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

Day 16

October 3, 2018

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Wednesday, 3 October 2018

(9.45 am)

(Proceedings delayed)

(9.52 am)

THE CHIEF CORONER: Mr Keith.

MR KEITH: Is that a convenient place for you, sir? It is rather difficult ——

THE CHIEF CORONER: It is convenient for me, I can —— there we go.

Submissions on determinations to be made by the Coroner by MR KEITH QC

MR KEITH: Sir, there can be no doubt whatsoever that you have conducted, as Mr Patterson QC rightly submitted yesterday, a full, rigorous and fearless inquiry as the law requires and as these tragic deaths demand.

On the issue of parliamentary security, you heard many hours of examination of Commander Usher and Chief Superintendent Aldworth, and their long testimony is testament to the rigour of your inquiry, because their examination was lengthy, comprehensive and, at times, pitiless.

You heard from the AFOs on duty, you heard from the majority of the unarmed officers at Carriage Gates and from Inspector Rose, and you inquired into the tactical hinterland, you examined the tactical planning reviews



for November 2014 and June 2015, the post instructions for January 2015 and December 2015, and the relevant parts of the post instructions going all the way back to 2010.

You received evidence of the relevant parts of the historic security reviews going back to September 2004. You've inquired into patrolling, supervision of the system, into the unarmed and armed officers' appreciation of their own working practices as well, of course, of the immediate events surrounding the murder of PC Palmer.

Has it been enough? Well, in light of some of the submissions made yesterday, I'm required to address that further issue. The fact that further evidence may not exist, or that you have not heard from everyone, absolutely everyone connected with the terrible events of 22 March, does not mean that this Inquest has not been fair, full and fearless. Nor does it mean that material has been hidden from you for malign or conspiratorial reasons. Sensible and fair limits have to be imposed, and if material does not exist or is not available, in fact, to the forensic benefit of those of my learned friends who seek to make the point that the absence of witnesses or checks or supervisory structures is, in fact, demonstrative of failings, then no number



of applications for disclosure will avail the seeker of further material.

It was also suggested yesterday that the Metropolitan Police Service had acted unfairly and in a way calculated to cause distress and outrage because Commander Usher had been selected to be the primary witness concerning the issues of the geography of New Palace Yard, its security arrangements, post instructions, the historic reviews and the events surrounding the investigation into Messrs Ashby and Sanders' actions.

The forensic and legal decision—making processes of the Metropolitan Police Service are not designed, or applied, to cause distress. More importantly, Commander Usher was palpably the best placed person to deal with the multitude of issues arising because he is the protection commander with strategic responsibility for PaPD. Had he not been called by the Inquest team, there would undoubtedly have been calls for him to give evidence, and, perhaps more importantly still, the decision to make him available was one endorsed by your own team, both directly and by the implication of having him respond to your and their further requests for additional information.

He and the MPS properly and unilaterally disclosed,



after no little diligence behind the scenes, the historic reviews of parliamentary security, the issue of Messrs Ashby and Sanders being off—post, the MM1 —— you can imagine the reaction if that had not been disclosed by Mr Usher in his statement —— the post instructions, the tactical planning reviews, the Inspector Munns chart and the ADAM—checked figures.

So by way of introduction, we say you are very well placed to address the genesis and legal consequences of the sole issue that you are required to engage with at this stage, which is whether there was an arguable breach of Article 2 on the basis that the absence of PCs Ashby and Sanders from the close proximity of Carriage Gates, which is common ground, was the result of a systemic failure of reasonable state measures and causative of PC Palmer's murder, or the result of individual failure and/or not causative of his death.

Beyond the legal issue of Article 2 and its arguability there is, of course, the factual matter of your narrative conclusion. I'm not permitted to address you in relation to the facts but, of course, the two matters are linked, even if they are not mutually dispositive, because even if there was, and you find there was, an arguable breach of Article 2, that does not of itself determine the wording of the conclusion on

the issue of system failure and causation. Those are separate matters, couched not in terms of Article 2 but in the well known common law concepts of possibility.

Turning to the evidence in broad terms, it establishes beyond any doubt that Masood's attack on PC Palmer was completely unexpected and brutal in its implacability, speed and violence. PC Palmer had no option but to try to get away and was, therefore, unable thereafter to defend himself as he fled from those knives. He had no other option, but he bravely attempted to put himself in harm's way in the best traditions of the police.

No other officer had any time at all to react. I've set out in our written submissions in the footnote on the first page the evidence of PC Glaze. The CCTV proves that just five seconds elapsed between Masood's entering through Carriage Gates at 14.41.10 and his main attack on PC Palmer, 14.41.15.

And, as a matter of common sense, therefore, we suggest that the rapidity of the attack was such that any proposition to the effect that PC Palmer's murder might have been prevented had PCs Ashby and Sanders been in close proximity to Carriage Gates is speculative. The stark reality is that Masood entered through Carriage Gates so quickly that not a single officer had



time to react, let alone prevent the fatal attack. No one was able to draw a baton and use it, or use CS spray. No one was able to physically intercept Masood.

Of course he was armed, viciously, with two knives, and that would have shut down a number of tactical options for dealing with him. But on any view, no officer came close to being able to engage him because, as you heard so vividly in evidence, for the majority of them, they turned round and Masood was already in.

We say that a determination that such shortcomings as there were in the system of supervision, which is what the Inquest has largely turned to focus on, were causatively linked to PC Palmer's murder would be unjustified in law. It's a matter of regret that I have to say that we intend no disrespect for advancing proper, evidence—based legal submissions to that effect. It is not right to challenge another interested person's case in terrorem by suggesting that the submissions that it advances have caused a person offence or distress, when in truth they are simply disagreed with.

We submit it is not arguable that there was a breach of the state of general duty to safeguard PC Palmer's life, because any shortcomings as contributed to Ashby and Sanders' failure to be in close proximity of Carriage Gates were the result of individual failure and



not systemic.

And, in any event, such shortcomings as you find systemic, if you make that finding, were causatively too remote from his murder as to give rise to a real prospect that his death might have been prevented.

Putting it another way, in common law terms, for the purpose of the narrative, such shortcomings as you find to exist were not possibly, let alone probably, causative of his death, and thus, there can be no phrase such as "due to the shortcomings in the system of supervision" in the narrative.

In any event, and I say this with the greatest of respect to my learned friend Mr Hough QC, the phrase in the current draft in either version is inapt in relation to shortcomings and causation because the narrative speaks in terms of not being certain. Certainty is not the relevant threshold on any view.

Further, Ms Stevens' suggested variant, which introduced the legal notion of contributory causes, plainly violates section 10(3)(b) on the prohibition on findings of civil liability.

The threshold, if the threshold is to be applied, is one, we suggest, of possibility, probability, if you find that or impossibility, not of "not certain".

Looking more broadly at the proposition advanced to



you that there was an arguable Article 2 breach, we submit that there are a number of issues that you must first address. Even on the basis that PCs Ashby and Sanders were unaware of the requirement to be in close proximity to Carriage Gates, it is not at all clear that their understanding, their personal understanding, was the result of a failure in supervision. There was just no evidence that even if more thoroughly supervised, and on the premise that they would have followed the post instructions religiously, that they would necessarily have been at Carriage Gates as opposed to being somewhere else in New Palace Yard, towards the Cromwell Green search point or, as it transpired, by the members' entrance.

Nor can the Inquest conclude, in any event, that they would not, in any event, have stepped out beyond the limits of the post instruction, and the truth of that proposition can be seen in this way. On PCs Ashby and Sanders' account, on their own account, they were guided by the laminated map which PC Ashby kept with him, and/or by the alarm map on the wall, or by the patrol area sent out as part of Superintendent Causer's PowerPoint.

But even on that account in which they understood the delineation of their patrol duties to be the alarm

map, the laminated map or the PowerPoint, nothing in those documents ever permitted them to be in the colonnades, static, for up to 40 minutes.

Even then, the evidence overwhelmingly establishes that had they been in close proximity to Carriage Gates or at Carriage Gates, they would have been drawn away to the noise, the explosive noise in Bridge Street, which they could not reasonably have ignored.

Further, even had they positively ignored that duty and remained at Carriage Gates, had they even been there, there is no evidence to support the proposition that Masood could have been shot, and either disabled or killed before the fatal attack on PC Palmer.

Properly analysed, there was an unusual sequence of events. Because, sir, what you are grappling with is a compounded hypothetical scenario. It's not just a consideration of whether the real prospect of survival was denied by a single event, such as in the Mastromatteo case, the wrongful release of a murderer from parole who goes on to commit an armed robbery and kills the driver of a stolen getaway car. You are dealing, sir, with multiple levels of hypothesis, concerning the assessment of the impact of better supervision. Would Ashby and Sanders have been in close proximity to Carriage Gates anyway? Would they have



been drawn away by the noise? What could they have done? What would they have done?

It's speculation built upon pre-existing speculation, or, putting it more charitably, as Mr Hough QC said in his written submissions, the tracing back of separate chains of events and causes often gives rise to difficult questions of judgment; with delicious understatement, that is an excellent exposition of the problem.

Secondly, the inherent difficulties, or inherent difficulties arise at every stage of a hypothetical timeline because the reality is that PCs Ashby and Sanders themselves, the very persons whom the family of PC Palmer suggest could have stopped Masood, do not themselves accept, ultimately, that they could or would have stopped him. So there is no evidential foundation for that essential proposition.

Of course, it remains a hypothetical exercise. Ms Stevens complained yesterday that the issue of what they might have done remains hypothetical. Of course it does. It remains hypothetical in relation to any consideration in any inquest of whether causatively a breach might have given rise to a denial of a real prospect of survival. But that doesn't bar you from reaching a conclusion, and nor, should I say, does the



absence of an expert, whose evidence would, by the very same approach adopted by her, would have remained hypothetical anyway.

