

OPUS 2

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Westminster Bridge Inquests

Day 15

October 2, 2018

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Phone: +44 (0)20 3008 5900

Email: transcripts@opus2.com

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Tuesday, 2 October 2018

1
2 (9.45 am)
3 (Proceedings delayed)
4 (9.49 am)
5 MR HOUGH: Sir, our first witness today is PC Carlisle .
6 Perhaps he could be sworn.
7 THE CHIEF CORONER: Thank you.
8 PC NICK CARLISLE (Sworn)
9 THE CHIEF CORONER: Good morning, PC Carlisle, thank you
10 very much for coming.
11 A. Good morning, sir.
12 THE CHIEF CORONER: If you wish to sit, that's absolutely
13 fine. Make yourself comfortable whether sitting or
14 standing.
15 A. Thank you.
16 Examination by MR HOUGH QC
17 MR HOUGH: Would you please give your name and rank to the
18 court?
19 A. PC Nick Carlisle , I'm a police officer at the
20 Parliamentary and Diplomatic Protection Command, sir.
21 Q. Officer , you understand I ask questions on behalf of the
22 Coroner, and then you may be asked questions by other
23 lawyers.
24 You are giving evidence, you understand, about
25 events you witnessed at the Palace of Westminster on

1

1 22 March last year?
2 A. That's correct, sir .
3 Q. You made witness statements on 22 March and on 27 March
4 of last year, the second one of those is more detailed.
5 You may refer to either of them as you wish.
6 A. Thank you.
7 Q. I appreciate I will be asking you about some very
8 distressing events. If you would like a break at any
9 stage, please say so.
10 A. Thank you.
11 Q. On 22 March 2017, were you on duty at the
12 Palace of Westminster in uniform?
13 A. I was.
14 Q. For how long before that had you worked in the grounds
15 of the Palace?
16 A. Since December 2014.
17 Q. How familiar were you with the New Palace Yard area and
18 the unarmed officer posts there?
19 A. Very familiar .
20 Q. On the afternoon of 22 March, which post were you at?
21 A. I was on Carriage in gates, Carriage Gates north.
22 Q. We'll look at a plan in a moment to identify that. What
23 shift were you on that day?
24 A. I was on a double shift . I was working from 06.45 until
25 midnight.

2

1 Q. Who were you on duty with that afternoon?
2 A. PC Tipple and PC Palmer.
3 Q. We have heard that PCs Glaze and Marsh were on the exit
4 south gates, and PC Ross at the pedestrian entrance to
5 the south of the gates; do you recall that?
6 A. I do, that's correct.
7 Q. We can bring up on screen a plan, {DC7960/78}, please.
8 If you look at the plan on the screen, you may be able
9 to see by the north in gates three markers, including
10 a green star which represents you?
11 A. I can, sir, yes.
12 Q. Does that correctly show the general area in which you
13 were stationed?
14 A. That's right .
15 Q. May we look next at a photograph, {DC7989/55}, this is
16 just a view from the inside. Now, this was taken after
17 the attack and the large metal gates are the
18 replacements installed after the attack, but subject to
19 that, would you have been stationed by the gates we see
20 closed on the right of screen?
21 A. Yes, sir .
22 Q. Now, we know that there were two authorised firearms
23 officers posted in New Palace Yard during sitting hours
24 in March 2017. During the period you were on duty that
25 day, were you aware of where the firearms officers were

3

1 stationed or patrolling?
2 A. I was aware that they had a patrol area and that part of
3 that time they spent standing behind us on the gates.
4 Q. Were you aware for how much of the time they were near
5 you and for how much of the time they were elsewhere?
6 A. I wasn't aware how long they were behind us. It was
7 an irregular patrol pattern.
8 Q. Where did you expect them to be standing or patrolling,
9 based on your experience of being stationed in that
10 area?
11 A. Either behind us against the metal barrier, down by
12 members' entrance, or on the colonnades.
13 Q. In your experience of being in New Palace Yard in the
14 weeks, months or years before the attack, where did the
15 firearms officers usually position themselves or patrol?
16 A. Across any of those three locations .
17 Q. Did you yourself before 22 March 2017 have any
18 experience as a firearms officer ?
19 A. I was a taser instructor only. I haven't carried
20 firearms in the Met.
21 Q. And therefore we may take it that you haven't worked as
22 a firearms officer at the Palace?
23 A. I have not.
24 Q. May we move to the afternoon of the attack. At about
25 2.40 that afternoon, were you in position at your post

4

1 at the gates where you've indicated?
 2 A. I was.
 3 Q. We've heard that the gates were open at this time
 4 because it was parliamentary sitting hours, and that the
 5 security barriers across the outside of the entrance
 6 were not barring the entrance because a division was
 7 being called?
 8 A. That's correct.
 9 Q. Looking at the photograph on screen, can you remember
 10 roughly where you were standing in relation to the
 11 gates?
 12 A. I had just been relieved by PC Tipple. PC Tipple was in
 13 the hut getting (inaudible) fluorescent jacket and I was
 14 turning on my heel to walk back to the mess, so I was in
 15 a position between the in and the out gates there,
 16 almost in line with the traffic cone.
 17 THE CHIEF CORONER: That's the traffic cone we see on the
 18 photograph?
 19 A. That's right, sir, yes.
 20 MR HOUGH: What first drew your attention to something
 21 unusual or concerning happening?
 22 A. I heard a loud bang in Bridge Street.
 23 Q. Did you have any idea where in Bridge Street the bang
 24 was emanating from?
 25 A. It was over my right shoulder, behind post 002, about 30

5

1 or 40 metres away. Closer to 30 metres away.
 2 Q. In your witness statement you say that it was from
 3 an area opposite Tesco.
 4 A. That's right.
 5 Q. And Tesco, I believe, was immediately at the base of
 6 Portcullis House?
 7 A. That's correct.
 8 Q. At this point in time, when you had heard the loud bang,
 9 did you hear any radio message?
 10 A. Over my shoulder was PC Glaze on the out gate, and he
 11 got on the radio and said words to the effect of
 12 "possible explosion Bridge Street, control room get the
 13 cameras on it".
 14 Q. When you looked over your shoulder at that moment, could
 15 you see anything from the direction of Bridge Street?
 16 A. I could see a grey vehicle, 4x4 size, I could see the
 17 top of it against the brickwork, against the wall,
 18 against the railings in Bridge Street.
 19 Q. Could you see anything else to suggest what might have
 20 happened?
 21 A. Thin smoke was coming through the fence. It looked as
 22 if there had been a high-speed road traffic accident,
 23 road traffic collision.
 24 Q. Did you form a clear view that that was what had
 25 happened or was there any uncertainty in your mind?

6

1 A. It wasn't certain what had happened, but I suspected
 2 there had been a road traffic collision and I was making
 3 my way back to the gate and turning to go round the
 4 corner to have a look.
 5 Q. And you've told us about the radio message you heard
 6 from Mr Glaze; what next did you hear or see of
 7 significance?
 8 A. Shouting, screaming from that location, from the
 9 location of the vehicle against the wall.
 10 Q. Just pause there a moment. I know it's very difficult
 11 to recall precise times and precise time periods, but
 12 can you recall how quickly you heard, or how long after
 13 that initial impact and bang you heard shouting or
 14 screaming?
 15 A. Immediately. I don't believe there was a delay.
 16 Q. At that moment, could you hear anything being said,
 17 anything intelligible among the screams?
 18 A. No.
 19 Q. What did you next see or hear?
 20 A. As a mass I could see people running along Bridge Street
 21 away from the location of that incident, running towards
 22 Parliament Square.
 23 Q. How were you seeing them? Where were you looking to see
 24 them?
 25 A. I was looking -- I was standing on the cobbles within

7

1 the parliamentary estate, looking across the grassed
 2 area and looking through the fence line.
 3 Q. Do you have any idea how many people you could see
 4 moving in that way?
 5 A. A crowd of people, 20 or 30 people.
 6 Q. Did you form at that time any idea about what was going
 7 on, what they were doing?
 8 A. It was impossible to see what was happening.
 9 Q. What's the next memory you have of a significant sight
 10 or sound?
 11 A. I stepped forward into the mouth of the gates, looked to
 12 my right and saw the crowd emerging around the corner.
 13 Q. At that stage could you see or hear anything from the
 14 crowd just as they were coming around that corner?
 15 A. That was the first occasion I got a shouted warning.
 16 A white man wearing a suit, a male in his 40s with dark
 17 hair shouted words to the effect of "men with knives
 18 stabbing people, men with knives".
 19 Q. How close was the man in the suit when you heard that
 20 being shouted by him?
 21 A. About 5 metres. Close.
 22 Q. Was that man part of the large crowd you had seen at the
 23 corner?
 24 A. He was.
 25 Q. So may we take it that the man had had to run or move in

8

1 some way from the corner to you, to 5 metres away from
 2 you, before you heard him say that?
 3 A. It certainly looked that way.
 4 Q. Was anything else being said that you could hear from
 5 him or anyone else in the crowd?
 6 A. I didn't hear any other shouted warnings. As soon as
 7 he'd said that my eye was drawn to the attacker, who was
 8 just behind him.
 9 Q. So pause there a moment. Before you saw the attacker,
 10 were you aware where the other officers stationed around
 11 you were?
 12 A. We were all close at hand within the mouth of the in
 13 gate.
 14 Q. And when you refer to "all of us", is that just the
 15 officers stationed there, or all the officers at
 16 Carriage Gates?
 17 A. That was three officers. That was PC Palmer, PC Tipple
 18 and myself.
 19 Q. Now, you say that you saw the attacker close behind the
 20 man in the suit who had shouted about people stabbing?
 21 A. That's right.
 22 Q. When you first saw him, what did you notice about him?
 23 A. I noticed that he had two very large knives that were
 24 held up at eye level, and that he was running through
 25 the crowd. He wasn't looking at members of the public.

9

1 He was looking directly -- he looked me in the eye. He
 2 was looking at police officers at the gates.
 3 Q. By this time had you been aware of the other officers
 4 around you doing or saying anything?
 5 A. I believe PC Tipple had shouted "shut the gates" and
 6 that PC Palmer, who was a yard or two in front of me,
 7 had shouted -- had waved to the crowd and shouted "Come
 8 in here, come in here".
 9 Q. Can you recall at what point in the sequence PC Tipple
 10 shouted to shut the gates?
 11 A. The sequence was very, very short. These events were
 12 almost on top of each other.
 13 Q. Was that before or after you heard the man shouting
 14 about people with knives stabbing?
 15 A. It was after we'd had that shouted warning.
 16 Q. So are we right to get this impression: the man is
 17 coming towards you, 5 or so metres away, he shouts that,
 18 the man in the suit, then PC Tipple shouts "shut the
 19 gates", and then very soon afterwards you see the
 20 attacker immediately behind the man in the suit?
 21 A. As soon as the warning was shouted, almost immediately
 22 my eye was drawn to the attacker, directly behind the
 23 male that shouted this warning.
 24 Q. May we put on screen, please, {WS0168C/3}, and this is
 25 a radio transmissions transcript which you have

10

1 annotated, officer. Do you see the second entry in the
 2 transcript is this:
 3 "Patriot, Carriage Gates, just had some sort of
 4 explosion, er, down near Portcullis House."
 5 And you have annotated that?
 6 A. That was PC Glaze.
 7 Q. So was that the entry that you have told us, or the
 8 radio transmission you have told us about, immediately
 9 after the sound of the bang?
 10 A. That's correct.
 11 Q. Then we have an entry:
 12 "Can we have 6 patrols, 6 Trojan units, Portcullis
 13 and update, over."
 14 Do you recall that transmission at all?
 15 A. I don't recall that transmission.
 16 Q. And then we have a transmission:
 17 "Knives attacking, please with knives attacking."
 18 You have annotated that as Mr Glaze; was that
 19 a transmission you recall hearing at the time?
 20 A. I don't recall hearing it but I believe that
 21 I recognised Doug's voice on the radio transmission on
 22 the tape.
 23 Q. You were, just to be clear, no mystery about this, you
 24 were played this transcript, as other officers were, and
 25 you helped identify some of the speakers?

11

1 A. That's right, sir, yes.
 2 Q. And then we have a transmission:
 3 "Male: Yeah, we've got running in the street, it's
 4 a live incident".
 5 Is that a transmission that you recall?
 6 A. I don't remember that transmission.
 7 Q. Then we have another transmission with an inaudible part
 8 and then the word "Gates". Any recollection of that or
 9 what it might have been?
 10 A. No, sir.
 11 Q. Thank you very much. We can take that down.
 12 You have told us about your first view of the
 13 attacker and his movement through the crowd, intent on
 14 police officers. How did he move from that point?
 15 A. He was just outside the gates. As soon as I saw him
 16 I looked to create distance between himself and myself
 17 and I recoiled backwards, as did PC Tipple. I lost
 18 sight of PC Palmer.
 19 Q. Did you stay with your view towards the gates or did you
 20 have to turn slightly in order to make that movement
 21 back?
 22 A. The gates weren't in my sight the whole time. I turned
 23 slightly and backed off at least 10 metres.
 24 Q. As you got to that point, 10 metres or so away, to
 25 create distance, as you've described, what did you do?

12

1 A. I turned and saw that the attacker had caught PC Palmer
2 and was driving back into New Palace Yard.
3 Q. Could you see, in broad terms, what the attacker was
4 doing at that stage?
5 A. I'd already seen the knives in his hands. I couldn't
6 see -- his hands were out in front of him. He was
7 clearly armed with knives. PC Palmer was being driven
8 back with his arms up, attempting knife--defence, trying
9 to parry off blows.
10 Q. What did you then do?
11 A. This was about 10 metres away from me. I was to the
12 right--hand side of the attacker. I ran forward
13 intending to issue a rugby tackle, shoulder barge to the
14 attacker from the right--hand side and put him to the
15 floor.
16 Q. We can put on screen a plan, {DC7960/81}. We can see
17 there that the maker of this plan has marked PC Palmer
18 in blue by the semicircular wall forming the boundary of
19 the down ramp; do you see that?
20 A. I do, sir.
21 Q. And the maker has also marked you as having moved
22 forward close to him by that wall. Does that accurately
23 show where you got to as you moved towards the attacker?
24 A. By this time, sir, PC Palmer had stumbled backwards and
25 was sitting on his backside with the attacker above him.

13

1 I ran forward to attempt my shoulder barge, rugby
2 tackle, at which time he turned to face me.
3 Q. What did he do then?
4 A. He came at me with knives up. I was very close. It was
5 impossible to carry through that rugby tackle. I had to
6 veer away to the side, at which time -- I didn't realise
7 at the time, but I've seen on CCTV that PC Palmer was
8 able to get up and run towards the vehicle blocker.
9 I veered away to the left and ran alongside PC Palmer
10 through the vehicle blocker.
11 Q. We have all seen the CCTV showing that and I'm not going
12 to show it again. We know that your movement towards
13 Masood appears to have distracted him and let PC Palmer
14 move away, but that wasn't something you were actually
15 aware of at the time?
16 A. I didn't realise that he'd been able to run away.
17 Q. As you moved through the vehicle exit barrier area where
18 we know the barrier had risen for a vehicle leaving, as
19 you went through there, were you saying anything?
20 A. I was shouting for armed support. I expected the
21 firearms officers to be standing at members' entrance or
22 on the colonnades.
23 Q. Could you see any response to that?
24 A. I didn't see the DPG armed police officers, but I did
25 see two close protection officers making their way up

14

1 the cobbled area, handguns already drawn.
2 Q. We're not naming them, so I'm not going to ask you any
3 details about them which might identify them, but beyond
4 that, where were those officers and how were they
5 moving?
6 A. Their handguns were drawn and they were running up the
7 cobbles towards the exit gate on the run.
8 Q. Is it right to say that they were moving towards you and
9 the distance between you and them was closing?
10 A. That's correct.
11 Q. How did you move in the seconds that followed?
12 A. I got out of the line of fire and indicated the suspect,
13 making it clear who the attacker was and pointing him
14 out.
15 Q. Did you see what then happened?
16 A. Their guns were already drawn. I didn't hear a warning,
17 I believe there was but I didn't hear one, there was
18 a volley of shots, the attacker was coming on the run
19 and they shot him and put him down.
20 Q. At the time the shots were fired, where were you
21 looking?
22 A. I was in -- I was between the firearms officers and
23 Masood but close enough that I was able to see shooting
24 and the attacker shot and go down.
25 Q. After he went down, did you proceed to secure him with

15

1 cuffs?
2 A. I did. I expected this to be a jihadi--type attack.
3 I believed that he was likely to be wearing body armour
4 and more likely a suicide belt. One hand was out to the
5 side with a knife on display, one knife was tucked away
6 out of sight, his arm was under his body and I went
7 forward and handcuffed him?
8 Q. And the relevance of the fact that he might have been
9 carrying a bomb or wearing a suicide vest was that you
10 wanted to secure his hands and prevent him triggering
11 it?
12 A. That's correct, sir.
13 Q. Shortly after you had dealt with that, did you assist
14 with first aid for PC Palmer?
15 A. I did, sir. I've looked across the vehicle blocker,
16 which was back down in the blocked closed position to
17 where I'd last seen Keith Palmer expecting to see
18 an injured officer. I saw a little bit of debris,
19 perhaps his hat and a watch lying on the cobbles, and
20 I was surprised over my shoulder to see a gaggle of
21 people already around a prone officer and when I went to
22 look, I saw it was Keith, I saw it was Keith Palmer.
23 Q. Then I think you assisted others in their efforts to
24 resuscitate him?
25 A. I did. It was clear that a sensible update needed

16

1 transmitting on the radio. Tobias Ellwood was already
 2 involved in CPR. Two army boxers had pitched in to
 3 provide first aid, one was doing -- Tony Davis,
 4 I believe, was doing lips-on-lips, mouth-to-mouth, and
 5 Tobias Ellwood told me: I'm an army medical officer or
 6 army doctor, something along those sort of lines. Can
 7 you tell them on the radio we've got a police officer
 8 shot in the head and we need HEMS on the hurry up.
 9 I passed that information over the radio.

10 MR HOUGH: Thank you very much. I'm not going to ask
 11 further details about the first aid, because we've heard
 12 about that in some detail. Thank you for your evidence,
 13 officer.

14 A. Thank you, sir.

15 Examination by MR ADAMSON

16 MR ADAMSON: PC Carlisle, my name is Dominic Adamson and
 17 I ask questions on behalf of the widow of PC Palmer.
 18 PC Carlisle, I just want to go over just the
 19 sequence of events, if I may, just to understand
 20 a little bit more detail of your account. We know that
 21 you had your attention drawn to a loud bang, and you
 22 were then drawn to look towards the direction of where
 23 the bang had come from; is that right?

24 A. That's right, sir.

25 Q. We have in the photographs, and perhaps we could get it

1 up on the screen, {DC7989/60}. Now, I appreciate that
 2 this photograph is not taken from your exact location,
 3 but are you able to help us as to where on that
 4 photograph the bang had emanated from?

5 A. The large tree there, sir. I think it was just to the
 6 right of that tree.

7 Q. Just to the right of that tree. So from your position,
 8 you could see that?

9 A. I could.

10 Q. Yes. And am I right in thinking that from your position
 11 as we look at that photograph, you would be further over
 12 towards the yellow bucket, which I assume contains salt?

13 A. At this time I had just been relieved, so I had turned
 14 on my heel to go back to the mess, so this is probably
 15 very close to where I was standing.

16 Q. Sorry, so the point from which this photograph is taken
 17 is very close to where you were standing?

18 A. That's right, sir.

19 Q. Right. Now, you've explained that there was a -- the
 20 sound of screaming very shortly thereafter?

21 A. Yes, sir.

22 Q. And you became aware from your position that there were
 23 people running away from the point where the bang had
 24 emanated from?

25 A. That's right, sir, yes.

1 Q. So is it fair to say that when these events were
 2 unfolding, that it was clear that they were running from
 3 something that you were aware of?

4 A. That's fair to say, sir.

5 Q. And your next movement was to go towards the gate; is
 6 that right?

7 A. That's right, sir.

8 Q. Yes. Now, just in terms of distance, is it fair to
 9 say -- and this is not a criticism -- that between the
 10 sound of the bang and you reaching a point where you
 11 could see people running along the front of
 12 New Palace Yard, that you hadn't covered a great deal of
 13 distance?

14 A. I had moved about 5 or 10 metres.

15 Q. 5 or 10 metres. And when you'd moved that 5 or
 16 10 metres, you were then in a position where you were
 17 able to see the people running but also to hear what
 18 they were saying?

19 A. I certainly heard one person shout.

20 Q. Right, and was this a loud shout?

21 A. A very loud shout.

22 Q. Yes. So somebody within 5 or 10 metres of where you
 23 were could have heard that shout?

24 A. Yes, sir.

25 Q. The topography of New Palace Yard is such that the

1 difference between Bridge Street and New Palace Yard is
 2 far greater at the colonnade end than it is at the gates
 3 end; is that right?

4 A. The colonnades are much lower than the gates. The yard
 5 drops away.

6 Q. Yes. So anybody towards the back end, if I can call it
 7 that, of New Palace Yard, is in a much worse position to
 8 be able to appreciate what's going on on Bridge Street;
 9 would you agree with that?

10 A. From the colonnades they get a look at the fence line,
 11 they could probably see 70 metres of fence line at one
 12 glance, so it depends on what they're looking for as to
 13 where they stand.

14 Q. Yes. Perhaps we could call up on screen {DC7989/63}.
 15 To the right-hand side of that photograph we can see the
 16 differential, can't we, between the level of
 17 New Palace Yard and the level of Bridge Street?

18 A. Yes, sir.

19 Q. And, again, just to help us orientate ourselves, in
 20 terms of the location from which you recall hearing the
 21 bang, would it be on the post where we can see that
 22 white sort of lamp-like structure on the wall of the
 23 edge of New Palace Yard?

24 A. I believe that's the post that the vehicle crashed into,
 25 yes.

1 Q. Yes. So somebody in the position of the photographer
 2 who took that photograph would not be in a position to
 3 appreciate people running away from the vehicle; do you
 4 agree with that?
 5 A. There's certainly a fence line effect there, a wall
 6 effect in the fence. It looks difficult to see through
 7 the fence line.
 8 Q. Yes. We can see the tree is an obstruction, we can see
 9 that there's a further tree further back, there's
 10 the hut and then there's the fencing itself.
 11 Whereas from your position you were aware, and you
 12 were aware immediately, that people were running away
 13 from the vehicle?
 14 A. Yes, sir, I was.
 15 Q. And one of the reasons why they might be running away
 16 from the vehicle is the possibility that there was
 17 a threat coming from behind them; do you agree with
 18 that?
 19 A. It was impossible to tell from my angle. As I say, it
 20 sounded like a road traffic collision.
 21 Q. Sorry, it was impossible to tell from your angle
 22 because?
 23 A. It was impossible to tell what had happened. It
 24 looked -- it sounded like a road traffic collision.
 25 Q. Sounded like a road traffic collision?

21

1 A. That's right, sir.
 2 Q. It didn't sound like a terrorist attack at that stage?
 3 A. Not at that time.
 4 Q. So there's a period of time when although this is
 5 an event that's out of the ordinary, it's not one which
 6 made you think "We are under attack"?
 7 A. Not at that time. Not until the initial shouted warning
 8 from the white man in a suit rounding the corner.
 9 Q. So you don't rush to the location; you move slowly
 10 towards the gates?
 11 A. I moved to the gates, looking across at the building
 12 line. It was my intention that I was going to exit the
 13 gates and walk round the corner to see what was
 14 happening, what had happened.
 15 Q. So would this be fair: in the aftermath of the
 16 collision, and between that moment and the time of the
 17 attack on PC Palmer, you personally had not travelled
 18 a great deal of distance?
 19 A. I hadn't, sir, no.
 20 Q. You personally, because of your proximity to the gates,
 21 and the visibility that you had, were aware that there
 22 were people running away from the vehicle?
 23 A. That's right, sir.
 24 Q. You personally were aware that they were running along
 25 the front of New Palace Yard?

