
 20 an AFO and also all your years of experience as a police
 21 officer when you were unarmed.
 22 A. That's correct, yes.
 23 Q. It would be pretty obvious, wouldn't it, in terms of
 24 assessing how much help you could provide to dealing
 25 with the risk, that if you are unarmed and you are

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1 facing an assailant who is holding two very large
 2 knives, you're not going to be able to assist greatly?
 3 A. That's correct.
 4 Q. Therefore, in the position of an unarmed officer like
 5 Police Constable Palmer, if there had been an authorised
 6 firearms officer present, the authorised firearms
 7 officer would be in a much better position to deal with
 8 the risk than PC Palmer?
 9 A. That's correct.
 10 Q. It goes further than that, because it's not just that
 11 the unarmed officer, Police Constable Palmer, is going
 12 to be unlikely to be of much assistance; if the unarmed
 13 officer remains at Carriage Gates and doesn't move, they
 14 could end up being an obstacle to your line of fire,
 15 couldn't they?
 16 A. That's correct, madam, yes.
 17 Q. And anybody who has been through any police training
 18 would know that that's something that wouldn't assist
 19 the authorised firearms officer?
 20 A. That's correct, madam.
 21 Q. So in terms of the training, you would know that you
 22 would need to move out of the way so that the AFO has
 23 a clear line of fire?
 24 A. Yes, madam.
 25 Q. It's also part of your training, isn't it, to be aware

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1 that people can be used as a physical barrier, that
 2 humans can be used as shields?
 3 A. Yes, madam.
 4 Q. So it's a known terrorist tactic to take a person
 5 hostage and use them to try and stop an officer firing
 6 at them?
 7 A. Yes, madam.
 8 Q. Therefore, in the position of an unarmed police officer
 9 at Carriage Gates, if you don't move, you are unlikely
 10 to be able to help; yes?
 11 A. Yes.
 12 Q. You could get in the way of an authorised firearms
 13 officer's line of fire?
 14 A. Yes.
 15 Q. And you could further cause problems by being taken and
 16 used as a physical shield.
 17 A. Yes, madam.
 18 Q. So in terms of all the training and experience, the best
 19 thing to do is to move out of the way.
 20 A. Yes.
 21 Q. That's if an authorised firearms officer is present.
 22 A. Yes.
 23 Q. If an authorised firearms officer is not present,
 24 an unarmed officer really is left with two options,
 25 aren't they? Number one is to run off.

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1 A. Yes.
 2 Q. As we know many did. The second is to move forward and
 3 try and confront, as we're aware Police Constable Palmer
 4 incredibly bravely did?
 5 A. Yes, madam.
 6 Q. Can you think of any other option that an unarmed
 7 officer is going to have, being at Carriage Gates with
 8 no AFO in sight, other than those two options?
 9 A. No, madam.
 10 Q. However, if there was an authorised firearms officer
 11 there, there's that option three of moving out of the
 12 way?
 13 A. That's correct.
 14 Q. So you don't have to step forward and confront the
 15 person wielding the knives, you can step to one side?
 16 A. Yes, madam.
 17 Q. In terms of communication between the armed officer and
 18 the unarmed officer, you've got your radio equipment,
 19 haven't you?
 20 A. Yes, madam.
 21 Q. Right. So you, the AFO, would be able to give
 22 an instruction to say "Move out the way"?
 23 A. Well, yes, I'd like to think I could do that verbally,
 24 but yes, you're right, I could use my radio, yes.
 25 Q. Exactly, if you are close enough you don't need --

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1 A. Absolutely.
 2 Q. -- to use any radio --
 3 A. Yes, madam.
 4 Q. -- you can simply say it. You would also hope that if
 5 you are dealing with an experienced officer that they
 6 would know, in any event, that that's what they need to
 7 do?
 8 A. Yes, madam.
 9 Q. You would hope that would happen very quickly, wouldn't
 10 you?
 11 A. Yes, madam.
 12 Q. Can I just ask you about a couple of more factors. In
 13 terms of what we know of Mr Masood, when you're
 14 assessing the threat, is it a relevant factor that you
 15 are -- when I say the threat, when you are assessing
 16 what you can do in terms of the threat and the time
 17 you've got, so looking really at this issue of timing,
 18 is it a relevant factor that you have somebody who has
 19 been described as not being athletic, not sprinting, but
 20 lumbering? If somebody is lumbering, is that going to
 21 give you more time to shoot?
 22 A. Yes, madam.
 23 Q. If you have somebody who is holding up the knives so
 24 they're clearly visible, that gives you more time to
 25 shoot, doesn't it, than if you have somebody who at the

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1 very last minute gets out weapons that they've had
 2 concealed?
 3 A. Yes, madam.
 4 Q. So both of those factors give you more time, don't they?
 5 A. Yes.
 6 Q. In relation to timing, AFOs have an E36 carbine; is that
 7 right?
 8 A. That's G36.
 9 Q. G36, forgive me. Thank you very much. A G36 carbine
 10 and a Glock pistol?
 11 A. That's correct.
 12 Q. In relation to yourself on that day, we know that your
 13 weapons were loaded?
 14 A. That's correct.
 15 Q. And that you had live round in the breach?
 16 A. That is correct.
 17 Q. That is something that is going to be a matter of
 18 course, isn't it?
 19 A. Yes, madam.
 20 Q. You, therefore, as indeed would any AFO armed with those
 21 weapons loaded with live round in the breach, you're
 22 going to be able to respond very quickly, aren't you?
 23 A. Yes, madam.
 24 Q. Having the G36 carbine is going to put you in a better
 25 position to engage with an armed assailant than a close

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1 protection officer with just a pistol?
 2 A. Well, the weapon would do the same thing, but certainly
 3 the carbine is a more powerful round, so yes.
 4 Q. More powerful and easier to get that successful hit?
 5 A. Yes.
 6 Q. In terms of your training, you must have undergone, as
 7 would any AFO, numerous scenarios where you have to get
 8 a shot in very difficult circumstances?
 9 A. Yes, madam.
 10 Q. Those circumstances are going to include when the attack
 11 has already started?
 12 A. Yes.
 13 Q. Trying to get a shot when people are already being
 14 attacked and are struggling?
 15 A. Yes.
 16 Q. Because otherwise, if you were unable to try and get
 17 a shot when a struggle is ongoing, AFOs are not going to
 18 be in a very good position to help, are they, if they
 19 come along later?
 20 A. No.
 21 Q. No. So you are trained in terms of how to deal with
 22 that, aren't you?
 23 A. Yes.
 24 Q. The training that you are given in relation to difficult
 25 circumstances and getting that good shot is very

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1 intensive, isn't it?
 2 A. It is.
 3 Q. It's good training and it's effective training?
 4 A. Yes, madam.
 5 Q. In terms of the dynamic assessment, you will have to
 6 take into account not only the circumstances in terms of
 7 how easy it is to get a shot, you're also going to have
 8 to take into account how severe the consequences are if
 9 you don't try; that's right, isn't it?
 10 A. That's correct.
 11 Q. So if it's clear that your unarmed colleague could be
 12 killed in front of your eyes, you're going to try and
 13 get that shot in, aren't you?
 14 A. Yes, madam.
 15 Q. You're not going to stand by with a loaded firearm and
 16 do nothing and watch an unarmed colleague be stabbed to
 17 death, are you?
 18 A. No, I'm not, madam.
 19 Q. You were prevented from doing that because of the
 20 system, the security system, that was in place, weren't
 21 you?
 22 A. Yes, madam.
 23 Q. You had views about the changes from the fixed post to
 24 this large patrol?
 25 A. Yes, madam.

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1 Q. Were you ever able to express those views to other AFOs?
 2 A. Well, yes, we expressed them at the time, you know,
 3 there was quite a lot of us that didn't feel that move
 4 was the correct one.
 5 Q. Quite a lot of you felt that move was incorrect?
 6 A. Yes.
 7 Q. Because it was so obvious that moving it from a fixed
 8 post to expecting you to have all that different
 9 responsibility was not a proper system of security?
 10 A. To me as a firearms officer it just appeared that it
 11 wasn't the right thing to do.
 12 Q. To a degree that a number of you expressed that?
 13 A. That's correct.
 14 Q. Were you able to express that to your sergeants?
 15 A. Yes, we would -- yes.
 16 Q. Did you express it to your sergeants?
 17 A. Yes, madam.
 18 Q. Are you aware if it was expressed to any higher level?
 19 A. I don't know where it went from there.
 20 Q. Right. Certainly, though, a number of you AFOs made it
 21 clear that the change in the security system was, as far
 22 as you experienced AFOs on the ground were concerned,
 23 simply not right?
 24 A. Yes, madam.
 25 Q. Having done that, were you given any feedback later as

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1 to why your views, as experienced AFOs on the ground,
 2 were ignored?
 3 A. No, we were just told that the sector patrol is coming
 4 in and that's what you're to perform.
 5 Q. So in effect, not only were they ignored, you were just
 6 told: that's the system, live with it?
 7 A. I was told to do something, that's what I did, madam.
 8 Q. Having expressed your views, having had the response
 9 that it was going to happen anyway, there was nothing
 10 else that you, as a police constable, could do, was
 11 there?
 12 A. No, madam.
 13 Q. Other than to resign your post?
 14 A. Yes, correct.
 15 Q. Right. You had expressed your disagreement and the
 16 reasons for it in the only way that you could?
 17 A. Yes, madam.
 18 MS STEVENS: No further questions. Thank you very much.
 19 Examination by MR KEITH QC
 20 MR KEITH: PC Ashby, I'm going to ask you some questions on
 21 behalf of the Metropolitan Police Service; do you
 22 understand?
 23 A. Yes, sir.
 24 Q. You have given a great deal of evidence about your views
 25 on the security arrangements at the

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1 Palace of Westminster.
 2 A. Yes, sir.
 3 Q. Although you are evidently an experienced AFO, you are
 4 not a trained tactical firearms assessor?
 5 A. That is correct, sir.
 6 Q. Have you ever been involved in the process of providing
 7 tactical assessments to any member or body of the
 8 Metropolitan Police?
 9 A. No, sir.
 10 Q. Have you ever, in writing, tried to provide your views
 11 on the security arrangements in the
 12 Palace of Westminster?
 13 A. No, sir.
 14 Q. Your role as an AFO was to carry out the patrolling
 15 duties set for you by post instructions; is that right?
 16 A. Yes, sir.
 17 Q. And although you have expressed your views widely on the
 18 arrangements at the Palace of Westminster, the reality
 19 is that you did not go to the ADAM system and,
 20 therefore, you did not see the post instructions; that
 21 is the position, is it not?
 22 A. Yes, sir.
 23 Q. And the responsibility for that failure, PC Ashby, who
 24 does that rest with: you or somebody else?
 25 A. Like I said, sir, prior to the incident, I was not

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1 informed to go on the ADAM system. We were told every
 2 day to use the map that was on the wall.
 3 Q. PC Ashby, you had heard, had you not, of the ADAM
 4 system, the Armed Deployment Authorities Management
 5 system?
 6 A. Yes, sir.
 7 Q. When had you first heard of it?
 8 A. I can't recall exactly when, sir.
 9 Q. Well, you've been an AFO for 13 years, six of them in
 10 the permanent team. Assist the Chief Coroner, please,
 11 with when you first heard of the ADAM system?
 12 A. Sir, I don't know when I first heard of the ADAM system.
 13 Q. It was instituted around 2012. You accessed it on
 14 29 June 2015, not, in fact, the December date that was
 15 put to you and with which you agreed. Your last access,
 16 your only access, was on 29 June 2015. Why did you go
 17 to the ADAM system on that day if you did not know of
 18 the system?
 19 A. Possibly to log on to see if I could get onto the
 20 system, sir.
 21 Q. And what did you find, officer?
 22 A. I can't remember, sir.
 23 Q. Did you find the post notes?
 24 A. I don't know, sir.
 25 Q. They're in the system, so may we presume that you would

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1 have found the post notes if you went to the system?
 2 A. You could presume that, sir.
 3 Q. Yes?
 4 A. I can't recall seeing them, sir, but possibly.
 5 Q. Do you accept that if you went to the ADAM system and
 6 you logged on, as you've agreed you did, you would have
 7 seen the post notes because they were in the system and
 8 they have always been in the system?
 9 A. It's possible, sir.
 10 Q. Yes. Did you ever discuss with your fellow officers
 11 that you had been to the ADAM system through the
 12 Parliamentary and Diplomatic Protection Information
 13 Point and logged on?
 14 A. No, sir.
 15 Q. Are you saying that in the six years that you were on
 16 the permanent team, no officer, to your knowledge, ever
 17 discussed the primary means of accessing the post
 18 instruction?
 19 A. Yes, sir.
 20 Q. So you've agreed that your role is to do that which the
 21 post instructions, or post notes, tell you to do. The
 22 map on the wall is not a post instruction, is it?
 23 A. That's what I was told to do every day, sir, the map
 24 that was on the wall.
 25 Q. Why would an officer, a sergeant, or an inspector, tell