Putting it another way, counsel to the Inquest have properly recognised that the issue of whether PC Palmer's chances of survival may have been improved by a better supervisory system is a challenging question which involves a good deal of speculation. Again, we agree.

Thirdly, the alleged failings put generally as a lack of supervision, but more specifically as a failure to audit and spot-check the dissemination of and the putting into practice of the post instructions, are essentially failures to audit the precise means by which the AFOs carried out their patrols. They are not failings addressed towards an alleged absence of patrols, or the absence of AFOs generally, or the absence of proper equipment or the absence of training. AFOs were in the yard. They were patrolling. And we know, moreover, that PCs Gerard and Sanders were at Carriage Gates themselves between 13.29 and 13.43, an hour before.

The failing, we suggest, properly analysed, is one that concerns the practical operation of the patrol at Carriage Gates, not the tactical security system. Even



then, the specific failing, and Article 2 obliges everybody to concentrate on the specific facts of the alleged breach, the specific failing was not the wide practice we suggested with general circular patrol around New Palace Yard, nor of a patrol not being a short patrol but remaining disproportionately in areas of New Palace Yard that were not required to be patrolled, but because, again, Messrs Ashby and Sanders were statically located in the colonnades at the time of Masood's entry.

Fourthly, you recognise the speculative nature of the exercise, because in your 16 September ruling, rejecting the application under section 7 of the Coroners and Justice Act made by Ms Stevens, you noted at paragraph 45 that it was somewhat speculative at that stage to suggest that PCs Ashby and Sanders could have saved PC Palmer's life even if they had been standing in close proximity to Carriage Gates when the attack began. You said:

"They might have moved away from their post in response to the sound of the vehicle colliding with the north wall of New Palace Yard. Even if they had not done so, they would have had seconds to react, and any attempt to take a shot would have been complicated by the attacker's close proximity to Keith Palmer and other

unarmed officers."

Your understanding, sir, of the authorised firearms officer supervisory system is obviously plainly greater than it was at 16 September, because you have now heard the actual evidence. Your understanding of the post instruction issued and its dissemination is greatly enhanced now that you have heard the evidence. You know far more about the ADAM checks, the maps, the documents and the Inspector Munns' chart.

But the position concerning the heart of your observation, which was that the causative chain remains essentially speculative, is unchanged because since you have received the evidence, it is now apparent, when it was not apparent before, that no witness can say, with the requisite degree of possibility or chance, that even if PCs Ashby and Sanders had been at Carriage Gates when they had only seconds to react to take a complicated shot, that they would necessarily have disabled Masood.

We've set out in our written submissions at pages 15 to 17 what we say in relation to those parts of the evidence governing that issue.

Can I now turn and make seven points in relation to the law. Paragraph 15 of our written submissions describes the Osman Article 2 obligation, and I hope, genuinely, that the propositions that we advanced in our



written submissions are not contentious and do, indeed, accurately reflect the legal position.

The font of the test in Osman is one of reasonableness, not an absolute standard. Article 2 will only be breached where the authorities fail to take measures within the scope of their powers which, judged reasonably, might have been expected to avoid the risk of a real and immediate to life of a person or persons.

So reasonableness is a necessary part of the test, as is an expectation, not any prospect at all, but a reasonable expectation that the risk might have been avoided. It's that concept of expectation that engages the difficult issue of causation, but it also goes to the nature of the obligation, because where the nature and location of the exact terrorist attack is necessarily unknown, it is more difficult to say what reasonably should have been expected.

Secondly, it's not endless in scope, it only applies to certain well defined circumstances —— paragraph 14 of our submissions.

Three, the test is stringent, or high, paragraph 17(a).

Fourth, not every claimed risk can entail a requirement to take operational measures to prevent a risk from materialising, and we have set out in



paragraph 17(b) the point that because not every claimed risk can entail such a requirement, that approach has particular resonance here in which any assessment of the risk of a terrorist attack, as I say, was hindered by the unpredictability of any such attack, and the procedures adopted to meet the risk included difficult operational choices in terms of response, means of response, availability of resources and the particular requirements of the Palace of Westminster.

In addition, of course, the risk which must be set against, ultimately posed by Masood, was sudden and unexpected. It is, of course, right to say that the tactical position at New Palace Yard was premised on the existence of a terrorist risk, whether armed by knife or by gun or by vehicle or bomb. Of course that risk was planned for and anticipated, but in practice, the extremely violent and speedy way in which he came through the gate, intending to kill and to die himself, and preceded by a noise that, whilst not calculated was diversionary in effect, made for a more difficult, operationally more difficult set of circumstances.

Fifthly, guard should be taken against hindsight, of course. Sixthly, the causative test is also not an infinite one. It is not permissible to ask whether but for some claimed failing, the death would not have



resulted.

We have set out and cited the admissibility decision in Pearson and made a reference to Mastromatteo v Italy, to which I've already referred, in which the ECHR rejected the claim where it was argued that but for the murderer was released on parole, he would not have robbed the bank, stolen a getaway car and murdered the driver. A single change, you may think, in the chain of events will not generally suffice. The test, instead, is whether the reasonable measures which were not put in place, so it is said, would have had a real prospect of avoiding the deaths if they had been instituted.

So the question may be posed in this way: even if there had been charts, dip sampling, auditing, auditing of oral briefings, constant assured testing of the dissemination of post instructions, would those steps have had a real prospect of meaning that PC Palmer would not have been killed by a maniacal man determined to kill.

Lastly, there is the important divide between systemic failing and individual breach. We accept that PC Palmer was, of course, in a sufficiently vulnerable position legally —— not factually but legally —— so as to engaged principled application of Article 2, and in paragraph 19 of our submissions we have set out the

broad context or categories in which the Osman test has been held domestically, or at Strasbourg, to apply: killing by state agents; death in custody; conscripts; mental health detainees and other situations where the state has a positive substantive obligation to take steps to safeguard life.

What we suggest, though, is that where the Article 2 obligation is assessed in this particular context, where PC Palmer, whilst not, of course, armed, and at a position where he interfaced with members of the public, was not in any particular vulnerable position vis—à—vis the state. In such a situation we say the obligation applies in an attenuated form. The nature of responsibility owed by the state in terms of expected measures to be undertaken is more akin to those, perhaps, in the services or in hospital, as opposed to police custody, and in that type of case, where there must be a reasonable assessment of the measures, there is a stark divide drawn between errors of judgment by individuals and negligent coordination, and systemic failure, and you will see from the citations from the case —— your case of Parkinson at paragraph 23 of our written submissions, also Stoyanovi v Bulgaria at paragraph 24, and Susan Smith at paragraph 26, that that divide is clearly drawn: there is a distinction between



individual error, failing or coordination and systemic failure.

Putting it another way, and to apply the test in Long v Secretary of State for Defence, was this a matter over which the state had substantial control? We suggest that the unanticipated violence and speed of Masood was something over which the state had very little control, and we would invite you to pay particular regard to the observations made in the case of Scarfe which we set out at paragraphs 54 to 59 —— 54 and 59 of Scarfe, I think they are set out in paragraph 19 of our written submissions —— to the effect that there is a difference between errors of practice which might point to a systemic fault in the design or supervision of a system, and, notwithstanding that they are repeated, operational errors such that it may be impossible fairly to characterise those areas as a system fault. You will remember that that case which concerned suicide prevention at HMP Woodhill concerned a series of distinct but separate operational mistakes, in fact, a very substantial number of mistakes, but the court concluded that that frequency evidenced not a failure of the system but, rather, a system that allowed operational error.

Turning to the evidence and applying the principles



that we suggest should be adopted, we make four or five points at paragraphs 29 to 37 of our submissions. They are these: firstly, the submission from counsel to the Inquests rightly implied that no breach arises from any alleged failing on the part of the MPS to respond to the general terrorist threat or to respond to specific intelligence suggesting terrorism—related activity in or near Carriage Gates. There is nothing to suggest that the general security arrangements were deficient, whether strategically or tactically in a way relevant to PC Palmer's Inquest. I say general. The evidence is that the security was constantly under review. Tactical firearms advisors, specialist advisors, constantly reviewed and sought to improve the security arrangements in Parliament, and at Carriage Gates in particular. The security arrangements were elaborate and under constant review, as those detailed reports evidenced in Commander Usher's first statement readily demonstrate.

In particular, that dichotomy between mobility which might lead to AFOs not being in the precise location of an emerging threat and fixed patrols which might lead to predictability and vulnerability, was under constant examination, and you will recall the evidence from Commander Usher that the history of the MPS's tactical consideration of that issue, that dichotomy, established



that there is no easy solution.

(b), secondly, in addition no system of security is perfect. It would have been and remains quite impossible to entirely remove the risk of a determined marauding suicide attack. As I've said, Masood plainly intended that he would die trying to kill people in and around the Palace of Westminster, and you will recall Commander Usher's evidence that the number of attacks which might have been considered are bounded only by imagination.

Three, it is also clear that the fact that Masood was able to gain access to New Palace Yard was through no fault of the Metropolitan Police Service. The evidence is one way. It is to the effect that the will of Parliament was that Carriage Gates had to be kept open, both as a practical measure and as a symbol of the openness of the United Kingdom's Parliament, and that was also reflected by the evidence of Commander Usher.

And, of course, the attack occurred at the time of the division, which meant that the gates had to have been open under the standing arrangements.

You will recall evidence to the effect that it was simply not a matter upon which the MPS had any discretion. Even if a decision had been made that the gates ought to be closed between the entrance and exit

of individual vehicles, the gates had to have been open to allow access for the division.

Fourthly, you have plain evidence to the effect that consideration was given by the Metropolitan Police Service specifically to the risk to unarmed officers. Indeed, that risk was brought to the attention of Parliament because, as I repeat, it wasn't a matter that lay within the sole discretion of the MPS, and Chief Superintendent Aldworth raised the issue of whether or not the most obvious mitigation was surely to close the gates altogether.