22

1 A. By the time I got to New Palace Yard the events were
 2 very, very quick, the full events were very, very quick.
 3 Q. You personally were aware, because of your proximity to
 4 the gates, that somebody was shouting "There's a man
 5 with knives"?
 6 THE CHIEF CORONER: I think "Men with knives".
 7 MR ADAMSON: "Men with knives".
 8 A. He was 5 metres away from the gates by the time that
 9 warning was shouted, but yes.
 10 Q. But it was shouted, understandably in the circumstances?
 11 A. When he was close to the gates.
 12 MR ADAMSON: Thank you very much, PC Carlisle.
 13 A. Thank you.
 14 Examination by MS STEVENS
 15 MS STEVENS: Police Constable Carlisle, my name is
 16 Susannah Stevens and I'm asking questions on behalf of
 17 the parents and siblings of Police Constable Palmer.
 18 I don't have very much for you at all. I just wanted to
 19 ask you: there you are at Carriage Gates, you've told us
 20 that the conclusion you reached was that this was a road
 21 traffic collision; that's right, isn't it?
 22 A. That was my initial thoughts when I heard the bang and
 23 saw smoke drifting through the fence.
 24 Q. Yes. The sound, then, was like a car collision, but can
 25 I just ask you this: there was no smell, was there, such

23

1 as a strong smell of gas that you would associate with
 2 a bomb?
 3 A. I don't believe I recall any smell at all.
 4 MS STEVENS: No further questions, but can I say on behalf
 5 of Police Constable Palmer's family, thank you very much
 6 for your bravery in trying to assist.
 7 MR ADAMSON: Can I associate myself with those last
 8 comments.
 9 A. Thank you.
 10 THE CHIEF CORONER: Mr Keith.
 11 Examination by MR KEITH QC
 12 MR KEITH: PC Carlisle, may I just ask you some questions,
 13 please, about the speed with which Masood came in
 14 through Carriage Gates. You described it as very, very
 15 quick.
 16 Could we have, please, on the screen {AV0073/5}.
 17 This is a still from the CCTV at 14.41.12. Then
 18 {AV0073/6}, one second later, you can see PC Palmer
 19 stumbling and about to fall to the ground.
 20 PC Glaze, we know from the transcript of the radio
 21 call, makes his call one second later. Can we have
 22 {AV0073/7}, 14.41.14. Is that PC Glaze, as far as you
 23 are able to tell? If you can't, don't worry.
 24 A. Possibly.
 25 Q. All right. We know he made a call at 14.41.14.

24

1 If you could then have {DC7960/92} on the screen.
 2 This is a map showing the point of the attack by the
 3 barrier, or the low barrier, at 14.41.15, so just one
 4 more second further on.
 5 You bravely attempted to go towards Masood and
 6 PC Palmer to try to disable Masood, but the reality was,
 7 wasn't it, that there was no time for you to stop him
 8 before he got to PC Palmer, and once he turned towards
 9 you with his knives, there was no time or ability to
 10 stop him after that?
 11 A. That's fair to say, sir, yes.
 12 Q. We know from a CCTV still, in fact from the CCTV itself,
 13 that a few seconds after the pictures and the stills
 14 that you have seen, you were seen to have your baton
 15 out, your asp out, and you had obviously tried to get it
 16 out in order to try to deal with Masood, but it wasn't
 17 possible?
 18 A. It wasn't possible at the time, sir, it was just too
 19 quick.
 20 Q. You said that you were aware that there had been, or
 21 that there generally were firearms officers, authorised
 22 firearms officers, on patrol, including Carriage Gates.
 23 Had you yourself been on duty an hour or so before? You
 24 were just about to or had just been relieved from the
 25 north gate at 14.41. How long had you been on post; can

25

1 you recall?
 2 A. I can, sir. 90 minutes.
 3 Q. So is it possible that you would have seen firearms
 4 officers near Carriage Gates earlier on in that
 5 particular posting?
 6 A. I can't remember their particular movements that day,
 7 but I had seen them multiple times.
 8 Q. The noise in Bridge Street, you thought that it might be
 9 a road traffic accident?
 10 A. It initially sounded like a road traffic accident.
 11 I could see a vehicle through the wall, it had clearly
 12 crashed into the wall, and smoke was drifting through.
 13 Q. Some of your colleagues believed it might be
 14 an explosion, because we know PC Glaze called it in as
 15 an explosive sound near Portcullis House. Were you sure
 16 about what you thought it might have been?
 17 A. That was my initial thought, so I couldn't be sure.
 18 Q. Is it part of your role as a police officer on duty at
 19 north Carriage Gates to leave the gates to go to
 20 investigate a noise or potential threat somewhere else
 21 in New Palace Yard?
 22 A. Not usually, but having just been relieved I was
 23 possibly surplus to requirements. I could have left two
 24 officers at the gates and gone around and issued a
 25 sit rep over the radio as to what had happened.

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1 Q. If I may say so, very sensible indeed. But if you had
 2 not been relieved, if you were still on duty, would you
 3 have thought it part of your duty to go to Bridge Street
 4 to see what it was, or would you have been obligated to
 5 remain at north Carriage Gate?
 6 A. I would have remained at my post.
 7 Q. If there is a threat or an event on the perimeter of
 8 New Palace Yard, as one of the officers on the gate, who
 9 did you understand would be primarily responsible for
 10 investigating it? Who goes to see what it is?
 11 A. Perhaps the external borough or the six patrol officers
 12 within Parliament, or CCTV might have a look in the
 13 first case.
 14 Q. Finally, in relation to Masood, did you have any doubt
 15 in your mind whatsoever as to what he was intending to
 16 do?
 17 A. There was no doubt in my mind whatsoever.
 18 Q. What was it, PC Carlisle?
 19 A. He was coming in — I was at eye level, he looked me
 20 directly in the eye, he had run through a crowd of
 21 people, he wasn't interested in members of the public:
 22 he was coming to kill police officers.
 23 MR KEITH: Thank you very much, PC Carlisle. If I may say
 24 so too, you acted extremely bravely and in the best
 25 traditions of the police.

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1 A. Thank you, sir.
 2 MR HOUGH: No further questions, PC Carlisle, thank you very
 3 much.
 4 THE CHIEF CORONER: Thank you very much indeed for coming,
 5 officer, and can I simply echo what's been said in
 6 relation to your actions on that day: thank you very
 7 much indeed.
 8 A. Thank you, sir.
 9 MR HOUGH: Sir, the next witness is Inspector Rose.
 10 THE CHIEF CORONER: Thank you.
 11 INSPECTOR STUART ROSE (Sworn)
 12 Examination by MR HOUGH QC
 13 MR HOUGH: Will you please give your name and rank to the
 14 court.
 15 A. Inspector Stuart Rose. I'm attached to Holborn Police
 16 Station.
 17 THE CHIEF CORONER: As with anyone else, if you prefer to
 18 sit or stand and sit at various times, please just make
 19 yourself comfortable.
 20 A. That's very kind, sir, thank you.
 21 MR HOUGH: Mr Rose, you understand I ask questions first on
 22 behalf of the Coroner and then you may be asked
 23 questions by other lawyers.
 24 A. I do.
 25 Q. You've said that you're currently attached to Holborn

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1 Police Station. Is your job there one responsible for
 2 the oversight of custody of prisoners?
 3 A. That's correct, yes.
 4 Q. Is it right that you were previously a duty inspector in
 5 the Diplomatic Protection Group stationed at the
 6 Palace of Westminster?
 7 A. That's correct, yes.
 8 Q. For which period did you hold that post?
 9 A. At palace of Westminster I was there from
 10 approximately November 2015 until May 2017.
 11 Q. At that time, were you yourself a trained authorised
 12 firearms officer?
 13 A. I was.
 14 Q. For how long have you been an authorised firearms
 15 officer?
 16 A. I qualified in February 2009, sir.
 17 Q. You appreciate that you are giving evidence today about
 18 practices for supervision of AFOs at the
 19 Palace of Westminster?
 20 A. I do.
 21 Q. You made a witness statement on this subject last week,
 22 and you may refer to that if you wish.
 23 A. Thank you.
 24 Q. Is it right to say, given the dates when you were at the
 25 Palace of Westminster, that at the very start of your

29

1 period there you were under the management of
 2 DCI Nick Aldworth, as he then was?
 3 A. I think he was a chief inspector, I don't know whether
 4 he was a detective or not, but yes, Nick Aldworth was
 5 the officer that was directly line-managing the
 6 inspectors there.
 7 Q. We've heard that he left the Palace of Westminster at
 8 the end of 2015.
 9 A. Mm-hm.
 10 Q. Were you later under the management of Chief Inspector
 11 Simon Causer?
 12 A. I was, yes.
 13 Q. And above him, Superintendent Amanda Dellar?
 14 A. I was, yes.
 15 Q. Did your responsibilities include the management,
 16 supervision and welfare of both armed and unarmed
 17 officers at the Palace?
 18 A. After the change where the security officers moved from
 19 being MPS employees to House employees at Parliament
 20 in April 2016, yes, that's correct.
 21 Q. We are aware that the Palace of Westminster was divided
 22 into sectors and posts for the purposes of AFO
 23 deployment?
 24 A. Yes, that's correct.
 25 Q. As I think you appreciate, we're concerned in particular

30

1 with armed policing of New Palace Yard, which was, or
 2 included, sector 3.
 3 A. That's correct.
 4 Q. We also know that in early 2017, the arrangements were
 5 for two AFOs to be in that location, in that area?
 6 A. That's correct, yes.
 7 Q. What was your understanding of what their deployment
 8 was, namely what they were supposed to do during the
 9 sitting hours of the Palace?
 10 A. The patrol of sector 3 was a two-officer patrol working
 11 not necessarily side-by-side but as a pair, and there
 12 will be another officer that would relieve on a shift
 13 pattern, so there were three in total, but two out at
 14 any one moment. It was dictated as not a post but
 15 a sector patrol. So I would have expected a short
 16 patrol within the area of New Palace Yard with an idea
 17 of any areas of vulnerability and paying attention to
 18 those.
 19 Q. Was there any expectation that they would focus on
 20 particular areas, carry out their patrolling in any
 21 particular way, or be stationed at particular areas at
 22 any time?
 23 A. As I say, it was a sector patrol, a short patrol within
 24 that area, but Carriage Gates would be a large focus of
 25 their attention as a front-most iconically known

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1 entrance to Parliament.
 2 Q. So if we bring up a plan of New Palace Yard,
 3 {DC7960/78}, using this plan, what areas of
 4 New Palace Yard would you expect the AFOs to cover in
 5 their patrol?
 6 A. On the left-hand side of the map where the stars -- the
 7 green and blue stars are, that is the area immediately
 8 behind Carriage Gates. That would be an area that
 9 I would expect them to patrol. The area to the top of
 10 the map where the barrier system is, where the
 11 underground car park entrance was, that would be another
 12 area for them to look at.
 13 Further to the bottom of the map we have the
 14 entrance to Cromwell Green visitor entrance. That would
 15 be an area that I would expect them to concentrate on as
 16 well, and be mindful of the top right of the map by the
 17 colonnades entrance, which leads to the entrance from
 18 the subway.
 19 Q. When you say "be mindful of" do you mean actually to
 20 patrol there or something else?
 21 A. I would expect them to spread their time around that
 22 area, certainly, but not going beyond the encompasses of
 23 New Palace Yard.
 24 Q. Is there anywhere in the area of New Palace Yard, the
 25 cobbled area, where you would not expect them to be or

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1 would not expect them to stand for any period?
 2 A. Certainly not underneath the colonnades, or further than
 3 the entrance to -- beyond the entrance from Carriage
 4 Gates to members' entrance. Not beyond that, I wouldn't
 5 expect.
 6 Q. Did you have any expectations about them standing for
 7 any length of time, ie a minimum or a maximum, in any
 8 particular location?
 9 A. I wouldn't have explicitly mentioned that, but common
 10 sense would be it would be a patrol, ie not a static
 11 moment in any one place. So I would pause to confirm
 12 everything was correct, no issues, and then to move on
 13 to the next area and keep arriving in an unpredictable
 14 manner.
 15 Q. Now, you've said that one of the areas you might expect
 16 them to be is at the top right-hand corner of the map.
 17 A. Sorry, no, I meant that they should have a view of that
 18 area. You can see along there into the colonnades, so
 19 anyone approaching from the subway entrance, they would
 20 be aware of. I wouldn't expect to walk up that way as
 21 a matter of course.
 22 Q. Now, we know that if one got close to the area we see
 23 marked with the words "construction site "; do you see
 24 that on the top right?
 25 A. Yes.

1 Q. If you got particularly close to that area, you would be
 2 in a position where there was very little view of
 3 Carriage Gates at all.
 4 A. Indeed. It would be obstructed by the -- I believe
 5 there's bushes that grow around the central part, and
 6 there's a retaining wall that leads to the underground
 7 car park. That would make vision difficult.
 8 Q. So might it happen that officers would be patrolling in
 9 accordance with your expectations, be in, for example,
 10 that area and have a poor view of Carriage Gates?
 11 A. If they were there then their view would be obstructed,
 12 yes.
 13 Q. Now, an officer close to members' entrance, which is
 14 towards the bottom right-hand corner of the plan, would
 15 be some distance away from Carriage Gates and would have
 16 a relatively imperfect view of what was going on there;
 17 would you accept that?
 18 A. It would be less clear, sir, yes.
 19 Q. So would you accept that, according to your
 20 expectations, officers might be on patrol in that area
 21 and have a far from perfect view of Carriage Gates?
 22 A. Indeed. If they were there, their view would be less
 23 clear than further along.
 24 Q. May I now ask you about post instructions, please, and
 25 may I put on screen {DC8032/1}. As we can see, this was

1 the post instruction which was introduced
 2 in December 2015, shortly after you assumed your
 3 responsibilities at the Palace?
 4 A. Yes, that's correct.
 5 Q. And we know that that's the document that was in force
 6 in March 2017, at the time of the attack?
 7 A. That's correct.
 8 Q. Were you aware of this document during the time that you
 9 were working at the Palace?
 10 A. I was, yes.
 11 Q. How had you become aware of it?
 12 A. As I arrived to start my tenure at Parliament, I was
 13 aware there were post notes that I would, having worked
 14 primarily on the diplomatic side of the OCU, be unaware
 15 of, due to the necessity of not working in that
 16 environment, I wouldn't need to know that information.
 17 Obviously with the change in role I would need to
 18 make myself aware of any requirements of any officers,
 19 armed and unarmed, where they should be, what they
 20 should be doing. So I made myself familiar on arriving
 21 with the post notes.
 22 Q. Where were they for you to make yourself familiar with
 23 them?
 24 A. There are two different areas to access them, if you
 25 will. They are contained on the ADAM system, which is

1 an electronic system that can be accessed through our IT
 2 systems, that's maintained by the operations office.
 3 Any updates will then go onto the ADAM system.
 4 In addition to that, there was a paper, manuscript
 5 binder of post notes, which was in the duty inspector's
 6 office at the time at Parliament. Any alterations to
 7 any post notes would come out on an email to, I believe,
 8 all inspectors and sergeants, it may have gone to PCs,
 9 I can't confirm, but any alterations or changes would be
 10 brought to our attention via an email, and also updated
 11 on ADAM.
 12 But my knowledge, I find it easier to orientate
 13 myself with the manuscript form rather than on
 14 a computer screen, so my preferred option was the
 15 manuscript binder.
 16 Q. You referred to a binder in the duty inspector's office
 17 which contained the post instructions. The duty
 18 inspector's office is somewhere different, I think, from
 19 the base room which the armed officers have talked
 20 about?
 21 A. It is, yes.
 22 Q. You refer to the way you would have got access to this
 23 material; how would you have expected other officers,
 24 including the PCs on duty with weapons in the Palace,
 25 how would they become aware of documents such as this?

1 A. Any officer joining the Operational Command Unit would
 2 attend what we call the core course, which is a -- it
 3 varied between two weeks and a week, I'm not sure how
 4 long it would have been, but it covered all aspects of
 5 post work, protection work and so on and so forth, and
 6 it would cover -- there would be a section on that
 7 explaining what post notes were, what they referred to,
 8 where to find them, and the expectation that you should
 9 be familiar with the post notes of whatever deployment
 10 you were being sent to.
 11 Q. And after that period of time, how would an officer
 12 access post notes or be expected to access them?
 13 A. Again, through the electronic system on ADAM they would
 14 be available for them to peruse and ensure they are up
 15 to date with. If there were any changes that came out
 16 that were of any significance, that would more than
 17 likely, I would expect, be brought up on the initial
 18 parade on the first shift after those changes had
 19 occurred. So there would have been a verbal briefing
 20 that there's been an alteration to post 1, and those
 21 changes are as follows, so this is what we will do from
 22 now. But they would be stored on ADAM as well.
 23 Q. Who would give that verbal briefing by reference to the
 24 post notes?
 25 A. That would be the sergeant parading the troops.

1 Q. May we now look at the second page of this document
 2 {DC8032/2}, the instruction for sector 3, Carriage
 3 Gates. The first refers to the weaponry held by the two
 4 officers, and then it states this:
 5 "Officers are to work together, working within
 6 proximity of each other but not specifically as a pair.
 7 Officers to be positioned in close proximity to the
 8 gates when they are open, but not outside.
 9 "Both officers are to be positioned in line of sight
 10 of each other with the ability to respond to
 11 Cromwell Green entrance search point and should include
 12 a short patrol into New Palace Yard towards the exit
 13 point of the Cromwell Green search area."
 14 A. Yes.
 15 Q. Now, that was the instruction in December 2015,
 16 introduced shortly after you arrived. Officer, you can
 17 take it from me that the instruction enforced before
 18 that was very largely the same but didn't include the
 19 reference to a short patrol.
 20 A. Yes.
 21 Q. I think you may have seen that document in recent times?
 22 A. Yes.
 23 Q. Were you specifically aware of this instruction while
 24 you were an inspector working at the
 25 Palace of Westminster and supervising others?

1 A. I was, yes.
 2 Q. How did you read and interpret it?
 3 A. The key aspect is, I suppose, "short patrol". It's
 4 a relative term in regards to line of sight and
 5 encompassing Cromwell Green entrance, search entrance
 6 point, which is also another point of vulnerability.
 7 I would say to the extremity of members' entrance would
 8 be as far as I would interpret "short patrol".
 9 Q. If an officer was standing at members' entrance, would
 10 you regard them as in close proximity to the gates, as
 11 described in this instruction?
 12 A. I think that would be the furthest I would expect them
 13 to be. In reading, "close proximity" does seem a little
 14 far for that, but "a short patrol", I think that would,
 15 in my mind, qualify as "a short patrol".
 16 Q. Now, we looked at the area at the north-east corner of
 17 the square near those words "Construction site"; do you
 18 remember that?
 19 A. Yes.
 20 Q. Would an officer in that area, or approaching that area,
 21 be in close proximity to the gates as you understood
 22 these notes?
 23 A. I wouldn't say so sir, no. It would be -- that side of
 24 the colonnade line, if you will, puts you further from
 25 Cromwell Green entrance and it also puts you further

1 from Carriage Gates, so that would be beyond what
 2 I would say is close proximity, certainly.
 3 Q. Now, the suggestion might be made that what these notes
 4 were suggesting was that officers should spend the bulk
 5 of their time standing close to their unarmed colleagues
 6 at the gates, and only occasionally and intermittently
 7 move away from them a relatively short distance. If it
 8 was suggested that that was the meaning of this
 9 document, what would you say to that?
 10 A. I would say that that would limit a potential response
 11 to Cromwell Green entrance, which is an equally
 12 vulnerable area with regards to any form of attack. So
 13 to prioritise one area of entry over another I think
 14 would be unbeneficial.
 15 Q. So is it right from that answer that you were
 16 interpreting these notes to an extent by reference to
 17 your view of what areas in New Palace Yard needed or
 18 might need protection?
 19 A. Indeed. That's fair to say.
 20 Q. Does it follow from that, then, that the notes were, to
 21 a degree, open to interpretation and requiring
 22 interpretation from your perspective?
 23 A. From my perspective I would agree, sir, yes.
 24 Q. May we move, please, to page 4 of the notes, page 4 of
 25 the document. {DC8032/4}. Now, if you look towards the

1 bottom of the page there is a note concerned with
 2 directed -- under the heading of "Directed patrols".
 3 What did you understand "directed patrols" to be?
 4 A. I can't recall, I am afraid.
 5 Q. This would appear, looking at the first paragraph, first
 6 full paragraph under that heading, to be a reference to
 7 officers who were not stationed in any of the particular
 8 areas identified earlier in the document; would you
 9 agree with that?
 10 A. I would agree, yes.
 11 Q. Thank you very much. We can take that off the screen
 12 now.
 13 While you were at the Palace of Westminster, what
 14 arrangements were in place for the supervision of
 15 officers in the various sectors and checking compliance
 16 with their post duties?
 17 A. It would be the role of the parliamentary duty officer
 18 and other parliamentary sergeants, armed or unarmed, to
 19 make patrols around the estate to ensure that officers
 20 are where they should be, to answer any issues or
 21 questions those officers may have, provide any welfare
 22 support that might be needed for anyone. General
 23 frontline supervision.
 24 Q. Would that include you going round in your duty --
 25 A. Certainly.

1 Q. -- in your role as duty inspector?
 2 A. Yes.
 3 Q. And also sergeants?
 4 A. Indeed, yes.
 5 Q. If an AFO were doing a standard shift in
 6 New Palace Yard, would he expect, on average, to receive
 7 such a visit in a day?
 8 A. I would imagine so, yes. There are some posts that are
 9 more frequently supervised by others -- than others,
 10 purely because of their location. They're on the way to
 11 or from anywhere, and Palace Yard would have been one of
 12 those areas that would have probably got more attention
 13 than, perhaps, other areas.
 14 Q. You've said that your job, when you were going round,
 15 was general frontline supervision, including matters of
 16 welfare and so on. Would you also be checking that
 17 officers were complying with their post instructions as
 18 you understood them to be?
 19 A. I would be, yes.
 20 Q. Would you have been expecting sergeants to do the same
 21 when they were going around?
 22 A. I would sir, yes.
 23 Q. Would you physically have a copy of the post notes with
 24 you when you were going around?
 25 A. No. I would use my previous operational knowledge of

1 them.
 2 Q. How would you check compliance? Would you just be
 3 looking at where they were or would you be having
 4 discussions with them about their understanding of their
 5 duties?
 6 A. If they were correctly positioned and there were no
 7 interventions required, then that may well be where it
 8 would end. If I needed to speak to them on another
 9 matter, I would go and speak, generally to pass the time
 10 of day with officers to make sure that they felt that we
 11 were there looking and we were there to look after them.
 12 That would be part of the approach.
 13 But if an officer weren't where I would expect them
 14 to be or wasn't concentrating or was, for example, using
 15 a mobile phone, then that would have been dealt with
 16 there and then.
 17 Q. Can we bring up the plan of New Palace Yard again,
 18 please {DC7989/80}. If you had seen a pair of armed
 19 officers in the area of members' entrance on one of your
 20 supervisory visits, would you have considered that that
 21 represented any problem, required any discussion?
 22 A. It would depend on how long I felt they were there for.
 23 As you walk down the colonnade, you can -- as I say, if
 24 you walk down from the top of the map to the bottom,
 25 that would be where the duty officer's office was based

1 in another building, so we would walk down the colonnade
 2 quite frequently.
 3 If I saw officers in that vicinity I may well
 4 approach and speak and make sure that they hadn't been
 5 there for an undue amount of time.
 6 Q. If you saw the armed officers at the north-eastern
 7 corner of the yard, or towards there, moving towards the
 8 area of the construction site, say, would you think
 9 there was anything wrong?
 10 A. I would certainly question where they were going to.
 11 I -- I imagine I would assume their intention was to do
 12 a circuit via the vehicle search point and back round to
 13 Carriage Gates. It would be dependent on, I suppose,
 14 their answers to me asking: where are you off to?
 15 Q. If they had been doing a general circuit in your sight
 16 around the square not spending a great deal of time in
 17 any one place, would that have caused you concern?
 18 A. I think it would -- if they were walking circuits around
 19 and around what's effectively a roundabout, then that
 20 would give me concern. I would see it as a short patrol
 21 from Carriage Gates around to members' entrance and then
 22 back again would be acceptable, unless obviously
 23 something caught their attention that they felt they
 24 needed to approach, investigate and deal with that was
 25 further round that section, but I certainly wouldn't

1 expect them to be doing circuits .
 2 Q. If you had seen the pair of firearms officers in the
 3 area of Carriage Gates and you thought that they hadn't
 4 been moving from there for quite a long period of time,
 5 say half an hour or an hour, would that cause you
 6 concern?
 7 A. I believe it would. I would -- I think I would remind
 8 them that there are other areas of vulnerability , as
 9 I've mentioned with Cromwell Green entrance, that is
 10 part of their short patrol and that they pay attention
 11 to all of their patrol area.
 12 Q. Now, do you recall specifically on your various visits
 13 to New Palace Yard area where you would normally see
 14 AFOs either standing or patrolling?
 15 A. I don't, I am afraid, no.
 16 Q. At the time that you were responsible there, were
 17 central records kept of the results of these compliance
 18 checks that you and your colleagues were carrying out?
 19 A. Not that I, or to my knowledge, any of the other duty
 20 officers were aware of, no.
 21 Q. We've heard from two AFOs who were on duty on the day of
 22 the attack, PCs Ashby and Sanders, that their view of
 23 their responsibility was to patrol New Palace Yard
 24 generally, and that they would often be in areas out of
 25 view of Carriage Gates. Was that a reasonable or

1 unreasonable view of their duty?
 2 A. I couldn't say to their understanding of the post notes,
 3 but I would suggest that the areas of vulnerability are
 4 as I've dictated in the Carriage Gates/Cromwell Green
 5 entrance area, so that would be where I would expect
 6 them to spend the majority of their time.
 7 Q. May we please have on screen {WS1633/5}. Now, this is
 8 a copy of a laminated map which we know was posted in
 9 the base room underneath New Palace Yard, and the area
 10 blacked out at the bottom identifies the locations of
 11 the various alarms marked with the red dots; can you see
 12 that?
 13 A. I can, yes.
 14 Q. Is that a document, a map you remember from your time at
 15 the Palace?
 16 A. I didn't recall it initially , but when I was shown the
 17 photo of it in situ in the base room of the armed
 18 officers , then I did recognise it , yes.
 19 Q. What was the functional purpose of that map, as you
 20 understood it?
 21 A. Looking at it , it seems to suggest the patrol area for
 22 sector 3.
 23 Q. Now, the officers Ashby and Sanders have given evidence
 24 that they were expected and, indeed, were instructed, to
 25 patrol that area marked in blue generally, excluding the

1 passageway down from Cromwell Green entrance further
 2 south.
 3 What would you say to that understanding? Would
 4 that match yours?
 5 A. I can understand where they had got that impression
 6 from, but that would go beyond my interpretation of
 7 a short patrol in close proximity to the gates .
 8 Q. You say you can understand where they got that
 9 impression from; why?
 10 A. The shading seems to suggest this is the entirety of
 11 your patrol area if that's the intention of the map.
 12 I'm not sure who has produced the map.
 13 Q. We can take that down now.
 14 In January 2017, do you recall a briefing paper
 15 being circulated by your line manager, Chief
 16 Inspector Causer, and his superior,
 17 Superintendent Dellar?
 18 A. I do, yes.
 19 Q. Was the context of that briefing paper a review of armed
 20 policing across the estate and potential changes?
 21 A. It was, yes.
 22 Q. May we please look at {WS5132/11} and we see here the
 23 details page for the briefing paper which shows that it
 24 was created in November 2016?
 25 A. That's correct, yes.

