

Requests for disclosure

Commander Usher

New Palace Yard Post Instructions and relevant reviews

1. The security systems are said to be decided by, inter Alia, taking into account “lessons learnt from programmes of testing and exercises”. No material as to the programmes of testing, exercises and/or lessons learnt has been disclosed, save for an Operation Standfast report¹. This is notwithstanding the fact that training exercises and recommendations from security reviews prior to 22 March 2017 falls within paragraphs 4(h) and (i) of the disclosure scope document drafted at an early stage following the January 2018 PIRH.
2. In respect of Operation Standfast, 2013, Commander Usher states that: “the method of deploying officers and the physical security measures in place to assist them at the time of this report were very different to those in place in 2017, as outlined in my original statement²”. In the original statement, and indeed his second statement there is no evidence of what the security measures were in 2013. Disclosure is sought of the positioning in 2013, use of static/ mobile patrols and any differences in their scope or briefing methods.
3. Reference is made to decisions having been made by the security coordinator³. Who is that and have they been approached as to the decisions made in relation to security at NPY and the relevant documentation held. For instance, the security coordinator’s report.
4. The previous Tactical Firearms Assessment to that dated 1st June 2015, which was conducted to support the post being static as it was in January 2015 is required⁴. This is relevant as to: the number of static posts within NPY; whether there was also a patrol at that time, and if so its scope/parameters and the number of AFOs working within NPY. When the post changed from static to patrol, were the numbers of AFOs reduced? Have the numbers of AFOs in NPY been reduced at any time prior to 22nd March 2017? This material is relevant to the systems in place and the way in which the systems changed, falling within para 4(f) and (h) of the disclosure scope document.
5. No statement has been taken from Chief Superintendent Nick Aldworth in relation to the issues that he raised as to security measures before 22nd March 2017 in February 2015⁵. The only statement taken from him deals with bridge security. A statement

¹ Commander Usher statement 3, 28th August 2018.

² Commander Usher statement 3, 28th August 2018 at [13, 14, 15]

³ Commander Usher statement 1, 16th July 2018 at [8]

⁴ Commander Usher statement 1, 16th July 2018 at [65]

⁵ Commander Usher statement 2 undated at Annex 1(e) WS5103/15

from him is requested to address: the totality of his concerns about security in NYP (the emails provided are entitled “Firearms stance again); the reason for his concerns; who he notified of them and when; any changes to security within NPY when he was Chief Inspector of Operations. It is of note that he emailed on the 16th January 2015 asking to “change the position of armed officers to provide more proximate protection to our staff and visitors”, in light of the change in threat level. In that email, he refers to AFOs moving from “the fixed patrol at the back of the CGE search area” to a position “in close proximity to the gates when they are open”. He also refers to a “dedicated patrol (sitting days only)...we would want the patrol to extend as far as Subway entrance⁶”. There has been no evidence served as to a dedicated patrol within NPY and their area of responsibility, nor any statement as to the changes that took place in relation to patrols and static positions. Commander Usher does not refer to a dedicated patrol in his statement at all.

6. The question was asked by Counsel to the Inquest (“CTI”) as follows: “was any specific action taken as a result of the officer’s concerns in 2015 about officers not following Post Notes and the level of supervision and if so, please provide details”⁷. As part of his answer in the second statement, Commander Usher refers to “supervision, though not perfect, became more consistent” although the evidential basis for this is not clear given this appears the more direct responsibility of Chief Superintendent Nick Aldworth. It is also not clear what systems were then put in place to supervise officers in NPY – who was responsible and how often were they present? In addition, Commander Usher refers to “dissemination to DPG Sergeants to reiterate and ensure compliance”. There is no evidence that there was any dissemination to DPG Sergeants or that the Sergeants spoke to the PCs⁸.
7. Daily briefings were apparently uploaded/ given by supervisors to the officers in NPY. A binder was in the police mess. Has there been a review of the briefings given and the binder to ensure that relevant material as to security within NPY is disclosed? The only question asked of Commander Usher as to the briefing material is limited to an “explanation or guidance on how regular or extensive” the short patrol should be. No wider questions have been asked of the briefings given to unarmed officers and/or armed officers as to systems in place to deal with security in NPY and what should occur in the event of an attack.
8. Any notes made of the conversation with PCs Ashby and Sanders or any other documents concerning this conversation (including referral emails, conversations with DPS). The conversation relates to relevant evidence, namely the systems in place in NPY and the AFOs’ knowledge of the same.