Whilst that was not the subject of a formal recommendation, Parliament was aware of the risk, but the tactical planning review could not give effect to that individual officer's suggestion.

So then turning to the short patrol. The schedule of post instructions at {DC8040} is the clearest evidence of the Metropolitan Police continually reviewing and improving the security arrangements at Carriage Gates, because you know that from that schedule, the policing model was modified on six different occasions between 2010 and 2016, in order that the arrangements at Carriage Gates were best suited to meet the threat appreciated at each of those particular times.



The fact that there was a recognised vulnerability at the gates when they were open does not mean of itself that the arrangements to meet that risk were deficient, nor that there was necessarily a breach of Article 2 because, as I have ventured to suggest, no risk can be entirely eliminated, and of course it's possible to imagine actions which could have been taken which might have —— again, hypothetically —— removed the possibility of the attack taking place at one particular location. None of the reviews have ever recommended an absolute increase in the number of armed officers or the complete closure of the gates.

You may conclude that the tactical planning generally favoured the unpredictability of a patrol as providing a better model, and that accorded with the evidence of PC Ross who himself spoke of the risk of attackers attacking unarmed officers or, indeed, armed officers, whose presence could be too predictable in the course of a static patrol.

PC Glaze also spoke of the danger of predictability and the need to protect not just Carriage Gates but also an attacker entering New Palace Yard over the railings. PC Ashby spoke of patrols having the advantage of unpredictability. Commander Usher explained the risk of a static post to hostile reconnaissance and to the



seizure of a firearm.

And so there can be no doubt that in light of these competing and difficult considerations, a short patrol was the best tactic to strike a balance between armed support and unpredictability, and that accords with the issues which you are obliged to consider in Osman, namely the difficulties in policing modern societies, unpredictability of human conduct, and the difficult operational choices which must be made.

Sir, it is common ground that PCs Ashby and Sanders were not patrolling as required by the post instructions at the time of the attack. The evidence of Commander Usher, Chief Superintendent Aldworth and Inspector Rose was that officers should have been patrolling in accordance with their post instructions. No one seriously disputes that post instructions were generally clear and accessible. They were described, I think, as the very function, or the very essence of an AFO's functions.

It was also clear that the ADAM system was generally known of and accessible. But the fact that Messrs Ashby and Sanders did not patrol in close proximity of Carriage Gates is of itself not necessarily evidence of a systemic failing. We suggest that what failed was not the post instruction system; the failure was instead



a failure to prevent Messrs Ashby and Sanders from spending 40 minutes in the colonnades.

We've set out at paragraph 43 of our written submissions those steps that were taken, properly by the Metropolitan Police Service, to meet the needs of the threat posited at New Palace Yard. The computerised system, ADAM, allowed officers to access post instructions online, it was in place from October 2012. There was significant evidence of inspectors and sergeants being informed by email of the introduction of the system, the purpose of that system, the means by which AFOs could access post notes and briefings on demand.

You've seen the emails that demonstrated that supervisors were sent links to updated post notes. Hard copy post instructions, we suggest, were available in the patrol room. Mr Ashby did finally accept that it was possible that such a binder was present, but he did not look at it.

In terms of monitoring, there was inspection between September 2015 and February 2016, including supervision of PCs Ashby and Sanders on sector 3. Inspector Rose said supervision did continue, even if not recorded. And you have clear evidence that where officers, senior officers, appreciated officers were not

adhering to post instructions, action was taken as a result.

Chief Superintendent Aldworth stated he had taken action himself when he had seen officers not on post, and you will remember he also described the daily management meetings which involved a review of the previous 24 hours, plans for the day ahead, and discussion of any failure to comply with post instructions.

So it's a necessary part of the Article 2 arguability argument advanced to you by my learned friends that it was not just Ashby and Sanders, but the majority of the AFOs who did not follow the obligations of a short patrol, because if you conclude that the failing here was an individual failing of those two officers by virtue of their remaining in the colonnades, then there will be no systemic element. For that argument to succeed, you need to go further and conclude, in essence, that Messrs Ashby and Sanders were telling the truth and were correct in suggesting that it wasn't just them, it was -- I paraphrase, I hope to no disrespect to them -- everybody else.

But the evidence to the effect that AFOs generally were out of position due to the unfamiliarity of the post instructions is very limited. The ability of



unarmed officers to gauge how long AFOs were in close proximity to the gates was, of course, itself quite limited. PC Ross accepted that his back would be to the AFOs and that he focused on the gates and it would be hard to say when the AFOs were present. PC Glaze gave similar evidence, that he was busy doing his own job. PC Ross said that ADAM was not in use when he was an AFO, we could date his own AFO duties to before October 2012, but that he was familiar with post instructions of the kind of at {WS5103}.

His AFO experience in fact predated our relevant post instructions and so it's not at all unsurprising that he was, or may have been, unaware of the recent short patrol obligation.

PC Glaze transferred from an armed patrol to Lewisham in 2012 so he wouldn't have used ADAM and he wouldn't have known of the most recent post instructions, and Commander Usher's evidence was clear that it would be extraordinary for sergeants and inspectors who received post note updates not to have briefed constables upon the content of them. He, himself, had seen the AFOs at Carriage Gates, as had Chief Superintendent Aldworth. He said:

"AFOs were at the gates more often than not."

There is also evidence of emails being sent to both



the leadership and the entire command of the heightened threat, and you will recall the evidence from Chief Superintendent Aldworth to the effect that he had slept on his office floor overnight to ensure that he had properly briefed officers coming on duty the next day, and he carried on doing so until every new officer coming on duty had been personally briefed.

Inspector Rose, the most recent witness on this subject, said in essence that he was surprised to hear of officers being unaware of the post instructions or of generally not being on short patrol, or of following the alarm map, because it was contrary to the supervisory practices and his own understanding.

He was asked:

"Question: [Was] there anywhere in the area of New Palace Yard, the cobbled area, where you would not expect them to be or would not expect them to stand for any period?

"Answer: Certainly not [he said] underneath the colonnades, or further than the entrance to -- beyond the entrance from Carriage Gates to members' entrance. Not beyond that."

"Question: How important to the life of an authorised firearms officer is a post instruction?

"Answer: It certainly guides their actions and



their attentions.

"Question: Is there any document that you can think of which is designed to describe to them the limit to their patrol area?

"Answer: No."

Then in relation to the alarm map:

"Question: Is there anything ... which ... is to be taken as a post instruction ...?

"Answer: No, there's not."

He was asked to comment on the evidence of PC Ashby to the effect that his patrol duties had been guided exclusively by the map on the wall and that he had been told every day to follow the map. He said:

"Answer: It would be surprising that that was the briefing. I would be surprised, given the time that PC Ashby worked at Parliament, that he would have to be reminded of the detail of the same sector he had worked many, many times before each and every day ... I was surprised that they used the map and used those terms as a briefing for him."

PC Ashby has, of course, given evidence to the effect that nobody ever informed him that ADAM was the primary means of accessing post instructions, but we suggest that you must approach that evidence with a little care, because he himself accepted he had

accessed ADAM in June 2015, and had he done so, he would presumably have found the post instructions which he was availed upon eventually to agree.

He was a long-standing officer who must, we suggest, have been well aware of the presence and status of the post instructions. He accepted that he may have been aware of emails as well.

The base room map in relation to which he asserted was the primary guidance for the carrying out of his patrolling duties, and indeed, was followed by everybody else over a matter of years, is, we suggest, something of a red herring. The map was self-evidently not a post instruction, it had red personal alarm locations on its face and a legend detailing the alarm locations. It said nothing about patrolling and it underwent no alteration over six years.

The laminated map was not a post instruction. It provided a guide for incoming patrols, it would seem. It said nothing about the extent or nature of any patrol.

PC Sanders accepted that the post instructions were clearly available on ADAM and everybody knew there was a terminal on ADAM available for such use.

You have heard close questioning of the witnesses responsible for security at the Palace of Westminster



about shortcomings. Of course they are there. You have heard evidence of it, and indeed the problems in New Palace Yard have been openly exposed. We have summarised them at paragraph 52.

There is evidence that the short patrol was interpreted differently by individual officers. PCs Ashby and Sanders' practice was, according to the author of the MM1 document, reflective of a wider practice. There was inadequate recording of the supervisory checks made of compliance with post instructions: an auditing level assurance, not, we suggest, an operational one. And there is evidence that only a comparatively small proportion of officers accessed ADAM after December 2015.

In relation to the evidence that short patrol was interpreted differently by individual officers, no possible interpretation of the post instructions, however lacking in clarity, could possibly have excused the static patrol in the colonnades for 40 minutes. Inspector Rose gave evidence that he would have intervened to stop it, whatever, in effect, the post instruction could be interpreted to mean.

So we say that when there is a proper analysis of what actually went wrong in a fact-specific way for the purposes of the arguable Article 2 issue, the failing



was not in the promulgation of post instructions, the existence of ADAM, or ultimately even in the wording of the post instruction, because the post instruction was tolerably clear. It was a short patrol in New Palace Yard, or Carriage Gates towards the Cromwell Green exit. The failing, if there was a failing, was simply this: that the two authorised firearms officers were in the colonnades and not at Carriage Gates, and it cannot necessarily be supposed that on any alternative interpretation of the post instructions, or the supervision, or the auditing process, or the assurances which were meant to be kept, that they would have been at Carriage Gates. Because even on their own approach to the map, the alarm document, the laminated document and the PowerPoint, they were not doing what even those documents would have had them do because none of those documents said "remain static for 40 minutes in the colonnades".

In relation to causation, our submissions are set out shortly at paragraphs 55 to 61 of our written document. Even if there had been a tighter supervision or downloading or reading of post instructions, this would not necessarily have meant that PCs Ashby and Sanders would not have decided to go to the colonnades, not because that was not in the documents, but because



they were inclined to do so.