1 Q. And then if we move on to page 12, please {WS5132/12},
 2 we see an extract of that briefing paper with redactions
 3 for security reasons; do you recall seeing that?
 4 A. I do, yes.
 5 Q. How did that bear upon or represent your understanding
 6 of the various armed deployments?
 7 A. Again, similar to the previous map shown, that seems to
 8 suggest the patrol area for sector 3.
 9 Q. Did you read that as suggesting any change to the
 10 deployment or representing what you already thought the
 11 patrolling deployment was as you've described to us?
 12 A. As I said, it seems to go a little further from where
 13 I would expect officers to be routinely patrolling .
 14 MR HOUGH: Thank you very much, those are my questions, as
 15 I say, there will be others.
 16 Examination by MR ADAMSON
 17 MR ADAMSON: Good morning, Inspector Rose, my name is
 18 Dominic Adamson and I ask questions on behalf of the
 19 widow of PC Palmer.
 20 A. Good morning.
 21 Q. Inspector Rose, you have been taken to the
 22 post instructions .
 23 A. Yes, I have.
 24 Q. You've been taken to the blue shaded plan.
 25 A. Yes.

1 Q. And you've been taken to the diagram that we just saw,
 2 with the red shape depicting the area of sector 3?
 3 A. Yes.
 4 Q. Do you agree with me that those three documents give
 5 differing impressions of the scope of sector 3 patrol?
 6 A. I would, yes.
 7 Q. Yes. Because there's a post instruction, and we can
 8 call it up on screen just for ease, {DC8032/2}, and we
 9 can see there the description of Carriage Gates, and
 10 this is the post instruction which came in shortly after
 11 you arrived at the location:
 12 "Both officers are to be positioned in line of sight
 13 of each other with the ability to respond to
 14 Cromwell Green Entrance search point and should include
 15 a short patrol into New Palace Yard towards the exit
 16 point of the Cromwell Green search area."
 17 Do you agree with me that the use of the word
 18 "towards" suggests towards Cromwell Green from Carriage
 19 Gate?
 20 A. Yes.
 21 Q. Yes. That doesn't envisage, does it, somebody being at
 22 the members' entrance specifically?
 23 A. It's not mentioned, no.
 24 Q. No. But you would see it as being included within the
 25 scope of such a patrol?

1 A. I would see it as the extremity of what I would
 2 interpret.
 3 Q. Yes, but I mean, let's be clear about it, members'
 4 entrance is frankly at the back of New Palace Yard,
 5 isn't it?
 6 A. It's towards the colonnade end, yes.
 7 Q. Yes. So if one was to take a literal interpretation of
 8 this post instruction, you would countenance a patrol
 9 which went beyond the scope of the literal
 10 interpretation of it?
 11 A. Indeed, yes. In that respect, yes, but the problem with
 12 post notes is if you word them too rigidly it
 13 indoctrinates a rigid approach to protection, if you
 14 word them too loosely then there's far too much
 15 interpretation. So I would say a degree of
 16 interpretation is required and necessary for the proper
 17 functioning of providing functioning protection.
 18 Q. We've heard evidence from Commander Usher to the effect
 19 that no interpretation is permitted; would that come as
 20 a surprise to you?
 21 A. I couldn't comment on his comments. I'm not aware.
 22 Q. Yes. I appreciate the difficulty of answering
 23 a question like that.
 24 The post instruction includes at the end, it's
 25 page 5 of the document, {DC8032/5}, second line from the

1 bottom of the "Administration" section; do you see that?
 2 A. I do.
 3 Q. "Supervision of this post is the responsibility of the
 4 Duty Officer / Patrolling Sergeant. Recorded periodic
 5 checks are to be carried out to ensure compliance with
 6 these instructions."
 7 Do you see that?
 8 A. I do, yes.
 9 Q. You're not aware of such records?
 10 A. Not kept by the duty officers, no.
 11 Q. Yes. So that aspect of the post instruction was not
 12 being followed?
 13 A. It could well have been followed by the sergeants who
 14 may well have had to -- my attention was drawn to
 15 a rolling CAD that was apparently in existence that
 16 would record such things, but it wouldn't be something
 17 that a duty officer would put an entry on.
 18 Q. Yes. We have been told that there are no records of any
 19 supervisory checks after February 2016. So would you
 20 accept, therefore, that --
 21 MR KEITH: I'm so sorry, I may well be mistaken but I had
 22 understood that we were told there was no central record
 23 of supervisory checks made, and my learned friend will
 24 know of a document in Opus concerning supervisory visits
 25 and a note made of those, but it may well be that he is

1 addressing his question in another matter.
 2 MR ADAMSON: Well, if there are records after February 2016
 3 of supervisory checks, I look forward to being
 4 illuminated in relation to it.
 5 The existence of records demonstrating checks is not
 6 something that you're aware of; is that right?
 7 A. That's correct, sir.
 8 Q. So if that's right, then at a supervisory level, the
 9 post instructions are being ignored; do you agree with
 10 that?
 11 A. That aspect would well be potentially not adhered to,
 12 yes.
 13 Q. And it's not very satisfactory, is it, from a management
 14 perspective, for the managers not to be doing something
 15 which instructions indicate that they ought to be doing?
 16 A. It may well be that there is a generic format for the
 17 post notes, including the diplomatic side. Having
 18 worked on the diplomatic side, there was certainly a CAD
 19 of checks that each sergeant would complete on checking
 20 each post as they were more dispersed than they would be
 21 at Parliament. That would be down to the sergeants to
 22 complete and update, so that may well be why my
 23 knowledge of it -- it's not within my role, although it
 24 does suggest that in the post note.
 25 Q. But you weren't checking to see that the records were

1 being kept?
 2 A. That's correct, no.
 3 Q. The map with the blue shaded area, you accept, as
 4 I understand your evidence, that it's entirely
 5 understandable that authorised firearms officers would
 6 interpret the blue shaded area as representing the scope
 7 of their patrols in New Palace Yard?
 8 A. That would be fair to say, yes.
 9 Q. Were you aware that that diagram had been on the wall in
 10 the base room since, perhaps, 2012?
 11 A. The only reason I recognised it was I recognised the
 12 photo of it in situ, because I recognised that part of
 13 the base room, but I didn't recall the map until it was
 14 put into context.
 15 Q. And it might be suggested to you that it's an alarm map,
 16 but your understanding of the blue shaded area is that
 17 it can only, sensibly, have been relating to patrols?
 18 A. Seeing it now, I can see that that would be how it would
 19 be interpreted.
 20 Q. Yes. And, again, you would accept, wouldn't you, that
 21 it's not very satisfactory to have on walls documents
 22 which are contradictory to post instructions?
 23 A. I'd say it certainly goes beyond what I would interpret
 24 from the post instructions, but I don't think it's
 25 contradictory.

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1 Q. Well, it is contradictory though, isn't it? If the
 2 whole of the blue shaded area represents the scope of
 3 the patrol and the post instruction envisages a smaller
 4 area of patrol than the blue shaded area, they are
 5 contradictory, aren't they?
 6 A. Yes, from my interpretation of it and the interpretation
 7 suggested by the map, yes.
 8 Q. And the position is confused yet further as late
 9 as January 2017, when we see the diagram with the red
 10 shaded area; do you agree with that?
 11 A. I don't think the purpose of that document was for
 12 briefing of officers and explaining suggested patrol
 13 areas. I think it was more general to highlight the
 14 changes that were envisaged and were planned for later
 15 on in the year.
 16 Q. Well, we know it was sent -- it was a version of that
 17 diagram was sent to PC Sanders.
 18 A. I couldn't say the distribution to it.
 19 Q. And if you see a red box with the words "Sector
 20 3 NPY x2" and you are an authorised firearms officer,
 21 it's perfectly understandable, isn't it, that such
 22 a person would interpret the red box as indicating the
 23 scope of the patrol?
 24 A. That would be fair to say, yes.
 25 Q. Yes. Now, you have very fairly said that you would not

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1 criticise -- at least on my interpretation of your
 2 evidence, correct me if I am wrong -- you would not
 3 criticise an officer standing on patrol by the members'
 4 entrance?
 5 A. It would depend on the duration of them standing there,
 6 but taking it in as part of their patrol, no,
 7 I wouldn't.
 8 Q. I understand the qualification. If he had been there
 9 for an hour, you would say: well, he's not doing
 10 a patrol.
 11 A. Indeed.
 12 Q. But you wouldn't criticise an officer for walking from
 13 the members' entrance along the cobbled roadway adjacent
 14 to the colonnade to continue up the Bridge Street side
 15 of New Palace Yard?
 16 A. I think as I previously said, I wouldn't envisage my
 17 interpretation of post notes to encompass
 18 a circumnavigation of the grassed area, no.
 19 Q. But if it wasn't a circular navigation -- I appreciate
 20 your point about ensuring uncertainty -- as long as they
 21 are not doing circles, if they were just walking in that
 22 direction and turning left up the Bridge Street side of
 23 New Palace Yard, you wouldn't have any difficulty with
 24 that?
 25 A. I would, I think. I think I said that I would envisage

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1 a patrol from Carriage Gates down past Cromwell Green
 2 search point entrance to members' entrance and then back
 3 the same way. I wouldn't expect a circumnavigation, no.
 4 Were something to draw their attention that
 5 warranted further investigation, I could understand why
 6 they would move in that direction, but I wouldn't expect
 7 that to be their default patrol movement.
 8 Q. You said in your statement, and it's page 4 of it for
 9 those who wish to read it:
 10 "The focus of threat for the armed officers would
 11 have been entrances into their respective sectors."
 12 A. That's correct, yes.
 13 Q. And you went on:
 14 "These are Carriage Gates, the colonnade entrance
 15 from the subway, and the entrance to Star Chamber Court
 16 and Cromwell Green visitor entrance."
 17 A. That's correct.
 18 Q. Now, "Star Chamber Court" is a term I don't think we
 19 have heard before. Where is that?
 20 A. It's in the corner, if you walk from Cromwell Green on
 21 your right-hand side towards the colonnades, it's in the
 22 far corner there.
 23 Q. Right. So right in the corner of that area?
 24 A. Yes.
 25 Q. Beyond the members' entrance?

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1 A. Beyond members' entrance, yes.
 2 Q. So these two authorised firearms officers have the
 3 unenviable task of patrolling four locations where one
 4 could gain access to the New Palace Yard?
 5 A. In retrospect, Star Chamber Court would be less of
 6 an issue because it opens out onto an already restricted
 7 area, but certainly the subway entrance via the
 8 colonnades, Cromwell Green search point and Carriage
 9 Gates would certainly be the main areas of concern.
 10 Q. And you've agreed with Mr Hough that the view from one
 11 point of the New Palace Yard to, for example, the other
 12 corner of New Palace Yard, is not a very good one?
 13 A. No, it would be obstructed, yes.
 14 Q. The view from the members' entrance to the Carriage
 15 Gates would not be a very good one, would it?
 16 A. Not very good, no.
 17 Q. So the reality is they're being asked to do
 18 an impossible job, aren't they?
 19 A. A difficult task, certainly.
 20 Q. Impossible, would you agree?
 21 A. With the movement and regular patrols, I think it's
 22 achievable but it's not an easy task.
 23 Q. Achievable, but only by not complying with the
 24 post instructions?
 25 A. If taken in their strictest interpretation, perhaps.

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1 Q. So the long and short of it is AFOs, even if they're
 2 aware of the post instructions, are entitled to ignore
 3 them because if they don't ignore them, they're not
 4 doing their job properly?
 5 A. I wouldn't say that, no.
 6 MR ADAMSON: Thank you very much, Inspector Rose.
 7 Examination by MS STEVENS
 8 MS STEVENS: Inspector Rose, my name is Susannah Stevens --
 9 THE CHIEF CORONER: Ms Stevens, I was going to suggest we
 10 took our break there, if that is a convenient moment.
 11 MS STEVENS: I'm completely in your hands, sir, otherwise
 12 I was literally going to be five minutes.
 13 THE CHIEF CORONER: Oh, fine. We'll have your five minutes,
 14 Ms Stevens, then we'll take our break then.
 15 MS STEVENS: Thank you.
 16 Inspector, I was just saying that I appear on behalf
 17 of the parents and siblings of Police Constable Palmer.
 18 Can I just ask you a little bit, first of all, about
 19 some of the expectations that you have given evidence
 20 of. So you have told us that it would be your
 21 expectation that AFOs would not walk up the
 22 Bridge Street perimeter side as a matter of course. Can
 23 you help us with whether or not that's recorded anywhere
 24 in written form of guidance?
 25 A. Not to my knowledge, no.

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1 Q. You said that you wouldn't expect AFOs to be static :
 2 rather that they should keep moving around. Is that
 3 an expectation that is recorded in writing anywhere?
 4 A. It was a comment made to differentiate the static points
 5 of peers' entrance and the external entrance of
 6 St Stephen's, which is an armed static post where they
 7 are expected to remain on that post and that post only.
 8 It was an intention to differentiate that from the
 9 sector that covers Cromwell Green and Carriage Gates.
 10 Q. So there's a distinction between a post that's described
 11 as a fixed one and a post that isn't described in that
 12 way, but is there any form of written guidance to assist
 13 an AFO with how long they should stay at a post if it's
 14 not a static one?
 15 A. There's not, no.
 16 Q. The evidence that you gave was that if you had seen
 17 an AFO for a period of time such as 30 minutes at
 18 Carriage Gates, you would have reminded them that there
 19 were other areas of vulnerability and said: well, look,
 20 there's the Cromwell Green entrance and also the
 21 requirement to patrol. Do you remember saying that?
 22 A. I do, yes.
 23 Q. In saying that, you would have been conscious, wouldn't
 24 you, that there were two AFOs who needed to cover
 25 a number of areas?

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1 A. That's correct, yes.
 2 Q. If there had been more than two AFOs in New Palace Yard,
 3 if you had had, say, four AFOs with two on patrol,
 4 there wouldn't have been such a problem with AFOs
 5 remaining at Carriage Gates, would there?
 6 A. Well, that would stand to reason, yes.
 7 Q. It also stands to reason, doesn't it, that the difficult
 8 task that you described of the AFOs within
 9 New Palace Yard would have been made an easier one if
 10 there had been more of them?
 11 A. That would be true.
 12 MS STEVENS: No further questions, thank you.
 13 THE CHIEF CORONER: We'll take our break there and we'll sit
 14 again in 15 minutes' time.
 15 (11.24 am)
 16 (A short break)
 17 (11.41 am)
 18 THE CHIEF CORONER: Mr Keith.
 19 Examination by MR KEITH QC
 20 MR KEITH: May we have, please, on the screen {DC8032/2}.
 21 Inspector, this is the post instruction modified on
 22 14 December 2015, so it was the post instruction in
 23 force at the time of March 2017.
 24 You have, it would appear, many years' experience of
 25 dealing with and supervising authorised firearms

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1 officers?
 2 A. That's correct.
 3 Q. How important to the life of an authorised firearms
 4 officer is a post instruction?
 5 A. It certainly guides their actions and their attentions.
 6 Q. Is there any other document that you can think of which
 7 is designed to describe to them the limits of their
 8 patrol area?
 9 A. No.
 10 Q. If you said to an authorised firearms officer "What is
 11 a post instruction?" would you be surprised to hear
 12 a denial of knowledge? Would any sensible firearms
 13 officer not know what a post instruction is?
 14 A. It's unlikely, I would hope.
 15 Q. Looking at this document, it says that:
 16 "Both officers are to be positioned in line of sight
 17 of each other with the ability to respond to
 18 Cromwell Green Entrance search point and should include
 19 a short patrol into New Palace Yard towards the exit
 20 point of the Cromwell Green search area."
 21 Does it tell officers to walk in a circular fashion
 22 all the way around New Palace Yard?
 23 A. It doesn't, no.
 24 Q. Does it say "short patrol into New Palace Yard" or
 25 "a short patrol always around New Palace Yard"?

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1 A. Into.
 2 Q. Does it tell officers that they should give equal weight
 3 to the colonnades area, Star Chamber, Speaker's Court
 4 and the east side of New Palace Yard?
 5 A. It doesn't, no.
 6 Q. When you saw this post instruction, when it was brought
 7 out and when you have been shown it more recently, did
 8 you have any doubts as to what was being sought by this
 9 post instruction?
 10 A. Once I had familiarised myself with the geography of the
 11 area and interpreted it correctly, then no.
 12 Q. You've told us how you were, as part of your duties,
 13 responsible for supervising the AFOs and speaking to
 14 them if you believed that they were off their proper
 15 patrol area?
 16 A. That's correct, yes.
 17 Q. Could you have done that task without understanding
 18 yourself what was required by the post instruction?
 19 A. No.
 20 Q. You were asked some questions about the alarm map --
 21 I've called it the alarm map. The map. Let's have it,
 22 {WS1633/5}. This was the map which was on the wall of
 23 the base room, inspector, and was removed from there by
 24 SO15 and produced in evidence in these proceedings. Can
 25 we have the unredacted version, please, from the Inquest

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1 team? Thank you very much.
 2 So it's on the wall of the base room. Do you
 3 recognise the red dots?
 4 A. I don't, no.
 5 Q. Looking at the bottom of the page, would it appear that
 6 there was a connection between the red dots and what is
 7 said at the bottom?
 8 A. Yes, there would.
 9 Q. Alarm locations?
 10 A. Yes.
 11 Q. Is there anything on that map which says anything at all
 12 about patrols or whether they go around New Palace Yard
 13 or into New Palace Yard or whether they cover the
 14 Carriage Gates area or the north side or the east side?
 15 A. There's none of that, no.
 16 Q. The map is headed "Ranger sector 3"?
 17 A. That's correct, yes.
 18 Q. Is it headed "Patrol area within ranger sector 3"?
 19 A. No, it's not, no.
 20 Q. Is there anything at all that you can see on this map
 21 which indicates that it is to be taken as
 22 a post instruction in any shape or form?
 23 A. No, there's not.
 24 Q. The document produced by, I believe, Chief
 25 Superintendent Dellar, certainly by

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1 Superintendent Causer, could we have that up, please,
 2 {WS1237C/3}. This was sent out by, we've heard,
 3 an officer as part of a PowerPoint dealing, I think,
 4 with TSG, pulse patrols, changes in security
 5 arrangements which were about to be introduced
 6 in April 2017 at the Palace of Westminster?
 7 A. That's correct, yes.
 8 Q. Did you understand that this map formed part of a series
 9 of maps relating to the Palace of Westminster as
 10 a whole?
 11 A. I did, yes.
 12 Q. Is there anything on that map which says anything at all
 13 about how patrols are to be conducted?
 14 A. There isn't, no.
 15 Q. Is there anything on the map about whether or not it
 16 should be taken as a post instruction?
 17 A. There is not, no.
 18 Q. Is there anything at all about focus on Carriage Gates?
 19 A. There is not, no.
 20 Q. Because you said, inspector, that that map and the
 21 earlier map, gave a different impression to what is set
 22 out in the post instructions, but of those three maps,
 23 or documents, which one is the post instruction?
 24 A. Well, the post instruction is the post instruction, yes.
 25 The maps are not, no.

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1 Q. Would you be surprised to hear that officers were giving
 2 the same weight to this map and to the alarm map as the
 3 post instruction?
 4 A. I couldn't say to -- whether they felt which was more
 5 relevant, or ...
 6 Q. Your job entailed speaking to officers to ensure that
 7 they patrolled in accordance with their
 8 post instructions, didn't it?
 9 A. That's correct, yes.
 10 Q. So if an officer said to you, "Inspector, sir, I have
 11 knowledge of this PowerPoint and I know that on the base
 12 room wall there is a map with red dots and a shaded
 13 area, but I also am aware that there are
 14 post instructions, I'm going to give equal weight to the
 15 blue shaded area in the alarm map and to this
 16 semi-hexagonal structure on the PowerPoint as I am to
 17 the post instructions", what would you say?
 18 A. I would say that the post instructions are there to
 19 guide, not these maps.
 20 Q. Thank you.
 21 A. I wouldn't be able to answer fully because I'm not aware
 22 of the blue shaded maps' author or its purpose, other
 23 than it would suggest the alarm positioning. But the
 24 fact that it's blue, shaded, I can understand how they
 25 would misinterpret that.

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1 Q. But if they were aware of the post instructions and they
 2 asked you: which one is correct? Which one is the
 3 predominant? Which would you say?
 4 A. It would be the post notes.
 5 Q. Would you have any doubt in your mind at all about the
 6 correctness of that answer?
 7 A. No.
 8 Q. In relation to the system for supervision, from having
 9 spoken to AFOs and having yourself gone to ADAM, do you
 10 have any doubt but that AFOs knew what the ADAM system
 11 was?
 12 A. I'd be surprised if they didn't.
 13 Q. Why is that?
 14 A. It's common knowledge that an email would come out,
 15 circulated, if there were any change to any post notes
 16 and the inference with "For further details and
 17 clarification please refer to ADAM".
 18 Q. So when you received emails saying that there was about
 19 to be a change and the new change could be found in
 20 ADAM, what would you do to ensure that AFOs followed
 21 that procedure?
 22 A. Well, generally it would be the post note would be
 23 forwarded out via email in addition to being submitted
 24 to ADAM. So all officers would have received that
 25 specific email.

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1 Q. If the post instructions were changed and were then sent
 2 out by email and put onto ADAM, and you were then
 3 carrying out your own supervisory checks afterwards,
 4 would you allow the patrolling to continue in line with
 5 the old post instructions or the new post instructions?
 6 A. No, it would be the new instructions.
 7 Q. Would you be unaware of the need to ensure that
 8 post instructions were adhered to?
 9 A. I would expect them to be adhered to, yes.
 10 Q. You've described how there was a hard copy binder of
 11 post instructions in the inspector's room. Are you
 12 aware of whether or not there was one in the base room?
 13 A. I wasn't, no.
 14 Q. Did you ever go in there yourself?
 15 A. Yes.
 16 Q. Can you recall, searching back in your memory, whether
 17 or not there was a shelf with binders on it inside the
 18 base room?
 19 A. There may be, but I can't recall specifically.
 20 Q. All right. Were there daily briefings at all to you
 21 from those above you? So, for example, Chief Inspector
 22 Aldworth?
 23 A. No, there were what we call Metbats system, which is the
 24 generic briefing, and it would be specific to each OCU,
 25 or area of work which officers were expected to log

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1 onto. That would be part of their parade.
 2 Q. Could you look, please, at {DC7960/87}. This is
 3 a graphic reproduction of the movements of
 4 Messrs Sanders and Gerard who were the two AFOs on duty
 5 before Messrs Sanders and Ashby, and it shows how they
 6 move at the time given, which I think is 13.54, from the
 7 top left-hand corner, the north side of New Palace Yard,
 8 to the east side to the colonnade, and if we go forward
 9 one page, {DC7960/88}, please. Having been lost from
 10 view, Messrs Ashby and Sanders move to the north-east
 11 corner of the yard, they look around, and that's at
 12 14.40 in response to the noise, explosive noise, on
 13 Bridge Street.
 14 They are not seen on the CCTV for approximately 40
 15 minutes, so they're lost from view after the first
 16 graphic reproduction of the first map, and then they
 17 reappear on the CCTV as you can see from this map.
 18 On the premise that they spent around 40 minutes in
 19 or in the very close proximity to the colonnades, if you
 20 had seen that, what would you have said to them?
 21 A. I would have asked them why they're still in the
 22 colonnades, or why they're in the colonnades at all, and
 23 I would have directed them back to where they should
 24 have been.
 25 Q. Mr Ashby told this court that he didn't recall being

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1 asked to look at the ADAM system pre-22 March 2017. He
2 said:

3 "I was told every day that the map on the wall of
4 the base room [that's the blue shaded, we would call it
5 the alarm map] is my sector and I patrolled as I was
6 told it. I was told every day to follow that map."