⁶ Commander Usher statement 2 undated at Annex 1(e) WS5103/14

⁷ Commander Usher statement 2 undated WS5103/2

⁸ At paragraph, page 2 – 3 of Commander Usher’s second statement.

9. The DPS file into the review of whether or not the absence of the AFOs would “necessarily have prevented” PC Palmer’s death.
10. A note of the line managers conversation with PCs Ashby and Sanders as to being in the incorrect location at the time of PC Palmer’s death. This should be held by the line managers and/or placed in their personal file/ emailed to DPS. This material is relevant as it relates to the security systems in place and the officers knowledge of them.
11. The summarised extract of the report December 2013 – has the exact wording of the relevant section of the report been extracted and placed in the statement? Was there anything further said as to the recommendation of a patrol at the rear sector near the line of Colonnade? Was there any reference in the report to: Carriage Gates; static posts or having a combination of both conducted by different officers?
12. Post the review in May 2015 - was there a consultation or any communication with the House as to closing Carriage Gate? If there was any communication with the House, disclosure is requested of: when this occurred; what was said and the response.
13. The extract of the review on 22nd May 2015 and/or a more detailed statement in relation to anything within the review that covered AFOs and unarmed officers in NPY, in particular: the recommendations for static and patrol posts; their geographical scope; the number of officers to undertake the different posts and any identification of risk flowing from a patrol post, rather than a static post at Carriage Gates.
14. Disclosure of any consultation or communication with the House after the second report, dated March 2016, recommending a review of the policy of maintaining an open gate at Carriage Gate.
15. “A number of related concerns and issues have been raised by MPS officers” about security at Carriage Gates “including Chief Superintendent Nick Aldworth”. Has there been full disclosure of the concerns raised by MPS officers as to Carriage Gates and security systems within NPY? The questions posed of Commander Usher by Counsel to the Inquest have been limited to: “an email sent from the Senior Officer referred to in paragraph 82”; an email “from the same officer in February 2015” and “the document where concerns were raised about the levels of supervision”. A request has not been made for all the material that Commander Usher was aware of pre-the attack in which concerns were raised about security at Carriage Gates.
16. Post Notes in respect of Sector 3 including the relevant sections of Tactical Planning Reviews which were used to formulate Post Notes prior to that dated 14th December 2015 including any document recording decisions and rationale for changes to Post Notes. Prior Post Notes ought to be provided so that any development or change and the rationale for this can be identified. In particular:
 - a. The Post Note of December 2015;
 - b. Explanation of the change between the January and December 2015 Post Note.
 - c. Para 69 refers to a historic map from 2012. A copy of that map is sought, with details of who would be responsible for ensuring up to date mapping was available to AFOs.
 - d. Evidence from the supervising officer of PC Ashby and Sanders as to what verbal briefings were provided as to their appropriate locations whilst on Sector 3 in and before March 2017.

17. Any material setting out how, prior to 22 March 2017, AFOs to be stationed in Sector 3 were to be trained and supervised to ensure compliance with Post Notes, briefings and sector maps.
18. Reviews of security concerning NPY and Sector 3 after 22 March 2017 which identify or refer to failings or weaknesses in security arrangements which would, or should, have been apparent in March 2017. In particular:
 - a. Para 21 1st statement. Following the incident a “Health and Safety Report” and “more comprehensive review of security measures”.
 - b. The relevant sections of the review of Sir John Murphy into POW perimeter security and security in NPY (the only section referred to in Commander Usher’s response to the recommendations is as to an armed policing command generally⁹).
 - c. Para 76. Evidence of what the “more intrusive” system in place to ensure familiarity with ADAM systems.
 - d. Para 77. Evidence of what “organisational learning” was implemented and through what means. Communications to supervisors relating to the checking of ADAM and evidence of any other measures put in place to ensure compliance with Post Notes.