There is evidence that officers did speak to AFOs and tell them when they were not on post, so it cannot be said that that decision by them to be in the colonnades was the result of a failure in that supervisory practice.

Secondly, even if they had been following the post notes, whether they would have been at Carriage Gates is a matter of complete speculation, because we will never know whether they might have been on the short patrol into New Palace Yard and thus unable to deal immediately with the threat in immediate proximity to the gates, or down towards the Cromwell Green search area exit.

A number of points were made about that yesterday. Of course it is a hypothetical analysis, but for the reasons I've given, all issues concerning causation are necessarily hypothetical.

My learned friend Mr Adamson made the point that the purpose of the post instructions and the plain obligation on PCs Ashby and Sanders was to protect unarmed officers at the gates. But that point, whilst right in principle, takes no account of the effect of the noise at Bridge Street, or of the speed and rapidity of Masood's entry.

The evidence clearly demonstrates that even if they

had been at Carriage Gates they would have moved towards the noise at Bridge Street and would have had at least 20 seconds in which to do so before the crowd, and then Masood, appeared at Carriage Gates. So they would have been drawn away from the gates for a sufficiently great elapse of time and of distance for them to be unable to respond in the three seconds that it took Masood to get through the gates and to start attacking PC Palmer.

There is evidence, of course, on top of their own evidence about their obligation to respond to the noise of how there is an obligation to respond to other threats in the sector, in effect to self-deploy. That evidence is in the post instructions and, as you are aware, was also contained in the evidence of Commander Usher.

PC Ashby said to this effect:

"Question: Could you have ignored that threat?"

That's to say the threat of a terrorist attack in Bridge Street.

"Answer: No, sir.

"Question: What would you have had to have done?

"Answer: I would have made my way to that location.

"Question: Would the same apply if you had been standing on Carriage Gates?

"Answer: Yes, sir.



"Question: Why would you have had to have gone to the emerging threat ...?

"Answer: Because of the nature of the threat, sir ... it's important that I get there to see if I can help ...

"Question: What do you think you would have done on that day if you had heard the sound of that car exploding up against the railings in Bridge Street?

"Answer: I would have gone there, sir, to assist.

"Question: Would you have gone even though it left Carriage Gates unprotected in terms of an AFO?

"Answer: Quite possibly, sir.

"Question: Why would you have done that?

"Answer: Because I had no idea that it was what it's turned out to be so, you know, first and foremost I'm a police officer as well and I want to help."

And PC Sanders gave evidence to similar effect.

A point was made that PC Carlisle, of course, didn't go to the noise, but what you were not reminded of yesterday is that part of his evidence where he accepted that his duty was not that of an AFO on a roving patrol, expected to self-deploy to threats, but of an officer directly on post at north Carriage Gate, and the reason that he went to explore the noise outside the gate was, of course, because he had already been relieved.



Lastly, such evidence as there is points towards it being highly unlikely that PCs Ashby and Sanders would have been able to shoot Masood even if they had remained out and returned to Carriage Gates because they simply would not have been -- and there is no evidence that they would have been -- in the physical position to deal with Masood when he came barrelling through Carriage Gates, let alone that they would have been in a position to neutralise him, and it needs very little exposition to set out the obvious difficulties that would have presented themselves to PCs Ashby and Sanders, taking a shot not with the gun that the close protection officer used, but with a carbine, at a fast-moving man carrying knives with other unarmed officers around him and with the crowd and members of the public behind him.

Q. PC Ashby accepted that he could not say whether he would have had a clear shot due to the need to create a reactionary gap in the backdrop. PC Ross gave similar evidence.

The fact that those officers who were the AFOs were unable to say that they would have taken a shot and could go no further than the position that they reached is the clearest possible evidence that the proposition that had AFOs been at Carriage Gates, and therefore able to take a shot which would have or might have disabled



Masood, remains entirely speculative.

For all those reasons, sir, we say that it is not arguable that there was a breach of Article 2, although we too adopt the proposition advanced by Mr Hough QC that it may make very little difference to the wording of your determination, and it has certainly made no difference to the format, scope, and rigorous inquiry in this Inquest. But in relation also to the findings, to like effect, the proper determination is one that does not suggest that it is possible that due to shortcomings in the systemic arrangements in New Palace Yard, a prospect or real prospect of PC Palmer being saved was negated.

Those are our submissions.

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

Reply submissions on determinations to be made by the Coroner by MR HOUGH QC

MR HOUGH: Sir, in reply I shall deal only with issues relating to PC Palmer. In taking that approach, I should make clear that it is with no disrespect to the other persons who died or to their loved ones. I hope we have made clear both in our written document and in our initial submissions, and indeed in our approach to the Inquests, that we have given them equal weight and significance.

THE CHIEF CORONER: Yes.
MR HOUGH: We address the issues concerning PC Palmer only because those issues are controversial between interested persons.

Sir, all interested persons have addressed you on the legal issues by reference to the facts. That is entirely proper because, as Lord Justice Moses said in the case of R (on the Application of Lin) v Secretary of State for Transport [2006] EWHC 2575 (Admin), it would be beating the wind to address you, sir, on the law, without reference to the facts in a case such as this.

So I propose to deal first with the question of whether Article 2 is engaged in relation to PC Palmer's Inquest, and then to address the determination and what content it should have, depending on your answer to the first question.

Those who are not steeped in the law of Article 2 may wonder why such energy is being put into this argument and what the Article 2 procedural obligation is all about.

The Strasbourg courts have determined that where it is arguable that the state has breached one of the substantive Article 2 duties formulated under the Convention, it is essential that the state establish an investigation which satisfies certain criteria.



In most respects, our inquest system satisfies those criteria, as was held in the Middleton case. But there is one respect in which the House of Lords in the Middleton case felt it was necessary to read down the statutory provisions so as to ensure compliance, and that was that the determination at the end of an inquest should answer a slightly broadened form of "how" question: how the deceased came by their death, to address the circumstances as well as the means of death. That, as I said in opening, permits or may permit a coroner to deliver a more expanded form of narrative conclusion which addresses the underlying circumstances. The coroner does so in order to satisfy a Convention standard of effectiveness.

So the question to be asked and addressed at this stage is whether there is an arguable case on the evidence that one of the substantive duties owed by the state under Article 2 was breached. The threshold is set low, at one of arguable breach, because the Convention institutions are concerned that deaths in which the state may be implicated -- may be implicated -- receive an independent investigation with the standards which the Convention institutions have identified.

The threshold, as I say, of arguable breach is a low



one. In the AP case, which we've identified in our submissions, it was said that a case of breach which was more than fanciful would suffice. So the question for you is whether there is a more than fanciful argument, a more than fanciful basis, for saying that the state or its agents breached one of the two recognised substantive duties.

So I will focus upon the general duty because that is the basis of our submission that Article 2 is engaged.

My learned friend Mr Keith QC, at points in his submissions, elided principles applying under the general duty with those applying under the operational duty. In the Osman case and in subsequent cases, the Strasbourg institutions have been careful to set precise and relatively narrow parameters for the operational duty to ensure that it is not every act of negligence by a state agent which calls into question the state's responsibility for a death under Article 2.

The general duty, however, is different. It is not concerned with the acts or omissions of individual or state agents; it is concerned with systems and procedures.

Sir, we set out the way that the general duty has been characterised at paragraph 7(b) of our document on



page 6, that it is a duty on the state to establish a framework of laws, precautions, procedures and means of enforcement to protect the lives of citizens.

How is that systemic duty to be distinguished from individual duties and the individual acts of state agents?

Well, sir, that question was addressed most recently in this country in the case of R (on the Application of Parkinson) v Kent Senior Coroner [2018] 4 WLR 106, with which you will be very familiar.

Sir, if I may just take a couple of passages from that, from paragraph 82, where the relevant principles are summarised in the judgment of the court. At paragraph 83, the court recognised that Article 2 imposed:

"... substantive positive obligations on the state, and procedural obligations."

At paragraph 84, the court stated that:

"The primary substantive obligation is to have in place a regulatory framework compelling their hospitals to adopt appropriate measures for the protection of their patients' lives."

At paragraph 87, the court said that:

"Where the state has made adequate provision for securing high professional standards among their health

professionals in the protection of lives of patients, matters such as an error of judgment on the part of a health professional, or negligent coordination among health professionals in the treatment of a particular patient are not sufficient of themselves to call the state to account under Article 2."

The court then dealt at paragraph 88 with exceptional cases where individual errors might nonetheless be suggestive of a dysfunction in a system, and at paragraph 89 the court said that:

"At the risk of oversimplification, the crucial distinction is between a case where there is reason to believe that there may have been a breach which is a systemic failure in contrast to an ordinary case of medical negligence."

But, sir, systems are not just about textbooks. Written procedures may be impeccable, but systems may nevertheless be defective. In this respect, the Strasbourg decisions have been ruthlessly pragmatic.

At paragraph 7(c) of our document on page 6, we have made reference to the Kakoulli and Makaratzis cases as examples of this: that the duty may extend beyond written procedures to ensuring that arrangements are in place for state operations to protect the lives of citizens to work properly and effectively.



The question, therefore, in this case is whether it is arguable that the security arrangements for the Palace of Westminster, including at its perimeter, were defective not merely through a number of individual errors, but through a defective system, and we submit that it is arguable that that's the case.

I don't propose to reiterate what I said earlier, and that which we address at paragraph 11 of our document, specifically pages 14 and following.

Sir, by way of brief summary, the Carriage Gates entrance had been recognised as a particularly vulnerable point, and one in need specifically of armed protection. It was therefore incumbent on those responsible for the security arrangements there to ensure that there was adequate protection at that perimeter point. Setting aside for one moment the important question of unarmed officers' protection, this was an estate including thousands of people, many of them very important people who would be very attractive targets for terrorists, and protection at the perimeter was the most important line of security, as Commander Usher recognised. It was for this reason that it was regarded as important that armed officers be tethered to the gates.