7 That's the map on the base room wall. Is that
8 a procedure that you were ever aware of?

9 A. No.

10 MS STEVENS: Well, forgive me for rising, sir, but clearly
11 we're only receiving evidence from an inspector, not
12 from the sergeant who would have undertaken the
13 briefing. You will be well aware of the family's
14 concerns about that.

15 THE CHIEF CORONER: Yes.

16 MS STEVENS: And we do query whether or not, in fairness,
17 this is the witness who is best placed to answer that
18 question. The police sergeants who gave the daily
19 briefings really should be asked that by the
20 Metropolitan Police Service.

21 THE CHIEF CORONER: I think, in fairness, Ms Stevens,
22 Mr Keith can ask the question of this witness, I think
23 he is in a position to answer it. Your point is whether
24 other people might also be able to answer it who might
25 be in a better position. I think for the moment

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1 I'm simply going to -- and I think, in fact, the officer
2 has given the answer, but I don't see any difficulty
3 with Mr Keith putting that question to this witness.

4 MS STEVENS: Yes, perhaps it just, as you say, amplifies the
5 need for the question to be put to the witness.

6 THE CHIEF CORONER: I am conscious that there are some
7 submissions you want to make about whether other people
8 should be called, we'll turn to those in due course, but
9 I think for the moment, as I say, I don't see
10 a difficulty with Mr Keith putting the question that he
11 has put.

12 MS STEVENS: Of course, thank you.

13 MR KEITH: So, inspector, Mr Ashby gave evidence to the
14 effect that his patrol duties were guided exclusively by
15 the map on the wall, that he was told every day to
16 follow that map. Would you be surprised to learn that
17 that is how he guided his patrol area?

18 A. It would be surprising that was the briefing. I would
19 be surprised, given the time that PC Ashby worked at
20 Parliament, that he would have to be reminded of the
21 detail of the same sector he worked many, many times
22 before each and every day, but I was surprised that they
23 used the map and used those terms as a briefing for him.

24 MR KEITH: Thank you very much, Inspector Rose, I have no
25 further questions for you.

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1 MR HOUGH: Sir, no further questions from me.

2 Inspector Rose, thank you very much for your evidence.

3 THE CHIEF CORONER: Thank you very much for coming.

4 MR HOUGH: Sir, the next witness is Detective
5 Superintendent Crossley.

6 DS JOHN CROSSLEY (Recalled)

7 Examination by MR HOUGH QC

8 MR HOUGH: Mr Crossley, you appreciate you are still on
9 oath?

10 A. Yes, sir.

11 Q. And you have given us, at the start of this Inquests
12 hearing, all the detail about your own background and
13 your role in the SO15 investigation?

14 A. That's correct, sir, yes.

15 Q. And you're now being called in order to address any
16 matters which have arisen in the course of the Inquests
17 so far.

18 A. Yes, sir.

19 Q. First of all, in the course of your work assisting the
20 Inquests, did you collate the details required to
21 complete death registration details on to records of
22 inquest for those who died?

23 A. I did, sir, yes.

24 Q. And I think you and the learned Chief Coroner, and
25 certainly I, have a copy of a schedule setting out those

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1 details?

2 A. Yes, sir, I've got one in front of me.

3 Q. And all I'm going to ask you to do, formally for the
4 record, is to confirm that that schedule contains
5 accurate and complete details?

6 A. That's correct, sir, it does.

7 Q. And you will understand that's so that records of
8 inquest can now be completed?

9 A. Yes.

10 Q. The next point about which I would like to ask you
11 concerns Andreea Cristea and the time period for which
12 she was in the River Thames after falling from the
13 bridge.

14 A. Sir.

15 Q. And I think you're aware that a colleague of yours,
16 Mr Railton, produced a witness statement dealing with
17 this matter?

18 A. Yes, sir.

19 Q. Now, in that witness statement, does he confirm from
20 CCTV imagery that Andreea Cristea entered the Thames at
21 14.40.22?

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

23 Q. Does he also confirm that the last sighting of
24 Ms Cristea on a CCTV camera on the Millennium Diamond
25 showing her in the water was 14.45.44?

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1 A. That's correct, sir, yes.
 2 Q. So we know that, is this right, she was in the water for
 3 a minimum of 5 minutes and 22 seconds?
 4 A. Correct, sir, yes.
 5 Q. Is it right to say that from that point in time there
 6 was no further sighting of her on the footage?
 7 A. That's correct, sir, yes.
 8 Q. And therefore, a precise time for when she was brought
 9 out of the water, using the Jason's Cradle, can't be
 10 given?
 11 A. That's correct, sir, yes.
 12 Q. Did your colleagues view the footage from the various
 13 cameras and also details of the vessel tracks of the
 14 Millennium Diamond and the Fireflash boat?
 15 A. Yes, that's correct, sir.
 16 Q. Did they establish from those that the Fireflash and
 17 Millennium Diamond were manoeuvring closely, that is to
 18 say reasonably close to each other, between 14.44.44 and
 19 14.46.00?
 20 A. That's correct, sir, yes.
 21 Q. Did they establish that there was then a period where
 22 the Fireflash appeared to drift downstream, that's to
 23 say northbound, at a low speed, between half a knot and
 24 one and a half knots?
 25 A. Correct, sir, yes.

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1 Q. With the vessel's position not changing dramatically?
 2 A. Yes, that's correct.
 3 Q. And did they then establish that at 14.48.55,
 4 Fireflash's speed apparently increased to 3.8 knots
 5 heading in a northerly direction?
 6 A. That's correct, sir, yes.
 7 Q. Did that indicate to your colleagues that Ms Cristea
 8 would have been recovered from the water by 14.48.55?
 9 A. Correct, sir, yes.
 10 Q. Because I think of the simple deduction that the
 11 Fireflash wouldn't have been moving at speed until
 12 Ms Cristea was safely aboard?
 13 A. That's right, then it moves off at greater speed at
 14 14.49.16.
 15 Q. But what we can't tell is at precisely what point in
 16 time between 14.45.44 and 14.48.55 she was brought on
 17 board?
 18 A. That's correct, sir.
 19 Q. And so when you gave evidence at the start of the
 20 Inquest about Ms Cristea having been on board for --
 21 sorry, in the water for a little over eight minutes,
 22 were you then giving the maximum period of time for
 23 which she could realistically have been in the water?
 24 A. That's correct, sir, yes. There was no clear CCTV image
 25 so they took it off the movements of the boats as the

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1 maximum time just for an abundance of caution for the
 2 family for how long she could have been in the water.
 3 Q. But to be clear, the minimum period was just over five
 4 minutes?
 5 A. Yes.
 6 Q. And if the Fireflash crew brought her aboard relatively
 7 quickly, as I think their evidence was --
 8 A. Yes.
 9 Q. -- is it reasonable to suggest that she would have been
 10 in the water for not very much longer than five minutes?
 11 A. That's correct, yes.
 12 Q. A different topic, please. When your colleague,
 13 Mr Holdcroft, gave evidence, one of the points about
 14 which I asked him was an entry made by Khalid Masood in
 15 manuscript on a map book.
 16 A. Yes.
 17 Q. I think you are familiar with that. And it referred to
 18 Birmingham Council and "Cancel". Are you able to
 19 confirm that before his death, Khalid Masood took steps
 20 to cancel housing benefit he had been receiving from
 21 Birmingham Council?
 22 A. Yes, he did, sir. On 20 March at 10.45 he made contact
 23 with Birmingham Council to do that.
 24 Q. So does that strike you as a reasonable explanation of
 25 that entry on the map book?

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1 A. It does, sir, yes.
 2 Q. Finally, may I turn to a statement made by Mr Scott,
 3 I think Inspector Scott in the Metropolitan Police
 4 Service. If we may bring that up, it's {WS5134/1}.
 5 Mr Crossley, are you aware that during the course of
 6 these Inquests, records have been provided which were
 7 kept by Inspector Munns of supervisory checks he carried
 8 out between September 2015 and February 2016 as a duty
 9 inspector at the Palace of Westminster?
 10 A. Yes, sir, I am.
 11 Q. Are you aware that work has been done to establish
 12 whether PC Ashby or PC Sanders was identified in the
 13 records as being visited in the visits recorded by
 14 Inspector Munns' document?
 15 A. I am sir, yes.
 16 Q. If we look at the bottom of this page, do we see it's
 17 been established first PC Ashby receives a supervisory
 18 visit in sector 3 at 16.40 on 28 September 2015?
 19 A. Yes, sir.
 20 Q. PC Sanders received two visits in sector 3 at 11.45 and
 21 15.40 on 4 December 2015?
 22 A. Yes.
 23 Q. Over the page, please {WS5134/2}. PC Ashby received one
 24 visit at 08.00 at sector 3, 11 January 2016?
 25 A. Yes.

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1 Q. PC Ashby received a visit at 10.00 at sector 3 on
 2 27 January 2016?
 3 A. Yes.
 4 Q. On 28 January 2016, PC Ashby received a supervisory
 5 visit at 11.10, sector 3?
 6 A. Yes.
 7 Q. Finally, on 4 February 2016, PC Sanders received one
 8 supervisory visit, 16.30, sector 3?
 9 A. Yes, sir.
 10 Q. Now, in fairness, is this right: that the record kept by
 11 Inspector Munns does not explain precisely, or doesn't
 12 say anything about where these officers were at the time
 13 that they were visited?
 14 A. That's correct, sir, from those records, yes.
 15 Q. It doesn't in general say what was said to those
 16 officers during those visits?
 17 A. No.
 18 Q. It doesn't say who visited them on those occasions?
 19 A. That's correct, sir.
 20 Q. What those officers understood the instructions or
 21 deployments to be?
 22 A. No, that's correct.
 23 Q. Or where PCs Ashby and Sanders were moving over the
 24 course of any longer period?
 25 A. No, that's correct, sir, it's just they were in

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1 sector 3.
 2 MR HOUGH: Thank you very much. Those are all my question.
 3 There will be others from some other lawyers.
 4 Examination by MR PATTERSON QC
 5 MR PATTERSON: Mr Crossley, four distinct matters, please,
 6 if I could ask for your assistance. First of all, the
 7 timings in relation to Andreea Cristea, which you've
 8 just helped us with. The last sighting on the footage
 9 from the pleasure craft, the Millennium Diamond, you
 10 told us was at 14.45.44?
 11 A. That's correct, sir, yes.
 12 Q. And we know that prior to that there had been the moment
 13 of transfer, hadn't there, when we saw Mr Markley with
 14 his boat hook transferring Andreea in the water to the
 15 crew of the fire boat who took receipt of her using
 16 their own boat hook?
 17 A. Yes, we know the boats were manoeuvring alongside each
 18 other at 14.44.44 and the boats were together at that
 19 point. On the CCTV, we don't have the sightings after
 20 that point.
 21 Q. And so transcripts page 4, we know that that precise
 22 timing of the moment of the transfer was at 14.44.28, so
 23 a little over a minute before Andreea goes out of sight
 24 in the footage.
 25 A. Okay.

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1 Q. And it's been adverted to already by Mr Hough, we know
 2 from the evidence of Mr Wolfe, the witness from the fire
 3 boat, that his estimate was it was something like
 4 30 seconds to a minute between the moment of the
 5 transfer and getting her up out of the water using the
 6 Jason's Cradle.
 7 A. Okay, sir.
 8 Q. And so all of that would support your conclusion that it
 9 was something like not much more than five minutes in
 10 total --
 11 A. That's correct, yes.
 12 Q. -- that she was immersed in the water.
 13 The early period between entering the water and
 14 being first hooked by Mr Markley being something in the
 15 region of 2 minutes and 18 seconds; does that sound
 16 about right?
 17 A. I would have to check that but it would sound about
 18 right on the timings I've got.
 19 Q. Thank you. Different topic, please. The rental of
 20 vehicles. We heard from your colleague, Detective Chief
 21 Inspector Brown, that Masood rented the 4x4 from
 22 a vehicle rental business in Birmingham.
 23 A. That's correct, yes. He initially booked it online and
 24 then collected it on the 16th.
 25 Q. And I think it's right, isn't it, that there have been

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1 many notable examples in recent years when terrorists
 2 have been found to use rented vehicles to carry out
 3 their attacks?
 4 A. We have seen occasions of that in the UK and abroad,
 5 sir, yes.
 6 Q. And you've been provided with some details, but taking
 7 it briefly, in 2006 in the USA there was a terrorist
 8 attack involving a rented SUV, sports utility vehicle,
 9 being driven into a crowded area with students at
 10 a university in North Carolina?
 11 A. Yes.
 12 Q. More recently, in 2016, the Nice attack, we know,
 13 involved a 20-tonne rental truck being driven into
 14 crowds for nearly a mile on the promenade at Nice,
 15 killing 86 people.
 16 A. Yes, just regarding the truck, I'd have to check on the
 17 details but it was a 20-tonne truck driven for that
 18 length of period, yes. Regarding the hire of it,
 19 I would have to check, yes.
 20 Q. Then in the chronology we have the Westminster
 21 attack, March 2017. Two and a half to three months
 22 later, in June of last year we had the London Bridge
 23 attack, didn't we?
 24 A. We did, sir, yes.
 25 Q. That involved Khuram Butt using a rented van, didn't it?

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1 A. Yes, it did, sir.
 2 Q. And I think it's right, isn't it, that investigations
 3 indicated that he originally he had planned to hire
 4 an even larger vehicle, a 7.5-tonne lorry, but because
 5 of problems with payment, the rental of the lorry didn't
 6 go ahead?
 7 A. There are some inquiries that show that he did make
 8 inquiries regarding that, sir, yes.
 9 Q. On 19 June, some weeks later, the Finsbury Park Mosque
 10 attack in London involved an attacker using a rented
 11 vehicle, a van?
 12 A. Yes, that's correct, sir.
 13 Q. One person murdered, others seriously injured?
 14 A. Yes, sir, that's correct.
 15 Q. In August of last year, in Spain, there was the
 16 terrorist attack in Barcelona, wasn't there?
 17 A. Yes, sir.
 18 Q. Involving 13 people being killed when, again, a rented
 19 vehicle, a van, struck a crowd of people on La Rambla in
 20 Barcelona?
 21 A. Yes, that's correct.
 22 Q. In September last year in Canada, Abdulahi Hassan Sharif
 23 intentionally struck a police officer driving a white
 24 Chevrolet and then later he fled using a rented truck,
 25 deliberately attempting to hit pedestrians as he fled,

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1 injuring with that rented vehicle, at least four people?
 2 A. Yes, sir.
 3 Q. And then following that, again last year, October 2017
 4 in New York, eight people were killed, others were
 5 injured, when again, a rented vehicle, a truck, was
 6 driven down a cycle path near the World Trade Centre?
 7 A. Yes, that's correct, sir.
 8 Q. So it's in that context that we are to consider the
 9 evidence of DCI Brown to the effect that there were no
 10 checks or regulations that in any way impeded Masood's
 11 ability to get his hands on this powerful Hyundai 4x4?
 12 A. Yes. There's obviously -- this is an area that gets
 13 looked at and there's work that's ongoing with hire car
 14 companies, but it is incredibly difficult with the
 15 amount of hire car companies there are internationally
 16 and across the UK and identifying those people hiring
 17 them, but there is work ongoing in working with the hire
 18 car companies.
 19 Q. And it's right, isn't it, to this day there is no
 20 compulsory regulatory process in place when somebody
 21 rents a vehicle?
 22 A. That's correct, sir.
 23 Q. A different topic, please. I think you're aware of
 24 evidence that was given and concerns that have been
 25 expressed by the Frade family in relation to an issue as

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1 to the taking of photographs in relation to Aysha Frade?
 2 A. Yes, I am, sir, yes.
 3 Q. And I think it's right, isn't it, that the investigation
 4 into what happened on 22 March last year showed that
 5 although many members of the public did assist the
 6 injured in the minutes that followed the attack, some
 7 members of the public, rather than offering help, used
 8 telephones to take photographs or make video recordings
 9 of some of the casualties; is that correct?
 10 A. Yes, that's correct, sir. As Mr Patterson has said,
 11 there was a lot of assistance from members of the public
 12 and some of the footage that was taken was sent in to
 13 the police, but there was some unnecessary footage taken
 14 that was posted online.
 15 Q. And some footage that you wanted to get hold of for
 16 evidential purposes never reached the police, did it?
 17 A. That's correct, sir, yes.
 18 Q. Despite a procedure that was set up to allow the public
 19 to make available their recordings?
 20 A. Yes, that's correct, sir, on any major incident like
 21 this there is a website put up where people can download
 22 and send the details through. Some of that we got, but
 23 not all of it.
 24 Q. I'll avoid names, but you've been given a summary of
 25 some of the examples that emerged, but it's right, isn't it

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1 it, that one member of the public who gave a statement
 2 to your team indicated that she and her husband had been
 3 hit. He, in particular, was very seriously injured, she
 4 was trying to help him, but people filmed and didn't
 5 offer any help.
 6 A. Yes, that's correct, sir.
 7 Q. "No one was helping, they were just taking photos and
 8 videos of us", is what she told you; isn't it that
 9 right?
 10 A. That's correct.
 11 Q. Another person who provided a statement to your team
 12 indicated that there were lots of people taking
 13 photographs and using selfie sticks:
 14 "I was getting cross with them and shouting at them
 15 to help rather than take photographs. I can remember
 16 getting very upset that they were doing that."
 17 Is that correct?
 18 A. That's correct, sir, yes.
 19 Q. Another person who happened to be on the bridge was
 20 an off-duty police officer, quite an experienced police
 21 officer; is that right?
 22 A. Yes, sir.
 23 Q. Did she, in a witness statement, indicate that she could
 24 see huddles of people along the footway, there were
 25 injured people who were being tended to, but she

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1 remonstrated with a man who had been told by another
 2 officer to stop filming?
 3 A. Yes, that's correct.
 4 Q. Another member of the public who was driving over the
 5 bridge at the relevant time, did he say the following:
 6 "I saw around six or eight people walking along the
 7 bridge with their mobile phones out as though they were
 8 filming or taking photographs of the injured people."
 9 That's what it looked like to him, and he made this
 10 observation:
 11 "I think they were sick for doing this."
 12 A. Yes, that's correct.
 13 Q. And then, Mr Crossley, in relation to Mrs Frade, it's
 14 right, isn't it, that a number of eyewitnesses have
 15 described what they saw in terms of the taking of
 16 pictures of Mrs Frade under the bus before the blanket
 17 was positioned to cover her?
 18 A. Sadly that's correct, yes.
 19 Q. Did one witness tell your team that she saw somebody
 20 with a large camera lens taking photographs of the body:
 21 "I told him very sternly, using bad language, to
 22 clear off, and as a result of that he walked away."
 23 A. Yes.
 24 Q. And another person said that there was somebody getting
 25 very angry, trying to get, as he put it, "some idiot" to

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1 stop filming her. So that was somebody who witnessed
 2 a video recording being made of Mrs Frade before she was
 3 covered?
 4 A. Yes, that's correct.
 5 Q. So is the position this: that in some cases, rather than
 6 helping where they apparently could help, some members
 7 of the public took photographs rather than helping?
 8 A. Yes, that's clearly the case on this occasion, very
 9 sadly, that we would have preferred that not to have
 10 happened, and obviously as soon as the police officers
 11 get there and members of the public have tried to stop
 12 them, but some people did that, yes.
 13 Q. The second feature is this: that there was a rather
 14 shocking disregard on the part of some for the dignity
 15 of casualties, not only injured people but also in at
 16 least one case, one of those who had been killed?
 17 A. That's correct, sir, yes.
 18 Q. Final topic, please, Mr Crossley, and that's this: we
 19 heard from DCI Brown that Masood had on his iPhone the
 20 social messaging application WhatsApp. That's right,
 21 isn't it?
 22 A. That's correct, yes.
 23 Q. And we know that it was used by him to send the
 24 so-called "Jihad" message, in which he sought to justify
 25 his conduct?

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1 A. Yes, that's correct, he sent the jihadi PDF.
 2 Q. As for what other messages he might have sent or
 3 received using WhatsApp, it's right, isn't it, that even
 4 if the police seize a phone, if messages have been
 5 deleted, you will be unable to recover them?
 6 A. Yes, that would cause us significant problems
 7 evidentially.
 8 Q. And so in the rare cases where they haven't been deleted
 9 and you get the phone and you're able to access the
 10 phone, all of which is problematic, in rare cases you
 11 can get WhatsApp messages, but often it's used, the
 12 messages are deleted, and you've got no opportunity to
 13 recover them?
 14 A. That's correct, sir.
 15 Q. And is it your experience, Mr Crossley, that in
 16 terrorist case after terrorist case, WhatsApp and other
 17 messaging applications like that, which use end-to-end
 18 encryption, are being used for secretive messaging by
 19 terrorists?
 20 A. That's correct. WhatsApp and a lot of other -- lots of
 21 other messages with end-to-end encryption are freely
 22 available and they do use them, they are used by many
 23 people, no doubt in this courtroom as well, but yes, it
 24 does cause us a problem in terms of encryption.
 25 Q. Do you know any reason why innocent messages or the

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1 exchanging of photographs, for example, requires
 2 end-to-end encryption?
 3 A. I don't, but I think there will be some civil rights
 4 people that may well do.
 5 Q. But certainly the experience of counter terrorism
 6 officers is it's being used effectively by terrorists.
 7 A. That's the world in which we work, and yes, we see that.
 8 Q. And it's frustrating investigations by the counter
 9 terrorism officers in their efforts to protect the
 10 public?
 11 A. Yes.
 12 MR PATTERSON: Yes, thank you. That's all I ask.
 13 THE CHIEF CORONER: Could I ask one question, I don't know
 14 whether you might be able to help me: we see from the
 15 footage across the bridge that there are many other
 16 people who are struck by the car that goes across.
 17 A. Yes.
 18 THE CHIEF CORONER: Now, clearly this Inquest is only
 19 concerned with those who died, but when I have watched
 20 the footage myself, it's clear to me that there are
 21 a significant number of other members of the public who
 22 are struck. Many of them obviously sustained extremely
 23 serious injuries.
 24 A. That's correct.
 25 THE CHIEF CORONER: Some of them would have, thankfully,

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1 received minor injuries .
 2 I have not been able, on my viewing of it , really to
 3 put a figure on the numbers that are struck by the
 4 vehicle . Is it something that you either know, for
 5 example, through serious injury , as opposed to those who
 6 had minor injury who were struck?
 7 A. There were 29 serious injuries and they range from
 8 people that are permanently disabled, to people with
 9 significant long-term injuries.
 10 THE CHIEF CORONER: Thank you.
 11 MR HOUGH: Mr Crossley, thank you very much for your
 12 evidence. Those are all the questions we have for you.
 13 A. Thank you very much.
 14 THE CHIEF CORONER: Thank you.
 15 MR HOUGH: Sir, before we consider any submissions on
 16 determinations, it's right that we address first a set
 17 of submissions that we received late yesterday afternoon
 18 from the representatives of the siblings and parents of
 19 PC Palmer.
 20 THE CHIEF CORONER: Yes.
 21 MR HOUGH: So what I propose to do is to give our response
 22 to those documents, comprehensively, and, I hope,
 23 fairly , and then allow Ms Stevens followed by any
 24 others, to make any representations that they have about
 25 further evidence to be called .

