

**BEFORE THE CHIEF CORONER HHJ LUCRAFT QC**  
**INQUESTS ARISING FROM THE DEATHS IN THE WESTMINSTER TERROR**  
**ATTACK OF 22 MARCH 2017**  
**INQUEST INTO THE DEATH OF PC KEITH PALMER GM**

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**LEGAL SUBMISSIONS ON DETERMINATIONS ON BEHALF OF THE**  
**PARLIAMENTARY AUTHORITIES**

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**Introduction**

1. These submissions are served in response to the written submissions filed by Counsel to the Inquest ('CTI') dated 1 October 2018.

**Article 2**

2. The Parliamentary Authorities respectfully endorse the detailed summary of relevant legal principles relating to Article 2 ECHR at paragraphs 4 to 8 of CTI's submissions.
3. At paragraph 11 of their submissions CTI (a) submit that Article 2 is engaged in relation to PC Palmer's inquest; but (b) limit the factual grounds upon which they rely in support of that submission to arguable systemic failings on the part of the MPS.
4. The Parliamentary Authorities do not propose to address any alleged shortcomings in the MPS systems.
5. We do submit, and we infer that CTI support this proposition, that there has been no evidence of any systemic failings on the part of the Parliamentary Authorities that might provide an additional or alternative factual basis for the engagement of Article 2. The evidence has been that security, including specifically the arrangements at New Palace Yard and Carriage Gates, has been the subject of a series of careful reviews over the years. None of the reviews had as part of their recommendations that Carriage Gates should be closed at busy times such as during the Division when Masood in fact

attacked. In May 2015 Chief Inspector Aldworth did suggest, in requesting a review of security risks posed by vehicular attacks, that the most obvious mitigation to protect officers was to close Carriage Gates and operate from behind them, although it was recognised that this would require consultation with Parliament. That suggestion, however, did not feature in the review's recommendations.

**PFD Reports**

6. We endorse the legal analysis at paragraphs 18 to 24 of CTI's submissions and agree that the procedure proposed at paragraph 25 is appropriate in the circumstances of this case.

**ANDREW O'CONNOR QC**

**NICHOLAS MOSS**

2 October 2018