The system, in that respect, was arguably failing in



that armed officers were not complying with the requirement to tether themselves to the gates on a regular basis. The suggestion was made at one stage in my learned friend Mr Keith's submissions that you would have to find that there was non-compliance by a majority of officers.

Sir, we don't accept that proposition. If the system was such that 10, 20 or 30 per cent of the time this important entrance was not protected, that may be, at least arguably, due to a failed system.

Furthermore, the evidence in these Inquests has shown that this level of non-compliance which we identify by reference to evidence at subparagraph (e) on page 15, was due to deficiencies in the system of supervision.

The systems which existed for ensuring observance of changing post instructions were, at least arguably, deficient in that so few officers had recently logged into the ADAM system, and key officers were unaware of their post instructions, at least on one view, and a legitimate view of the evidence.

We also see that the system could readily be improved. The MM1 document ends, critically, with recommendations and a commitment to improve the system dramatically to ensure compliance with



post instructions.

It cannot be that it is unarguable that there was a means of ensuring that all, or at least almost all of the time, officers in this critical place were complying with their instructions.

As to causation, the question is whether it's arguable that a systemic breach deprived PC Palmer of a real and substantial chance of survival. As I submitted earlier, that involves a low threshold test, arguable, and a loose test of causation, a real and substantial chance.

As to real and substantial chance, may we address the point about speculation and the level of proof in this way: first of all, there must be a real prospect that if compliance with post instructions had been better enforced, PCs Ashby and Sanders would have been at or close to Carriage Gates at the time of the attack. The suggestion that they would not have been, that they would have ignored their instructions no matter what better procedures had been in place, is an extraordinary counsel of despair, and it's also one without obvious rationale to back it up.

My learned friend Mr Keith said it may have been that they would have stayed in the colonnades whatever the degree of instruction and assurance processes,

because they would have been inclined to do so. Why would they have been inclined to be otherwise than their orders told them? There was no rationale or objective suggested behind such potential inclination.

At the next stage, there must be a real prospect that PC Palmer would not have moved towards the gates had there been armed officers supporting him, or that at least one of those armed officers would have stayed at the gates while the other moved towards the loud bang, or that they would have moved slowly away and returned quickly with either the screams of the crowds coming around the corner, or the shouts of the man in the suit that men were attacking with knives.

At the next stage there must be a real prospect that if one or more of them had been at the gates, they would have taken an effective shot. True it is that that would have involved some difficulties. True it is that it's speculative whether they would have had the clear shot. But the speed and effectiveness of the close protection officers' actions, surrounded as they were by fleeing officers, helps to make the point that there would have been a real prospect.

If there was a real prospect at each of those stages, we find it difficult to accept that it is not arguable that the arguable defect in systems caused



PC Palmer to lose a real and substantial chance of survival.

So for those reasons we remain of the view that Article 2 is engaged in relation to PC Palmer's Inquest.

May I move, then, to the form of determination. First of all, sir, Ms Stevens has informed us of the change of wording to the uncontroversial first paragraph of the form of determination we proposed ——

THE CHIEF CORONER: Yes.

MR HOUGH: —— and I think that has been made known to you. Sir, as I say, it is not a controversial passage: it simply asks for a change of wording to reflect the fact that PC Palmer stepped forward ——

THE CHIEF CORONER: Yes.

MR HOUGH: —— and challenged the attacker.

Sir, if Article 2 were not engaged, then it would only be the paragraph at 17(a) of our document which ought to form part of the determination.

If, however, Article 2 is engaged, then we submit that your determination ought to first of all set out the relevant circumstances underlying PC Palmer's death, address and resolve the key issues, and do so not in an anodyne way but in a relatively succinct way. Of course, all of that is more easily said than done but, sir, you have been assisted by the various proposals by



the interested persons as to forms of words.

May I say a little about causation in this regard. After you have decided what circumstances to identify, we agree with others that it is appropriate to say whether, for example, any defects in systems you have identified probably were causative of PC Palmer's death, or possibly were causative of PC Palmer's death.

My learned friend Ms Stevens makes reference in her submissions to the test of causation whether a factor was more than minimally contributory to a death. That's a test, sir, you will be familiar with in the context of gross negligence manslaughter. Its purpose is to make clear that where there may have been multiple causes of a death, a particular cause which gives rise to criminal responsibility does not need to be the sole cause: it need only be contributory.

But here the critical question which has to be addressed is whether a cause or a circumstance, was probably causative or possibly causative. In the Lewis and Tainton cases, the courts have made clear that circumstances which may have been causative, which possibly contributed to death, may fall within the circumstances of death that appear within the coroner's determination. In the Tainton case, it was specifically suggested that if significant failures or system defects



had been identified that were possibly causative of a death, they ought to feature.

We agree with the submissions that have been made that if you find that system defects probably contributed causally to PC Palmer's death, you ought to say so. Equally, if you consider that you cannot reach the threshold of probability, but you consider that system defects possibly contributed to his death, you should say so similarly, using words indicative of possibility.

My learned friend Mr Keith is quite right in his gentle criticism of our wording which used the phrase "not certain". He is right to say that the determination ought to speak either in terms of a probable causal link or a possible causal link.

In a similar spirit, however, of gentle and friendly criticism, we would point out that his form of words in naming Masood as the attacker infringes section 10(2)(a) of the Coroners and Justice Act 2009.

Sir, drawing the threads together, it is a challenging question involving some speculation whether the various arguable, or actual, deficiencies in the system of security at the Palace of Westminster were causative of PC Palmer's death. But we say, sir, that that should not cause you to abandon hope and abandon

the challenge of determining whether these deficiencies, if they were found to exist, were contributory or possibly contributory to his death.

As Mr Adamson said, it is sometimes the task of the court to engage in hypotheticals which may involve some speculation. But we say the question here is whether the set of uncertain hypotheticals reaches a threshold of realistic possibility or probability.

Sir, may I assist in any other way with the challenges you have to face?

THE CHIEF CORONER: No, Mr Hough, thank you very much. Can I, again, simply thank everyone for their very helpful, both written and oral, submissions.

Mr Hough, it is just shy of 11.10. What I'm going to do is I'm going to rise and I'm going to suggest we sit in an hour's time and take matters on to the next stage at that point.

(11.08 am)

(A short break)

(12.12 pm)

THE CHIEF CORONER: Mr Hough, can I just say, I'm about to start on reading my summary of the evidence that's been called in the course of the Inquests. Inevitably that's going to take me a little time to deal with, so I say that to start with.



Secondly, I don't intend to show any imagery, but clearly the descriptions of some of the things I'm going to talk about, some may find distressing.

MR HOUGH: Yes, sir.

Chief Coroner's Summary and Conclusions

THE CHIEF CORONER: On 22 March 2017, one of the most iconic areas of London was the site of a deliberate act of terrorism. Westminster Bridge, the areas around the River Thames, and the Palace of Westminster are visited by tourists from all around Great Britain and Ireland, and the rest of the world.

22 March was a day like most others in that area: groups of people of all ages making their way to see the Houses of Parliament, going towards the London Eye, the London Dungeon and the numerous other sites in that area. Others in the area were on the river, seeing the sights of London from the water. They were all there to enjoy the day. For many, it would have been their first time of seeing those sights; for others a return visit, and perhaps sharing their favourite views with friends. Others were in the area for work, or for business. Each was going about their day as if it was any other day.

These Inquests commenced with relatives and friends of the five who died giving me a picture of the person they loved in life. It was both powerful and moving.



There was some humour. There were photographs, showing people full of life. The families have shown great dignity throughout this process. I have had the opportunity to meet with maybe all of them privately, and it's been important for me to do so.

These Inquests are concerned with the deaths of five people. A coroner only looks into matters around death. This is not a general inquiry into the circumstances of those who were also injured. However, it would be wrong for me not to say something about those who did not lose their lives, but for whom 22 March was a life-changing day.

Four people were struck by the car driven by Masood and were killed. Many others were also struck by Masood's car. In some of the CCTV footage shown in the course of these Inquests, men, women and young people are seen to have taken an impact to their body from the car. In addition to those who lost their lives, no fewer than 29 people received serious injuries. The scene has been described by some as "carnage". It was clearly the deliberate targeting of pedestrians crossing the bridge.

On average, the vehicle was driving at between 30 and 32 miles an hour. From a standing start, it quickly got to that speed, and throughout its passage across the



bridge, on the roadway, on the pavement, in the cycle lane, and moving between those places, it was driven with a clear, murderous intent.

I am sure that one of the reasons that many more did not die from the serious injuries they sustained is due to the quite overwhelming acts of those who responded. Many doctors and nurses rushed from St Thomas' Hospital to give what assistance they could. Many members of the public did what they could to provide aid. Many stayed with the people they came across on the bridge, and comforted them and treated them where they could. Sadly some members of the public chose to photograph and film rather than help.

I have been struck by the particular work of a number of those who responded and cared for people with the most catastrophic injuries and who died. They could assess how serious the injuries were and the likely prognosis, but nonetheless they did all they possibly could to care for and comfort people. I am sure that what they did has been a great comfort to the families who could not be with their loved ones at that time.

It is clear that those who attended to casualties not so seriously injured also provided the best care they could, and I wish to put on record my sincere

thanks to all those from the emergency services who responded on the day as they did.

The City of Westminster is covered with CCTV cameras. The footage from the cameras in that area has provided helpful material in the investigation of these deaths. It has enabled the police to investigate the lead-up to and the carrying out of this atrocity. It has also meant, sadly, that the full horror of what took place has been fully recorded. That material has been displayed with sensitivity in these Inquests. The most graphic material has not been shown outside this process.