1 THE CHIEF CORONER: Thank you.
 2 Submissions by MR HOUGH QC
 3 MR HOUGH: Sir, the document that we received makes
 4 applications , or in some cases renews applications, for
 5 you to carry out further inquiries and call further
 6 evidence. It's right that it should be considered at
 7 this stage before the evidence has been closed. Our
 8 position, in short, is that there has been a sufficient
 9 and, indeed, exhaustive inquiry into the facts and
 10 circumstances of PC Palmer's death, as with the deaths
 11 of the other victims of this terrible attack.
 12 We say that it's not necessary for you to call
 13 further evidence to discharge your proper duties, and
 14 that it would not be appropriate to extend the Inquests
 15 as suggested.
 16 In making that submission, I should stress that we
 17 are not strongly influenced by a desire not to defer
 18 Khalid Masood's Inquest, although, of course, we would
 19 not be keen to put numerous witnesses in that hearing to
 20 distress and inconvenience.
 21 Our principal point, though, is that there has been
 22 a comprehensive set of inquests of the victims, and it's
 23 appropriate for them to be brought to a conclusion now
 24 as planned for the benefit of all of the families . In
 25 that respect, we observe again that the widow of

1 PC Palmer is not calling for a wholesale rearrangement
 2 of his Inquest.
 3 By way of general observations, may I say this : as
 4 you are aware, sir , the key purpose of an inquest is to
 5 establish how the individual died, the facts and
 6 circumstances of the death. As set out in our
 7 submissions on determinations, it's a question for a
 8 coroner's judgment how far to pursue inquiries and what
 9 evidence to call . It's almost always possible to
 10 identify further evidence that could be called .
 11 The request for further inquiries now made relate to
 12 one topic: arrangements for deployment of AFOs in
 13 New Palace Yard. It is one topic, it is a significant
 14 topic, and it is a topic which, we submit, has been
 15 extensively investigated .
 16 As we've previously pointed out, but as it's worth
 17 reiterating , the investigations have included the
 18 following: first of all , we have always identified the
 19 security arrangements at the Palace as a subject within
 20 the remit of the Inquests. The directions
 21 of January 2018 which you made, sir, which attach the
 22 indicative scope document, made that clear.
 23 Secondly, in April 2018, having reviewed
 24 security-sensitive reviews of parliamentary security, we
 25 raised questions of the Metropolitan Police Service and

1 Parliamentary Authorities on the subjects of security at
 2 the Palace, which included the positioning and
 3 instructions to armed officers .
 4 There was a note of issues for their evidence,
 5 {DC5263/1} which was circulated. We should note in
 6 passing that that was not, however, an amplification of
 7 the indicative scope.
 8 Commander Usher, in response to our requests, made
 9 a long first statement on the subject . We then posed
 10 further sets of questions of him, which led to the
 11 production of two further statements. We did that
 12 without any interested persons encouraging us to do so.
 13 In those statements, interested persons received details
 14 of the post instructions , in the last two versions
 15 applicable before March 2017, and relevant parts of the
 16 last tactical assessment.
 17 We included in the witness list , without prompting,
 18 the AFOs on duty in New Palace Yard, PCs Ashby and
 19 Sanders. We worked with the SO15 team to produce the
 20 CCTV compilation and the maps to show AFO movements on
 21 the day, again, without prompting.
 22 When the witnesses were called, we in-chief
 23 addressed the issues which were of concern to the Palmer
 24 family, and I hope others will agree, in some detail.
 25 We pursued lines of inquiry which arose during the

1 Inquest hearing, as often happens during Inquest
 2 hearings, including taking a fourth statement from
 3 Mr Usher, taking the statement of Inspector Rose,
 4 deciding without prompting to call him, and preparing
 5 our own note on usage of the ADAM system, which conveyed
 6 the key information without breaching any sensitivities .
 7 We've addressed, I hope in detail , the requests for
 8 inquiries which have been made during the hearing, and
 9 we have made inquiries of the Metropolitan Police
 10 Service where we considered it appropriate. In that
 11 regard, I should also stress that it's for you and your
 12 team to decide what inquiries to make of the
 13 Metropolitan Police Service, and that's what you've been
 14 doing.
 15 Against that background, let me address specific
 16 points that have been made. First of all , expert
 17 evidence. As we understand it, the argument is that you
 18 should commission a report from an expert with
 19 experience as a police firearms trainer and tactical
 20 advisor. There was no suggestion that expert evidence
 21 was required of this kind in any of the pre-Inquest
 22 review hearings, or even in the early stages of the
 23 Inquest hearing. It was first mooted in a note dated
 24 21 September, and at that time, as a form of expert
 25 evidence which the siblings and parents of PC Palmer may

1 be obtaining for themselves.
 2 The principal reason why it's now argued that expert
 3 evidence is needed is that there's an issue whether or
 4 not PCs Ashby and Sanders would have successfully
 5 stopped Masood inflicting fatal injuries on PC Palmer if
 6 they'd been stationed "in close proximity to Carriage
 7 Gates as the post notes indicated they should be".
 8 So as I submitted on 24 September, our answer to
 9 this point, in short, is that the issue is primarily
 10 a factual question, or a series of factual questions for
 11 you to consider. Let me reiterate them briefly: would
 12 the officers , or either of them, have moved towards the
 13 source of the bang? Would he or they have then moved
 14 back at any point? Where, precisely, would they have
 15 been when Masood entered? At what level of readiness?
 16 Would they have had a clear shot? Would they have taken
 17 the shot? Would they have hit the target? Would they
 18 have stopped Masood? Would they have stopped him before
 19 he inflicted the fatal strike?
 20 Sir, there is a temptation to believe, on the part
 21 of lawyers and others, that difficult speculative
 22 questions must be capable of resolution by some expert
 23 somewhere, but in our submission, that's not the case.
 24 We've previously submitted that this set of questions
 25 involves a degree of speculation such that it would be

1 unfair to say that PC Palmer's death resulted from
 2 omissions by these two officers . That's one of a number
 3 of reasons why we said that would be an unfair assertion
 4 to make.
 5 We've said in yesterday's written submissions on
 6 Article 2 engagement that it is arguable that PC Palmer
 7 lost a chance of survival because of the absence of the
 8 armed officers . We don't consider those submissions
 9 inconsistent , but setting that aside, even if they were,
 10 the key point for present purposes is that we can't
 11 realistically expect these difficult speculative
 12 questions of fact to be magically resolved by some
 13 expert. The argument is made at paragraph 23 of
 14 Ms Stevens' document: an expert in training of AFOs
 15 would be able to explain how officers would be trained
 16 or expected to respond to precisely the sequence of
 17 events which would have confronted PCs Ashby and Sanders
 18 at Carriage Gates had they been there at 2.40 pm on
 19 22 March 2017.
 20 But in our submission, it is unreal to suggest that
 21 such an expert could resolve these questions in the
 22 setting of this precise and unprecedented situation
 23 within a challenging and unique physical environment.
 24 At most, he or she could only make the general points
 25 about what AFOs were trained to do in terms of dynamic

1 risk assessment, moving towards signs of threat and so
 2 on, which PCs Ashby and Sanders, and indeed, PCs Ross
 3 and Glaze, have already addressed.
 4 A separate argument is then made to the effect that
 5 expert evidence is needed about the design of the
 6 security system in New Palace Yard in March 2017. In
 7 our submission, no such evidence is needed for at least
 8 two key reasons: first , the court has evidence in the
 9 form of the tactical assessments about what
 10 considerations actually underlay the post instructions .
 11 We also have the evidence that the course of and the
 12 results of the May 2015 security review gisted
 13 appropriately. These make clear what the guiding
 14 principles were, and how they were reflected in specific
 15 instructions .
 16 The court has the material, therefore, to make
 17 a judgment as to whether the rationale was good or bad,
 18 and whether the instructions were sufficient or
 19 insufficient .
 20 Secondly, and importantly, the real ground for
 21 complaint about the security system on 22 March, as made
 22 very clear in all the questioning, is not that the
 23 post instructions were manifestly deficient or placed
 24 the officers in the wrong place, but that PCs Ashby and
 25 Sanders weren't working to them at all .

1 Before leaving this topic, we should also respond to
 2 the suggestion that Chief Superintendent Morris was
 3 called unnecessarily and that time was thereby wasted.
 4 Ms Morris was called so that the court could understand
 5 police training and exercises for dealing with marauding
 6 terrorist attacks, Masood’s attack being a species of
 7 that.

8 The fact that such training is heavily focused on
 9 command and control does not mean that it has no
 10 relevance, and in any event Ms Morris did address in her
 11 evidence some of the exercises which involved authorised
 12 firearms officers at the PC level.

13 Her evidence was, in any event, brief, and
 14 dispensing with it would not have had any effect on the
 15 scheduling of other evidence.

16 The next point made in the document is that further
 17 AFOs ought to be called. The argument is made that if
 18 the Metropolitan Police Service is going to say that
 19 PCs Ashby and Sanders were responsible for their own
 20 non-observance of the post notes, you should call
 21 a number of further AFOs to comment on their view of
 22 their duties.

23 In our submission, it is obviously not practicable
 24 in these Inquests to call all the AFOs who have been
 25 deployed to the Palace of Westminster. It is, equally,

1 not practicable to call a selection who everyone would
 2 agree would be truly representative of the total.

3 We’ve heard from the AFOs on duty at the time of the
 4 attack, as well as unarmed officers at the gates who had
 5 previously been AFOs. We’ve heard from Inspector Rose
 6 this morning, who was responsible for the supervision of
 7 AFOs, as well as from the more senior officers.

8 A suggestion may be made that we should have called or
 9 we should now call some sergeants, but how many of
 10 those? Should we call all sergeants who were involved
 11 over all relevant periods? What if those sergeants said
 12 that they had been instructing authorised firearms
 13 officers in accordance with the post notes. Surely the
 14 argument would then be that we needed to hear from all
 15 or a representative selection of AFOs.

16 All these points simply go to show that it is not
 17 possible in an inquest process, no matter how
 18 exhaustive, to answer precisely what every AFO, or what
 19 a particular proportion of AFOs, believed about their
 20 instructions. A view has to be taken on the basis of
 21 a body of evidence about whether the non-observance of
 22 post notes was sufficiently widespread to be the failure
 23 of a system, and we’ve made our position clear in our
 24 document: we say that the answer is yes, on the
 25 evidence.

1 Sir, finally, further documentary inquiries. We’ve
 2 answered previous requests for material point-by-point.
 3 Let me then address briefly paragraphs 28 to 30 of the
 4 latest note.

5 First of all, material underlining the DPS review of
 6 PCs Ashby and Sanders. So we have the MM1 document
 7 which contains a full report of this review. As we’ve
 8 previously submitted, we’re not persuaded that further
 9 inquiries to try to trace any underlying papers, if any
 10 exist, are appropriate.

11 Secondly, AFO training materials. We’re not
 12 persuaded that it’s appropriate to engage in an inquiry
 13 into the general training given to AFOs. There are, of
 14 course, substantial voluminous training materials for
 15 AFOs, as those of us who have been involved in police
 16 shooting cases know well. But we are not persuaded that
 17 a tour of those very voluminous documents would help
 18 materially to resolve the hypothetical questions in
 19 precisely the factual circumstances that we’ve looked
 20 at.

21 Furthermore, none of the officers we’ve heard from
 22 who were actually involved on the ground has alluded to
 23 some specific feature of their training that would or
 24 would not have motivated them at a particular time, and
 25 which would have required reference to a document.

1 Thirdly, briefing materials for sector 3. We’ve
 2 been told that none exists. No witness has identified
 3 written briefings corresponding to the request.

4 Fourthly, materials on test exercises. So in our
 5 document in April we were careful to ask for information
 6 about security exercises and we did so in further
 7 documents. As a result, we received relevant
 8 information about security exercises at the Palace,
 9 which was gisted in the statements of Commander Usher
 10 and Mr Hepburn, and lest it be suggested that we took
 11 that at face value without further examination, we posed
 12 the further questions about Operation Standfast,
 13 probably the most relevant of those exercises, which
 14 were answered in Mr Usher’s third statement.

15 Sir, I know I have taken a little time, but that is
 16 in deference to the care with which the submissions were
 17 made.

18 THE CHIEF CORONER: Thank you very much, Mr Hough, that’s
 19 extremely helpful.

20 Ms Stevens.

21 MS STEVENS: Yes.

22 THE CHIEF CORONER: I’ve got in front of me the document
 23 which was sent through last night, which I have read,
 24 and I have reminded myself where it refers back to
 25 previous documents of what was set out there, so I’ve

1 got that material in front of me. It's really for you
 2 to have the opportunity, if there are other things that
 3 you wish to say, particularly in the light of material
 4 which came out this morning, or any other points that
 5 you want to make in relation to what I think are
 6 a number of applications, firstly -- I mean, I need to
 7 look at them, it seems to me, separately, as well as
 8 cumulatively. For example, you make a point about
 9 an expert. There are other witnesses that you invite
 10 consideration as to being called, and then there are
 11 further disclosure or further inquiries, and those seem
 12 to me to be the points which emerge from your documents.

13 Can I give you this assurance: that if I felt that
 14 there was merit in any of those points, the fact there
 15 would be a knock-on effect which would disrupt
 16 an inquest that is to follow on, that would not prevent
 17 me from making a direction in your favour if I felt it
 18 was required. So yes, it may cause a disruption, but it
 19 seems to me that I need to look at the merits of the
 20 applications you need, and in a sense, if that's the
 21 consequence, well that will be for me to explain to
 22 those witnesses that there's a necessary delay.

23 Submissions by MS STEVENS

24 MS STEVENS: Sir, thank you very much. First of all,
 25 I entirely agree that the matters that we've raised in

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1 the application do fall to be considered individually.
 2 Second of all, the family is grateful for the
 3 indication that timetabling considerations and knock-on
 4 effect for the Inquest of Khalid Masood would not be
 5 determinative and, in fact, would not be given undue
 6 weight.

7 Could I just stress this --
 8 THE CHIEF CORONER: Well, I'm going further than that:
 9 I'm saying that I'm going to look positively at the
 10 weight of your applications, and in a sense, take the
 11 consequences on my own shoulders should I accede to your
 12 applications for the disruption it might cause to
 13 others, but it seems to me that has to be the right
 14 approach.

15 MS STEVENS: Thank you very much.

16 Sir, just in relation to one matter that was raised
 17 by counsel to the Inquest in terms of the knock-on
 18 effect. Can the family of Police Constable Palmer make
 19 it plain that this application does not affect the
 20 victims or the families of the victims on the bridge,
 21 and therefore there would be no question of delaying
 22 submissions this afternoon in relation to their
 23 Inquests.

24 Dealing with what's been said by my learned friend
 25 about timing, if I may. Points have been raised that

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1 this application was not, for example, raised at the
 2 pre-Inquest review hearing. At the pre-Inquest review
 3 hearings, none of the relevant evidence that has
 4 triggered these issues had been served, therefore, even
 5 if the family of Police Constable Palmer had been
 6 represented, and of course, you know that they had no
 7 legal assistance at that stage, it would have mattered
 8 not because the evidence, having not been served, no
 9 submissions could be made about the timetable, calling
 10 of witnesses, or scope.

11 Further, in relation to what's been said about
 12 timing, we would ask for it to be borne in mind that
 13 an application to adjourn this Inquest was made at the
 14 start and it was made on the basis of a number of limbs,
 15 which included concerns even at that stage about
 16 outstanding material, insufficient time having been
 17 allowed for Police Constable Palmer's Inquest, and
 18 insufficient opportunity to engage through
 19 participation.

20 The last matter that we would wish to raise by way
 21 of response in relation to timing is this: that the full
 22 extent of the family's difficulties in terms of
 23 obtaining answers to the questions that they are so
 24 desperately seeking a response in relation to, was not
 25 made clear until the end of last week when we heard the

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1 evidence of Commander Usher, when it became plain that
 2 contrary to what the family had been told by the
 3 Metropolitan Police Service, that Commander Usher was
 4 best placed to answer questions as to tactics, in fact,
 5 as soon as the family sought to ask even elementary
 6 questions about why there were no fixed posts at
 7 Carriage Gates, he said he couldn't answer because he
 8 was not an expert.

9 Further, it was only when the evidence of Chief
 10 Superintendent Morris was given that it was clear that
 11 she was able to provide no answers to the family's
 12 questions about the training of either AFOs or police
 13 constables at Carriage Gates, because she very fairly
 14 accepted she had absolutely no experience or expertise
 15 in relation to those matters.

16 The family does have to ask, therefore, why it was,
 17 when it must have been clear that these important
 18 questions as to facts would be raised, that the only
 19 statement and witness to be obtained by the Metropolitan
 20 Police Service was from Commander Usher, who firstly
 21 doesn't have the requisite experience or expertise, and
 22 secondly, is not an independent witness, far from it,
 23 being the person of senior rank who was responsible for
 24 the security systems at the Palace of Westminster.

25 Further, when, presumably, the Inquest team asked

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1 for a statement to be prepared in relation to training ,
 2 why the witness who gave a statement was somebody who
 3 clearly didn't have the relevant expertise .
 4 In terms of the response that this can be a full and
 5 fearless investigation without such expert evidence
 6 being called , the family's submission is that that is
 7 simply not the case, and that the family is being
 8 deprived of a full and proper Article 2 inquest .
 9 That can be shown if one looks at the submissions
 10 advanced by counsel to the Inquest in relation to final
 11 determination when it is said that there is uncertainty
 12 as to whether or not the absence of AFOs at Carriage
 13 Gates would have made a difference. That issue for the
 14 family is an absolutely key one .
 15 It's said there's uncertainty, it's said that it's
 16 a difficult question to answer, the family's response is
 17 this: that there would not be uncertainty if evidence
 18 was called. This is a situation that is capable of
 19 being cured. The situation gets worse in terms of the
 20 family's view when one considers the Metropolitan Police
 21 Service submissions served this morning, where they
 22 seek, at paragraphs 57 and 58, to rely on the evidence
 23 of Commander Usher to say that apparently the evidence
 24 clearly demonstrates that even if there had been AFOs at
 25 Carriage Gates, they would have walked away. The family

1 find it extraordinary, and it causes them great distress
 2 that the Metropolitan Police Service put forward
 3 a witness who couldn't answer the family's questions
 4 because he said he was not an expert. He plainly wasn't
 5 an expert, if we take a step back. He has never been
 6 a tactical firearms advisor. He has never been AFO
 7 trained. He has never been an AFO. And yet the
 8 Metropolitan Police Service seeks to rely on this
 9 witness, Commander Usher, to say, in effect , it matters
 10 not what the security breaches were at New Palace Yard,
 11 it would have made no difference in terms of the death
 12 of their loved one, Police Constable Palmer, because
 13 it's safe and fair to rely on the evidence of
 14 Commander Usher .
 15 That is a proposition advanced by the Metropolitan
 16 Police Service with which the family cannot, and does
 17 not, agree .
 18 Can I just deal, please, with the suggestion that
 19 the matters that the family is seeking answers to, and
 20 they're dealt with in the skeleton argument at
 21 paragraphs 6, 23 and 25, which involve very fundamental
 22 issues when one looks at the Inquest into
 23 Police Constable Palmer's death, issues such as what
 24 training is given to AFOs in the event of a marauding
 25 attack? What is the range of the weapon in question?

1 Would there have been an opportunity to shoot, looking
 2 at the CCTV, attending the scene and reading evidence?
 3 Was there a prospect of blue-on-blue fire, looking at
 4 all that material? Why was a security system designed
 5 with only two AFOs having to deal with all those
 6 locations and the real risk of marauding attacks?
 7 The family simply can't agree, I am afraid, that
 8 those questions are matters that are not capable of
 9 being answered, and that it's a hypothetical suggestion
 10 that experts would be able to answer those matters .
 11 There's been no suggestion put before the family
 12 that anyone has even approached an expert to ask them
 13 whether or not they can answer the questions, and it's
 14 our submission that that cannot be fair . It is only
 15 right to advance a proposition that these are questions
 16 that are incapable of being answered if an expert has
 17 been instructed . As is well known, the family cannot
 18 instruct an expert to pose those questions .
 19 If one looks, though, at the evidence that's been
 20 called during the Inquest, a number of witnesses have
 21 been asked by, indeed, counsel to the Inquest and the
 22 Metropolitan Police Service, the very questions that the
 23 family submit can be asked of an expert .
 24 If it was deemed appropriate and reasonable to ask
 25 those questions of people who were not experts, it

1 appears illogical and unreasonable to the family to say
 2 that the questions cannot be asked of somebody with the
 3 relevant expertise .
 4 Can I deal briefly in response, please, in relation
 5 to the specific matter concerning training? The family
 6 is particularly distressed to see that no submissions
 7 have been made as to the issue of training by counsel to
 8 the Inquest or the Metropolitan Police Service .
 9 Of course, nothing meaningful can be said by the
 10 family because no evidence, no relevant evidence, has
 11 been called . Therefore, even though training was within
 12 the scope of the Inquest, at paragraph (h), even though
 13 it's an important issue for the family, not just in
 14 terms of getting answers as to what happened on the day,
 15 but also in relation to whether or not there should be
 16 recommendations as to the future, and therefore it is
 17 deeply troubling that nothing can be said on this issue .
 18 In our submission, that too is capable of being
 19 cured very simply by calling AFO trainers to give
 20 evidence rather than having just called trainers in
 21 relation to command level upwards .
 22 Briefly in relation to disclosure in response. It
 23 appears that it's being suggested in terms of the
 24 working practice review conducted by the Department of
 25 Professional Standards for the Metropolitan Police

1 Service, that it's not known if such a review exists .
 2 The family find that very surprising. If one looks at
 3 the DPS report, it refers in terms to a working practice
 4 review. Also when one looks at that report, there is
 5 reference to one witness and one witness alone having
 6 been spoken to, that being Chief Superintendent Johnson.
 7 Therefore, I am afraid on the basis of the misconduct
 8 review, it cannot be accepted by the family that this is
 9 material that is not in existence.

10 Sir, we've dealt with the training material and
 11 briefing material in writing and, therefore, unless
 12 there's anything that we can assist you with, those are
 13 our submissions.

14 THE CHIEF CORONER: Thank you.

15 Mr Adamson?

16 Submissions by MR ADAMSON

17 MR ADAMSON: Sir, very briefly, I say only this in relation
 18 to the application, in the light of something that
 19 Mr Hough has said. As you know, when my learned friend
 20 Ms Stevens made an application at the start of this
 21 process for an adjournment, we did not support that
 22 application.

23 THE CHIEF CORONER: No.

24 MR ADAMSON: I would simply say this: that we would not want
 25 an application made by Ms Stevens to be refused on the

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1 basis that we did not positively support it .

2 THE CHIEF CORONER: Thank you.

3 MR HOUGH: It appears that there are no further submissions
 4 from any of my learned friends. I have nothing to say
 5 in reply to Ms Stevens because I hope I sought to
 6 anticipate the points that she made.

7 Ruling

8 THE CHIEF CORONER: Yes. Mr Hough, it may help if I simply
 9 set out in brief terms what my view is, and then I can
 10 no doubt provide some more detailed reasons in due
 11 course, but can I make this clear: that I agree with the
 12 analysis that you have set out in relation to each of
 13 the points made in respect, or made on behalf, rather,
 14 of the family and the siblings of PC Palmer by
 15 Ms Stevens. I make it clear I've not only looked at the
 16 document which came through last night, as I indicated,
 17 but the earlier applications, and I take the view,
 18 Mr Hough, that I need to look at each of them
 19 individually: if one has merit, then I need to make that
 20 clear. But I have looked at each of them and I do not
 21 accede to those applications made, either in respect of
 22 the calling of an expert, other witnesses to be called,
 23 or disclosure or further inquiry to be made.

24 I have looked, as I say, at the merits of each of
 25 those applications. I have ignored, as I rather

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1 indicated to Ms Stevens, what the knock-on effect would
 2 be, because it seems to me the submissions are well set
 3 out, they are well documented in that document and in
 4 the previous ones, and it would be wrong for me to
 5 simply say I'm not going to accede because of the
 6 potential ramifications for witnesses or, indeed, for
 7 the court over having to delay that Inquest.

8 So that is the view that I have taken. Obviously
 9 I had time to look at the material overnight in addition
 10 to hearing the submissions made this morning. I am
 11 afraid that those applications are refused.

12 MR HOUGH: Sir, yes.

13 Would that be, therefore, a convenient moment for
 14 a lunchtime break before we move to submissions?

15 THE CHIEF CORONER: It would. What I was going to suggest
 16 is that I am conscious that what has come in whilst
 17 we've been sitting this morning are a number of written
 18 documents, which although I'm capable of doing some
 19 things at the same time, it's very difficult to read
 20 them and give them the reading time they require. What
 21 I was going to suggest, if it's not an inconvenience to
 22 anyone, is that we sit at 2.30. That will simply give
 23 me, and possibly other people, a chance to read each
 24 other's submissions.

25 I'll make it very clear, Mr Hough, I'm not expecting

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1 people to take me through the submissions, unless there
 2 are particular points that need to be highlighted, but
 3 really to give people an opportunity to expand upon them
 4 or other points which may flow.

5 MR HOUGH: Yes.

6 THE CHIEF CORONER: We will sit at 2.30.

7 (12.59 pm)

8 (The Luncheon Adjournment)

9 (2.33 pm)

10 THE CHIEF CORONER: Yes.

11 Submissions on determinations to be made by the Coroner by
 12 MR HOUGH QC

13 MR HOUGH: Sir, the time has now come for you to consider
 14 submissions on the determinations to be returned in
 15 these Inquests.

16 We have provided a detailed document, as have all
 17 interested persons. Those documents will be posted on
 18 the website and made available to the press, as other
 19 submissions have been. In the light of that, I can be
 20 reasonably concise.

21 THE CHIEF CORONER: Yes. Can I just say, before you start,
 22 Mr Hough, now that I have had a chance to read them all,
 23 can I simply thank everyone for the detail that's set
 24 out in the documents, very helpfully clearly set out, of
 25 great benefit to me.