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1 you every day, Mr Ashby, that the map was what you were
 2 meant to follow? Surely if you had done that every day
 3 for the previous five years, you would have been well
 4 aware of the map?
 5 A. Sir, we were told every day that the map on the wall in
 6 the base room is your patrol area in blue.
 7 Q. May I press you, please, Mr Ashby: who told you, which
 8 officers, which sergeants or inspectors, and over how
 9 long did they tell you to look at the map on the wall
 10 and follow that map every day?
 11 A. Our sergeants that were posted there told us every day
 12 that the map on the wall underneath the air conditioning
 13 unit, those sectors in blue, that is your patrol areas.
 14 Q. Would you please assist as to how this briefing went?
 15 A. Verbally, sir.
 16 Q. So the sergeant, or the inspector, would say: officers,
 17 today please follow this map on the wall?
 18 A. That's quite correct.
 19 Q. The map on the wall, did it ever change?
 20 A. No.
 21 Q. Were you not surprised that over the six years that it
 22 was on the wall -- I believe it was placed there in July
 23 of 2012 -- it never changed?
 24 A. I never thought to consider that, sir.
 25 Q. Have you heard of the expression "Post notes" or "Post

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1 instructions" or "Patrol notes" or "Briefing notes"?
 2 A. Yes, sir.
 3 Q. So did you think to yourself: this map does not say
 4 "Post instructions" on it, I wonder whether there are
 5 other post instructions or post patrol notes or post
 6 notes available?
 7 A. No, sir, I assumed that because it said on the wall
 8 sector 3 and I was being told every day to do it,
 9 I would do it.
 10 Q. Can we have, please, on the screen {WS1633/5}. This is
 11 a copy of the map taken from the wall, PC Ashby, by
 12 an SO15 investigating officer. By your evidence, you
 13 have looked at this map every day for at least five and
 14 a half years; yes?
 15 A. Yes, sir.
 16 Q. You must have wondered what the red dots were?
 17 A. I know what the red dots are, sir.
 18 Q. What are they?
 19 A. They are panic alarms.
 20 Q. And you had a copy of this map in your pocket?
 21 A. That's correct.
 22 Q. The laminated map?
 23 A. That's correct.
 24 Q. The laminated map didn't have the redacted portion on
 25 the bottom of the screen, did it? If we could scroll

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1 down, please, to the bottom of the exhibit, we can see
 2 that there's a part of it redacted.
 3 A. That's correct.
 4 Q. This map related, didn't it, to the red dots, it was
 5 about the red dots, wasn't it?
 6 A. No, sir, I was told that that is our sector 3.
 7 Q. No, I'm asking you, on the face of the map, what was it
 8 concerned with?
 9 A. Sector 3, the New Palace Yard area.
 10 Q. What were -- what was the significance of the red dots
 11 on the map, PC Ashby?
 12 A. The red dots are alarm points on that -- in that area.
 13 Q. This map was about the location of alarm points, wasn't
 14 it?
 15 A. No, sir, we were told that that was sector 3, our patrol
 16 area.
 17 Q. Put aside what you were told, PC Ashby --
 18 A. Yes.
 19 Q. -- I'm going to come back in a moment to that. To you,
 20 as an intelligent, experienced AFO who had looked at
 21 this map every day for five and a half years --
 22 A. Yes.
 23 Q. -- what was the purpose of this map on the wall of your
 24 base room?
 25 A. The purpose of that map, to me, was that's the area that

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1 AFOs assigned to sector 3 are told to be in.
 2 Q. It was a map, was it not, of alarm locations. That is
 3 the redacted part, that is what the red dots refer to;
 4 that is correct, isn't it?
 5 A. The red dots do refer to alarms on there, yes.
 6 Q. And did you ever think to yourself: that's curious, this
 7 map appears to relate to alarm locations, yet I'm being
 8 told that that is where I'm due to patrol?
 9 A. No, I just thought it was areas where at any point
 10 alarms could go off.
 11 Q. This map, even when it was first introduced
 12 in July 2012, was not in fact the area that you could or
 13 did patrol because you never patrolled the top area to
 14 the left, which was the part of the
 15 Palace of Westminster going down towards St Stephen's
 16 entrance.
 17 A. That's correct.
 18 Q. You never patrolled that?
 19 A. No, sir, we were told not to patrol that part because it
 20 actually moved into another sector.
 21 Q. Yes. So did you think to yourself: this blue area can't
 22 be the patrol map that I am meant to patrol for ranger
 23 sector 3 because part of it is not in fact my patrol
 24 area?
 25 A. No, because like I've just said to you, sir, I was

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1 told -- we were all told not to patrol that area.
 2 Q. Do you now understand that post instructions varied over
 3 time, before being uploaded --
 4 A. I now understand that, yes.
 5 Q. -- into the ADAM system. Did you ever receive an email
 6 notifying you that the post instructions had changed and
 7 that the new instruction could be found in ADAM?
 8 A. I can't recall, sir.
 9 Q. PC Ashby, you do receive emails, do you not, in relation
 10 to the performance of your operational duties?
 11 A. Yes, sir.
 12 Q. In fact, you regularly receive emails, don't you,
 13 setting out changes to your operation, changes to your
 14 practice, changes to your work?
 15 A. Yes, sir.
 16 Q. From your sergeants and your inspectors?
 17 A. Yes, sir.
 18 Q. And over the years, you have received possibly hundreds
 19 of emails?
 20 A. That's correct.
 21 Q. So please tell the Chief Coroner, did you receive
 22 an email ever referring either to ADAM or to post
 23 instructions or to post patrol notes?
 24 A. I may have done, sir, yes.
 25 Q. All right. And if you did, which you might have done,

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1 and you had opened them or read them or gone to the
 2 link, you would have seen the post instruction, would
 3 you not?
 4 A. Yes, sir.
 5 Q. You would have seen the post instruction
 6 of May 2010, April 2011, October 2012, November 2014,
 7 January 2015 and December 2015. Six in all before the
 8 terrible events of March 2017; correct?
 9 A. Yes, sir.
 10 Q. Whose responsibility is it, or was it, to open those
 11 links and those emails and find the post instructions?
 12 A. Mine, sir.
 13 Q. Whose fault is it that you did not know, apparently,
 14 that the post instructions gave you the patrol area?
 15 A. Sir, I was told that sector 3 is the area that I patrol,
 16 that's what I was told every day.
 17 Q. Whose fault is it that you now say you did not know the
 18 exact area of the patrol location in ranger sector 3?
 19 A. Sir, I can only go on what I'm told to do every day.
 20 Q. I'll ask you one more time, please, officer: whose fault
 21 is it that you did not know the details of the post
 22 instructions when you accept you may have received the
 23 emails with the links and you knew of the ADAM system
 24 and the access to it, but which you did not do?
 25 A. Sir, I -- that's what I was told to do every day, what

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1 was on that -- on the wall where we book out our guns.
 2 Q. Well, we will draw our own conclusions from your answer
 3 to that question.
 4 You were asked whether other officers had done the
 5 same as you and had not logged onto ADAM. You do not
 6 know whether other officers logged onto ADAM because you
 7 are not privy to the access codes for ADAM which tell
 8 you who has logged on, are you?
 9 A. No, sir.
 10 Q. You do not know how frequently other officers logged
 11 onto ADAM, do you?
 12 A. No, sir.
 13 Q. And therefore when you said that you understood that
 14 officers hadn't, that may have been a guess on your
 15 part?
 16 A. I'm sure I heard that people said they hadn't logged
 17 onto ADAM, sir.
 18 Q. Did you ever hear -- did every officer on duty at the
 19 Palace of Westminster tell you that they had never
 20 logged onto ADAM?
 21 A. Every officer?
 22 Q. Did every officer at the Palace of Westminster to whom
 23 you spoke tell you that they had never logged onto ADAM?
 24 A. No, sir.
 25 Q. No. You do not know how many times they logged on or

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1 who did, do you?
 2 A. No, sir.
 3 Q. The base room is where you commence your patrols from,
 4 is it not?
 5 A. That is correct.
 6 Q. And in the base room, there is a hard-copy binder
 7 containing documents, isn't there?
 8 A. I don't know, sir, what's in the documents?
 9 Q. In the base room, is there not a blue hardback folder
 10 containing written directions and documents relating to
 11 the duties of AFOs in the Palace of Westminster?
 12 A. Not that I've seen, sir.
 13 MS STEVENS: Sir, sorry, I hesitate to rise. Could we just
 14 deal with a matter of disclosure.
 15 MR KEITH: Commander Usher says in his witness statement:
 16 "Due to IT difficulties there is a hard-copy binder
 17 containing post instructions kept in the base room,
 18 including one for armed officers. They're expected to
 19 read it regularly."
 20 That is what I am putting.
 21 THE CHIEF CORONER: Right.
 22 MS STEVENS: Sir, you may remember that we did ask for
 23 disclosure of the contents of that folder which we
 24 haven't been given.
 25 THE CHIEF CORONER: At the moment I think what's being asked

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1 is about the existence of a folder. We haven't got onto
 2 the contents of it at the moment.
 3 MS STEVENS: No.
 4 THE CHIEF CORONER: PC Ashby has simply said he's not aware
 5 of a folder.
 6 MS STEVENS: So be it. If it goes further, I just wanted to
 7 lay that marker. Thank you.
 8 THE CHIEF CORONER: Thank you.
 9 MR KEITH: What documents were in the base room, PC Ashby?
 10 A. We had our duty binder, showing what we do every day.
 11 Q. And what is that, a schedule of hours showing you are on
 12 patrol ranger sector 3 from 10.00 to 12.00; 2.00 to 6.00
 13 ranger sector 4, or something like that?
 14 A. Yes, sir. Yes, sir.
 15 Q. What else?
 16 A. You would have the armoury log, showing when you book
 17 out weapons. You would have the maps on the wall.
 18 Q. Were there any other folders, PC Ashby?
 19 A. Not that was brought to my attention, sir.
 20 Q. Is it possible that there was a folder there but no one
 21 specifically placed it in your hands and said: these are
 22 the post instructions?
 23 A. It's possible.
 24 Q. And you simply do not know?
 25 A. It's possible, yes.

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1 Q. From what you have told us, this map with the red dots
2 was the only map to which you had regard in the entirety
3 of your time as an AFO at the Palace of Westminster?
4 A. Yes, sir.
5 Q. The whole time?
6 A. Obviously I didn't have that map prior to doing sectors.
7 Q. No. So what did you look at before 12 July 2012 when
8 this map was produced, because you were still an AFO
9 before that date, were you not?
10 A. Yes, sir.
11 Q. What did you look at then?
12 A. I can't recall, sir.
13 Q. When was the post for Carriage Gates a fixed post,
14 PC Ashby?
15 A. I can't remember the exact date, sir, when it was.
16 Q. Was it two years ago, three years ago, six years ago,
17 15 years ago? Help us if you can.
18 A. When the sectors came in, sir. I can't remember the
19 exact time they came in.
20 Q. No, when the post -- just when, physically, AFOs,
21 according to you, stopped standing still at a static
22 post at Carriage Gates and began mobile patrol?
23 A. Just prior to sectors coming in, sir.
24 Q. Do you know when that was?
25 A. No, I am afraid I don't know when it was.

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1 Q. The alarm system has been around for a very, very long
2 time, so presumably ranger sector 3 has been around for
3 a very, very long time. So are you right to say that
4 sectors were introduced at the same time as mobile
5 patrols?
6 A. To the best of my knowledge, sir, all sectors were
7 introduced at the same time and that's what we were told
8 to do as per the maps.
9 Q. You were asked why, if this map was truly a map of your
10 proper patrol area, it wasn't taken down from the wall,
11 and I think the point being made was: well, it should
12 have been taken down if there had been changes to the
13 post instructions and to the method of your patrol?
14 A. Yes, sir.
15 Q. But if it was an alarm map showing static alarm points
16 which never changed, there would have been no need to
17 take the map off the wall, would there?
18 A. Sir, all I can say to you is every day we were told:
19 sector 3, your patrol area is that which is on the map.
20 That's what every firearms officer was told.
21 Q. Is that because you are saying that every firearms
22 officer was gathered together and every day they were
23 told the same thing?
24 A. No, I'm saying, sir, that I had patrolled sector 3 on
25 many occasions with many different AFOs, and they all

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1 patrolled the same area in blue as per being told to.
2 I've been there on many occasions when I've heard that
3 being said.
4 Q. I want to press you further on this, please, PC Ashby.
5 Are you saying that every single supervisor -- because
6 they changed -- every single inspector and every single
7 sergeant -- because they changed from day-to-day -- told
8 you exactly the same thing: today you follow the map?
9 A. I'm saying that, sir, yes. I'm saying that when we was
10 out in that patrol area we were being approached by
11 sergeants, all manner of ranks, and no firearms officer
12 received any criticism for being in that area.
13 Q. That, with respect, is another issue.
14 A. Okay.
15 Q. It's quite possible, we can understand that officers
16 approaching you whilst you are on patrol may not have
17 said: PC Ashby, you are in the wrong area, get back to
18 Carriage Gates, but that's a separate issue which I will
19 come back to. I'm talking to you about what you were
20 told by way of instruction every morning that were on
21 duty. Are you telling us that every single supervisor
22 and every single inspector and sergeant said the same
23 thing every day for six years?
24 A. Yes, sir, you were told to patrol that area as per the
25 maps on the wall.