Westminster was busy on the day and many of the people there would have had with them mobile phones and cameras. From some of the CCTV footage it is clear that some people took photographs and moving footage of what took place. Some of that was sent to the police to assist with the investigation. Sadly some people, for whatever reason, have posted some material on the internet. Some of that material has been very distressing to the families, and I would encourage that it is removed.

Masood began his attack when he drove into the east side of Westminster Bridge from a bus lane in which he had remained stationary for a short period of time.



Masood's vehicle first mounted the kerb at 14.40.08. Masood was shot at 14.41.30. The attack lasted 82 seconds.

Kurt Cochran. Kurt Cochran and his wife, Melissa, were visiting London for a day as part of a tour of Europe. They were visiting Europe and celebrating their 25th wedding anniversary. They walked across the bridge from Parliament to the south bank. As with other tourists they were taking in the sights and sounds of London. They had visited Westminster Abbey and were planning on going down the stairs to the embankment to sit on a bench.

They had been in London for about two and a half hours when tragedy struck. Melissa was taking photographs on her phone as they walked across the bridge. She had put her phone in her purse and was looking at the postcards on the stand by the edge of the bridge. She heard a car revving, saw the front of the car, and then her next memory is of being on the ground with someone's hand on her head. Melissa received serious injuries from the impact she sustained and was in hospital for over three weeks.

The CCTV footage makes clear that in what must have been an instinctive act, Kurt, when he saw the car coming towards where he and Melissa were stood, pushed



his wife away from the path of Masood's vehicle. Masood was clearly intent on driving into them at some speed, with the devastating consequences that would have.

Kurt's action almost certainly had the effect of saving the life of his wife. Had he not taken the action he did, it is clear that she may have died or sustained even more serious injuries than she actually sustained.

It was clear to those who saw the car being driven towards Kurt and Melissa that this was a deliberate act. Ms Smith, a school teacher, was in the area with a group of her students. They were visiting various parts of London. Ms Smith, who was stood close to where the incident took place, described what she saw as a calculated act, a deliberate act towards those by the postcard stand.

The impact between the car and Kurt was such that Kurt was thrown into the air. He was thrown over the side of the bridge and fell on the lower embankment area. He fell from a height of some 5.12 metres. The car was being driven at a speed of between 32 and 36 miles per hour.

On the lower embankment was Neil Hulbert. He was with his nephew and they had just been on the London Eye and were looking at the sights along the embankment.



They had just taken some photographs when they heard the sound of a crash and then saw the sad sight of Kurt flying through the air and landing close to where they stood. Neil Hulbert describes Kurt hitting the solid ground with a terrible thud. He immediately went to where Kurt was lying.

Mr Hulbert had some first aid training. His assessment was that Kurt had broken legs and a serious head injury. There was a lot of blood and his breathing was laboured. He checked for signs of consciousness but could not detect any. The emergency services were called by a lady who was close to Mr Hulbert. Kurt's breathing became more laboured and Mr Hulbert sought to comfort Kurt.

Ms Henshaw, a clinical nurse specialist from St Thomas' Hospital, was by the entrance to the hospital when some people came in to say there had been a terrible accident and mentioned that someone had gone over the side of the bridge and onto the path below. Staff called an ambulance and Ms Henshaw decided to go and see what she could do rather than return to her office. She made her way to where Kurt was with Mr Hulbert. She made a preliminary assessment of Kurt and formed the view that he was obviously very badly injured. In her view, his head must have made contact

with the pavement from the bridge. He was not conscious and there was a lot of blood. His breathing was staggered. She described it as "stridal", something she associated with people at the end of their life. She checked for a pulse but was not able to detect one peripherally. None of the signs were good.

An ambulance crew were soon to join them. A doctor also arrived. All were deeply concerned about the condition of Kurt.

James Richards is a paramedic who went to where Kurt was lying on the ground. He explained all of the steps they took with Kurt for his airway, breathing and circulation. Despite the most valiant of efforts of all who attended to Kurt, his injuries were such that he did not survive. Kurt Cochran sustained catastrophic head injuries and was declared dead at 15.00 hours on 22 March. He was then aged 54.

Dr Simon Poole, a Home Office pathologist, carried out a post mortem on Kurt on 25 March at Westminster Mortuary. He noted multiple injuries on an external and internal examination, the most severe of which were to the head and trunk. Those injuries can be attributed to blunt force trauma. There was a skull fracture running across the top of the scalp. There were injuries to the lower limbs, around the knee joints, the right ankle, to



the backs of some of the ribs and a partial dislocation of the left shoulder joint. There were a large number of areas of bruising underneath the surface of the scalp, as well as many other areas of internal injury.

The brain was formally examined by Professor Al—Sarraj. The conclusions he came to as a result of all the examinations were that there were multiple injuries found on external and internal examination, the most severe of which were to the head and the trunk. All the recent injuries and marks can be attributed to the result of the strike against a moving car, the throw and the impact or impacts against a hard surface, such as paving, carriageway or street furniture.

Given the severity of the head injuries, Dr Poole considers it likely that after coming to rest, Kurt would have been rapidly rendered unconscious. He also regarded it as probable the post—injury survival period would have been brief. He gave the cause of death as multiple injuries. His view was that any medical attention which could have practically been given at the scene, these injuries were not survivable.

The pen portrait material showed how much Kurt was loved by his family and by all who knew him.

A statement from Kurt's sister, Sandy Cochran, was read,



as was a statement from Melissa, read by her sister, Angela Stoll. In Melissa's statement, she included some thoughts and comments from other family members. I had the pleasure of meeting with and speaking to Melissa and her sister before they had to return home to Utah. We spoke about Kurt, the process of these Inquests, and also about her medical treatment.

Leslie Rhodes. Leslie Rhodes was walking along the pavement on Westminster Bridge from south to north. He was walking from St Thomas' Hospital across the bridge. He was struck by the Hyundai driven by Khalid Masood as it went across Westminster Bridge, veering on and off the pavement as it did so. The car struck him when he was on the pavement, and he was carried along it into the carriageway. From the point of impact to where he came to rest is a distance of some 33 metres.

DNA from Leslie was later found on the underside of the Hyundai. At the time of impact the accident reconstruction experts, Police Constable Keen and Police Constable Clark, estimated the average speed of the car to be between 29 and 36 miles per hour at the point of impact. The CCTV footage shows the use of the Hyundai as a weapon by Masood on Leslie, as it was with the others on the bridge that day.

Dr Lloyd, an ear, nose and throat registrar, then



working at Guy's Hospital and St Thomas' Hospital, was undertaking what he described as the role of the "hot registrar of the week" meaning that he was on call between 8.00 am and 5.00 pm for referrals and in patient reviews for patients within his key discipline, primarily at guys, but also at St Thomas' and King's College Hospitals.

He was on Westminster Bridge on his way to review a patient in intensive care at St Thomas', having travelled there by underground from Guy's to Westminster. He was walking across the bridge on the opposite side of the road to the attack. He heard a loud bang coming from the area in front of him and to the right of him. He looked to where the noise came from and saw the Hyundai travelling erratically. The engine was making a loud roaring noise suggesting to him that the accelerator was being pressed. It seemed to be gathering pace. He was aware of damage to the front of the car, dents to the bonnet and bumper. He estimated that the car was driving at 30 miles an hour. It was on and off the pavement. He saw three people struck by the car.

It appeared to him to be a deliberate act, and he wondered initially if it was a car evading a police chase, but no police vehicle seemed to be in pursuit.

He crossed the road to where he had seen three people struck. He went to one of the three, Leslie. He went to Leslie as he had appeared to take a significant impact and then made no attempt to move once he had landed on the ground. Leslie was unresponsive and needed immediate medical attention.

Dr Lloyd noted that the other two did not seem to need such urgent attention and had people attending to them. He had seen that Leslie was in the direct path of the Hyundai and had been hit by the front bumper of the car, lifted over the bonnet towards the windscreen, which then lifted him further before then falling to the road. Another person called an ambulance, and so Dr Lloyd attended to Leslie.

He felt for a pulse, first on the arm and then on the neck. In doing so, he noted an injury to the head. It was very serious. To him it looked like an immediately life-threatening injury. It would, he said, be a significant injury for any age, but with the age, the potential for significant and life-threatening injury was severe.

Leslie did not appear to be making any effort to breathe. With the assistance of the lady who had called for the ambulance, he moved Leslie. He noted other injuries to Leslie, to the right eye, and there was



blood coming from the nose and mouth. Dr Lloyd sought to open Leslie's airway. He carried out a jaw-thrust manoeuvre and Leslie began to breathe spontaneously. He then tried to remove secretions and blood from his mouth by putting him in the recovery position and using his fingers. At this stage he had no medical equipment and was doing what he could.

A paramedic arrived by bike and the two of them continued to treat Leslie. They used an aspirator to remove blood from the back of Leslie's mouth and they gave oxygen. With the equipment the paramedics had and then the ambulance, they were able to obtain intravenous access and apply monitoring. They also placed two needles in the front of the chest with the aim of decompressing any chest injury.

Initially the observations were, in the view of Dr Lloyd, quite remarkable: pulse, blood pressure and oxygen saturations which were better than they had anticipated, and made them more optimistic about his chance of survival. Definitive treatment needed to happen quickly. They were awaiting allocation of a hospital. As they were on the south side of the bridge they felt the best course was to head south.

Dr Lloyd went with Leslie to the hospital. His role was to maintain the airway and also be involved in the



monitoring of Leslie. As they went to hospital, Leslie's oxygen saturation was slowly dropping. The journey took eight minutes. Leslie's care was then handed over to the major trauma team on arrival, but Dr Lloyd remained at the hospital.

Leslie went for a CT scan. That scan revealed extensive injuries to the head, chest and abdominal organs. The head injury was significant, and had caused potentially irreversible changes to the brain. Leslie was to die later.