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1 MR HOUGH: Yes. Our submissions are, in short, as follows:
 2 first, for all five of those who died: Kurt Cochran,
 3 Leslie Rhodes, Aysha Frade, Andreea Cristea and
 4 PC Keith Palmer, the determinations should record that
 5 they were unlawfully killed. Each of them was murdered
 6 in a terrorist atrocity which was no less brutal for its
 7 lack of sophistication.
 8 Second, for each of those struck by the Hyundai on
 9 the bridge, the determination attached to the record of
 10 inquest should also contain a narrative giving a more
 11 detailed account of how the person died. It's only
 12 right that the public record should set out the facts
 13 particular to each individual.
 14 Thirdly, for PC Palmer, the determination should
 15 similarly contain a narrative giving an account of how
 16 he was killed. Also the narrative should, in our
 17 submission, address reasonably succinctly the lack of
 18 armed support at the Carriage Gates entrance, and the
 19 basis for that finding. We say that the narrative can
 20 address that subject by virtue of Article 2, as given
 21 effect by the decision in Middleton.
 22 Fourthly, sir, you will wish to consider carefully
 23 your powers to issue a Prevention of Future Deaths
 24 Report.
 25 THE CHIEF CORONER: Yes. Just in relation to that topic,

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1 Mr Hough, right at the end of your written submissions
 2 there is a proposed timetable for that. I think of the
 3 other documents I have seen, certainly that from
 4 Mr Patterson goes into that issue in quite some detail,
 5 very comprehensively, very clearly set out.
 6 I think what is proposed in your document is that
 7 the other IPs, or interested persons, have
 8 an opportunity to respond to that and any other such
 9 recommendations or suggestions.
 10 MR HOUGH: Yes. That's exactly what we propose. We have
 11 sought to set out the legal principles governing the
 12 content of such reports, and our proposal is for
 13 interested persons to have the opportunity to make
 14 suggestions for the content of such a report and then
 15 for others to respond to those suggestions before you
 16 decide whether to make a report and with what content,
 17 taking account of all the points that have been made.
 18 THE CHIEF CORONER: Yes.
 19 MR HOUGH: Sir, I propose to address matters in the
 20 following order: briefly to summarise the legal
 21 principles; secondly, to deal with the engagement of
 22 Article 2; thirdly, a few words on unlawful killing
 23 conclusions; fourthly, to address the narrative
 24 determinations concerning the victims on the bridge;
 25 then, fifthly, the narrative determination concerning

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1 PC Palmer, and; sixthly and finally, the procedure for
 2 considering a possible PFD report, expanding on what
 3 I've just said.
 4 So legal principles. The statutory provisions
 5 governing inquest determinations are set out in
 6 paragraphs 4 and 5 of our document and the legal
 7 principles covered from paragraph 6. I hope I can
 8 summarise the law uncontroversially as follows.
 9 First, under sections 5 and 10 of the Coroners and
 10 Justice Act 2009, the task for a coroner is to produce
 11 a determination in each inquest which provides answers
 12 to four factual questions: who the deceased was and
 13 when, where and how the person came by his or her death.
 14 The determination cannot go any further and must not
 15 appear to determine any question of criminal liability
 16 of a named person or any question of civil liability at
 17 all.
 18 The scope of inquiry will usually be much wider than
 19 strictly necessary to answer those questions. That is
 20 because the process of inquiry will naturally bring into
 21 focus the factors relevant to the cause of death. It is
 22 also because the process of inquiry is valuable in
 23 itself and intended to answer legitimate public
 24 questions, and it is also necessary because a broader
 25 inquiry often assists a coroner to consider the option

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1 of making a Prevention of Further Deaths Report.
 2 So in the present case we have considered such
 3 matters as Security Service procedures, guidance on
 4 protective security on the highway, police body armour,
 5 and the life and background of Khalid Masood. No one
 6 submits that those should feature in the determinations,
 7 but everyone recognises, I hope, that they were all
 8 proper subjects for the inquiry.
 9 As in most inquests, the critical question in these
 10 cases is how each person died. In most Inquests that
 11 question is to be read as by what means the person died,
 12 so focused on the means of death. The question in that
 13 form may be answered by a short form conclusion, of the
 14 well known kind, such as accident or suicide, or by
 15 a short narrative of the means of death, or by
 16 a combination of the two.
 17 Article 2 of the ECHR, the right to life, sir,
 18 contains a procedural dimension. As well as requiring
 19 the establishment of procedures to investigate death
 20 generally, it entails a specific obligation in certain
 21 cases to carry out investigations meeting conventional
 22 law criteria.
 23 Where it is arguable that the state or its agents
 24 may have breached substantive Article 2 duties in
 25 relation to a death, that procedural obligation is

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1 engaged. Where that obligation is engaged in relation
 2 to an inquest, there is an effect on the form of
 3 determination. As was held in the Middleton case, the
 4 determination can then address the circumstances of
 5 death, as well as the means of death, which may bring in
 6 factors going beyond the immediate cause of death, this
 7 may expand the range of the narrative conclusion.

8 Finally, one should not overstate the significance
 9 of a finding of Article 2 engagement. Even where
 10 Article 2 is not engaged, a proper narrative
 11 determination can give an individualised and appropriate
 12 account of a death, and we hope to do so in respect of
 13 the deceased for whom nobody suggests that Article 2 is
 14 engaged.

15 But even where Article 2 is engaged, the
 16 determination should still be reasonably succinct and
 17 focused on the particular death, as the Court of Appeal
 18 reminded us only last week in the Hambleton case.

19 At paragraph 8 of our document we have sought to set
 20 out the case law concerning the content of
 21 determinations.

22 May I move, then, to engagement of Article 2. The
 23 Article 2 procedural obligation is only engaged in the
 24 relevant sense in any of these Inquests if it's arguable
 25 that the state or its agents breached an Article 2

1 substantive duty in connection with the death. There
 2 are two relevant substantive duties: first,
 3 an operational duty owed by state agents in certain
 4 circumstances, as set out in paragraph 7(e) of our
 5 document by reference to the Osman case. That duty may
 6 arise if a public authority or state agents know or
 7 ought to know that an individual or identifiable group
 8 is at a real and immediate risk of death. It's breached
 9 if the public authority or state agents fail to take
 10 steps which might have been expected to avoid the risk.

11 Secondly, there is a general duty, discussed in
 12 paragraphs 7(b) to (d) of our document, which is a duty
 13 on the state to establish a framework of laws,
 14 precautions, procedures and means of enforcement to
 15 protect life. Breach of that duty requires a systemic
 16 failing rather than individual acts of negligence or
 17 a concatenation of individual failings.

18 As a matter of causation, the failing in question
 19 under either of the forms of duty must be one which
 20 deprived the deceased person of a substantial chance of
 21 survival.

22 In our submission, the evidence does not establish
 23 an arguable case of breach of an Article 2 duty in
 24 relation to any of the victims on the bridge, and we
 25 understand others to agree with that proposition. The

1 evidence hasn't suggested any breach of an operational
 2 duty because no agent of the state knew or ought to have
 3 known that any of the victims was at a real and
 4 immediate risk of death and failed to act in response.
 5 This was an attack planned and prepared in secret,
 6 without even Masood's family and close friends being
 7 aware.

8 As regards the general duty, sir, first of all, very
 9 proper questions have been put on the subject of
 10 barriers and protective security, but properly, those
 11 who represent the families of those who died focused
 12 their submissions in this regard on the possibility of
 13 points being made in a PFD report or reports. They do
 14 not submit that this gives rise independently to
 15 an arguable breach of Article 2, or engagement of
 16 Article 2 on that basis. So we agree with that for the
 17 reasons given in our document. I don't propose to
 18 expand on them now, given the approach taken by others.

19 Equally, sir, Mr Patterson QC asked a series of
 20 proper and searching questions of Witness L about MI5's
 21 knowledge of Khalid Masood, but again, there is no
 22 suggestion that there is a basis for asserting a breach
 23 of the operational or general duty by reference to the
 24 Security Service or counter terrorism police in their
 25 actions and investigations prior to the attack. Again,

1 Mr Patterson properly and carefully makes his points in
 2 relation to the security services in his submissions on
 3 PFD reports.

4 Sir, in our submission there is, however,
 5 an arguable case for the breach of the general duty in
 6 relation to PC Palmer's death, specifically, it's
 7 arguable that security arrangements at the
 8 Palace of Westminster were not adequate in one important
 9 respect: the systems of briefing, supervision and
 10 assurance were not adequate to ensure that authorised
 11 firearms officers were in close proximity to Carriage
 12 Gates when they were open, those gates being a known and
 13 key point of vulnerability.

14 Sir, because this is the principal dispute
 15 ventilated by the submissions, let me set out our
 16 arguments in brief so that others can address them.
 17 They are at paragraph 11 of our document.

18 First, a number of security reviews had identified
 19 Carriage Gates as a point of weakness and one highly
 20 attractive to any attacker. It was appreciated since
 21 early 2015 that unarmed officers at the gates were in
 22 a vulnerable position and location.

23 Secondly, Carriage Gates were open for working hours
 24 and even the external crowd barriers were left open at
 25 some times. Physical barriers to entry were thus often

1 non-existent. Human barriers were the only ones
 2 present.
 3 Thirdly, for those reasons, tactical assessments had
 4 stressed the need for armed officers to be at Carriage
 5 Gates as a protection and a visible deterrent. To be,
 6 in Commander Usher's words, tethered to those gates.
 7 Fourthly, while we see little to criticise in the
 8 content of post instructions, and we acknowledge that
 9 they were accessible via the ADAM system, that does not
 10 preclude there being an arguable breach of the general
 11 duty. A proper system requires proper arrangements for
 12 briefing and compliance checking.
 13 Fifthly, there is at the very least an arguable case
 14 that AFOs were not complying with post instructions and
 15 that this was happening quite regularly. We have the
 16 evidence of PCs Ashby and Sanders. They understood
 17 their duty to include a roving patrol of the whole of
 18 New Palace Yard. That's very likely to have been
 19 an honest belief because a roving patrol was no easier
 20 or more convenient than standing still. It's likely
 21 that PC Gerard had the same understanding, given what
 22 his movements were on the day.
 23 PCs Ashby and Sanders both insisted that other AFOs
 24 held the same belief that they did and it's likely that
 25 at least some of them did as it would be a terribly

1 strange coincidence if the security was tested by
 2 an attack at the one time there were AFOs with
 3 a divergent understanding on duty.
 4 PCs Ross and Glaze said it was commonplace for AFOs
 5 not to be standing by Carriage Gates. The MM1 document
 6 produced following the DPS review noted that wider
 7 command practice was reflective of the same
 8 misunderstanding as that of PCs Ashby and Sanders, and
 9 there was no incentive for the author of that document
 10 to reach that conclusion.
 11 The only record of compliance checks we have
 12 contains an entry suggesting that a sergeant actually
 13 challenged the AFOs on Carriage Gates not just to stand
 14 at the gates, and we had the evidence of Inspector Rose
 15 this morning, which suggested that he expected AFOs to
 16 walk on patrols that were, on at least one
 17 interpretation, quite a bit further than those
 18 identified by the post instructions.
 19 Next, sixthly, it's at least arguable that systems
 20 for ensuring reading and observance of post notes
 21 weren't adequate. First, just 13 per cent of officers
 22 had logged into the ADAM system since the last version
 23 of post instructions had been produced, viewed
 24 from August 2016, and just 33 per cent since the
 25 previous version had been produced. There appears to

1 have been no effort to check logging in to the system
 2 other than in early August 2016 and there's no evidence
 3 of steps taken at any time to address the problem of
 4 officers not using ADAM.
 5 There was never any centrally-held record of
 6 compliance, despite Mr Aldworth's belief that there
 7 ought to be, and no record at all after Inspector Munns'
 8 records ran out in February 2016.
 9 Seventhly, there's evidence that post instructions,
 10 even if understood, were thought to be advisory only.
 11 That was the conclusion of MM1 document, and it's echoed
 12 to an extent in Inspector Rose's evidence since he
 13 regarded the post instructions as needing considerable
 14 latitude in interpretation.
 15 Eighthly, it can't be suggested that there was no
 16 means of improving the system. The MM1 document
 17 recorded improvements being introduced after the DPS
 18 review including more first and second line intrusive
 19 supervision and dip sampling.
 20 That leaves the question of causation, sir, if you
 21 accept there is an arguable case of failure of the
 22 systems, or systemic weaknesses in the security
 23 arrangements. The question of causation, we accept, is
 24 a difficult one. The issue whether AFOs stationed at
 25 Carriage Gates would have prevented Masood killing

1 PC Palmer is fraught with speculation, as we submitted
 2 before lunch today, in relation to the evidence and, as
 3 we've set out in paragraph 11(i) of our document.
 4 But we remind ourselves that for the present
 5 question about Article 2 engagement, all that is needed
 6 is that there is an arguable low-threshold case that
 7 a defect in systems lowered PC Palmer's chance of
 8 survival, a loose causal test. Our submission is that
 9 it's not fanciful to suppose that the presence of AFOs
 10 at Carriage Gates would have improved his chances of
 11 surviving that attack.
 12 Sir, you will hear more detailed submissions from
 13 others on the question of causation, and I shall respond
 14 to those as you wish, and as appropriate.
 15 A word or two finally on this topic in relation to
 16 the operational duty. I only need address this briefly,
 17 because, sir, if you consider that there is an arguable
 18 breach of the general duty, that's sufficient for
 19 Article 2 engagement. We don't say that there was
 20 an arguable breach of the operational duty for this
 21 reason: although officers at the gates were undoubtedly
 22 at a point of recognised vulnerability, we submit it is
 23 difficult to say that the demanding threshold of a real
 24 and immediate risk of death was met effectively at all
 25 times for those officers because of their location

1 standing at the gates to the Palace of Westminster,
2 bordering Parliament Square.

3 That's what I propose to say for the moment about
4 Article 2 engagement in relation to PC Palmer.

5 THE CHIEF CORONER: Yes.

6 MR HOUGH: Moving to unlawful killing conclusions, in our
7 submission a short form conclusion recording that each
8 deceased person was unlawfully killed should be returned
9 in each case. Other circumstances of death may be
10 important, but the simple fact remains that each person
11 was murdered in a terrorist atrocity. The public record
12 should state that fact, and I think everyone has agreed
13 upon that. There can be no doubt at all that each
14 person was murdered. On the bridge, Masood drove his
15 vehicle at pedestrians intentionally, as the
16 reconstruction expert confirmed yesterday, and he must
17 have intended to kill and maim as he did.

18 In New Palace Yard he attacked PC Palmer with
19 deliberate savagery and with force sufficient to cause
20 deep wounds and to bend the knife out of shape.

21 Dealing with determinations concerning the victims
22 on the bridge. For each of those who was struck by the
23 Hyundai on the bridge we propose that there should be
24 a narrative conclusion setting out in an informative way
25 the manner in which each person met his or her death.

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1 We have proposed a form of words for each one. I don't
2 propose to recite them now, but I simply observe for all
3 present that each one is drafted to include the
4 following details: What the person was doing and where
5 he or she was when struck. The fact that the Hyundai
6 was deliberately driven onto or along the pavement
7 towards him or her. The fact that this was part of
8 a terrorist attack. What physically happened to the
9 person as a result of the impact. What injuries he or
10 she suffered and, in simple terms, how they were
11 suffered. What medical care he or she received in
12 summary, both at the scene and, where appropriate, in
13 hospital. And when and where he or she actually died.

14 Mr Patterson, Mr Adamson and Mr Hill for the LAS
15 have suggested some modest changes to the form of those
16 determinations. We don't see any difficulty with any of
17 those, but if others do, no doubt they will make those
18 points orally.

19 THE CHIEF CORONER: So far as I can see, Mr Hough, I can see
20 no difficulty with them either.

21 MR HOUGH: What none of these determinations, however, can
22 record or convey, is a sense of the life and personality
23 of the person who died. The cold facts of death
24 recorded in a record of inquest and a register of deaths
25 can never, sadly, encapsulate an individual's character.

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1 That is why the pen portraits with which these Inquests
2 began were so important and why it was so encouraging to
3 see them reported fully in the media.

4 Determinations concerning PC Palmer. For PC Palmer
5 we have made our proposals in two parts. First, as with
6 other victims of this attack, there should be a passage
7 in the narrative conclusion setting out how he was
8 killed. We don't discern disagreement about the content
9 of that passage, as suggested in our document.

10 Secondly, if our submissions on Article 2 engagement
11 are accepted, there should be a further passage
12 recording, first of all, that authorised firearms
13 officers in New Palace Yard had not been close to
14 Carriage Gates; secondly, that this was because they had
15 understood their duty to involve a roving patrol around
16 New Palace Yard, and thirdly, that this was against the
17 tactical assessments and written instructions. That
18 passage should then go on to record your determination
19 as to whether, in fact, there were shortcomings in the
20 system of supervision and compliance, and any further
21 findings you make about shortcomings in security
22 arrangements at the Palace.

23 It should also record, we submit, your finding as
24 regards causation. We suggest that there is an inherent
25 and unavoidable uncertainty as to whether authorised

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1 firearms officers, if stationed at Carriage Gates, would
2 have prevented this terrible murder, but you will need
3 to hear and consider carefully the submissions that
4 a degree of certainty can attach to that question one
5 way or the other.

6 Sir, finally, may I say a few words about the
7 consideration of a possible Prevention of Future Deaths
8 Report. We've set out in our document in detail the
9 legal principles governing such reports, and I don't
10 propose to go through that section in detail now. You
11 will want to consider carefully your power to make such
12 a report having regard to the proper purposes of such
13 reports, as set out in our document. Mr Patterson in
14 particular has given detailed and careful thought to the
15 content of such a report and has made a number of
16 suggestions which you will need to consider.

17 But other interested persons are likely to have
18 views on the content of any such report, and it is
19 appropriate that other interested persons, in
20 particular, public authorities, may wish to make
21 responses, which it would be helpful for you to consider
22 before you decide on the content of report.

23 For that reason, we've proposed a process whereby
24 first of all interested persons have made submissions
25 about possible matters for inclusion in a report. If

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1 any additional time is required by an interested person
 2 to make positive proposals in that regard, they can no
 3 doubt ask you in their submissions and you will consider
 4 that and no doubt give reasonable time. After that,
 5 there should be a period, which we've suggested as
 6 being, I think, four weeks, for other interested
 7 persons, we would expect particularly public
 8 authorities, to have the opportunity to respond, saying
 9 whether a particular subject merits a comment in a PFD
 10 report and, if so, what sort of comment.

11 A decision can then be made whether to make a report
 12 and with what content. We all recognise, I think, that
 13 these decisions can involve difficult judgments, because
 14 since the attack there have been substantial changes in
 15 matters such as parliamentary security, protective
 16 security in the capital, and Security Service
 17 procedures. But, as we've submitted, the fact that the
 18 judgments are difficult should not lead to paralysis in
 19 the use of what is an important tool in the inquest
 20 process.

21 So, sir, those are our submissions on the various
 22 matters addressed in the documents. I hope that's
 23 helped to provide a framework for others.

24 THE CHIEF CORONER: Thank you very much indeed, Mr Hough.

25 MR PATTERSON: Sir, I don't know if you have a particular

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1 order in mind or whether you wanted to hear from the
 2 various interested parties simply one by one as to the
 3 various issues that particularly pertain to their
 4 position.

5 THE CHIEF CORONER: What I was going to suggest,

6 Mr Patterson, is we go in the sequence.

7 MR PATTERSON: Certainly.

8 THE CHIEF CORONER: Because I suspect that's probably going

9 to be the easiest thing for me, because that is the
 10 order in which I have read the documents, so if you
 11 don't mind starting the ball rolling.

12 MR PATTERSON: Certainly.

13 THE CHIEF CORONER: As I say, I have read your document and

14 it is extremely well written, very thorough, and as

15 I mentioned to Mr Hough, I am grateful to all of you for
 16 the work that has gone into these documents.

17 MR PATTERSON: I'm very grateful. I don't propose to simply
 18 read it through, but may I, sir, just take a few minutes
 19 to expand upon and highlight the key points we would
 20 invite you to make at this important stage as we draw
 21 towards the conclusion of the Inquests.

22 THE CHIEF CORONER: Yes.

23 Submissions on determinations to be made by the Coroner by

MR PATTERSON QC

25 MR PATTERSON: On behalf of the family that I represent,

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1 I would like to thank you, sir. The families would like
 2 to formally thank you and representing the legal team
 3 that I represent, I would like to thank you formally for
 4 the very thorough investigations that you have ensured
 5 took place. You and your team of counsel and all those
 6 that support and work with them have conducted
 7 incredibly thorough investigations into this horrific
 8 attack, and by calling and examining relevant and
 9 significant witnesses, the families have been able to
 10 understand a lot more about the circumstances in which
 11 their loved ones met their death.

12 THE CHIEF CORONER: Yes. Mr Patterson, I recall one of your
 13 submissions at one of the pre-Inquest reviews, which
 14 I shamelessly copied into my document that I set out,
 15 because it seemed to me that it was important that, in
 16 fact, this process is as thorough as it possibly can be,
 17 because there can be nothing worse, I suspect, than
 18 actually a loved one dying perhaps in a different
 19 country, away from you, not fully understanding what's
 20 happened and wanting to have a thorough examination,
 21 within the proper confines of an inquest process as to
 22 actually what has been undertaken.

23 Certainly I have been extremely well assisted by
 24 a very good team who have, I think, left no stone
 25 unturned.

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1 MR PATTERSON: We would certainly endorse those observations
 2 and we have found both Mr Hough and Mr Moss particularly
 3 helpful at all stages with any difficulties we have
 4 experienced or any queries that we have wanted to raise.

5 Sir, findings that each of the four loved ones was
 6 unlawfully killed are important. Each was murdered in
 7 a horrific act of terrorism carried out pursuant to
 8 a warped and hate-filled ideology, and so the finding
 9 that they were unlawfully killed is not of
 10 insignificance; it matters and it is important.

11 We endorse the suggestion of narrative conclusions.
 12 We have no objections to the amendments proposed by the
 13 London Ambulance Service, and we welcome those.

14 We also want to record our gratitude to the way in
 15 which all of the issues have been pursued and the way in
 16 which, sir, you have allowed us to pursue issues, and
 17 you have allowed a wide scope to your investigations,
 18 and we are grateful for that.

19 THE CHIEF CORONER: Can I just on that point, Mr Patterson,
 20 say it was tempting on occasions to ask people to
 21 truncate their questions or put them in a different way,
 22 but I was very happy to leave you to do it, I suspect
 23 other than a couple of situations where I did interrupt
 24 the question, because I was very conscious that, in
 25 fact, the witnesses who came wanted to provide answers

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1 to the questions that they were being confronted with.
 2 MR PATTERSON: Yes.
 3 THE CHIEF CORONER: Again, conscious that they wanted to
 4 provide as much help and assistance to those asking the
 5 questions, knowing actually it wasn't — they weren't
 6 asking for their own sake, they were asking very much
 7 for the benefit of others.

8 MR PATTERSON: Yes. And as you know, sir, each family in
 9 an unprecedented situation like this will have all sorts
 10 of concerns and questions, and you've allowed all of
 11 those to be explored. We are grateful for that and it
 12 has been a real comfort to the families to get answers.

13 It's trite but worth observing, sir, that for some
 14 bereaved persons they shy away from the detail because
 15 it can be too painful, but for many others it's the
 16 detail that helps them to understand and process and
 17 then in due course to move on, and in this Inquest,
 18 learning a lot of those details has been beneficial to
 19 many of the families that I represent.

20 Mr Hough accurately indicated that we do not advance
 21 any Article 2 arguments, and that is correct, sir.
 22 However, it will be apparent from the questioning, and
 23 from our document, that the families do nonetheless
 24 submit that there are some troubling areas of concern
 25 that have emerged from the evidence, and which do sadly

1 persist.
 2 We strongly urge you to make a report into
 3 circumstances of risk in order to protect the public.
 4 This is an important and integral part of the process.
 5 It's not an additional, optional afterthought, and it
 6 would be a terrible shame, we respectfully submit, sir,
 7 if there was a lost opportunity, not just for the people
 8 of this city, of London, but across the United Kingdom,
 9 if there were to be a lost opportunity not to use this
 10 Inquest to take steps to really help the public. That
 11 would be a terrible shame and we're confident, sir, that
 12 you would not allow that to happen.

13 We do invite you to ask the relevant agencies to
 14 really try, really try where possible to improve the
 15 protections needed by the public against this ongoing
 16 and terrible threat that we all face of continued
 17 terrorist attacks. We all know there will be another.
 18 We all know that as Chief Coroner, sir, you may well in
 19 the months ahead open your newspaper, like the rest of
 20 us, to see another attack in this city or in this
 21 country, and at every stage, squeezing the learning out
 22 of the evidence is of vital importance.

23 Parliament made it obligatory to have a report, as
 24 opposed to the previous approach of merely something
 25 that was discretionary, and Parliament made that change

1 for the very obvious and good reason that public
 2 protection is paramount, and we respectfully submit that
 3 it would be a fitting memorial to those who were killed
 4 if there were real improvements in public safety, not
 5 only for the Londoners, Aysha Frade and Leslie Rhodes,
 6 but also equally for those who come from overseas to our
 7 great city, to the tourists, Andreea Cristea and
 8 Kurt Cochran, who visited London and should have been
 9 properly protected.