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1 Q. You were told, were you not, after the terrible events
2 of March 2017, that you were obliged to follow post
3 instructions and that that map was not the post
4 instruction, weren't you?
5 A. Yes, sir.
6 Q. Because when you were first asked this morning, where
7 you were asked about these events and your duties and
8 the misconduct matter and the post instructions, you
9 denied that there was a meeting. Had you forgotten?
10 A. No, I initially didn't know that it was the meeting with
11 Commander Usher.
12 Q. No, you were asked: did any of your senior officers
13 speak to you after the event about the post
14 instructions, your failure to access ADAM, and what you
15 had not done?
16 MR ADAMSON: Sir, I think the question that I asked related
17 to whether or not PC Ashby had been told what he did
18 wrong.
19 THE CHIEF CORONER: That, I think, accords with my
20 recollection, but I haven't got a note-for-word
21 recollection.
22 MR ADAMSON: I obviously haven't got a note, because I was
23 on my feet.
24 THE CHIEF CORONER: No, and I haven't got the transcript in
25 front of me.

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1 MR KEITH: We have a note. We will check it, if I am wrong,
 2 I will of course be the first to accept it.
 3 THE CHIEF CORONER: But we do have a transcript, is what
 4 I was going to say, so we can, at least --
 5 MR ADAMSON: That would be the best record.
 6 THE CHIEF CORONER: Yes.
 7 MR ADAMSON: I just want PC Ashby to be questioned fairly.
 8 THE CHIEF CORONER: Quite.
 9 MR KEITH: PC Ashby will always be questioned fairly.
 10 THE CHIEF CORONER: I think Mr Keith has said that if he has
 11 got it wrong, Mr Adamson, he will correct it, but short
 12 of actually going back to the very passage in the
 13 transcript, I'll let Mr Keith continue for the moment
 14 and we can check it in due course.
 15 MR KEITH: Superintendent Audrey Shannon, who was the senior
 16 officer of Parliamentary and Diplomatic Protection spoke
 17 to you, did she not, on 19 January at 1 o'clock?
 18 A. That's correct.
 19 Q. And she took you through the MM1, which is the document
 20 setting out the report on possible misconduct?
 21 A. Yes, sir.
 22 Q. The fact finding?
 23 A. Yes.
 24 Q. She told you that the CCTV had showed that you had not
 25 been at Carriage Gates at the time of the attack?

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1 A. That's correct.
 2 Q. Although, significantly, Mr Sanders and Mr Gerard had
 3 been there earlier, for around about 15 minutes. She
 4 told you that access to the system had revealed that you
 5 had not used ADAM since June 2015.
 6 A. That's correct.
 7 Q. And she told you that you were obliged to use the ADAM
 8 system and that the post notes which you would have
 9 found there were there to be complied with?
 10 A. That's correct.
 11 Q. So she told you in terms what had gone wrong, hadn't
 12 she?
 13 A. She told me that the misconduct investigation had found
 14 that it was understandable why we were in our location,
 15 and that the issue regarding post notes, whilst I hadn't
 16 logged onto it, but that was put down to organisational
 17 learning, is what she told me, sir.
 18 Q. And you understood, didn't you, that had you gone to the
 19 ADAM system, had you opened the emails which you may,
 20 you have accepted, have received, if you had looked at
 21 the post instructions, you would have realised that the
 22 map on our screen was no patrol map at all; it was
 23 an alarm map. You realised that, didn't you, at that
 24 point?
 25 A. At that point, yes.

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1 Q. The post instructions, we've been calling them post
 2 instructions, but you're very familiar, aren't you, with
 3 the phrase "post notes" or "patrol notes" or "briefing
 4 notes"?
 5 A. Yes, sir.
 6 Q. They are the very stuff of police officers discharging
 7 their duties?
 8 A. Yes, sir.
 9 Q. All police officers, to some extent, receive patrol
 10 notes, post notes, briefing instructions, documents --
 11 A. Yes, sir.
 12 Q. -- setting out what their obligations are.
 13 A. Yes, sir.
 14 Q. If what you say is right, that you were told every day
 15 to patrol according to the alarm map, which is how
 16 I will call it, did you not think to yourself: this is
 17 strange that in 16, perhaps more, years I've never
 18 received a single briefing note, parade book entry,
 19 sector binder, post note, post instruction or document
 20 relating to the discharge of my duties?
 21 A. Sir, I thought that when my supervisors were telling me:
 22 that's what you do, that's what I do. That wasn't
 23 unique to me. That was every firearms officer that went
 24 out onto sector 3.
 25 Q. We've debated that issue. You don't know, you've

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1 agreed, whether they did have access to ADAM or to what
 2 I suggest is the hard copy binder in the base room. You
 3 don't know.
 4 The post instructions, had you accessed them,
 5 ordered the police officers patrolling ranger sector 3
 6 to focus on Carriage Gates, didn't they?
 7 A. Yes, sir.
 8 Q. And they made it absolutely plain, certainly
 9 from January 2015 and following the review
 10 in December 2015 and therefore covering the events
 11 of March 2017, that officers were not to patrol in
 12 pairs; that their focus was on Carriage Gates, but that
 13 there could be a short patrol into New Palace Yard to
 14 cover, in particular, the Cromwell Green visitor search
 15 route exit?
 16 A. Yes, sir.
 17 Q. So let us discuss, please, for a moment, how you might
 18 have reacted if you had been aware of the post
 19 instructions which you say you weren't aware of. You
 20 now know what they comprised of?
 21 A. I do sir, yes.
 22 Q. And if you had understood that your primary focus was
 23 Carriage Gates and you had remained in the area between
 24 Carriage Gates and the members' entrance, or between
 25 Carriage Gates and the Cromwell Green search centre

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1 exit, that is to say around about the south side of
 2 New Palace Yard —
 3 A. Yes, sir.
 4 Q. — that wouldn't have meant, would it, that you would
 5 have ignored a threat coming from somewhere else?
 6 A. No, sir.
 7 Q. Of course not.
 8 New Palace Yard presented all sorts of threats, did
 9 it not?
 10 A. Yes, sir, it did.
 11 Q. And you are the gentleman who had to suffer the daily
 12 brunt of assessing and reacting to threats that might
 13 arise, so tell us, please, what sort of threats you were
 14 aware of in March 2017 that might have impacted upon
 15 New Palace Yard. What were you — in other words, what
 16 were you looking out for? What might have happened that
 17 you would have had to react to?
 18 A. It could be anything, sir. Someone coming through
 19 Cromwell Green entrance, an attack at members' entrance
 20 going over the low fence, someone coming through
 21 Carriage Gates.
 22 Q. You have mentioned Carriage Gates and members' entrance.
 23 A. Cromwell Green.
 24 Q. Cromwell Green.
 25 A. Cromwell Green entrance.

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1 Q. Is there a public subway that comes out into the
 2 colonnades?
 3 A. You have the subway entrance. You also have along
 4 Bridge Street a fence which I believe in the past people
 5 have mounted and gone over into the estate.
 6 Q. So on Bridge Street, as we've seen from some of the
 7 documents, there is, of course, a perimeter.
 8 A. Yes.
 9 Q. Bordered by Bridge Street?
 10 A. Yes, sir.
 11 Q. And there's another perimeter, isn't there, of course
 12 adjacent to Carriage Gates onto Parliament Square?
 13 A. Yes, sir.
 14 Q. So you have a perimeter on two sides?
 15 A. Yes.
 16 Q. On a third side, you have the exit from the subway from
 17 Westminster tube station?
 18 A. Yes, sir.
 19 Q. Which comes out at one end of the colonnades?
 20 A. That's quite correct.
 21 Q. And in the middle of the colonnades, you have an exit or
 22 entry into Speaker's Court?
 23 A. That's right.
 24 Q. And on the far side of New Palace Yard, you have the
 25 members' entrance where parliamentarians go in and out?

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1 A. Yes.
 2 Q. You've got the exit from Carriage Green search point?
 3 A. Cromwell Green.
 4 Q. I apologise, Cromwell Green search point. And then you
 5 come back round of course to Carriage Gates?
 6 A. Yes, sir.
 7 Q. So were there, in fact, potential threats on all four
 8 sides of New Palace Yard?
 9 A. Yes, sir.
 10 Q. Is New Palace Yard level with the surrounding geography,
 11 the roads and the streets —
 12 A. No, sir.
 13 Q. — or is it lower?
 14 A. No, sir, it sits below Bridge Street.
 15 Q. What is the significance of that in terms of risk?
 16 A. Well, as a firearms officer it's very significant
 17 because anyone above it would have the hierarchy of
 18 threat if I was engaged in a firearms incident.
 19 Q. Now, no one told you to stand in the colonnades for
 20 46 minutes, did they?
 21 A. No, sir.
 22 Q. You exercised your discretion to be there because it is
 23 just one of the possible places from which a threat may
 24 emerge?
 25 A. Yes, sir.

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1 Q. Were you prone to standing in the colonnades more than
 2 any other area?
 3 A. No, sir.
 4 Q. Would you ever have moved away from that place at the
 5 same time on every single patrol or would it have been
 6 a random departure?
 7 A. It's random, sir, yes.
 8 Q. Why is that?
 9 A. Because we're never told to actually — you know, we had
 10 freedom of movement, so you're unpredictable to hostile
 11 reconnaissance.
 12 Q. Right. So the benefit of frequent movements is its
 13 unpredictability?
 14 A. Yes, sir.
 15 Q. What other threats did you understand you were obliged
 16 to be alert to? In terms of the terrorist threat with
 17 which we, but particularly you, live? What forms of
 18 threat present themselves?
 19 A. Sorry, sir, I don't particularly ...
 20 Q. Okay. Are you aware of what a VBIED is, a vehicle-borne
 21 improvised explosive device?
 22 A. Yes, sir.
 23 Q. What is it?
 24 A. It is a vehicle which is essentially carrying an
 25 improvised explosive device within it.

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1 Q. What is an IED?
 2 A. It's a bomb.
 3 Q. Is a suicide bomber a form of IED?
 4 A. Yes, sir.
 5 Q. What is a marauding attack?
 6 A. A marauding attack is similar to a Mumbai-style attack
 7 where there are several terrorist attackers at different
 8 locations.
 9 Q. What's a stand-off attack?
 10 A. A stand-off attack?
 11 Q. So attack from outside the area, a stand-off attack?
 12 A. I'm not aware of that phrase, sir.
 13 Q. You don't know that phrase. Could a terrorist stand on
 14 Bridge Street or Parliament Square and aim a mortar or
 15 a gun or some other explosive device at New Palace Yard?
 16 A. Absolutely.
 17 Q. Are all those threats realistic threats?
 18 A. Yes, sir.
 19 Q. Were they threats which you had in mind?
 20 A. Yes, sir.
 21 Q. If you were standing by Carriage Gates, or the
 22 Cromwell Green exit, and a terrorist drove a vehicle
 23 into the gates, into the railings, I apologise, in
 24 Bridge Street --
 25 A. Yes.

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1 Q. -- with a bomb on board, or a bomb on him or her --
 2 A. Yes.
 3 Q. -- could you have ignored that threat?
 4 A. No, sir.
 5 Q. What would you have had to have done?
 6 A. I would have made my way to that location.
 7 Q. Would the same apply if you had been standing on
 8 Carriage Gates?
 9 A. Yes, sir.
 10 Q. Why would you have had to have gone to the emerging
 11 threat somewhere else in New Palace Yard?
 12 A. Because of the nature of the threat, sir. As a police
 13 officer, an AFO, it's important that I get there and see
 14 if I can help.
 15 Q. If you had been on Carriage Gates whether as part of
 16 a mobile patrol or a fixed post, that is to say a post
 17 from which you do not depart at all in the whole course
 18 of your patrolling duties --
 19 A. Yes, sir.
 20 Q. -- what do you think you would have done on that day if
 21 you had heard the sound of that car exploding up against
 22 the railings in Bridge Street?
 23 A. I would have gone there, sir, to assist.
 24 Q. Would you have gone even though it left Carriage Gates
 25 unprotected in terms of an AFO?