Dr Lloyd said that from the moment he saw the head injury on the bridge and the age of Leslie, he feared that it was likely to be an unsurvivable injury. On the bridge he had asked about the possibility of assistance from HEMS. Leslie fitted the criteria and type of patient for their assistance. As far as Dr Lloyd was concerned, there was no direct contact with HEMS, but he understood they would be coming, but minutes later it became apparent they were attending the scene on the north side of the bridge.

Dr Lloyd did not think there was anything he could have done to have materially changed the outcome for Leslie. It is clear to me that Dr Lloyd not only did all that could be done medically to aid Leslie, but also all he did to comfort Leslie in the time after he



sustained such catastrophic injuries.

Gary Moody, a paramedic with the London Ambulance Service, arrived on Westminster Bridge at 14.44. Dr Lloyd told him of his observations and he worked with Dr Lloyd in giving care to Leslie. He was told that HEMS were on their way and he was aware of the helicopter above them. There was some delay in landing and he did ask if they were still coming for Leslie. There was, he said, however, no delay in Leslie's treatment.

He was then told that there was another patient who had been stabbed somewhere around Parliament, and so they continued with their treatment of Leslie. An ambulance was on the scene quickly, and they decided to take Leslie to the major trauma facilities at King's College Hospital. He, too, went with Leslie to the hospital.

The patient form he completed shows his arrival time at the scene as 14.44 and the time with the patient at 14.45. He had completed details as to his observation, including a Glasgow Coma Score suggestive of unconsciousness. Airways were inserted and there was then continued spontaneous respiration. They left the scene at 15.08. Had HEMS been present and taken further steps, Leslie would have remained on the bridge for

longer, possibly another 15 minutes. They were at the hospital by 15.18.

Dr Simon Calvert, a consultant in emergency medicine and intensive care medicine at King's College Hospital was covering the major trauma rota on this day. He was the initial leader of the team that provided care to Leslie on his arrival at about 15.18 that day. He was given a full history of the interventions by Dr Lloyd and they set about securing his airway and maintaining his breathing. The CT scan showed a severe traumatic brain injury and a depressed skull fracture. There was air inside the skull cavity. The scan also showed some haemorrhage and a loss of grey/white differentiation in the brain which would suggest either severe swelling or a severe lack of oxygen had occurred and this would be a very significant finding early on in a CT scan.

Dr Calvert explained that they wouldn't normally expect to see that for a day or two after an injury like this, so that in combination with the fact that he was unconscious at the scene and his pupils were not reacting to light painted a picture that the injury would not have been survivable.

Other, slightly less significant injuries, were also shown on the scan: there was a dislocation of the right knee that may be consistent with the moment of impact



from the car, as well as injury to the lumbar vertebrae.

There were discussions between consultants from various disciplines: neurosurgery, the trauma team, the intensive care team, and the conclusion was that this injury was likely to be unsurvivable. There was no surgical intervention that would be able to help. In effect, the damage had been done at the time of the event, and surgery would be of no value.

Leslie was transferred to the intensive care unit. Despite the care they provided, Leslie became increasingly unstable and died at 20.44 on 23 March 2017. It is clear to me that all those who cared for Leslie on the bridge, in the ambulance and on his arrival at King's, did all they humanly could to help him, but his condition was so grave nothing more could be done.

Dr Ashley Fegan—Earl, a Home Office pathologist, carried out the post mortem examination on 25 March 2017. He noted significant injuries from both his external and internal examinations. The most significant injuries were those to the head and brain. Again, Professor Al—Sarraj examined the brain to make an assessment. From his examination and all of the additional information he was provided with, Dr Fegan—Earl concluded that Leslie had died as



a consequence of an act of violence. The external examination showed features of impact to an upright individual, probably to the right—hand side of the body. This was a reference to injuries to Leslie's right lower limb with fractures and instability of the ankle joint, and the significant head injury to the right—hand side. Leslie had suffered a devastating head injury to the right—hand side of the head. There is a rounded skull fracture that may be relevant to impact against a patterned object. That could either be by impact against a vehicle or as a result of his projection onto the road.

Leslie also suffered from bruising to the brain caused by the moving head striking the ground. In Dr Fegan—Earl's opinion it was devastating, unsurvivable and would have rendered him deeply unconscious straightaway. Professor Al—Sarraj found evidence of a particular type of injury: diffuse axonal injury. This refers to the shearing of nerve fibres caused by violent application of force. Such injuries are graded out of 3, with 3 as the most severe, and Leslie had suffered grade 3 axonal injury.

Such an injury further confirmed his view both as to the unsurvivability of this injury, and the fact he would have been rendered immediately and deeply



unconscious.

Various other injuries on Leslie's body are consistent with road contact, with the most relevant of those being the impact injury to the lower right leg. Dr Fegan—Earl also expressed the opinion there was no issue with the medical treatment Leslie received, and the formal cause of death was head injury. He was aware that after Leslie was hit by the vehicle, he was thrown into the road and carried forward some distance, and that there is a combination of head injury in part caused by primary contact with the vehicle, but exacerbated by his subsequent projection onto the roadway.

There were signs of injury to the brain, suggesting that it was moved from side to side within the skull. When he was hit and then thrown onto the roadway, his head would have stopped suddenly and that can cause a particular pattern of bruising that had been identified.

In relation to whether it might have been possible to transport Leslie to hospital more quickly through the action of the HEMS, his clear opinion was that, leaving aside whether that was practical, as a matter of probability, in the light of the neuropathology results, Leslie would not have survived if he had either been

transported to hospital earlier or received earlier medical intervention. Leslie had been deeply unconscious from the start and would have suffered little or no conscious pain or suffering.

Mr Patterson QC read a moving statement from Amanda Rhodes, a niece of Leslie's. That statement covered all aspects of his life, including his work as a window cleaner, his family and his interests, particularly those in cricket and fishing.

Aysha Frade was walking towards Parliament Square across Westminster Bridge. She was carrying a shoulder bag. Aysha was working at the DLD College on Westminster Bridge Road. She had just left work and was heading home to collect her children. Masood drove the Hyundai into her. Three other pedestrians were also hit at about the same time.

Aysha and the others were plainly in view of the driver of the vehicle. Aysha was thrown into the air and propelled forward. She was thrown a distance of some 17.4 metres from where she was first struck and into the path of the nearside rear wheels of a bus. The bus applied the brakes, but sadly, the rear wheels passed over her body. Such were the injuries she sustained that death would have been instantaneous.

In the moments before the impact, Aysha can be seen



on her mobile phone. Masood's car hits Aysha at the front, or the front driver's side of the car. The time of impact is 14.40.16. Aysha does not turn around or make any other movements suggesting that she knew what was to happen or that she had noticed the car.

There was clearly a hard impact with her head on the windscreen of the car. The time when she landed on the road was at 14.40.17, and then the bus brakes and it is at a halt about five seconds later. Although there is limited CCTV footage to give an accurate view of the speed of the Hyundai at the point of the impact, soon after the impact the calculations from the reconstruction experts put the speed at between 31 and 42 miles per hour.

Rob Lyon was in London for business commitments, including an interview at the ITV Studios on Millbank. He was with some colleagues and they had left the studios at about 14.30. They were staying at the Park Plaza Hotel and so they went past the Houses of Parliament and were due to cross Westminster Bridge to their hotel. Mr Lyon recalls the bridge being fairly busy with the usual mix of tourists and businesspeople.

They were about two—thirds of the way across the bridge when one of his colleagues, James, shouted to get



out of the way. He heard a crunch, a sound like the kerbing of a wheel of car but much louder, and some really high revving of an engine. It sounded to him as if someone had floored the wheel in first gear. He then saw three people being hit by the car. He heard lots of noises, bangs and shouts, and his next memory is of being stood in the road.

He saw the Hyundai mounting the pavement in front of him, the engine was revving incredibly loudly and he almost expected it to crash into the wall of the bridge. He thought it was a car crash, but the car seemed to be revving louder and louder. The car then corrected itself in terms of its direction, before heading straight down the pavement. The pavement was thronged with pedestrians. He saw the car hit two women and a man. It all happened incredibly quickly.

His first reaction was to freeze. He described the picture as one of carnage. He did not remember hitting the side of the bus, but he had tried to slow the bus because he could see that it was going to run over Aysha. He thought the Hyundai had been travelling at about 40 miles an hour. It felt to him as if it was accelerating and the loudness of the impact gave him that impression. Then he was aware that the bus ran over Aysha. This was very close to him, perhaps 6 foot



away. He saw it and heard the sound. Aysha was face—down with her upper body under the bus.

He used his phone then to contact the emergency services. He wanted to help Aysha, but he knew it was too late.

Another man, Robert English, picked up Aysha's phone from the road. The phone had rung and he answered it and it was John, Aysha's husband.

Richard Webb—Stevens is a motorcycle paramedic based at Waterloo ambulance station. At 14.42 he received a text message, saying "Westminster Bridge RTC". As a motorcycle paramedic he gets sent to a job and the ambulance comes to support him. He and another colleague were both being sent to one call.
Mr Webb—Stevens is also a HEMS paramedic. It seemed to him that they were both going to the call, and he deduced that he was going as a HEMS paramedic to give support to the patients and ambulance crews on the scene.

When he arrived on the bridge he was trying to get an overview of what had happened. En route he had his first manual message to the effect that it was an RTC with multiple casualties. He could see the police running to the south side. He could see it was a significant job that was brewing. He spoke of the

advantage of being on the helicopter in the HEMS crew, that you have the massive advantage of seeing the scene from a good height. It might be an error, he said, to run for the first patient, so he tried to give himself a few seconds to have that overview. He could see where Leslie Rhodes was, another group of people to the left of him, and Aysha underneath the bus.