10 We respectfully agree with what Mr Hough and Mr Moss
 11 say in their document at paragraph 22: we should not be
 12 immobilised through fear, you, sir, should not be
 13 paralysed through a sense of defeatism: we encourage
 14 optimism rather than defeatism, and we invite you to do
 15 everything that you can to improve procedures where they
 16 can be improved.

17 Already today in one of the documents we have seen
 18 arguments based upon complexity and, no doubt, sir, in
 19 the weeks ahead you will receive more arguments
 20 suggesting that there are no needs for improvement
 21 because of complexity, or that everything that could
 22 possibly be done by way of improvement has already been
 23 done. Already we've seen suggestions along those lines
 24 from MI5, that there's nothing more that is needed.
 25 Well, we respectfully invite you to be careful about

1 such arguments and, forgive me for using a cliché, there
 2 is always room for improvement, we would submit.

3 At page 5 onwards I've set out the recommendations
 4 we would invite you to consider. We have been careful
 5 as to what we have put forward. We haven't put forward
 6 everything that has occurred to us at any stage of these
 7 Inquests, but we have sought to be focused and practical
 8 and realistic and fair, recognising as we must that
 9 resources are not limitless and that there are some
 10 things that simply cannot be prevented.

11 However, in relation to MI5, we do think that there
 12 is room for improvement in terms of decision-making, and
 13 a key feature, sir, of the evidence of Witness L was
 14 that all-important decision: when do they investigate,
 15 when do they not? When do they stop investigating?
 16 When do they revisit somebody who they have stopped
 17 investigating? Greater structure can only assist, sir.
 18 Good record-keeping or documentation that focuses the
 19 mind of the decision-maker so that everything of
 20 relevance is identified and appropriate weight is given
 21 to everything of relevance and, sir, I'm sure you have
 22 the points I make, I don't need to repeat them, that
 23 I made in questioning of the witness, but is it really
 24 the case that not so much weight should be given to
 25 serious records of violence? Is it really the case that

1 not so much weight should be given to again and again
 2 and again associating with suspected terrorists? Those
 3 sorts of points, sir, that we made in questioning of the
 4 witness are points, we would submit, of real concern,
 5 and we would invite you to consider whether improvements
 6 can be made in connection with such decision-making.

7 At page 7, sir, and paragraph 25, we make
 8 a recommendation in relation to revisiting the decision
 9 to close an investigation where fresh evidence or
 10 intelligence emerges. Sir, this is of real concern to
 11 the Frade family. They were, quite frankly, bewildered
 12 by the failure to revisit Masood in the latter years
 13 when, again and again, he was meeting with ALM
 14 individuals and the point I sought to make in
 15 questioning of the witnesses as to the cumulative weight
 16 of the material over time is a point we would invite you
 17 to consider with real care, and whether there is scope
 18 for MI5 to improve their procedures in that regard.

19 At point 28, over on page 8, again, this is of
 20 concern to the Frade family in particular, there seems
 21 to be something of a black-and-white approach to
 22 evidence suggesting attack-planning on the one hand, and
 23 then evidence which doesn't suggest attack-planning but
 24 which is treated as somehow of limited significance on
 25 the grounds that it's simply evidence of extremism, and

1 we submit, sir, that that's a wrong approach to take,
 2 that it attaches far too little weight to the evidence
 3 of extremism, because evidence of extremism can, in
 4 fact, amount to a generalised belief in the desirability
 5 or, indeed, duty to use violence, and it goes a long way
 6 towards attack-planning. It may not be a specific,
 7 targeted victim, or a particularised target, but often
 8 that sort of material that we saw again and again in
 9 relation to Masood's background can show really
 10 significant evidence about a generalised belief or
 11 willingness to use violence, and that needs to be given
 12 greater weight, we would respectfully submit, when it
 13 comes to decision-making as to investigating or
 14 reopening a closed investigation.

15 So, sir, that's all I say about MI5. Dame Heather
 16 Hallett was presented with arguments that there was
 17 nothing more that needed to be done. She was not so
 18 persuaded. We urge you, sir, not to be so persuaded,
 19 and to probe carefully any submissions to the effect
 20 that everything that is needed to be done has been done.

21 Barriers and protective security, sir. The pen
 22 portrait that you heard in relation to Aysha Frade at
 23 the beginning of this process was a very moving pen
 24 portrait, and you will recall, sir, Mr Frade speaking
 25 about his wife, and can I remind you of one point that

1 he made. It was at paragraph 31 of his pen portrait,
 2 and it's perhaps worth repeating the very words that he
 3 used. Speaking of his wife he said:

4 "She worried about the new location of her school's
 5 campus, moments away from Parliament. She asked me
 6 several times 'what if anything were to happen in
 7 Westminster?' My words were always of encouragement and
 8 positivity, never once entertaining how an incident
 9 could horrifically become reality, especially a place
 10 I imagined so highly clad with security, CCTV and
 11 police."

12 Pausing there, sir, those words show that Mr Frade
 13 was repeatedly giving his wife words of reassurance as
 14 to security and safety in that part of the city.

15 When we heard the evidence of Chief Superintendent
 16 Aldworth and of Ms Hayward, however, we would submit
 17 grounds for concern did arise as to protective security
 18 in the crowded places and open places of this city, and
 19 we do ask you to look at that topic, sir. It might be
 20 thought that that confidence that was being shown by
 21 Mr Frade was sadly misplaced, given what has since
 22 emerged in relation to security procedures to protect
 23 the public, and we've made submissions about this at
 24 paragraph 34, and to this day it seems that there are
 25 prominent and busy places where the public remains

1 vulnerable to attack.

2 And I repeat what I said earlier: there will be
 3 further attacks, and, sir, this is a good opportunity
 4 for improvements in this regard in relation to crowded
 5 places and the interpretation of the definition and the
 6 relevant organisations working well together to make
 7 sure that there are no more gaps of the type that
 8 Ms Hayward referred to.

9 We are pleased to see that Transport for London in
 10 writing have indicated that they are committed to
 11 learning lessons and that they will not shy away from
 12 any report, and the families I represent welcome those
 13 words and that refreshing approach from one of the IPs,
 14 at least. Again, if you are presented with arguments as
 15 to complexity, we invite you not to be dissuaded from
 16 making a recommendation.

17 Sir, the rest of the topics are set out in writing.
 18 I probably don't need to expand upon them other than
 19 this: in relation to vehicle rentals, in addition to
 20 what we've set out in writing, you've heard today from
 21 Detective Superintendent Crossley about the very real
 22 problem that that presents, given the repeated nature of
 23 terrorist attackers using rented vehicles. Again,
 24 another area where this court could encourage the
 25 Government to try again. There is nothing to lose and

1 everything to gain, we respectfully submit.
 2 In relation to radicalisation, you may be met with
 3 objections or suggestions that a lot is being done
 4 already, but if that is the case, and it may well be the
 5 case that there have been efforts to date, they appear
 6 to be failing and this court should at least try, the
 7 families ask you at the very least, please, to try to
 8 see if anything more can be done to address the problems
 9 of the internet and radicalisation.
 10 And likewise in relation to end-to-end encryption,
 11 again, you may be presented with arguments to the effect
 12 that it's too complicated or that it's a hopeless task.
 13 We invite you not simply to give up. The attacks in
 14 London show the effects of radicalisation all too
 15 painfully, and the hateful ideology that radicalisation
 16 leads to. We heard today from Detective Superintendent
 17 Crossley as to how the investigators are on the back
 18 foot, the terrorists are on the front foot, and we
 19 invite you, sir, to at least try, to show ambition
 20 rather than defeatism.
 21 THE CHIEF CORONER: Just on that topic, Mr Patterson.
 22 MR PATTERSON: Yes.
 23 THE CHIEF CORONER: Sitting as I do as a judge at this
 24 court, and having dealt with a number of terrorism
 25 cases, it's quite illuminating when the phone is seized

1 with the messages still kept on the phone as to quite
 2 how graphic some of them can be and quite what they say.
 3 MR PATTERSON: Yes.
 4 THE CHIEF CORONER: But, as we've heard in the evidence,
 5 once the deletion has happened, that's it.
 6 MR PATTERSON: That's right. And unlike other areas of
 7 mobile communications, text messages, they can be
 8 recovered by investigators and we've all seen telephone
 9 schedules where significant messages deleted by
 10 defendants have been recovered and they're very
 11 incriminating.
 12 With terrorism, the WhatsApp messages, once
 13 deleted -- and they're usually deleted the moment
 14 they're sent and received -- the investigators cannot
 15 recover them.
 16 THE CHIEF CORONER: WhatsApp is only one of a multitude of
 17 similar --
 18 MR PATTERSON: Surespot, all manner of them, and again and
 19 again in terrorism cases, those are the apps they are
 20 choosing to use, and I dare say every judge in this
 21 building has presided over a terrorist trial where that
 22 is what is being used by the terrorists and yes, sir,
 23 you will be presented with civil liberties arguments.
 24 Nobody is stifling Article 10 rights. Nobody is saying
 25 that the public cannot communicate with each other.

1 There are all manner of mechanisms for proper exchanges
 2 of messages. But when terrorism is getting the upper
 3 hand, we invite you, sir, to at least try to help the
 4 public.
 5 Sir, unless there is anything else I can assist you
 6 with?
 7 THE CHIEF CORONER: No, thank you very much indeed,
 8 Mr Patterson.
 9 Mr Adamson.
 10 Submissions on determinations to be made by the Coroner by
 11 MR ADAMSON
 12 MR ADAMSON: Sir, yes. I too am indebted to Mr Hough and
 13 Mr Moss for their written submissions setting out their
 14 position in relation to both of my clients.
 15 As you will understand, the majority of my
 16 submissions will be directed towards the issues which
 17 pertain to PC Palmer --
 18 THE CHIEF CORONER: Yes.
 19 MR ADAMSON: -- and the Inquest into his death, but
 20 I'm grateful, sir, for your indication that in relation
 21 to Kurt Cochran, that you see no reason why the wording
 22 that Mr Patterson and I discussed last night could not
 23 be included within a potential conclusion in relation to
 24 the inquisition in respect of his death.
 25 Sir, in relation to PC Palmer, you will have seen my

1 written submissions and, like Mr Patterson and Mr Hough,
 2 I don't propose to regurgitate them for your benefit
 3 this afternoon. The law and the discussion of it
 4 obviously supplements the discussion that Mr Hough
 5 provides in his note, and I don't propose to go through
 6 the various passages stating the principles which will
 7 be all too familiar to you.
 8 We recognise that in relation to the general duty,
 9 an act of individual negligence will be insufficient to
 10 engage Article 2 for these purposes. Something more
 11 must be shown. Something more than a concatenation of
 12 unfortunate events.
 13 The evidence must show that there was, in short,
 14 a systemic failure and, in our submission, the evidence
 15 as shown in relation to the security arrangements at
 16 New Palace Yard, that the system for protecting unarmed
 17 officers at the gates of the Palace of Westminster had
 18 failed and had been failing for years.
 19 This is not an instance of an individual act of
 20 negligence. The problems were, in our submission,
 21 obvious and ought to have been identified by those in
 22 authority at the Palace of Westminster.
 23 As Mr Hough has identified, the gates were a place
 24 which was recognised as a particular weakness. As
 25 I state in my note, that I cannot improve on

1 Commander Usher’s own description of them as a clearly
 2 and identifiable and exploitable weakness.
 3 Given that they represented such a weakness, the
 4 importance of the provision of armed support at the
 5 gates for unarmed officers cannot, we would submit, be
 6 understated. Indeed, the parliamentary estate security
 7 review in December 2013 noted that an armed police
 8 response was vital and must be effective and timely.
 9 We know that it was neither effective nor timely on
 10 22 March, and so this Inquest, in my submission, must
 11 consider why that was so.
 12 The balance of the evidence, we submit, demonstrates
 13 strongly and clearly that for the majority of the time,
 14 there was not effective support at Carriage Gates at the
 15 Palace of Westminster. The evidence has shown that in
 16 the 108 minutes that preceded the attack, authorised
 17 firearms officers were within the vicinity of the gates
 18 for a maximum period of 14 minutes. That, as I’ve noted
 19 in my submission, is a total of 13 per cent of that
 20 time. As we say in our note, that was, as the evidence
 21 again has shown, reflective of the day-to-day
 22 arrangements at New Palace Yard. And, in my submission,
 23 that evidence, or that conclusion, that there was
 24 routine absence from the gates of authorised firearms
 25 officers, comes from a wealth of sources: PCs Ashby and

1 Sanders have given the clearest of possible accounts.
 2 PCs Ross and Glaze corroborate their accounts. Today,
 3 PC Carlisle gave further support for the proposition
 4 that AFOs would routinely not be stationed at the gates,
 5 because he described them being in the colonnade area,
 6 the members’ entrance, and, of course, up towards the
 7 gates.
 8 So in the circumstances, in my submission, it
 9 doesn’t take much for this court to conclude that, as
 10 a matter of routine, AFOs were absent. Why were they
 11 absent? Well, they were absent, in my submission,
 12 because that was the nature of their instructions. The
 13 evidence, in my submission, is clear: PCs Ashby and
 14 Sanders regarded the scope of their patrol as
 15 encompassing the entirety of New Palace Yard. In my
 16 submission, they are supported in that by the evidence
 17 of the unarmed officers.
 18 They have been consistent in relation to those
 19 matters throughout. Their practice is consistent with
 20 what can be observed in the CCTV footage of PC Gerard’s
 21 movements. What evidence has this court heard from
 22 those that actually do the job of providing protection
 23 in New Palace Yard, be it unarmed or armed, that the
 24 system was actually working in the sense that officers
 25 were in close proximity to the gates as a matter of

1 routine? The answer to that is, in my submission, this
 2 court has heard no such evidence. The reason for that
 3 is because that, in my submission, is not what was
 4 happening.
 5 We’ve heard evidence relating to the various
 6 materials which authorised firearms officers had access
 7 to, and which were understood by some or all of them,
 8 depending on which document one is looking at, which set
 9 out the scope of their responsibilities.
 10 We know from the evidence that we heard only today
 11 that those materials were inconsistent. The
 12 post instructions were inconsistent with the plan, the
 13 blue shaded area. The plan with the blue shaded area
 14 was inconsistent with the document which was provided
 15 in January 2017.
 16 An inspector responsible for officers in this area
 17 candidly acknowledged that the scope of the patrol that
 18 he envisaged the post instructions provided for was
 19 greater in scope than the wording of the
 20 post instruction itself.
 21 So there is at best, we would submit, complete
 22 confusion as to what the arrangements were. Officers
 23 doing the job knew what they thought they were required
 24 to do, and this court has heard evidence that up to 100
 25 of them did it in exactly the same way as PCs Ashby and

1 Sanders.
 2 So in the circumstances, in my submission, the court
 3 can be completely satisfied that there was a breakdown
 4 between what was happening on the ground and what those
 5 in command thought was happening on the ground.
 6 That, you might think, is unsurprising when the
 7 principal means by which post instructions were provided
 8 to officers was the ADAM system which was, so far as the
 9 information that this Inquest has heard, utilised in the
 10 nine months after the most recent post instruction by
 11 only 13 per cent of AFOs. We submit that is
 12 a lamentable statistic, and the efforts to portray it as
 13 being utilised by upwards of 80 per cent of officers
 14 was, in my submission, a clear attempt to provide
 15 utilisation statistics in the most favourable light, and
 16 in a manner which did not reflect the reality.
 17 There is evidence of the existence of a binder
 18 containing post instructions in the base room. There is
 19 no evidence that it was ever utilised. There are
 20 suggestions that there were oral briefings given to
 21 officers. There is no evidence to contradict, in my
 22 submission, what PCs Ashby and Sanders have said
 23 represented the scope of their duties. There is no
 24 evidence, we submit, to credibly contradict the evidence
 25 that we’ve heard from all those with responsibility,

1 unarmed and armed, officers within the New Palace Yard
 2 as to what was in fact happening.
 3 And so one is left, we submit, with a series of
 4 lengthy failures in the security arrangements at
 5 New Palace Yard. There was no effective system for
 6 ensuring the content of post instructions being
 7 communicated to firearms officers. There was no
 8 effective system for ensuring that they were aware of
 9 or, indeed, complying with the content of
 10 post instructions. Routine non-compliance with those
 11 post instructions was not identified by supervisors.
 12 The post instructions did not clearly establish, in and
 13 of themselves, that officers should remain within a very
 14 small radius from the gates themselves. The fact that
 15 they were not clear is underscored, we submit, by the
 16 evidence that we heard today from Inspector Rose.
 17 We say further that having regard to the level of
 18 threat posed to those in the yard that there were
 19 opportunities to take other steps which would have
 20 provided protection. They included ensuring that the
 21 gates were shut, and they included increasing the number
 22 of armed officers.
 23 To respond to a point which has been made in the
 24 submissions on behalf of the Metropolitan Police, it's
 25 not suggested that the yard should have been flooded

1 with firearms officers. We simply observe that
 2 requiring two officers to patrol this large area with
 3 vague instructions was destined to ensure that for
 4 substantial periods, officers would be unprotected at
 5 the gates.
 6 The unarmed officers were undoubtedly doing
 7 dangerous work. The need to provide them with
 8 protection is, we submit, obvious. It's suggested in
 9 the submissions on the part of the Metropolitan Police
 10 that there is a dichotomy between the advantages of
 11 a static post and the advantages of unpredictability
 12 created by a roving post.
 13 In my submission, it's a complete red herring.
 14 Commander Usher acknowledges that officers should have
 15 been at the gates. They were not there because the
 16 system wasn't functioning.
 17 The Metropolitan Police, at paragraph 52 of its
 18 submissions, acknowledges that there were deficiencies.
 19 They submit that there is some evidence that "short
 20 patrol" was interpreted differently by individual
 21 officers. There is plentiful evidence, in my
 22 submission, that the scope of the patrol was regarded by
 23 all who actually provided security services within the
 24 yard as comprising the totality of the yard.
 25 The Metropolitan Police acknowledge PC Ashby and

1 Sanders' practice of not remaining in close proximity to
 2 Carriage Gates was reflective of wider practice. Now,
 3 quite how wide the Metropolitan Police acknowledge the
 4 practice spans is unclear because, in reality, the
 5 Metropolitan Police has never sought to get to the
 6 bottom of that issue.
 7 What we know is that the evidence that this court
 8 has heard is that PCs Ashby and Sanders' practice of not
 9 remaining in close proximity to Carriage Gates was
 10 reflective of practice generally.
 11 The Metropolitan Police acknowledged that compliance
 12 with post notes was not at all times recorded in the
 13 manner envisaged by the post instructions. Well, in my
 14 submission, the evidence shows that for over a year
 15 prior to this incident there were no records. The
 16 records that we have seen do not provide any confidence
 17 that the post instructions were being implemented in
 18 practice, and the fact that there were no records and
 19 the fact that the records that we have do not
 20 demonstrate compliance with the post instructions in
 21 practice, again, in my submission, underscores the
 22 points that we make in relation to the inadequacy of the
 23 supervisory arrangements.
 24 Finally, the Metropolitan Police say there is
 25 evidence that only a comparatively small proportion of

1 officers had accessed ADAM after December 2015, they
 2 posit probably because access was only required when
 3 post instructions were infrequently changed.
 4 In my submission, point one, that is speculation on
 5 their part; point two, 13 per cent of AFOs had accessed
 6 that system in the period after December 2015 for which
 7 we have data. In my submission, that is indicative of
 8 a serious failing in the system of ensuring that the
 9 post instructions were, in fact, digested and
 10 implemented by officers.
 11 When one looks at those admissions in and of
 12 themselves, in my submission one can be satisfied that
 13 there were systemic failings in this case, because on
 14 close consideration they illustrate exactly the points
 15 that we have been making. They illustrate exactly the
 16 points which I raised in my written submissions on
 17 12 September 2018.
 18 So far as the operational duty is concerned, sir,
 19 you have my written submissions in relation to that and
 20 I don't propose to amplify them orally. The reality is
 21 this is a location where there was a threat which was
 22 regarded as highly likely, that is to say a highly
 23 likely terrorist threat at this location, and in my
 24 submission, these officers at this location were
 25 particularly vulnerable.

1 I am not saying that all officers who patrol on the
 2 streets of London in circumstances where the national
 3 threat is similar, if an incident occurred, that they
 4 could be said to be subject to a real and immediate
 5 threat in the Osman sense, but where you have
 6 a particular location which is particularly attractive
 7 to a terrorist, in my submission, then in those
 8 circumstances, such a duty can arise.

9 So far as causation is concerned, sir, the starting
 10 point, and indeed, in my submission, the most telling
 11 point, is that the reason why officers are expected to
 12 be in close proximity to the gates is because it is from
 13 there that they can provide the protection that unarmed
 14 officers require. And so it is odd, in my submission,
 15 to assert against that background, against the rationale
 16 for placing officers in that location, to suggest that
 17 it wouldn't have made a difference. If it wouldn't have
 18 made a difference, why have them there at all? You have
 19 them there because they can provide the support that
 20 officers require.

21 Secondly, to address what one might call the
 22 speculation point. Well, it's right that considering
 23 whether or not it would have made a difference does
 24 involve a degree of speculation. That is the daily diet
 25 of courts up and down the land.

1 What we know is that when PCs Ashby and Sanders
 2 heard the bang, their response was to move very slowly.
 3 That's not a criticism. This is not a situation where
 4 they would hear the bang and then run to the scene; they
 5 took time to assess. I invite you, sir, to reconsider
 6 the AV footage for New Palace Yard, in particular, AV
 7 New Palace Yard compilation 2. Consider how the
 8 officers moved. I suggest that when one looks at how
 9 far they moved in the period after the collision, they
 10 are moving slowly, they do not travel a great deal of
 11 distance.

12 Is there any reason, in my submission, to think that
 13 the same noise would have resulted in a different
 14 response had they been where they ought to have been?
 15 In my submission, no. They still would have moved
 16 slowly. But they would have been in a different
 17 location. They would have had a different perspective.
 18 They would have been able to hear things and see things
 19 from the area of the gates of New Palace Yard that they
 20 simply would not be able to do from the colonnade area.

21 The suggestion that with that superior location,
 22 that additional information, that it would not have made
 23 a difference, in my submission, is simply untenable, and
 24 it comes back to my original point: you have them at the
 25 gates for a reason. This is not, in my submission,

1 fanciful analysis. The MM1 contains the observations of
 2 two individuals which acknowledge the possibility,
 3 arguably the probability, that it would have made
 4 a difference:

5 "I support the assertion that the loss of PC Palmer
 6 could not necessarily have been avoided had they fully
 7 complied with the post notes."

8 "Could not necessarily have been avoided."

9 Set against that, the Metropolitan Police submit
 10 four matters: they submit that:

11 "... tighter supervision of the downloading or
 12 reading of post instructions, or [the] delivery by way
 13 of oral reminders, ... would not necessarily have meant
 14 that PCs Ashby and Sanders would have complied."

15 So what they're actually saying is: if we'd been
 16 clearer about what they were supposed to do, they would
 17 just have ignored it.

18 THE CHIEF CORONER: This is paragraph 55?

19 MR ADAMSON: Paragraph 55. It is a remarkable submission,
 20 we submit. It is a submission to the effect that
 21 PCs Ashby and Sanders would have deliberately failed to
 22 comply with a direct order. That's their first
 23 submission.

24 The second submission is: well, they might not have
 25 been at the gates. And their argument is: well, they

1 could have been 20 to 25 yards round towards the
 2 Cromwell Green search area. Well, how does that help
 3 them? Because let us assume they were at the extreme
 4 end of that range, let's assume they were 25 yards away.
 5 The bang occurs. They respond, they start moving back
 6 towards the gates. They would be, in my submission, in
 7 a very good position to assess the risk and to take
 8 action.

9 I've dealt with the point in relation to moving
 10 towards the noise. As I say, the footage shows the
 11 officers moving slowly.

12 Finally it's suggested, paragraph 61, it's:

13 "... highly unlikely that they would have been able
 14 to shoot Masood even if they remained, or returned to,
 15 Carriage Gates. It is not clear that they would either
 16 have been in a physical position to deal with Masood
 17 when he came through [the gates], or able to neutralise
 18 the threat he posed by shooting him."

19 I say again, if that is right, why have them there
 20 at all? If that is right, the gates should never have
 21 been open, because if that is right, it is an
 22 acknowledgment that the arrangements were truly
 23 hopeless.

24 In my submission, the causation test set out in
 25 Van Colle is cleared easily: there is sufficient

1 evidence upon which you could be satisfied that the
2 failings did contribute to the death. In my submission,
3 it is very clear that you can be satisfied that as
4 a result of those failings, the consequences for
5 PC Palmer was that there was a substantial loss of the
6 opportunity for him to be saved.

7 In terms of how I submit that that ought to be
8 addressed, you've seen in paragraph 38 of my submission
9 the systemic failures that I've identified. In my
10 submission, wording of that sort can, and indeed should,
11 be developed into the narrative aspect of your
12 conclusion.