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1 A. Quite possibly, sir.
 2 Q. Why would you have done that?
 3 A. Because at that time I had no idea that it was what it's
 4 turned out to be so, you know, first and foremost
 5 I'm a police officer as well and I want to help.
 6 Q. Because unless and until Masood comes in the gates,
 7 there is no obvious threat there, is there?
 8 A. That's correct.
 9 Q. Where is the only threat of which you would have been
 10 aware?
 11 A. The vehicle, sir.
 12 Q. In fact, are you aware that your predecessor, in terms
 13 of the patrolling officer, Mr Gerard, along with your
 14 colleague Mr Sanders, PC Sanders, had been in the
 15 vicinity of Carriage Gates between 13.29 and 13.43?
 16 A. I am aware of that, sir.
 17 Q. We will never know, PC Ashby, where you would have gone
 18 after the colonnades if Masood hadn't driven into the
 19 railings in Bridge Street and then insanely and
 20 viciously come through Carriage Gates.
 21 A. That's quite right, sir.
 22 Q. Might you have gone to Carriage Gates?
 23 A. Yes, sir, I might have done.
 24 Q. But we don't know, do we?
 25 A. No, sir.

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1 Q. When you went to the noise on Bridge Street, why did
 2 you, at least for a few moments, attempt to take shelter
 3 behind the low barrier that forms the exit from the
 4 underground car park?
 5 A. Because I was aware that gunshots had gone off, sir, and
 6 I thought I was being shot at.
 7 Q. However experienced, while standing near the exit point
 8 from the underground car park, would any AFO have been
 9 able to detect the direction from which those shots had
 10 come?
 11 A. No, sir, I don't think so.
 12 Q. So did you know where the shots were likely to have
 13 been?
 14 A. No, sir.
 15 Q. Could you exclude that the shots may have been in
 16 Bridge Street or on that perimeter?
 17 A. No, sir.
 18 Q. If you had been on Carriage Gates and Masood had
 19 turned -- I apologise. I'll start again.
 20 Having gone to Bridge Street because of the noise,
 21 you remained for a while next to the top of the exit
 22 ramp from the car park?
 23 A. Yes, sir.
 24 Q. If Masood had turned left and not right, as he came in
 25 through Carriage Gates, in which direction would he have

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1 gone?
 2 A. He would have come round to the vehicle search point, so
 3 towards where I was.
 4 Q. Towards where you and --
 5 A. PC Sanders.
 6 Q. -- Mr Sanders were?
 7 A. That's correct.
 8 Q. So if he had turned left, not right, he would have gone
 9 straight into the two AFOs in New Palace Yard?
 10 A. That's correct.
 11 Q. The CCTV shows that the time lapse from Masood entering
 12 Carriage Gates to Keith Palmer falling to the ground and
 13 the commencement of the appalling frenzied attack on
 14 him, was three to four seconds. You've been asked about
 15 reaction time. Let me ask you the same questions,
 16 please.
 17 If you had been at Carriage Gates and a threat had
 18 presented itself in the form of Masood with his knives,
 19 what, as an AFO, do you do first?
 20 A. I would have -- well, first of all I'd have drawn my
 21 firearm, but after assessing the backdrop. There's lots
 22 of things, sir.
 23 Q. Would you have been standing with your firearm fully
 24 armed and ready to shoot?
 25 A. Yes, sir.

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1 Q. If he had been standing there and there had not been
 2 a noise, an explosion or a type of explosion, in
 3 Bridge Street, would your firearm have been levelled,
 4 ready to fire?
 5 A. Yes, sir.
 6 Q. Or would it have been low ready?
 7 A. No, it would have been -- if the attack was about to
 8 take place in front of me --
 9 Q. I've not asked the question in a clear enough way,
 10 PC Ashby.
 11 A. Sure.
 12 Q. You're standing at Carriage Gates. You don't know
 13 Masood. Let's assume that there had been no explosive
 14 noise in Bridge Street. You are standing there. He
 15 comes through. That is the first time that the threat
 16 presents itself?
 17 A. I understand the question.
 18 Q. Would your gun already have been armed and in a ready to
 19 fire position?
 20 A. No, sir.
 21 Q. You would have had to assess whether you should bring it
 22 up to a ready fire position?
 23 A. Quite right, yes, sir.
 24 Q. And arm it?
 25 A. Yes, sir.

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1 Q. But let's assume then a second time that you were in
 2 Carriage Gates but you had heard the noise in
 3 Bridge Street?
 4 A. Yes.
 5 Q. What would you have done in terms of readying your
 6 weapon for fire?
 7 A. I would have put the select lever to fire and raised the
 8 weapon up.
 9 Q. Right up or low ready?
 10 A. To a low ready until the point of aim.
 11 Q. So if you had just heard the noise but no threat had
 12 appeared in Carriage Gates, your firearm would have been
 13 armed but not ready in a ready position?
 14 A. So I've just heard the noise of the bang?
 15 Q. Yes.
 16 A. And what was after that, sorry?
 17 Q. You're standing at Carriage Gates --
 18 A. Yes.
 19 Q. -- and Masood comes through the gates?
 20 A. Right, okay, then yes, my weapon would have been up in
 21 a low ready position.
 22 Q. So you have to bring your weapon up?
 23 A. Yes, sir.
 24 Q. What else do you have to do?
 25 A. You have to arm the weapon. You have to assess your

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1 backdrop, you have to consider the weapon you've got in
 2 your hand, the round that's in it. You have to create
 3 a reactionary gap, you have to shout out to your
 4 colleagues to move out the way.
 5 Q. Pause there.
 6 A. Yes.
 7 Q. What do you mean by having to create a reactionary gap?
 8 What is a reactionary gap?
 9 A. A reactionary gap is to create space so that you can
 10 find a suitable place to shoot.
 11 Q. Why do you need to do that?
 12 A. Because there's a lot of people behind, sir, and from
 13 that close it's quite possible that the round in my
 14 weapon could over-penetrate.
 15 Q. PC Palmer would have been there?
 16 A. Yes, sir.
 17 Q. The other unarmed officers were in the near vicinity?
 18 A. Yes, sir.
 19 Q. There were members of the public behind the gates,
 20 behind the crowd control barriers?
 21 A. Yes, sir.
 22 Q. In fact, there were many members of the public running
 23 past the gates in a group, were there not?
 24 A. Yes, sir.
 25 Q. So all that would have had to be considered?

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1 A. Yes.
 2 Q. And you were asked earlier what would you have done if
 3 you had had a clear shot, to which the answer fairly
 4 sensibly suggests itself, you would have fired?
 5 A. Yes, sir.
 6 Q. But let's look at whether or not you would have had
 7 a clear shot. Can you tell now whether you would have
 8 had a clear shot?
 9 A. No.
 10 Q. Given PC Palmer's presence there, the other unarmed
 11 officers, the crowd streaming past behind Masood, and
 12 the -- I've told you already, the three to four seconds
 13 that it took only for Masood to be upon PC Palmer, do
 14 you think you would have had a clear shot?
 15 A. Quite possibly not, sir.
 16 MR KEITH: I have no further questions, thank you.
 17 Further examination by MR HOUGH QC
 18 MR HOUGH: PC Ashby, just some final matters from me. You
 19 were asked about accessing the ADAM system and it was
 20 put to you that you had last accessed it in June 2015,
 21 before the attack.
 22 A. Yes, sir.
 23 Q. You recall those questions, not long ago. Is this
 24 right: that the timing of your access to the ADAM
 25 system, whether it was diligent or not diligent, is

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1 something of a red herring, because the post notes and
 2 the two versions we saw before and after that time
 3 didn't change dramatically in relation to the duties at
 4 Carriage Gates, did they?
 5 A. Yes, sir.
 6 Q. You're agreeing with me?
 7 A. Yes.
 8 Q. You were asked in relation to the ADAM system about
 9 whether you would have seen the post notes when you
 10 accessed it, and you said it's possible you saw the post
 11 notes?
 12 A. It's possible.
 13 Q. We don't want a great deal of detail, but how much
 14 information, how many documents are accessible via the
 15 ADAM system?
 16 A. Quite a lot, sir.
 17 Q. Dozens? Hundreds?
 18 A. There's so many posts. Yes, lots.
 19 Q. So merely knowing that you accessed the ADAM system
 20 in June 2015 doesn't tell us confidently that you read
 21 this particular post note that we've all looked at?
 22 A. No, sir.
 23 Q. If you had seen that post note in June 2015, would it
 24 have struck you as remarkable or unusual?
 25 A. Yes, sir.

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1 Q. Would you have asked for guidance about it and what it
 2 meant and whether you should follow it?
 3 A. Yes, sir.
 4 Q. You were asked about the map on the wall. May we have
 5 {WS1237B/6}.
 6 While that's being brought up, the base room is
 7 quite a small room, isn't it?
 8 A. Yes, sir.
 9 Q. Is this a picture of some of the maps in situ on the
 10 wall?
 11 A. Yes, sir, there's one more to the right, but yes.
 12 Q. We're going to look at that in a moment. That's page 6,
 13 can we move to {WS1237B/7}, and do we see there on the
 14 wall the ranger sector 3 map?
 15 A. Yes, sir.
 16 Q. Now, you are the one who has been in this room. I can't
 17 see on this document any title referring to them as
 18 alarm maps; is there anything in the room describing
 19 them in that way?
 20 A. No, no, sir.
 21 Q. Now, what I'm now going to do is, unless anyone objects,
 22 is to bring up an unredacted copy of the map without
 23 that black box at the bottom. It was originally
 24 redacted at the request of the police, but because it's
 25 now been made clear that the red dots are alarms,

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1 I'm going to ask for that unredacted copy to be brought
 2 up, in fairness to you, officer. Is that what the map
 3 looks like without that black box as you actually saw it
 4 on the wall each day?
 5 A. Yes, sir.
 6 Q. So fair to say that the key at the bottom identified
 7 sector 3 alarm locations?
 8 A. It shows the alarm locations, yes.
 9 Q. But that's all there was at the bottom of the map?
 10 A. Yes, sir.
 11 Q. If we can take that down now, please.
 12 Post instructions, please. Is this right: it's not
 13 only those patrolling sector 3 who have post
 14 instructions?
 15 A. That's correct.
 16 Q. Officers in locations, not just firearms officers, but
 17 officers in locations across the Palace of Westminster
 18 have post instructions.
 19 A. Yes, sir.
 20 Q. Written documents which identify what their duties are?
 21 A. Yes, sir.
 22 Q. Would officers talk about their post instructions from
 23 time to time?
 24 A. Yes, sir.
 25 Q. Did it ever strike you as odd that you didn't, as you've

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1 told us, for sector 3 at any rate, have a post
 2 instruction, you just had a map and a laminated copy of
 3 the map?
 4 A. Sir, it never crossed my attention because that's what
 5 we was told to do.
 6 Q. Given that other officers did have specific guidance in
 7 written form about what their duties were, did it ever
 8 occur to you to ask your line managers, or even your
 9 colleagues, whether there was a post note for these
 10 various patrols shown on the maps?
 11 A. No, sir. Like I've already said, every firearms officer
 12 that did sector 3 did that same patrol as we were told.
 13 Q. Were there post notes, written post notes, as far as you
 14 were aware, for the other sectors?
 15 A. Not that I'd seen, no, sir.
 16 Q. When you accessed ADAM, did you notice that post notes
 17 existed on the system not just for sector 3 but for
 18 other sectors and other areas of the Palace as well?
 19 A. I have to say, sir, I know obviously I did access ADAM,
 20 but what I saw, I can't recall.
 21 Q. Now, it was suggested to you that you were acting out of
 22 line, as it were, in not following the post notes. We
 23 saw the disciplinary process document indicating that
 24 others had been acting as you had.
 25 A. Yes, sir.

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1 Q. Was that something that was explained to you in your
 2 meeting in which that document was gone through?
 3 A. No, sir.
 4 Q. Finally this: did any other officer, at your own level
 5 or at any senior level, ever see you on your patrols
 6 around New Palace Yard and tell you that you ought not
 7 to be doing what you were doing and you should be
 8 stationed at Carriage Gates?
 9 A. No, sir.
 10 MR HOUGH: Thank you very much, those are all my questions.
 11 Sir, do you have any questions?
 12 THE CHIEF CORONER: No, I don't. Thank you very much
 13 indeed.
 14 MR HOUGH: The next witness is Dr Chapman.
 15 DR ROBERT CHAPMAN (Sworn)
 16 THE CHIEF CORONER: Dr Chapman, thank you very much.
 17 I'm sorry, we've kept you waiting a little bit,
 18 I'm sorry.
 19 Examination by MR HOUGH QC
 20 MR HOUGH: Would you please give your full name to the
 21 court?
 22 A. I'm Dr Robert Charles Chapman.
 23 Q. Dr Chapman, you know that I ask questions firstly on
 24 behalf of the Coroner and then you may be asked
 25 questions by other lawyers.

