

**IN THE MATTER OF THE INQUESTS INTO
THE WESTMINSTER TERRORIST ATTACKS OF
22nd MARCH 2017**

**MPS RESPONSE TO FURTHER DISCLOSURE REQUESTS
RECEIVED 13.09.18**

1. The process of reviewing these reports has been explained on several occasions. Much of the material requested at [1] is confidential and or irrelevant for the reasons already explained by CTI and the MPS. All relevant information has been provided to the IT. It is obvious that the detail of security testing programmes would pose an ongoing risk if disclosed. The parts relevant to Carriage Gates (CG) have been disclosed and or dealt with in the statements of Commander Usher.
2. An overview of the recent relevant changes has already been provided by Commander Usher. For the reasons already explained by CTI and the MPS, previous security arrangements are not strictly relevant to this inquest. However, in light of the expressed beliefs of PCs Ross and Glaze as to the previous history concerning post instruction, and the supposed move from fixed to mobile patrols, a schedule has been created setting out the previous post instructions going back to 2010.
3. The role of the security coordinator is clearly explained at paragraphs 6 to 8 of Commander Usher's statement. All relevant material has been provided to the IT. Commander Usher is able to answer any further relevant questions as to the process.
4. For the reasons set out at response (2) above, this is not strictly relevant to this inquest. However, in light of the evidence of PCs Ross and Glaze, a copy of the relevant part of the 2014 Tactical Firearms Assessment has been provided to the IT (this was the predecessor to the 01.06.15 assessment).

It is clear from the disclosure to date, and it has been confirmed during the evidence of the AFOs, that 2 AFOs were deployed in NPY during all of the dates referenced in the family's document. This is reflected in the schedule of post instructions.

5. Palace security is dealt with by Commander Usher. Superintendent Aldworth's emails were disclosed in the interests of transparency.

The email referred to references both NPY and a separate dedicated patrol. Further disclosure of information relating to the dedicated patrol is not relevant.

6. This is, in part, comment. Commander Usher has provided a further statement dealing with these matters. The evidence comes from this witness.

7. The MPS can state that there is a binder, and that it contains current post notes. The binder can be inspected by the IT should they so wish. However, as the binder has (of course) been modified since March 2017, and because its contents at that earlier time cannot now be verified, its contents are likely to be of very little relevancy to this inquest. The MPS has addressed the areas requested by the IT.
8. It is not known what conversations are being referred to, and with whom. CTI and the MPS have already responded to the request for notes of any conversations with Commander Usher and between Det Supt Crossley and the Gold Commander.

All relevant material has been disclosed in the statement(s) of Commander Usher, the form MM1 and the statements of PCs Ashby and Sanders along with exhibits.

9. As is clear from the MM1, the matter was referred back from DPS. All relevant material regarding the investigation has been disclosed. This point has already been answered – this is not an inquiry into the misconduct report process.
10. Enquiries have been made which have confirmed that there was no conversation with line manager(s); the only conversations were with Commander Usher and Superintendent Shannon. Both have made witness statements dealing with these conversations. No notes were made during these conversations.
11. All relevant parts of the report have been gisted. The report has been provided in full to the IT.
12. The relevant communications have been disclosed in emails exhibited by Commander Usher. This has also been addressed by Mr Hepworth.

Further enquiries have been made by the MPS and it is not believed that there is any further material. Final confirmation is awaited from one staff member who is on leave but it is not thought likely more material will be produced.

13. This has already been answered by CTI and the MPS. All relevant parts of the report have been gisted. The report has been provided in full to the IT. As is clear from the statement of Commander Usher, this was a brief report and there was no input from a tactical firearms advisor. Tactical advice is a pre-requisite for any change in AFO postings or tactics.
14. See paragraph 12 above.
15. All relevant documents have been provided.
16. See below for specific responses.
 - a. The relevant post note has already been disclosed. A schedule has also been created setting out the previous post instructions going back to 2010.

- b. See above.
 - c. This has been provided already. The map concerns the layout of the POW and relevant equipment within the Estate.
 - d. This was a matter for PCs Ashby and Sanders.
17. This is dealt with by Commander Usher and Chief Inspector Sheridan.
18. Post attack reports and reviews might be relevant to any report to prevent future deaths (though this has been substantially dealt with by Sir Jon Murphy). They are necessarily of less relevance to the matters to be considered in this inquest but a full review of the material has in any event been undertaken by the IT. As to the four specific requests.
- a. This has been provided to, and considered by, the IT.
 - b. This has been provided to, and considered by, the IT.
 - c. Commander Usher can be questioned about this.
 - d. Commander Usher can be questioned about this.
19. This is a repeat of the earlier request dated 10.09.18. See (10) above. Para (a) - there are no notes; Para (b) – this is irrelevant.
20. As set out above, and as is clear from the MM1, the matter was referred back by DPS. The relevant information is provided in the form MM1 and the statement of Commander Usher. This has already been answered by CTI and the MPS.
21. These requests relate to events after the attack. As to the specific requests:
- a. The opinion of the investigating officer is just that. This is not a review of the misconduct process.
 - b. The MPS has requested that some material be gathered dealing with the introduction of the ADAM system and post instructions being available on the system.
 - c. These were the conclusions the officers reached, having made the enquiries set out in the documentation disclosed.
 - d. The meaning is clear.
 - e. This is self-explanatory. The meaning is clear.
 - f. This has already been answered.

22. See below for the responses to specific questions:

- a. A schedule has been created setting out the previous post instructions going back to 2010.
- b. The map is dated 2012. These questions can be asked of the witnesses. However, they are likely to be very difficult to answer in 2018.
- c. Statements have been taken from these officers, addressing the issue of which channel their radios were tuned to, and what they heard on the day of the attack.

23. No request.

24. See below for the responses to specific questions:

- a. The IT was provided with a copy of this document.
- b. Training of AFOs is dealt with by the statement of CI Sheridan. He is the appropriate witness to direct questions to.
- c. It is not known if, by coincidence, any of the officers had been involved in a live exercise.
- d. The nature of a HYDRA exercise is clear from the statement of Dawn Morris. This is obviously not an exercise that could be conducted with all police officers. If the positions is unclear, these questions can be asked of Dawn Morris.

25. These are matters which could have been asked of PCs Ashby and Sanders or the unarmed officers.

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