Investigation into the location of AFOs on 22 March 2017

19. Materials or notes recording initial conversations regarding the location of AFOs in NPY, in particular:
 - a. Notes from the initial meetings referred to between Commander Usher and AFOs;
 - b. Emails or other records of initial discussions between the Gold Commander, Det Supt Corssley and/or Commander Usher.
20. Instructions as to the ambit of the review to be conducted by DPS into the location of the AFOs.
21. Arising from the misconduct report:
 - a. Why the investigating officer was not provided with copies of the statements of PC Ashby and Sanders and how in the absence of these he was able to conclude “*that officers have written honest accounts of their recollections of the incident*”?
 - b. WS5099/43 “*Having looked at the ADAM system there is an Organisational Learning (OL) across the whole command in that I have established that there are a number of officers who have either not registered to use the system or who have not logged on for considerable periods of time*”
 - i. Details of the numbers of officers this concerned, and confirmation of which command is referred to.
 - ii. Details of periods of time said to be “considerable periods of time”.
 - c. WS5099/44 “*it is evident as outlined by both the PSC and OCU Commander (Ch Supt Johnson) from the review of working practices, that officers consider post notes to be advisory and there is scope for some personal interpretation*”
 - i. All materials relied upon to reach these conclusions.

⁹ Exhibit AU/02

- ii. Confirmation of the enquiries undertaken by Ch Supt Johnson.
- iii. What actions have been undertaken to correct this issue by way of training, supervision and guidance.
- d. WS5099/44 *“it is clear that this practice is not unique to these officers, and that wider command practice was reflective of the same misunderstanding”*
 - i. What is meant by wider commander practice and at what level “misunderstanding” extended to.
- e. WS5099/44 *“SLT have immediately taken action to address the issue of improving compliance with post note instructions, posting notes are being reinforced by intrusive first and second line supervision”*
 - i. When this action was taken and by who.
 - ii. What is meant by intrusive first and second line supervision and how this differs to the practice which existed prior to 22 March 2017.
- f. If not covered in the above, materials not previously disclosed which were used to compile this report.

Materials arising from the evidence of AFOs Ashby and Sanders

22. PC Ashby:

- a. Statement dated 29 June 2018 *“I was on the permanent firearms team for at least six years. I remember the time we had fixed postings, and I remember moving from this to sector patrols. It is my understanding that a reason for this change was to make firearms officers’ movements unpredictable”*
 - i. Confirmation of when the decision was made to change from static to mobile patrol and the reasons for this, if not answered above.
- b. Statement dated 7 September 2018 *“The map is a copy of the map that is on the wall outside of the armoury at the Palace of Westminster base room. At the time that the OCU moved to sector patrols, a pile of these were left in the base room and we were told to take one each as a reference guide to the sectors.”*
 - i. Who produced this map.
 - ii. When was this map produced.
 - iii. Who told officers to take one.
 - iv. What briefing was provided to AFOs in respect of this map and by who.
- c. Whether any enquiry was undertaken into why PC Ashby appears not to have heard calls for urgent assistance on 22nd March and the result of this.

23. PC Sanders

Training

24. Superintendent Dawn Morris:

- a. Para 7. We request that the MPS response guidance be provided to the Coroner so that it can be ascertained whether this contains any relevant guidance for unarmed officers manning static locations such as Carriage Gates in response to a terrorist attack.
- b. Para 9. In the case of the officers deployed in NPY on 22 March 2017 who would have been directly responsible for training:

- i. The AFOs as to the appropriate positioning and area to cover in NPY. We request disclosure of any such training materials dealing with this or confirmation that there is no such material.
 - ii. The unarmed officers as to how to respond to an armed terrorist attack. We request disclosure of any such training materials dealing with this or confirmation that there is no such material.
- c. Live exercises referred to at paras 19 to 23. Had any of the 5 officers stationed in NPY at the material time on 22 March 2017, prior to this, conducted any live exercises testing their role at Parliament in NPY whilst subject to the Post Notes of December 2015?
 - i. If yes, would this have involved the scenario of a terrorist attack on Parliament?
 - ii. What training had the unarmed officers received as to how to deal with an armed attacker attempting to get through Carriage Gates? What role would they have expected AFOs stationed in NPY to have played in such a scenario?
- d. Hydra immersive training events Paras 26 to 30. Is it correct that as these were only delivered to those performing Gold, Silver and Bronze roles, they would not have involved training at the level of individual PCs as to how to respond to a particular scenario arising in their post at POW?

25. PC Howes:

- a. Did any of this training with how unarmed officers on Carriage Gates ought to respond to an armed terrorist attack?
- b. Did training include any scenarios including both AFOs and unarmed officers and actions to be taken in respect of a terrorist attack in NPY?

26. PC Morrow. Also OST training summary

- a. Did any of this training deal with how an unarmed officer ought to respond to an armed terrorist attack?