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1 A. I understand.
 2 Q. By profession, are you a consultant forensic
 3 pathologist?
 4 A. Yes.
 5 Q. Would you give your qualifications in summary?
 6 A. Yes, I hold a medical degree, I'm a fellow of the Royal
 7 College of Pathologists, I hold a diploma in medical
 8 jurisprudence, in forensic pathology, and I am a fellow
 9 of the Faculty of Forensic and Legal Medicine.
 10 Q. Did you perform a post mortem examination and prepare
 11 a report on that examination in relation to
 12 Keith Palmer, one of the victims of the terror attack at
 13 Westminster?
 14 A. I did, yes.
 15 Q. You may refer to that report as you wish.
 16 A. Thank you.
 17 Q. Now, Dr Chapman, I think it's inevitable that your
 18 evidence will include some details of the injuries.
 19 I make that warning, although I'm aware that some of
 20 Keith Palmer's family have left, no doubt for that
 21 reason.
 22 A. Yes.
 23 Q. Before you performed your examination, were you given
 24 a briefing document which summarised the facts of the
 25 incident, including a summary of how Keith had suffered

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1 his injuries which ultimately led to his death?
 2 A. Yes, I was.
 3 Q. Did you also, in preparation for the examination,
 4 receive the results of a CT whole body scan?
 5 A. Yes, I did.
 6 Q. Now, I would like to begin with your external
 7 examination and to illustrate that and some of the
 8 internal findings by reference to body maps.
 9 A. Yes.
 10 Q. And if we can bring up {AV0089/2}. Now, as we go
 11 through these, Dr Chapman, would you please identify the
 12 significant injuries or indicate where we are looking at
 13 merely minor bruises or cuts?
 14 A. I will.
 15 Q. So this is an overview picture. May we now move to the
 16 next page, page 3 {AV0089/3}. Can you identify the
 17 injury?
 18 A. Yes, this is a cutting wound, a sharp injury to the back
 19 of the head, as we see there. A wound that was
 20 9.6 centimetres in length on the surface of the skin
 21 with an undercut right-hand edge, passing forwards from
 22 Keith Palmer's right to left, through the full thickness
 23 of the scalp to actually score the bone underneath, but
 24 not pass any further than that.
 25 Q. So a knife wound, as we know, going forwards, scoring

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1 the skull surface but going no deeper?
 2 A. Correct.
 3 Q. Next page, please. {AV0089/4}.
 4 A. This is a stab wound, as we see there, to the upper
 5 mid-line back. 1.9 centimetres in length on the surface
 6 of the skin, directed from Mr Palmer's left to right and
 7 slightly downwards to a depth of about 1 centimetre into
 8 the skin and the tissues beneath but no penetration of
 9 the chest cavity or any other vital structures in
 10 relation to that wound.
 11 Q. Next page, please, page 5. {AV0089/5}.
 12 A. This is a stab wound to the left side of the back, as we
 13 see there, 8.5 centimetres in length, passing from
 14 Keith Palmer's left to right, and slightly upwards,
 15 through the space beneath the left third rib, fracturing
 16 the left fourth rib, and continuing into the chest
 17 cavity to strike the upper lobe of the left lung. The
 18 wound continued through a branch of the pulmonary
 19 artery, one of the major blood vessels within the lung,
 20 as well as some of the airways in the lung. The track
 21 continued further to strike part of the left atrium, the
 22 upper chamber of the heart on the left side of the
 23 heart, penetrating the heart through a 1.5 centimetre
 24 wide track.
 25 The depth of the wound from the skin to the heart

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1 was about 18 centimetres.
 2 Q. Is it right that this was, in terms of its effects, the
 3 most serious of the stabbing injuries?
 4 A. That's correct, yes.
 5 Q. You've told us that it penetrated a depth of
 6 18 centimetres just behind and under the left arm?
 7 A. Yes.
 8 Q. Damaging the structures of the lungs and impacting on
 9 the heart?
 10 A. Yes.
 11 Q. Are you able to say with what force this blow would have
 12 had to be landed in order to drive a knife into the body
 13 to that depth?
 14 A. Pathologists usually have a very simple three-point
 15 scale of force. This would be, on a scale of mild,
 16 moderate and severe, this would be a severe force
 17 injury. It's not only penetrated deeply, but it's
 18 actually caused significant damage to a bone, the fourth
 19 rib.
 20 Q. Next page, please {AV0089/6}. What is this
 21 illustrating? The same wound in a slightly different
 22 way?
 23 A. It's the same injury, it just shows the appearance of
 24 the wound without opposing, putting the edges together
 25 to see the shape of it better, so it's of no further,

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1 really, interest, I don't think.
 2 Q. Page 7, please. {AV0089/7}.
 3 A. This is number 4, which is a cutting wound to the upper
 4 part of the right shoulder, a flap injury with the flap
 5 attached, as we can see on the graphic, towards the
 6 front of the shoulder, measuring 5 by 2 centimetres
 7 overall, and involving the skin and the tissues to the
 8 muscle on the top of the right shoulder.
 9 Q. Thank you. Next page, please. {AV0089/8}.
 10 A. We see two stab wounds there. Number 5 is a stab wound
 11 1.4 centimetres in length on the skin surface, passing
 12 backwards through the skin and into the muscles of the
 13 right chest wall. It struck the breastbone at the level
 14 of the right second rib. It was about a centimetre
 15 deep. It did not penetrate the chest cavity.
 16 Number 6, a similar stab wound, 1.6 centimetres in
 17 length on the surface of the skin, passing backwards,
 18 and slightly from Keith Palmer's left to right, into the
 19 soft tissues of the chest wall. That didn't pass
 20 through the chest wall and was about a centimetre in
 21 depth.
 22 Q. Next page, please, page 9. {AV0089/9}.
 23 A. Number 7, another stab wound on the side of the chest,
 24 1.5 centimetres in length on the skin's surface, passing
 25 about for a centimetre into the skin and the muscles of

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1 the right chest wall.
 2 Q. Then the next page, page 10. {AV0089/10}.
 3 A. Number 8 is a stab wound as we see there to the outside
 4 of the mid left upper arm. The wound was about
 5 11 centimetres in length on the surface of the skin and
 6 the track was dissected to find that it passed from
 7 Mr Palmer's left to right and slightly upwards through
 8 the skin and muscle of the back of the arm to slightly
 9 cut the bone of the upper arm, the humerus. The track
 10 was about 11 centimetres in total depth and passed
 11 through the limb to emerge as an exit wound on the
 12 inside of the left upper arm where there was a wound
 13 2.2 centimetres in length on the skin surface.
 14 THE CHIEF CORONER: You mentioned 11 centimetres in depth;
 15 do you mean the length rather than the depth?
 16 A. Yes, the wound on the skin surface was 11 centimetres,
 17 the depth of the wound passing through the limb was also
 18 11 centimetres. So both those measurements are the
 19 same.
 20 THE CHIEF CORONER: Thank you.
 21 MR HOUGH: Given that that was a stab wound through the arm,
 22 and given, as you say, that it caused some damage to the
 23 bone as it went through, are you able to put a figure,
 24 according to your scale, on the force of that particular
 25 stab?

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1 A. That, although it has caused some slight damage to the
2 bone, would I think be regarded more as a moderate force
3 injury on the three-point scale of mild, moderate and
4 severe.
5 Q. Next page, please, page 11. {AV0089/11}. We're seeing
6 the same injury from a slightly different perspective?
7 A. We see the entrance wound, what I call the entrance
8 wound, at the outside of the upper arm, and the exit
9 wound on the inside there.
10 Q. Then the next page, page 12. {AV0089/12}.
11 A. We see injury 9, which is an area of reddish abraded or
12 incised injury on the inside of the left wrist, an area
13 5 by 5 centimetres with some associated bruising of the
14 skin. And we see number 10, which is a superficial
15 cutting wound on the palm of the hand, 1 by
16 0.3 centimetres.
17 Q. Page 13, please. {AV0089/13}.
18 A. We see 11, which is another cutting wound on the back of
19 the right hand, 2.5 centimetres in length. We also see
20 a blunt injury, just a graze on the back of the hand at
21 the base of that right middle finger.
22 Q. So you've identified so far no less than 11 stab or
23 cutting injuries --
24 A. Yes.
25 Q. -- varying in severity from relatively minor cuts to

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1 a very serious, forceful injury to the side of the
2 chest?
3 A. Yes.
4 Q. And another moderately serious force injury that went,
5 in fact, through the left arm?
6 A. Yes.
7 Q. Next page, page 14. {AV0089/14}.
8 A. This shows a bruise on the back of that left index
9 finger, and there was a little bit of grazing, or even
10 a cutting injury overlying it. This is an area of
11 injury 1.5 by 1 centimetres.
12 Q. Page 15, please. {AV0089/15}.
13 A. Just a graze on the back of the right elbow, 1.2 by
14 0.6 centimetres.
15 Q. Page 16. {AV0089/16}.
16 A. These really show various areas of grazing and slight
17 bruising overlying the knees.
18 Q. Page 17. {AV0089/17}.
19 A. The significant injury there is number 12, which is
20 another sharp injury, which is a stab wound on the front
21 of the left lower thigh, which appears in my second
22 statement. I'm just looking for the dimensions of that
23 injury. (Pause).
24 I have it in my original notes in any case. This
25 was a stab wound, 2.5 centimetres in length on the skin

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1 surface, penetrating the thigh to a depth of about
2 a centimetre.
3 Q. Then finally -- no, not finally, page 18, please.
4 {AV0089/18}.
5 A. This, again, shows a close-up of the areas of grazing on
6 the front of the right knee.
7 Q. And finally, page 19. {AV0089/19}. We are now seeing
8 aspects of your internal examination?
9 A. Some internal anatomy showing where the left pulmonary
10 artery is and the left atrium is on the heart.
11 Q. You've identified, I think on the top left of the
12 images, the ribs which were involved in the stab injury
13 that went into the lungs and heart?
14 A. Yes.
15 Q. And in the bottom right you've identified the position
16 of the left atrium which was injured?
17 A. Yes.
18 Q. We can take that off the screen now.
19 From your internal examination, did you note any
20 significant findings in relation to the head and brain?
21 A. No. No, I saw no evidence of injury or any natural
22 disease in those areas.
23 Q. You note some moderate cerebral swelling; is that an
24 incidental finding of other injuries?
25 A. It really is an incidental finding, yes, it's of no

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1 significance.
2 Q. Other than the injuries you've described and the effects
3 on internal organs that you have described already in
4 discussing the stab wounds, were there any other
5 significant internal injuries?
6 A. No. No.
7 Q. Did you reach a number of conclusions based on those
8 findings?
9 A. I did, yes.
10 Q. Could you please run through the principal ones?
11 A. The first, that Mr Palmer was a man of medium build,
12 there was no evidence of significant natural disease to
13 cause or contribute to his death. Death had resulted
14 from haemorrhage from a stab wound passing into the left
15 side of his chest at the level of the left armpit and
16 directed from his left to right and slightly upwards,
17 through the left third intercostal space to pass through
18 the upper part of the left lung, a branch of the left
19 pulmonary artery and then to enter the left atrium of
20 the heart. The wound track was about 18 centimetres in
21 length from the skin to the deepest point of the wound,
22 and haemorrhage or blood loss from the heart vessels
23 within the lung, the lung tissue itself and the chest
24 wall caused his death.
25 I gave formally as the cause of his death

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1 haemorrhage as a result of a stab wound to the chest.
 2 I say at conclusion 4 that the fatal wound would have
 3 caused immediate and profuse blood loss initially into
 4 the left chest space. Collapse would have been rapid
 5 although some degree of movement would have been
 6 possible prior to final collapse, and in my opinion this
 7 injury was not a survivable wound.

8 In addition to the stab wound to the chest there was
 9 a long cutting wound to the right side of the back of
 10 the head, a cutting wound to the top of the right
 11 shoulder, two stab wounds to the upper front of the
 12 chest and one to the upper right chest close to the
 13 right armpit. There was a further stab wound close to
 14 the upper mid-line back at the base of the neck. These
 15 wounds were relatively superficial and had not
 16 contributed to his death.

17 Examination of his left arm showed a through and
 18 through wound to the upper part of the arm, passing from
 19 the left and slightly upwards, to exit at the back and
 20 inner aspect of the left upper arm, and whilst this
 21 would have contributed to the overall blood loss, in the
 22 context of this case it could not be regarded as
 23 a significant contributor to his death.