13 As to Mr Hough's submissions that any conclusion
14 should be short, in my submission, it's clear on the
15 authorities that an inquest and its conclusion must get
16 to the heart of the issues which have been considered in
17 the course of the hearing, and the failings which
18 I identify in paragraph 39 -- I apologise, not 38 -- in
19 my submission are those issues. Anything less, in my
20 submission, runs the risk of being bland and anodyne,
21 and for the reasons set out in Cash, in my submission,
22 that would not be a fitting conclusion to this process.

23 Sir, unless I can be of further assistance, those
24 are my submissions on those matters.

25 So far as the question of Prevention of Future

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1 Deaths Reports --

2 THE CHIEF CORONER: Yes.

3 MR ADAMSON: -- at this stage, in relation to PC Palmer
4 I'm not in a position to produce a document in relation
5 to that --

6 THE CHIEF CORONER: No.

7 MR ADAMSON: -- so I would welcome the opportunity for
8 a little time to formulate my submissions in relation to
9 that.

10 THE CHIEF CORONER: What I'm likely to say in relation to
11 that, Mr Adamson, I'm conscious that a lot of work has
12 gone into these submissions in respect of these points,
13 and I'm likely to make provision for some further time
14 for those to be put in, and then for responses to follow
15 thereafter, as Mr Hough suggested in his submissions,
16 but I suspect the period of time I'm likely to set will
17 be comparatively short --

18 MR ADAMSON: I understand.

19 THE CHIEF CORONER: -- because I'm conscious that one needs
20 to address them and see which ones I should deal with.

21 MR ADAMSON: Of course. One needs to address them and
22 address them promptly whilst matters remain fresh in the
23 mind.

24 Can I just say I'm also indebted to my learned
25 friend Mr Patterson. He gave me the opportunity to

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1 consider his submissions last night. Can I say that my
2 instructions are that in relation to his document
3 paragraphs 20, 22, 25, 28, 30, 32, 35, 41, 46 and 61 are
4 recommendations that we associate ourselves with.

5 That is not to say in relation to other proposals
6 that he make that we actively oppose them, we don't, but
7 we've selected only those which are particularly
8 relevant to those individuals for whom we act.

9 THE CHIEF CORONER: Thank you.

10 Ms Stevens.

11 Submissions on determinations to be made by the Coroner by
12 MS STEVENS

13 MS STEVENS: Sir, yes. We're conscious of the fact that, of
14 course, you not only have our written submissions, you
15 also have the written submissions of my learned friend
16 Mr Adamson --

17 THE CHIEF CORONER: Yes.

18 MS STEVENS: -- combined with the oral submissions that have
19 just been advanced. Can we at the outset endorse
20 everything that has been said by my learned friend
21 Mr Adamson. We won't seek to repeat the points, but
22 they are strong points, in our submission, and we agree
23 with all of them.

24 THE CHIEF CORONER: Thank you.

25 MS STEVENS: Can we, therefore, focus our oral submissions

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1 on responding to the matters raised by the Metropolitan
2 Police Service.

3 THE CHIEF CORONER: Yes.

4 MS STEVENS: Of course, because of the fact that we received
5 counsel to the Inquest's submissions at 10 o'clock
6 yesterday, hopefully we've covered all relevant matters
7 in our written submissions, and therefore, dealing with
8 the Metropolitan Police Service response, the family's
9 position in reality can be put very simply.

10 Police Constable Palmer, an unarmed officer, should
11 not have been stabbed to death inside the perimeters of
12 the Palace of Westminster on 22 March of last year,
13 without any adequate firearms protection.

14 By that date, the senior leadership team of the
15 Metropolitan Police Service was fully aware that the
16 Palace of Westminster would be high on the list of
17 terrorist targets. Further, that terrorists would be
18 armed, and if a further piece of the jigsaw was
19 required, it should have been abundantly clear that such
20 armed terrorists would be intent on causing the maximum
21 amount of death and carnage.

22 It was clear by 22 March last year that police
23 officers were a particular target to such dangerous
24 terrorists. Therefore, in the family's submission,
25 there was sufficient information to assess the risk. It

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1 is simply not accepted, as suggested by the Metropolitan
2 Police Service at paragraph 17(b) of their written
3 submissions, that an assessment of risk was hindered by
4 unpredictability or complexity.

5 The assessment of risk required in this case to
6 provide adequate protection to Police Constable Palmer
7 in the event of an armed terrorist attack at the
8 Palace of Westminster was not unduly complex, nor was it
9 one that the senior leadership team within the
10 Metropolitan Police Service could not have foreseen.
11 Therefore it's equally right to make clear on behalf of
12 the family of Police Constable Palmer that they do not
13 accept, and in fact, strongly disagree, with the
14 evidence that was given by Commander Usher on Day 10 at
15 page 175 of the transcript.

16 What he said was that an attack of a police officer
17 by a terrorist armed with two knives was only highly
18 predictable with the benefit of hindsight. The family
19 strongly disagrees with his contention on behalf of the
20 senior leadership team of the Metropolitan Police
21 Service that the attack on 22 March 2017 changed the way
22 security is viewed at Westminster. He said this:

23 "[It] changed the way security is viewed at
24 Westminster, and the way we do it ... [and the] reason
25 it ... changed is because one of the [experimental]

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1 things we take into account is the death of Keith."

2 We submit that it did not and should not have taken
3 Police Constable Palmer to die for the security failures
4 within the Palace of Westminster and New Palace Yard in
5 particular, to become clear. Police Constable Palmer's
6 death to that extent has tragically been entirely in
7 vain.

8 Those security failures should have been known
9 by March 2017 when you look at the plethora of
10 information that was available.

11 The Metropolitan Police Service in their written
12 submissions do not even accept that Article 2 is
13 engaged. That's clear from paragraph 10 of their
14 written submissions. In doing so, the Metropolitan
15 Police Service does not accept any systemic failings in
16 regard to the security systems. That is set out at
17 paragraph 10(1). The family finds that position to be
18 quite extraordinary given the evidence that has been
19 provided by the witnesses during this Inquest. The lack
20 of acceptance and responsibility on the part of the
21 senior leadership team of the Metropolitan Police
22 Service, even at this late stage, is highly distressing.

23 The family submit that it is self-evident that there
24 are clear, systemic security failings. We've set them
25 out in writing, and really they can be very simply put.

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1 If one leaves to one side the important detail that, of
2 course, sir, we know you will consider, it really boils
3 down in terms of dealing with the risk to two options.
4 Either, number one, you arm each police constable who is
5 placed at Carriage Gates and who is given the
6 responsibility of protecting that location and the
7 people within the Palace of Westminster, or, if that's
8 not deemed appropriate, the second option is you have
9 a security system whereby there are a sufficient number
10 of authorised firearms officers in New Palace Yard such
11 that there would have been a firearms officer at
12 Carriage Gates protecting the unarmed officers.

13 The second option should have ensured that firearms
14 officers were, indeed, tethered to Carriage Gates at all
15 times in order to protect the unarmed officers.
16 Therefore, it is not, in our submission, as the
17 Metropolitan Police Service have sought to suggest at
18 paragraph 17(b) of their written submissions, that this
19 is a case where there were difficult operational
20 choices. The operational choices were simple.

21 Further, this is not a case where the choices could
22 fairly be categorised as unreasonable ones, and that's
23 a standard that's referred to, sir, at paragraph 17(c)
24 of their written submissions.

25 Equally, we submit that security requirements cannot

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1 sensibly or reasonably be categorised as amounting to
2 an unduly burdensome obligation, and that's the
3 terminology, again, which is picked up in that
4 paragraph, 17(c).

5 It's not a question of unreasonable or unduly
6 burdensome obligations when it comes to the security
7 system that should have been in place on the day that
8 Police Constable Palmer was murdered. Adequate security
9 systems were entirely within the power of the
10 Metropolitan Police Service.

11 We too find it extraordinary that there has been
12 a suggestion on the part of the Metropolitan Police
13 Service that the family of Police Constable Palmer is
14 suggesting that what should have happened in March of
15 last year is that there should have been a security
16 system where New Palace Yard was flooded with authorised
17 firearms officers.

18 Adequate protection of Police Constable Palmer was
19 entirely possible. Adequate measures are now in place
20 and we have been permitted to hear some evidence about
21 the current position in relation to firearms officers
22 within New Palace Yard and, indeed, the current position
23 at Carriage Gates.

24 That system reveals that it is entirely possible
25 and, indeed, straightforward, to have a proportionate

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1 and reasonable security system in place to ensure that
2 police officers are given the protection to which they
3 are entitled .

4 Can we deal with the further suggestion of the
5 Metropolitan Police Service in terms of the way in which
6 the written submissions have been drafted, and
7 I'm moving now to paragraph 10(1).

8 The family does not accept that it is fair to
9 suggest that the security failures and the systemic
10 breaches in this case can be described as shortcomings
11 contributed to in relation to Police Constable Ashby and
12 Sanders' failures . In our submission, Police Constable
13 Ashby and Police Constable Sanders were not responsible
14 for the failure to implement either one of the two
15 options that we have just advanced.

16 In terms of a fair approach, reflecting on the
17 evidence that has been given, this is not a case of
18 individual failures on the part of police constables on
19 the ground.

20 The senior leadership team within the Metropolitan
21 Police Service, in our submission, should accept
22 responsibility for the systemic breaches. It was sheer
23 chance that Police Constable Ashby and
24 Police Constable Sanders were on duty that day. It
25 could have been any one of a number of authorised

1 firearms officers .

2 In fact , it moves on, in our submission, because
3 Inspector Rose today gave very fair and frank evidence,
4 and he told you, sir , that the system that was in place
5 in March last year was one where he would have told
6 an authorised firearms officer who lingered for too long
7 at Carriage Gates to move on. Therefore, the system
8 that was operating in practice was completely at odds
9 with the post note. Firearms officers would have been
10 positively instructed not to remain tethered to Carriage
11 Gates at all times.

12 The reason for the difference between the post note
13 and the reality of the practice in our submission is
14 clear, and again, the family is grateful to Inspector
15 Rose for dealing so clearly with this issue. The reason
16 why he would have tasked an authorised firearms officer
17 to move away from Carriage Gates, so move away from the
18 unarmed officers standing there, is because he was
19 conscious of the limited number of authorised firearms
20 officers who were available to cover all of the
21 vulnerable locations within New Palace Yard.

22 In our submission, it would not have been
23 an unreasonable or an unduly burdensome requirement,
24 given what was known about the vulnerability of Carriage
25 Gates and the vulnerability of unarmed officers who were

1 tasked to work there to have increased the numbers of
2 authorised firearms officers within New Palace Yard so
3 that there was a security system that was fit for
4 purpose where there would have been authorised firearms
5 officers tethered to the gate, and authorised firearms
6 officers who could deal with the other vulnerable
7 locations .

8 Can we move on, please, to respond to the
9 Metropolitan Police Service submissions as set out in
10 paragraph 8 of their document. Hopefully we have now
11 made plain why it is that we do not accept that this is
12 a question of a failure of supervision, or a failure in
13 understanding. Rather, this is a question of security
14 systems developing since 2015 because of the failures in
15 numbers and the difficult task that authorised firearms
16 officers face .

17 It's suggested that the evidence overwhelmingly
18 establishes that even if authorised firearms officers
19 had been in close proximity to Carriage Gates, they
20 would have been drawn away to what is described as
21 an explosive noise in Bridge Street which they could not
22 have reasonably ignored.

23 Could we make five points, please, when dealing with
24 this suggestion? In our submission, the evidence is far
25 from overwhelming and in fact points in the opposite

1 direction . First of all , the majority of witnesses do
2 not describe the loud noise as being one that sounded
3 like an explosion, and we were unable to deal with this
4 point during the questioning of Commander Usher, but the
5 evidence has now been summarised at appendix 2 to our
6 written submissions, so hopefully you will have there
7 a fair and accurate summary of what all the relevant
8 witnesses say in relation to that noise.

9 In our submission, when that is looked at, it can be
10 seen that actually a large number of them do not at all
11 regard the sound as being an explosion.

12 Second of all , in our submission, it's highly
13 important to reflect on what the authorised firearms
14 officers would have been aware of if they had been at
15 Carriage Gates, and therefore, in our submission, the
16 evidence of Police Constables Ashby and Sanders when
17 they were asked the hypothetical question as to what
18 they should do should be given little , if no, weight.
19 The reason being, of course, Police Constable Ashby and
20 Police Constable Sanders were not at Carriage Gates.
21 Therefore, they would have had a very different
22 perception of what was occurring.

23 In our submission, what is relevant, rather than
24 looking at what they said, considering they have no
25 knowledge of the relevant factors, is actually to look

1 at what those witnesses said who were at Carriage Gates,
 2 and we would ask you to take into account the written
 3 evidence of Police Constable Marsh, even though he
 4 hasn't been called to give evidence, because when one
 5 looks at the evidence of those officers who were
 6 actually there at the time of this loud noise, the
 7 position is very different, because they, of course,
 8 have a different view. Their view is that they can see
 9 the car, they can see the railings, they can see the
 10 perimeter, and of course, they're able to see through
 11 the railings, and therefore we had the important
 12 evidence of Police Constable Carlisle this morning of
 13 the factors that he was aware of.

14 The third point in our submission is a highly
 15 pertinent one when considering this issue of causation.
 16 Not a single witness in their written statements says
 17 that at the time they had a concern about the perimeter
 18 wall. Nobody says that they had a concern that the
 19 perimeter wall had been breached. Therefore, although
 20 that was something that was advanced and put to
 21 witnesses during questioning, in our submission, the
 22 best and most reliable evidence comes from the
 23 statements that they made, rather than hypothetical
 24 suggestions.

25 The fourth point is this, and it flows from the

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1 evidence of Police Constable Carlisle this morning. He
 2 was asked by my learned friend Mr Keith about what
 3 somebody would do at Carriage Gates in the circumstances
 4 that he was aware of. Police Constable Carlisle is the
 5 best placed witness to answer that question because, of
 6 course, he was there at the time of the car colliding
 7 into the perimeter.

8 He did not say that his duty and responsibility
 9 would be to go off in the direction of the sound. Quite
 10 the opposite: he gave three different things that he
 11 would do. First of all, he would ask for CCTV cameras
 12 to focus on that area. We know that's exactly what
 13 happened. He said that he would call for the
 14 parliamentary security. He also said that he would call
 15 on the assistance of those who are outside the perimeter
 16 wall. All of that, in our submission, makes perfect
 17 sense and is good policing, because you're dealing with
 18 the noise without causing there to be a risk to the
 19 location that you are tasked to protect, namely Carriage
 20 Gates.

21 His evidence was abundantly clear: he said:

22 "I would not leave my post."

23 If that's the position in relation to an unarmed
 24 officer, it's all the more so going to be the situation
 25 with regards to an authorised firearms officer in that

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1 situation, because when one takes into account all the
 2 matters that an authorised firearms officer at Carriage
 3 Gates would have been aware of, the suggestion that they
 4 would go off to leave Carriage Gates entirely open, so
 5 that anybody could walk through those gates and get
 6 straight into the Palace of Westminster, is one that in
 7 our submission is not sustainable.

8 The fifth point is this: that all of the
 9 hypothetical questions and the posturing of case
 10 theories, in fact amount to a red herring because the
 11 family submit that it all misses the fundamental point,
 12 which is this: if there were more than two authorised
 13 firearms officers at Carriage Gates, there would be no
 14 question of leaving Carriage Gates vulnerable by moving
 15 off elsewhere. The security system should have been
 16 such that it should never have been an either/or
 17 scenario, and therefore it all comes to the conclusion
 18 which, in our submission, is this: the inadequate
 19 security systems created a situation where there were no
 20 authorised firearms officers present at the time
 21 Police Constable Palmer was attacked.

22 If there had been authorised firearms officers
 23 present at that time, in our submission, on the balance
 24 of probability, they would have been able to prevent
 25 a loss of an opportunity of saving Police Constable

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1 Palmer's life, or, put it another way, that on the
 2 balance of probabilities their absence contributed to
 3 Police Constable Palmer's death.

4 We've submitted that and we maintain those
 5 submissions, not just on an analysis of this
 6 hypothetical scenario of moving away and leaving
 7 Carriage Gates unprotected, but we also advance it for
 8 the reasons set out at paragraphs 8 to 10, and I'm not
 9 going to repeat what's set out there.

10 But, in our submission, what is set out in those
 11 paragraphs results from a close analysis of the CCTV
 12 footage available, consideration of what's evident when
 13 one attends the location on a view, a consideration of
 14 the statements as to Khalid Masood lumbering forward as
 15 opposed to running at speed with weapons raised,
 16 viewable, and then, of course, the pathology evidence.

17 If one looks at the CCTV footage of what the close
 18 protection officer achieved in terminating the hideous
 19 risk that Khalid Masood was posing to all within the
 20 Palace of Westminster, when one looks at the speed at
 21 which the close protection officer was able to act and
 22 the accuracy of shot, in our submission, it is simply
 23 not right when the Metropolitan Police Service submits
 24 it would have made no difference if authorised firearms
 25 officers had been present at Carriage Gates. We know

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1 that the weapons that authorised firearms officers have
 2 available are better than the weapons that a close
 3 protection officer has. We know that an authorised
 4 firearms officer at Carriage Gates, aware of all the
 5 factors that we've referred to in writing, would have
 6 had his or her weapon raised. Further, that
 7 an authorised firearms officer is, of course,
 8 responsible for that location rather than a close
 9 protection officer who was fortuitously there.

10 Sir, can we just turn, please, in conclusion, to
 11 looking at what is proposed in relation to the narrative
 12 conclusions at paragraph 17(a). We have reduced our
 13 proposal to writing. There was one matter that we
 14 haven't included.

15 THE CHIEF CORONER: You said paragraph 17(a)?

16 MS STEVENS: Oh, sorry, counsel for the Inquest's
 17 submissions, sorry.

18 THE CHIEF CORONER: I have paragraph 21 of your written
 19 submissions in front of me.

20 MS STEVENS: Thank you. Exactly so. So there's just one
 21 matter that we neglected to add, but which we've been
 22 reflecting on, and as it's drafted at the moment, 17(a)
 23 reads:

24 "An attacker who had driven his vehicle into
 25 multiple pedestrians on Westminster Bridge entered the

1 Gates and immediately began attacking Police Constable
 2 Palmer with knives, driving him back into the
 3 New Palace Yard ..."

4 We make no criticism whatsoever in relation to this
 5 proposal, but could we respectfully suggest that the
 6 reference to "immediately began attacking" is amended to
 7 reflect Police Constable Palmer's bravery, because we
 8 know from the evidence of Detective Superintendent
 9 Crossley, and for your reference, sir, it comes -- it's
 10 the first day of the Inquest, in fact, page 110, who
 11 makes clear that Police Constable Palmer stepped
 12 forward. That is an addition and part of the factual
 13 matrix that is very important to the family. We would
 14 ask that that is marked.

15 It's not just important to the narrative conclusion.
 16 In our submission, it's also important to the question
 17 of causation in that if there had been authorised
 18 firearms officers present, Police Constable Palmer would
 19 not have had to sacrifice his life by moving forward in
 20 order to protect the Palace of Westminster and the
 21 individuals at that location.

22 If there had been an authorised firearms officer
 23 present, in our submission, Police Constable Palmer
 24 would have been able to step to the side to retreat so
 25 that those with the correct tools, namely firearms,

1 could deal with the clear and serious threat posed by
 2 Khalid Masood.

3 Sir, the final matter to just raise is in relation
 4 to recommendations. We will be submitting
 5 recommendations for your consideration. We, of course,
 6 hear and understand what was just said to my learned
 7 friend, Mr Adamson, about the need to submit such
 8 recommendations promptly. If we do so by midday
 9 tomorrow, will that cause any difficulties ?

10 THE CHIEF CORONER: Not at all. I had in mind a slightly
 11 longer time than that. What I had in mind, Ms Stevens,
 12 was to say seven days.

13 MS STEVENS: We're very grateful. We will still try our
 14 utmost to submit them tomorrow.

15 The only other matter in terms of recommendations is
 16 that we too support and endorse what's been said by my
 17 learned friend Mr Patterson on behalf of the victims on
 18 the bridge. Those recommendations, if we may
 19 respectfully say so, have clearly been extremely
 20 carefully considered, and the family of Police Constable
 21 Palmer would also wish for something positive to come
 22 from this Inquest, namely that members of the public are
 23 given greater protection in relation to the dreadful
 24 threat that terrorism poses to all of our lives on
 25 a daily basis.

1 Sir, unless we can help any further, those are our
 2 submissions.

3 THE CHIEF CORONER: No, thank you very much indeed.

4 MR HOUGH: Sir, just before anyone else rises, may I just
 5 say that for our part we have no objection to, and we
 6 can see very good reason for, adding words to the first
 7 part of the narrative determination concerning PC Palmer
 8 referring to him moving forwards.

9 THE CHIEF CORONER: Yes.

10 MR HOUGH: And, sir, perhaps Ms Stevens and her team can
 11 email us with a suggested amendment to the paragraph
 12 which we can incorporate.

13 THE CHIEF CORONER: Well, it was something that I was going
 14 to say, Mr Hough, that it seems to me it should be
 15 reflected, because clearly it's an accurate statement of
 16 what he did.

17 MR HOUGH: Absolutely.

18 MR ADAMSON: I obviously entirely support what Ms Stevens
 19 has said in relation to that.

20 THE CHIEF CORONER: Mr Keith, tempting as it is to ask you
 21 to start now, what I'm going to do, if you don't mind,
 22 is to simply ask anyone else on the back row if they
 23 want to say anything, because I'm conscious that to some
 24 extent, most of the rest of the written submissions
 25 don't take any issue with those on the bridge. None of

1 them, apart from -- I think there's some reference to
 2 responding to PFD reports, if I go down that route,
 3 I think other people haven't put forward suggestions,
 4 I think everyone has heard me say seven days. It may be
 5 that I will be a little bit kinder than that and say the
 6 end of next week, which is slightly more than seven
 7 days.
 8 MR KEITH: I'm entirely in your hands. Some might believe
 9 that the hearing of many sequential submissions from
 10 lawyers is quite a hard burden to bear.
 11 THE CHIEF CORONER: I would welcome reflecting on what's
 12 been said so far, Mr Keith, and then turning to yours
 13 tomorrow morning, but it just seemed to me, I just
 14 wanted to check whether anyone else wanted to say
 15 anything in addition to the documentation I've got.
 16 I'm not inviting it, because it's very clear.
 17 Ms Canby.
 18 Submissions on determinations to be made by the Coroner by
 19 MS CANBY
 20 MS CANBY: Very briefly, sir, and that is just to highlight
 21 that TfL is committed to learning lessons from the
 22 atrocious attack. TfL isn't seeking to hide behind
 23 complexities but would welcome an opportunity to provide
 24 you with observations on Mr Patterson's proposals, and
 25 any that were to be proposed by Mr Adamson, within the

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1 28 days that's been suggested of receipt.
 2 We see that Mr Patterson has made proposals that may
 3 impact on us, they're at paragraphs 35 and 41 of his
 4 submissions. We would hope that we could provide you
 5 with information in relation to both of those proposals
 6 to help assist with the identification of all the
 7 relevant stakeholders, the steps that have been taken
 8 since March 2017, and any further steps that could be
 9 taken.
 10 THE CHIEF CORONER: Yes.
 11 MS CANBY: There's one proposal that he makes at
 12 paragraph 41 in relation to parapets.
 13 THE CHIEF CORONER: Yes.
 14 MS CANBY: If that were to find favour with you, sir, we
 15 would submit that the appropriate course would be for
 16 you to identify the concern or the risk rather than
 17 prescribing a particular solution, which is how the
 18 proposal is currently suggested. But we will, within
 19 our counter submissions to you, sir, set that out more
 20 fully.
 21 THE CHIEF CORONER: Thank you.
 22 Mr Adamson, it seems to me Friday of next week
 23 should be sufficient time, because I saw a slight recoil
 24 of horror on your face when I said seven days, but it
 25 seems to me it is rather better that we have

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1 a comprehensive set from everyone, then 28 days
 2 thereafter for people to respond, which I think will be
 3 satisfactory so far as I am concerned.
 4 MR ADAMSON: Sir, if you prefer seven days, I am content
 5 with seven days.
 6 THE CHIEF CORONER: Friday of next week will be fine.
 7 So, Mr Keith, if we turn to your submissions, 9.45
 8 in the morning?
 9 MR KEITH: By all means.
 10 THE CHIEF CORONER: I'm not going to impose a guillotine on
 11 you, Mr Keith, at this stage, but it would just help me
 12 in terms of planning tomorrow as to how long you think
 13 you might be in addition to the written documents that
 14 I've got.
 15 MR KEITH: I will try not to bring the guillotine down upon
 16 myself, I think I will be about an hour at most.
 17 THE CHIEF CORONER: Yes. And I anticipate that Mr Hough may
 18 have some things to say in response. There may be
 19 things that I ask him to give me some assistance with,
 20 but that's helpful to know.
 21 I'll rise.
 22 (4.35 pm)
 23 (The court adjourned until 9.45 am on
 24 Wednesday, 3 October 2018)
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