24 There were minor superficial cutting injuries to the
 25 back of the right hand and to the left palm, as well as

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1 an area of superficial skin injury to the distal left
 2 forearm close to the wrist. These injuries appeared
 3 consistent with contact with the edge of a sharp weapon.
 4 There was an area of bruising to the knuckle of the left
 5 index finger with an overlying puncture and a cut,
 6 incised or abraded injury to the skin, and this may also
 7 have resulted from the contact with the tip of a sharp
 8 weapon or in some other way such as contact with a firm
 9 surface.

10 None of the injuries to the upper limbs were classic
 11 or typical defence injuries, but it's possible that the
 12 use of the hands in a defensive way had led to the sharp
 13 injuries.

14 Similarly, the wound transfixing the left arm could
 15 have resulted from a defensive manoeuvre.

16 The fatal injury to the left side of the chest would
 17 be regarded pathologically as requiring severe force on
 18 a crude three-point scale of mild, moderate and severe.
 19 The injury was deeply penetrating and had caused
 20 fracture of one of the ribs as it passed through the
 21 chest wall.

22 The patchy grazing to the knees had probably
 23 resulted from terminal collapse or contact with the
 24 ground immediately prior to collapse.

25 I thought there was some patterning in one of the

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1 wounds, the stab wound to the upper mid-line back which
 2 may on some occasions result from regular striations on
 3 the weapon responsible, and at the time of that
 4 statement I had not seen or examined any weapons
 5 recovered. The stab wound injuries did not indicate
 6 there had necessarily been more than one weapon involved
 7 in their production.

8 Q. So overall, consistent with the attack we have seen on
 9 the CCTV footage?

10 A. Yes.

11 Q. A number of wounds to various places on Keith's body,
 12 especially his upper body, and one wound -- one stab
 13 wound to his leg?

14 A. Yes.

15 Q. But the significant wound in terms of his death was that
 16 to the left side of his chest, which we've examined on
 17 the body maps?

18 A. Yes.

19 Q. You describe that as an injury that was not, in your
 20 opinion, survivable?

21 A. Yes.

22 Q. So just specifically, whatever medical attention Keith
 23 had received at the scene, do you consider that he could
 24 have been saved from death, having suffered that wound?

25 A. In my opinion, no.

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1 Q. And the depth of that wound consistent with a forceful
 2 and savage attack?

3 A. Yes.

4 MR HOUGH: Thank you very much.

5 Examination by MR ADAMSON

6 MR ADAMSON: Dr Chapman, my name is Dominic Adamson, I ask
 7 questions on behalf of PC Palmer's widow.

8 A. Yes.

9 Q. Dr Chapman, we know from the CCTV footage that there
 10 came a point when PC Palmer was on the floor next to
 11 a set of barriers within the New Palace Yard, and the
 12 attacker, Masood, was standing over him with the knife,
 13 the knives, up high and then driving them down towards
 14 PC Palmer.

15 A. Yes.

16 Q. You've said that the injury, the fatal injury to the
 17 left side of the chest required severe force.

18 A. Yes.

19 Q. Does the description that I've given of the attack with
 20 the knife being driven from an elevated position down to
 21 him on the floor, is that consistent with the fatal
 22 injury being administered at that time?

23 A. Yes, it is, in short.

24 Q. We also know that during that phase, albeit through
 25 grainy CCTV footage, we can see PC Palmer's arms up at

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1 differing points, doubtless to try and protect himself.
 2 A. Yes.
 3 Q. Is it right that that would be likely to expose the area
 4 where the fatal wound was struck?
 5 A. Yes, it would. Arm up here would expose this area under
 6 the chest. An arm up, of course, would also expose this
 7 part of the arm to that injury to the arm too.
 8 Q. So based on what you know about the attack, it seems
 9 likely that it was at that point that he was on the
 10 floor being attacked that he sustained the fatal injury?
 11 A. I think that's most likely, yes. My viewing the CCTV
 12 shows the two points of contact at the gate itself and
 13 then, as you say, near those barriers, and he's gone to
 14 the floor for some reason. It seems to me likely that
 15 he had gone to the floor -- he tripped, or he simply
 16 fell over, and then received this fatal injury.
 17 MR ADAMSON: Yes. Thank you very much, Dr Chapman.
 18 MR HOUGH: Thank you, Dr Chapman, those are all the
 19 questions that all the lawyers have for you.
 20 Sir, I know you had had it in mind possibly not to
 21 have a mid-afternoon break today.
 22 THE CHIEF CORONER: Yes.
 23 MR HOUGH: I have had a request, I think on behalf of
 24 PC Sanders, that we should have a very short break so
 25 that something can be addressed?

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1 THE CHIEF CORONER: Yes.
 2 MR HOUGH: If we can ask for it to be perhaps a little less
 3 than 15 minutes on this occasion?
 4 THE CHIEF CORONER: Yes, shall I suggest, Mr Hough, it's
 5 3.40, we will sit at 3.50. What I indicate -- it may
 6 be, Mr Adamson, I know you have another commitment first
 7 thing tomorrow but what I suggested to Mr Hough was
 8 whether we might start at 10 o'clock tomorrow morning --
 9 MR ADAMSON: That should be --
 10 THE CHIEF CORONER: Because I'm conscious that sitting early
 11 and sitting late doesn't always actually produce greater
 12 speed, so what I'm going to suggest is that we sit at
 13 3.50. We'll finish for the day at about 4.30 and then
 14 sit tomorrow morning again at 10 o'clock and I hope that
 15 will enable both you and Ms Stevens to, as before, not
 16 to cover the same material, but to dovetail where
 17 necessary and not cause difficulty for you later on
 18 tomorrow.
 19 MR ADAMSON: We'll ensure that we do that.
 20 THE CHIEF CORONER: Thank you, I'll rise.
 21 (3.39 pm)
 22 (A short break)
 23 (3.57 pm)
 24 MR HOUGH: Sir, the next witness is PC Nicholas Sanders.
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1 PC NICHOLAS SANDERS (Sworn)
 2 THE CHIEF CORONER: Officer, as with others, if you prefer
 3 to sit or stand, whichever you are happy with, please
 4 do.
 5 A. Thank you, sir.
 6 Examination by MR HOUGH QC
 7 MR HOUGH: Would you please give your name and rank to the
 8 court.
 9 A. Police Constable 2356 SO Sanders.
 10 Q. And that's Nicholas Sanders?
 11 A. Correct, sir.
 12 Q. Officer, I will be asking you questions first on behalf
 13 of the Coroner and then, I suspect tomorrow, you will be
 14 asked questions by other lawyers.
 15 I think you know you are giving evidence about
 16 events you witnessed and participated in at the
 17 Palace of Westminster on 22 March last year. You've
 18 made a number of witness statements about those events,
 19 three, I think, in total, and you may refer to those if
 20 you have them with you.
 21 Now, on that day, 22 March 2017, you, I think, were
 22 deployed in New Palace Yard within the Palace as
 23 a firearms officer, an AFO.
 24 A. Correct, sir.
 25 Q. How long had you served in the police by March 2017?

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1 A. By that point, I think 15 years, sir.
 2 Q. How long had you been an authorised firearms officer
 3 before that time?
 4 A. Since December 2011.
 5 Q. How long had you been carrying out duties as a firearms
 6 officer in the Palace of Westminster?
 7 A. Over a period of about four years, sir.
 8 Q. So from about 2013 to 2017?
 9 A. Correct.
 10 Q. On the day of the incident, what firearms were you
 11 carrying?
 12 A. A MP5 carbine rifle, Glock 17 pistol, and obviously
 13 an X26 taser as well.
 14 Q. Like your colleague, PC Ashby, I think you were wearing
 15 full NATO body armour?
 16 A. That's correct, sir.
 17 Q. Like him, you also would have had a police radio on your
 18 person?
 19 A. That's correct, sir.
 20 Q. Now, for the purpose of firearms officers' deployment in
 21 the Palace, was the estate divided into sectors?
 22 A. That's correct, sir.
 23 Q. Now, on 22 March at the time of the attack, which sector
 24 were you deployed in?
 25 A. Sector 3, sir.

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1 Q. Now, in your witness statement, you refer to laminated
2 maps of those sectors being posted in your base control
3 room in the area of the underground car park beneath
4 New Palace Yard?
5 A. That's correct, sir.
6 Q. We've seen them already today, but if we can put them on
7 screen again, {WS1633/5}. That, I think, is the map,
8 not in situ, but taken down by an SO15 officer. That,
9 we've heard, was one of the maps posted on the wall of
10 the base room?
11 A. Correct, sir.
12 Q. If we leave that on the screen, we know that it shows
13 New Palace Yard shaded blue.
14 How many times had you patrolled that sector or been
15 posted to that sector before March 2017?
16 A. Countless times. Many, many times, sir.
17 Q. When you were deployed to that sector, as you were at
18 the time of the attack, what was your understanding of
19 where you were supposed to stand or patrol?
20 A. My understanding of the sector 3 was that during our
21 times of being deployed there was to be within that area
22 and react or deploy to any part of the sector as and
23 when required.
24 Q. So far as you're aware, was there any particular area of
25 the yard where you were supposed to station yourselves

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1 at any particular time or times of day?
2 A. No, sir, there was no fixed points within the sector
3 area where we would -- well, there was no fixed points
4 within that area, sir.
5 Q. How did you understand you were supposed to move when
6 you were posted there?
7 A. We were expected to be unpredictable in our movements,
8 to be unpredictable to hostile reconnaissance from
9 outside the Palace and, as I mentioned earlier, to be
10 available to deploy anywhere within that sector as and
11 when required.
12 Q. Specifically, did you understand that you had to be
13 either at or within close sight of the Carriage Gates
14 main entrance at any particular times?
15 A. No, sir.
16 Q. So far as you're aware, or, rather, so far as you were
17 aware in March 2017, what was the general practice of
18 your colleagues when deployed to this sector?
19 A. Everyone deployed to the Palace at that time completed
20 those sector areas in the same fashion, sir.
21 Q. Are you aware of what post instructions are and were
22 in March 2017?
23 A. I'm aware what post instructions are. I wasn't aware
24 of -- are you mentioning the post instructions in
25 relation to ADAM or what I believed the post

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1 instructions to be on that day?
2 Q. Let's be clear. In March 2017, did you know that there
3 was such a thing as post instructions, a written
4 document setting out the duties you were to perform when
5 deployed to a particular sector or area?
6 A. My understanding of my deployments were in relation to
7 these maps that were on the wall, in the base room.
8 Q. Sorry, go on.
9 A. In the armoury, in the police base room.
10 Q. Let me ask a more general question: did you appreciate
11 that for officers in the Palace more generally, if you
12 were given a particular duty, there would be
13 an associated post note or post instruction in writing?
14 Did you think that was the case?
15 A. Not in relation to the Palace, no, because it was quite
16 unique in the sense that it was the only place on the
17 command that completed sector patrols.
18 Q. So as far as you knew, was there a written document
19 which told you what to do when you were on patrol in
20 this sector area or in any other sector area within the
21 Palace?
22 A. No, sir.
23 Q. Now, in fairness to you, I would like to show you the
24 post instructions which we understand were in place at
25 the time, and first of all, one that was produced

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1 in January 2015, {WS5103/9}. Now, this is a post
2 instruction produced in January 2015. Is this
3 a document you had seen before March 2017?
4 A. No, sir.
5 Q. We can move on to the next page, please {WS5103/10}.
6 The instruction for "Sector 3 - Carriage Gate", states
7 that the officers posted there:
8 "... are to work together, working within proximity
9 of each other but not specifically as a pair. Officers
10 to be positioned in close proximity to the gates when
11 they are open, but not outside.
12 "Both officers are to be positioned inline of sight
13 of each other with the ability to respond to
14 Cromwell Green Entrance search point."
15 First of all, did you understand sector 3 to be
16 Carriage Gate or something else?
17 A. The whole of the map area as you saw it in the previous
18 picture. The whole of New Palace Yard, sir.
19 Q. Now, I know your evidence is that you had not seen this
20 document before March 2017, but was it your
21 understanding that your instruction was to work with
22 your fellow officer when you were on -- when you were
23 posted there, within proximity of each other but not as
24 a pair?
25 A. No, sir.

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1 Q. What did you think you had to do in that regard?
 2 A. To be as a pair within the area of the sector, sir.
 3 Q. Now, assuming that the reference to the gates in the
 4 second sentence is to the main vehicle gates to
 5 New Palace Yard, we know that they were open when
 6 Parliament was sitting all day long. Was it your
 7 understanding that you and your colleague, when posted
 8 to this sector, should be in close proximity to those
 9 gates when they were open?
 10 A. No, sir.
 11 Q. Then was it your understanding when you were deployed to
 12 this area that you needed to be able to respond to the
 13 Cromwell Green entrance search point which we've seen on
 14 the map?
 15 A. Yes, sir. One of -- one of a number of areas we were
 16 responsible for, sir.
 17 Q. Now, of course there were areas of New Palace Yard, for
 18 example at the -- in the area near the vehicle entrance
 19 barriers, from which it would be rather difficult to see
 20 the Cromwell Green entrance search point. If you were
 21 on patrol around the entirety of the yard and were
 22 supposed to be unpredictable, you might find yourself by
 23 those entrance barriers from time to time, wouldn't you?
 24 A. Yes, sir.
 25 Q. So when you say that you needed to be able to respond to

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1 the Cromwell Green entrance search point, you're not
 2 saying that you always had to be within close view of
 3 it?
 4 A. No, sir, just that we had to be within that sector to be
 5 able to respond to anything as and when required there.
 6 Q. If we can look, then, at the subsequent version of the
 7 post instruction, {DC8032/1}. Again, I take it from
 8 your previous answers that this isn't a document that
 9 you had seen before the time of the attack?
 10 A. No, sir.
 11 Q. Then the second page, please. {DC8032/2}. The
 12 instructions here are largely the same as before, but in
 13 the second paragraph they refer to the officers making:
 14 "... a short patrol into New Palace Yard towards the
 15 exit point of the Cromwell Green search area."
 16 Do I take it from the answers you've already given
 17 that the instructions here don't reflect what you
 18 thought was your responsibility when you were deployed
 19 to that sector?
 20 A. That's correct, sir.
 21 Q. We can take that down.
 22 Now, if we put up, please, the plan of
 23 New Palace Yard, {DC7989/80}, the Cromwell Green search
 24 area was to the bottom left of this plan, I think.
 25 A. Yes, sir.

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1 Q. When you were posted in this yard, it's often not
 2 possible to see very clearly from one side to the other,
 3 as we have seen from photographs, and with the effects
 4 of the foliage as much as anything else. Did it occur
 5 to you at any time while performing your patrols there
 6 that you weren't able always to see all parts of the
 7 yard?
 8 A. That's correct, sir.
 9 Q. Were you aware, or did you consider, that the
 10 Carriage Gates vehicle entrances were a point of
 11 particular vulnerability?
 12 A. Yes, sir.
 13 Q. Did it cause you any concern that from certain parts of
 14 your patrol, you would not be able to see those vehicle
 15 entrance and exit gates?
 16 A. Yes, sir. It was part of many vulnerable areas in the
 17 yard that we couldn't see or be at at any one -- you
 18 know, all at once.
 19 Q. Were you aware that there had ever been a time when
 20 patrolling instructions were different?
 21 A. No, sir.
 22 Q. We've heard that there was a time, I think before you
 23 started working as a firearms officer at the
 24 Palace of Westminster, that firearms officers were
 25 instructed to take a static position near

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1 Carriage Gates; is that something you were aware of?
 2 A. I was aware that that was done previously, along with
 3 a static post in the Cromwell Green search point, sir.
 4 Q. But that's not something that happened at any time while
 5 you were working at the Palace?
 6 A. No, sir, that was ... no.
 7 Q. Now, in one of your witness statements, you refer to
 8 a briefing being given to armed officers on
 9 20 March 2017.
 10 A. 20 February 2017.
 11 Q. Sorry, 20 February 2017.
 12 A. Yes.
 13 Q. You're quite right. Can you tell us about that, please?
 14 A. This briefing was distributed by the base sergeants to
 15 PCs who were members of the permanent
 16 Palace of Westminster team, and the briefing was
 17 a PowerPoint presentation to inform us of the changes to
 18 the Armed Policing Plan that was to be implemented
 19 in April 2017.
 20 Q. I'm not going to ask you in detail about that because
 21 it's largely irrelevant for our purposes. Can we have
 22 on screen, please, {WS1237C/3}. Is this document one
 23 that you exhibited and which formed part of that
 24 briefing document?
 25 A. That's correct, sir.

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1 Q. Was that briefing document accompanied with any
2 explanation? Was anything said in relation to what this
3 meant?
4 A. Only with the deployments, obviously the numbers of
5 people deployed at any one time, resourcing levels and
6 that sort of thing, sir.
7 If you're referring to was there any metho --
8 I can't think of the word --
9 THE CHIEF CORONER: Methodology.
10 MR HOUGH: Methodology.
11 A. -- methodology in relation to what you were to do within
12 that sector, then no, sir.
13 MR HOUGH: Did you deduce anything or learn anything from
14 this which is relevant to your understanding of your
15 patrolling duties in that sector?
16 A. Only that it confirmed what we were -- what we already
17 knew, what we were already doing at that point in time.
18 Q. Which was to patrol the entirety of the area, as you've
19 described.
20 To whom was that briefing delivered?
21 A. That was delivered to all the constables who were on the
22 permanent Palace of Westminster team at the time, sir.
23 Q. And by whom was it delivered?
24 A. That was by one of the sergeants.
25 Q. Was there any discussion in the course of the briefing

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1 about what the duties were and what people understood
2 them to be?
3 A. No, sir, not in relation to the email itself, however
4 it -- there were discussions in relation to what the
5 proposed changes were going to be by senior officers
6 that attended the base room.
7 Q. Now, officer, you're aware -- we can take that down
8 now -- you are aware that after the attack, a misconduct
9 process was initiated in which potential misconduct
10 action was investigated in relation to you?
11 A. Yes, sir.
12 Q. And you are aware, I think, that one of the matters
13 considered was whether you had used a system called the
14 ADAM system?
15 A. That's correct, sir.
16 Q. Are you aware what that system is?
17 A. Yes, sir.
18 Q. It was, as we've heard, a system which could be accessed
19 by computer which would give you access to post notes
20 and other instructions about your duties?
21 A. That's correct, sir.
22 Q. Did you understand that it was your obligation to access
23 the ADAM system from time to time?
24 A. Yes, sir.
25 Q. According to the notes of the DPS process, there is no

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1 record of your having used the system before March 2017.
2 A. At all, or just in relation to the
3 Palace of Westminster?
4 Q. Well, let's look at the record. It's {WS5099/41}. If
5 you look two-thirds of the way down this page,
6 PC Sanders, it says that:
7 "... Post Notes are saved and viewable by ... staff
8 on the ... ADAM system."
9 It says how it is accessed, and then it states, the
10 document states, that the writer has checked access by
11 both officers and there is no trace of you having used
12 the system.
13 Had you, before March 2017, accessed the ADAM
14 system?
15 A. I believe so, yes, sir.
16 Q. Had you accessed it in relation to duties at the
17 Palace of Westminster?
18 A. No, sir.
19 Q. Is there any particular reason why you hadn't accessed
20 it to look at duties at the Palace of Westminster?
21 A. Because I believed that my post instructions for the
22 Palace were the maps on the armoury wall, sir.
23 Q. Did you receive any emails or any comments from any of
24 your colleagues or senior officers to the effect that
25 you ought to access the ADAM system to find post

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1 instructions for duties at the Palace?
2 A. No, sir.
3 Q. Thank you. Okay, we can take that down now.
4 Setting aside the post instructions for the moment,
5 when a division was called in the House of Commons, we
6 have heard that both the main gates to New Palace Yard
7 and the movable barriers outside would be open, and left
8 open. It might be suggested that at that time, with the
9 gates and the barriers open, that the Carriage Gates
10 area represented a particular area of vulnerability.
11 Would that make sense to you?
12 A. That would make sense to me, sir, yes.
13 Q. If it was suggested to you that at that time it would
14 have been good practice to be in the area of
15 Carriage Gates, whatever the formal instructions were,
16 what would you say?
17 A. I would say that in relation to divisions, a division
18 could be called at any time when you're on that sector.
19 So, depending on where you are, yes, it's possible that
20 you could make your way to the gates during a -- I think
21 it's eight minutes for divisions. But then again,
22 during divisions you would have MPs and cabinet
23 ministers back towards the colonnade area and the
24 members' entrance area, so that would be busy with
25 cabinet ministers, and also you've still got the

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1 continuing threat of even though the gates of Parliament
2 are open, there's always a threat of other places on
3 that sector, such as the Cromwell Green entrance, such
4 as the perimeter fence, such as the pedestrian subway
5 entrance as well.

6 So you've got to consider all these things at all
7 times, not just during division times.

8 Q. May I now move to the day of the attack. Is this right,
9 you came on duty that day shortly before 1.00 pm?

10 A. Correct, sir.

11 Q. For the first hour, as we've seen from footage, you were
12 on duty with PC Gerard, and he was then relieved at
13 2.00 pm or just before by PC Ashby.

14 If we can look at some plans and run through your
15 movements that day, first of all {DC7989/87}.

16 Now, PC Sanders, this is a plan prepared by a SO15
17 officer using CCTV footage to track your movements on
18 that day. I think you've seen these before?

19 A. Yes.

20 Q. And according to this plan we see that at shortly before
21 1.00 pm, at the start of your duty, you came up the ramp
22 leading down into the underground car park, into the
23 north-east corner of the New Palace Yard, and you moved
24 from there to members' entrance where PC Gerard was?

25 A. Correct, sir.

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1 Q. And then that after a short time, you moved towards the
2 porch of Westminster Hall, and remained there for,
3 I think, the next 25 minutes or half an hour. Can you
4 explain why you went there at that point in time?

5 A. To the Westminster Hall area?

6 Q. Yes.

7 A. It just would have been at that time a vantage point
8 whilst on the sector.

9 Q. There's no particular reason for stationing yourself
10 there rather than anywhere else?

11 A. Not that I believe, sir, at that point in time, sir, it
12 might have been just after PMQs, so it might have been
13 busy with members, I can't honestly remember, sir.

14 Q. PMQs, obviously Prime Minister's Questions?

15 A. That's it, sir.

16 Q. Next page, please, page 88 {DC7989/88}. Now, we see
17 from the plan that at 1.25 pm, you and PC Gerard moved
18 around the square in an anti-clockwise direction, first
19 of all reaching a point near the up ramp; yes?

20 A. Yes, sir.

21 Q. Then next page, please {DC7989/89}. Then after passing
22 through a CCTV blackspot, you continued your
23 anti-clockwise route and reached Carriage Gates at about
24 1.29. Was there any particular reason why you went to
25 Carriage Gates at that point of the day?

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1 A. No, sir.

2 Q. We know that you waited there for about 14 minutes,
3 along with PC Gerard, before moving on. Any particular
4 reason why you waited there for that period of time
5 rather than any other?

6 A. No, sir.

7 Q. Then next plan, please {DC7989/90}. After waiting there
8 for a little under 15 minutes, you began to head back in
9 a clockwise direction around New Palace Yard. This was
10 just before PC Gerard was due to be relieved by PC
11 Ashby. Is that a reason why you may have been walking
12 back towards the area of the up ramp?

13 A. Yes, sir.

14 Q. Then next plan, {DC7989/91}. This is just before
15 2.00 pm. You and PC Gerard are shown to wait at the top
16 of the ramp and at about 1.55 pm, he was relieved by
17 PC Ashby. At that point Mr Ashby moved towards the
18 colonnades and you went in the same direction?

19 A. That's correct, sir.

20 Q. You were then lost from view under the colonnades until
21 the time of the attack, so from just before 2.00 pm
22 until about 2.20 that afternoon; yes? Sorry, 2.40 that
23 afternoon. Is there any particular reason you can
24 recall why you went to and remained under the colonnades
25 at that time?

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1 A. We'd have been near to that area again, sir, PMQs, and
2 I can only think back to maybe there was cabinet
3 ministers and MPs, it would have been busier than normal
4 in that area, sir.

5 Q. So you were positioning yourself in that area you think
6 because there would be lots of people in that area?

7 A. There would have been about that time, sir, however, it
8 was still within the sector, within a -- it gave us
9 an almost -- I can't think of the word -- a good enough
10 view or a good enough location to respond to incidents
11 within the sector.

12 Q. In the period while you were there, so for about 45
13 minutes, and towards the end of that period in
14 particular, were you speaking to anyone that you recall?

15 A. I think we spoke to a number of people, the most
16 prominent I can remember was the, I think, Assistant
17 Commissioner at the time.

18 Q. That's Acting Commissioner Mackey?

19 A. Correct, sir.

20 Q. Who I think was on his way out from having had a meeting
21 at the Palace?

22 A. That's correct, sir.

23 Q. Did a time come when your attention was drawn to
24 something out of the ordinary happening?

25 A. To the loud noise which came from Bridge Street, sir.

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1 Q. What sort of noise did you hear?
 2 A. A very loud, what can only be described as the sound of
 3 an explosion.
 4 Q. Did you form an immediate view as to what you thought it
 5 was?
 6 A. When I first heard it, I thought it was loud enough to
 7 be an explosion. Then I thought maybe it could be
 8 an accident, but I just didn't know until -- I think
 9 that's at that point we started moving off towards the
 10 perimeter fence, and that's when the radio transmissions
 11 started, sir.
 12 Q. Before you heard anything on the radio, did you hear
 13 anything else from outside beyond what you thought might
 14 be an explosion?
 15 A. Following the explosion, there was a lot of screaming,
 16 sir.
 17 Q. Could you tell anything from the type of screaming?
 18 A. That someone was in obvious pain.
 19 Q. Now, you've said the messages started coming through on
 20 the radio; what do you recall having heard on the radio
 21 at that time?
 22 A. The -- as we approached that area the transmission that
 23 I recall the most is the -- there's been an explosion at
 24 or near to Portcullis House.
 25 Q. We've heard there was a general channel on the radio

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1 known as dispatch for officers on duty at the Palace,
 2 and then a channel specific to firearms officers that
 3 was separate. Which of those channels were you tuned
 4 into at the time?
 5 A. I don't -- I don't think they were separate firearms
 6 channels for firearms officers, sir.
 7 Q. We've heard of reference to a channel known as Patriot?
 8 A. Patriot 1.
 9 Q. And then a separate channel known as DPG?
 10 A. I think where the confusion there is, sir, is that at
 11 the Palace of Westminster everything was run on
 12 Patriot 1 channel, so even though we were DPG officers
 13 at the Palace, the rest of the DPG command would run on
 14 the DPG dispatch channel. But I believe at that time,
 15 firearms officers, unarmed officers, and I think still
 16 security staff, were working on Patriot 1 channel.
 17 Q. So in your case, do you think you would have been
 18 working on the Patriot 1 channel for the Palace?
 19 A. Without a doubt sir, yes.
 20 Q. And so you think it was on that channel that you heard
 21 a reference to an explosion?
 22 A. Yes, sir.
 23 Q. As you heard that, what did you do, or what were you
 24 doing?
 25 A. At that time -- well, almost instantaneously, after

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1 I heard the communications over the radio, that there
 2 had been an explosion, it seemed to be almost followed
 3 instantaneously by the sound of gunshots.
 4 Q. Can we have on screen {DC7989/92}. Now, this plan shows
 5 the movements of you and PC Ashby from the colonnades.
 6 We'll deal with the timing of the gunshots in a moment;
 7 can you help us with where you moved from the
 8 colonnades, having heard the explosion, or what you
 9 thought might be an explosion?
 10 A. As you can see on the map, sir, we moved from the
 11 colonnade up to the top of the vehicle exit ramp in
 12 New Palace Yard.
 13 Q. Why did you move in that direction?
 14 A. Because obviously we believed that something was
 15 happening at the perimeter fence to New Palace Yard, so
 16 we believed that there was -- something was happening
 17 that needed us to go and deal with it.
 18 Q. You've referred to shots, hearing shots fired. Can you
 19 recall now at what point in this sequence of events in
 20 your movements you heard the shots being fired?
 21 A. Well, looking at the map, I don't think that I would
 22 have reached the point of -- or the point where I heard
 23 the shots, I wouldn't have gone any further, I know
 24 that.
 25 Q. So does that mean that you got to the extent of the

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1 distance you walked before you heard the shots fired?
 2 A. I think I would have stopped at the time of the shots.
 3 Q. Can you recall from where the shots had been coming?
 4 A. I believe they were coming from behind me.
 5 Q. So you'd reached a point near the top of the up ramp,
 6 you heard some shots fired and you thought they were
 7 coming from behind you. What did you do in response?
 8 A. At that time, I then put my selector lever to fire on my
 9 MP5 carbine rifle.
 10 Q. Did you stay in position or did you move from your
 11 position?
 12 A. I think we -- I think PC Ashby at that point believed
 13 that the shots were coming down from Bridge Street, so
 14 he was saying to me to get cover, take cover.
 15 Q. What was he doing?
 16 A. He was going down the ramp, both trying to -- I think he
 17 was trying to look up because he believed that the shots
 18 were coming down from Bridge Street.
 19 Q. After he had done that, did you decide to go anywhere
 20 else?
 21 A. Yes, I think I shouted down to him saying that: it's
 22 coming from this way, behind us, this way. So that's
 23 when he then came back up the ramp and we started to
 24 move round to where the sound of the gunfire was coming
 25 from.

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1 Q. {DC7989/94}, please. Now, we have seen from the CCTV
2 footage, as you have, officer, that at that point you
3 walked back towards the area under the colonnades where
4 you had been before the attack?
5 A. Yes, sir.
6 Q. Why did you go in that direction?
7 A. Are you referring to the -- where we dart off to the
8 left?
9 Q. Yes.
10 A. Yes. That's because, obviously, there was a lot of
11 noise at that time coming from Bridge Street and there
12 was a lot of noise and panicking, screaming, coming from
13 the colonnade area. And as we were making our way back
14 round past the green area, coming up to the colonnade,
15 I could hear someone shouting in "They're in, they're
16 in, they're here", words to that effect, and I believed
17 at the time that there was an armed terrorist, possibly
18 in the colonnade area.
19 Q. When you darted off in that direction as you've
20 described, what did you see under the colonnades?
21 A. Just a lot of panicked staff members.
22 Q. But no obvious sign of a threat?
23 A. No, sir.
24 Q. Where did you go from there?
25 A. We then carried on round the yard up to the vehicle

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1 entrance gate.
2 Q. Now, we've seen the footage, as you have, and you and
3 PC Ashby were walking, moving at walking pace. Any
4 particular reason you would be going at that pace?
5 A. At the time, sir, I certainly believed that the Palace
6 was under attack from armed terrorists and it was just
7 a case of continuing -- a continuous threat assessment
8 as we walked round the yard.
9 Q. What made you think that the Palace was under attack by
10 armed terrorists?
11 A. Because of the sound of the gunshots, sir.
12 Q. Did you think that there was any particular area where
13 the threat was likely to be coming from?
14 A. I suppose it was -- it was coming from behind us.
15 I couldn't specify a particular area, only that it was
16 coming from behind me.
17 Q. Coming from behind you as you stood at the top of the up
18 ramp?
19 A. Correct, sir.
20 Q. As you came round from the colonnade towards
21 Carriage Gates, as we see on the plan, what did you see
22 ahead of you?
23 A. I saw a lot of activity with the unarmed officers, and
24 as we carried on approaching that area, I could see
25 PC Palmer on the floor to my right, and I could see the

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1 person I now know to be Khalid Masood further up to my
2 left.
3 Q. What did you then do?
4 A. We then carried on to take up a containment position at
5 the vehicle, the raised vehicle barrier.
6 Q. I think you say in one of your statements that before
7 doing that you gave brief firearms cover to the head of
8 the person you now know to be the attacker?
9 A. That's correct, sir, and at the same time, again, almost
10 simultaneously, an officer from C019 arrived and took
11 over with that cover.
12 Q. You have said that you moved to a containment position,
13 that would be in Parliament Square?
14 A. Yes, sir.
15 Q. But before doing so, did you remain at Carriage Gates
16 for any period of time?
17 A. A short time, sir. A short time. We had problems
18 getting through the vehicle barrier initially, but once
19 we did and the gates were closed, we then remained --
20 I think there was myself, PC Ashby and PC Lamb remained
21 at the Carriage Gates.
22 Q. After staying there for a short time and then moving to
23 your containment position in Parliament Square, were you
24 eventually sent off duty later that evening?
25 A. That's correct, sir.

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1 MR HOUGH: Thank you very much. Those are my questions. As
2 I say, the questions from others will follow tomorrow.
3 THE CHIEF CORONER: We're going to start at 10 o'clock
4 tomorrow morning, I hope that is convenient for you and
5 we will resume there --
6 MR HOUGH: Sir, just before we do.
7 THE CHIEF CORONER: Yes.
8 MR HOUGH: It is possible that PC Sanders may wish to speak
9 to a lawyer overnight, not in relation to anything
10 that's passed between him and me over the last 40 or 50
11 minutes.
12 THE CHIEF CORONER: Yes.
13 MR HOUGH: Sir, I'm raising the point now, I don't know
14 whether it's permission you would like to give now or
15 something you would like to deal with if the request
16 comes in overnight.
17 THE CHIEF CORONER: I'm content either way. I mean, it
18 seems to me -- I'm content to give the permission now
19 for PC Sanders if he wishes to take legal advice.
20 Obviously that shouldn't be a discussion of what's
21 happened, it should simply be a pure discussion as to
22 the advice that somebody may wish to tender to him.
23 MR HOUGH: Yes, sir. I don't know if anyone else has any
24 representations to make about that, but I'm just
25 concerned to be fair to the officer.

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1 THE CHIEF CORONER: Yes.
 2 MR KEITH: Sir, in light of the issue that's being raised,
 3 might you consider giving consent for Mr Sanders to be
 4 spoken to by the director of legal services for the
 5 Metropolitan Police Service, whom I am instructed on
 6 behalf of.
 7 THE CHIEF CORONER: Yes.
 8 MR KEITH: But of course only in relation to this issue of
 9 the concern that has been expressed on his behalf. But
 10 might I invite you not to do or say anything more on
 11 this issue now. Plainly, of course, he will have to
 12 take his own course as he sees fit, and that's a matter
 13 which is best dealt with in (inaudible).
 14 MR GOSS: Sir, I'm Mr Goss, I've been instructed at short
 15 notice effectively to deal with this very issue.
 16 THE CHIEF CORONER: Yes.
 17 MR GOSS: If I could ask for permission to speak to
 18 PC Sanders on this issue and perhaps also raise it with
 19 my learned friend for the Metropolitan Police Service
 20 and counsel to the Inquests as well.
 21 THE CHIEF CORONER: Certainly, Mr Goss. What I would
 22 suggest is that perhaps if you have a discussion with
 23 Mr Keith and Mr Hough first of all, and then obviously
 24 you may talk to the officer. I have no difficulty with
 25 that. I will give permission, Mr Keith, as you've

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1 requested in those terms. Should anything else
 2 transpire, I can be contacted by email and I will
 3 respond as quickly as I can.
 4 MR KEITH: Thank you very much. That will be very helpful.
 5 THE CHIEF CORONER: Mr Adamson.
 6 MR ADAMSON: Sir, there is just one thing, which is that
 7 during the course of the day I received two documents
 8 which were relevant to Mr Keith's examination of
 9 PC Ashby.
 10 THE CHIEF CORONER: Yes.
 11 MR ADAMSON: They in part related to matters which I had
 12 questioned PC Ashby about.
 13 THE CHIEF CORONER: Yes.
 14 MR ADAMSON: They were not drawn to my attention because
 15 they were not uploaded onto the system until after I had
 16 completed my questioning.
 17 THE CHIEF CORONER: Yes.
 18 MR ADAMSON: My point is simply this: that if there are
 19 further documents to emerge which are relevant to
 20 witnesses about who I'm going to inevitably ask
 21 questions, it's only fair that I get those documents
 22 before I start.
 23 THE CHIEF CORONER: That must be right.
 24 MR KEITH: May I deal with that, sir. In response to the
 25 letter to Kingsley Napley from your team yesterday we

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1 worked overnight to identify any more material which
 2 might be disclosable to the Inquest team in line with
 3 the usual arrangements, and bearing in mind the
 4 extremely important issue of the duty of candour on all
 5 the IPs. We provided this morning two documents
 6 immediately because we realised that, of course,
 7 Mr Ashby was still in the course of giving evidence and
 8 the families would wish to ask him questions.
 9 As it happened, it wasn't uploaded quick enough to
 10 come in the course of my learned friend's examination,
 11 but he is right to say that it is, at least indirectly
 12 relevant, or those matters are indirectly relevant to
 13 his evidence, and I put one of them to him. Although,
 14 in fact, primarily, they are concerned with the evidence
 15 we all anticipate will be given by Commander Usher.
 16 But we will deal with the rest of the responses as
 17 soon as we can get them out.
 18 THE CHIEF CORONER: Yes. I mean, I think, Mr Adamson, your
 19 point is noted, and I'm sure, bearing in mind the time
 20 at which the request came, things are being dealt with,
 21 I know, as quickly as they possibly can.
 22 MR ADAMSON: I'm conscious of that. I hope I have
 23 demonstrated during the course of the proceedings that
 24 I don't complain lightly.
 25 THE CHIEF CORONER: No, no.

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1 MR ADAMSON: But I just would like to know if there are any
 2 more documents to emerge overnight before I start
 3 tomorrow morning.
 4 THE CHIEF CORONER: Yes. Well, we will meet again tomorrow
 5 morning at 10 o'clock. I will rise.
 6 (4.44 pm)
 7 (The court adjourned until 10 o'clock on
 8 Wednesday, 19 September 2018)

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