He stopped at Leslie first. He stayed on his bike and shouted out to each group, because all the casualties were either sitting down or lying down and being tended to by members of the public. He was able to get a visual on their faces and to see if they were breathing and conscious. He asked each group in turn if the patient was conscious and breathing. He then carried on further onto the bridge.

He identified Leslie as a priority 1 patient. He could see that he had multiple injuries. He then made his way to the bus where Aysha was lying. He also needed to get an overview of her. He felt that if he was to stay with one patient, he would have lost the initiative. He noted other casualties as he rode to the bus.

At the bus he could see that Aysha was pinned by two wheels at the back of the bus. He rode along, and although the bus was pretty low he could see, he said,



some brain matter just beneath the bus. He was convinced that Aysha was dead. Aysha was lying on her front and was not giving any opportunity to ventilate. He sought to ascertain if the driver was still in the bus and if there was any damage to the bus as part of trying to piece together what had happened.

He tried to communicate with a group of Korean tourists who were looking into the river. They didn't speak English. He also found four other casualties with broken limbs and head injuries and then did an initial report to the HEMS control desk to update them.

He formed the view that sadly he could do nothing further to help Aysha. Had he seen any sign of life or any prospect of saving Aysha, he would have treated her by carrying out resuscitation, but based on the injuries he saw, which were unequivocal, and which were absolutely incompatible with life, he decided not to do any further assessment or treatment and went to the help of others.

He made his way to where the Hyundai had crashed into the perimeter wall where he found a young French teenager conscious and bleeding with limb fractures and external head injuries. Next to him was another French child with the same pattern of injuries and an Italian lady with injuries. Members of the public or a doctor



were tending to all of those he saw.

When he saw the damage to the Hyundai he thought it was a terrorist attack. In his view, this was a deliberate act, that he had run all these people over and made further contact with the control room to report to them what he had seen and what he believed was now a major incident and probably a terrorist attack. He was told to change his radio channel, consistent with this now being a major incident.

He noted that at 14.47 he was clear in his own mind that Aysha was dead. At 14.53 he confirmed this to a police officer and a blanket was placed over Aysha at 14.48.

In normal circumstances with a single patient, a blanket would have been placed sooner, but as the emergency services were dealing with so many casualties he said it didn't happen.

Mr Patterson asked him about the HEMS team. He was aware of the arrival of the HEMS team. As to a second HEMS team he said he thought that was pretty unlikely. They have one team operating every 12 hours and that is a team of a doctor, a paramedic and a consultant. In the event of a major incident or multiple causalities, other paramedics or doctors who may be at the hospital in operation can declare themselves as a second team.



He said it was not something you can do every 24 hours, but he was told that in this situation there were a couple of paramedics and doctors that were able to form such teams.

Having said that, he said, by the time they had been dispatched and arrived at Leslie Rhodes, Gary Moody had already left the scene and done the right thing. Had a second HEMS team landed, they would not have been able to do so in such a timely fashion as Gary Moody had already made his way to hospital with Leslie.

PC Kirsty Bambrough was also by Aysha. She arrived at 14.54. A doctor from St Thomas' was with Aysha at that stage. The doctor was looking for a pulse and holding Aysha's wrist. The officer spoke to a Mr Yacine Alouia who told her what had happened to Aysha. The doctor looked at Aysha after she arrived. She too saw the horrific injuries to the face and the head. She looked into the handbag to seek to identify Aysha and found a letter with the name of the school on it and made the decision to contact the school to inform them of the accident. PC Kirsty Bambrough remained with Aysha until 5.20.

Dr Colleen Anderson is a medical doctor. In March 2017 she was based at St Thomas'. She had qualified for about eight or nine months in clinical

practice. She was in an office overlooking Westminster Bridge that afternoon. A colleague ran past her at about 14.30 and said they needed to go out and help or alert A&E to get things moving.

Her colleague told her that someone had driven along the bridge. From what he said it didn't sound like an accident. When she, herself, looked out at the bridge it was at a standstill and people were attending to people lying in the road and there was a lot of mess and the postcard stand. She came to the bus and saw the body covered in a blanket. It was 14.53.30 when she arrived there. She made some checks of Aysha. It was obvious to her that the injuries were incompatible with life. She then went to aid another with serious injuries, Police Constable Kris Aves, before returning to her duties at St Thomas'.

Dr Fegan–Earl carried out a post mortem examination on Aysha on 25 March 2017. When he carried out his external and internal examinations, he noted significant head injuries and then a further distribution of injuries over the body and, in particular, the lower limbs. There was a catastrophic head injury to the upper part of the scalp, the top of the skull, a devastating and unsurvivable head injury.

On the internal examination, he noted multiple



fractures of the bones of the face, fractures across the base of the skull and a major crushing injury to the top of the skull.

When he examined the cardiovascular system he noted that the heart had torn away from the major blood vessel and had been pushed down into the abdominal cavity. In his opinion, that was a devastating injury in itself. There were fractures to both right and left–sided ribs and an injury to the seventh vertebrae which was disrupted very significantly. That is an injury of a substantial area of bone which he said required significant force.

In his opinion, Aysha had died as a consequence of violence. There were multiple injuries and death would have been near instantaneous, and in his view without suffering.

The most crucial injuries were those to the head, which are entirely consistent with her having been projected beneath the wheels of a bus. Dr Fegan–Earl considered the findings of his examination, and the CCTV material, and said there were features in keeping with primary impact to an upright individual, probably to the left side, given the fracture patterns.

He agreed that in the moments before impact she had been using her phone and appeared to be completely



unaware of what was about to occur. The impact caused Aysha to be violently projected, ultimately beneath the wheels of a bus. Whilst it was not possible to state definitively whether Aysha would have suffered fatal injuries from the impact alone, as it was not possible to conduct neuropathology, it is, however, his view that there is a distinct chance of fatality given first of all the speed of the vehicle that he had viewed, comparing that type of impact with his experience with other road traffic collisions which have proved fatal without the subsequent projection beneath the bus.

He also noted the evidence of contact between the windscreen of the vehicle and Aysha's head. The formal cause of death was head injury and chest injury. His view was that the death was instantaneous and that Aysha did not suffer. He had a high suspicion she would have died had she not even been thrown under the bus. It would have been obvious on even the most cursory view of Aysha's head injury as she lay under the bus that she was dead.

Aysha's sister, Michelle, spoke for herself and her and Aysha's other sister, Silvia, about the loss of their dear sister. Aysha's husband John also spoke movingly about the loss of his beautiful wife. His statement covered the many aspects of Aysha's life and



the impact on him and their two daughters of their loss. As with all of the others on the bridge, her full life was tragically cut short.

Andreea Cristea. Andreea was on Westminster Bridge with her boyfriend Andrei Burnaz. They were sight–seeing. They were walking across Westminster Bridge. They were a short distance apart when the Hyundai came towards them. Andreea was stopping on occasion to take photographs with her phone. The car hit Andreea, and such was the force of the impact that she was thrown into the air over the parapet of the bridge and into the River Thames.

PC Clark put the speed of the Hyundai at that point of impact, albeit from CCTV footage with a long view, at between 28 and 36 miles per hour. Andreea entered the water at 14.40.22. She fell from a height of more than 12.5 metres, that being the distance between the water level and the top of the balustrade.

The current in the Thames then pulled her along to the east. A tourist clipper boat, the Millennium Diamond, was close by. Andreea was carried a distance of approximately 100 metres and was in the water for a likely total of little more than five minutes before she was recovered by a London Fire Brigade boat, the Fireflash.

Michael Brown made a 999 call to report that a woman was in the river and was drowning. Andreea was brought to the side of the Fireflash boat at 14.43.33.

Andrei Burnaz explained that he and Andreea were in London on holiday. They had arranged to meet someone at the London Eye at 14.30. They had arrived in Westminster early on and visited the Abbey and then walked across Westminster Bridge towards the south bank. The bridge was quite busy with pedestrians. They stopped to take pictures. He became aware of screaming and noises in front of him. After that he heard a loud bumping and something hit something else.

In front of him he saw a car zigzagging between the pavement and the cars that were stopped for traffic. He saw the car come towards them. It was very quick, and he felt a burning sensation on his foot as the car passed over it, and then another banging and the car hit Andreea.

At the point of impact there was between 8 to 10 metres between him and Andreea. The car was damaged to the front. After the car passed, he looked to his left to find Andreea but couldn't see her. The last time he had seen her, she was to his left, but was now nowhere to be seen. He went to both sides of the bridge and was running about frantically looking for her. He



ran towards the car to see what had happened as he thought she was struck by the car and may be stuck underneath it.

As he ran to Parliament Square, he saw people on the pavement, some covered in blood and pools of blood everywhere. He tried to explain to a police officer he saw as to what had happened. The officers were trying to clear the area. He then tried to call Andreea on her phone, and it was ringing and he thought that was a positive sign. He then found her phone and her glasses in a pool of blood. They were close to where they had been standing when the car went past them.

He looked again into the river and he then called Andreea's family and spoke to Magda, her sister, and told her what had happened. At one stage he thought about jumping into the river himself, but he continued with his search and with making calls to the family.

He spoke to a police officer near to a hotel. He said that the car had hit his girlfriend and that she was in the river, and the officer took his details. This was about 15 minutes after the point of impact. He waited at the south bank hotel for some time. He received a call from Andreea's sister and was told that they had found Andreea and that she was in St Thomas' Hospital. He was taken to King's College



Hospital for his own injury and whilst en route was told that Andreea had been moved to the Royal London Hospital.

After he had been treated, he was taken to where Andreea was being cared for. He spoke about some of what he said to others at the time as being a response to being in shock over what had happened.

Michael Brown was driving his van across Westminster Bridge at the time of the incident. He was about halfway across the bridge when he heard a loud bang. At first he thought something had hit a bus. He looked towards the direction the sound came from and saw a vehicle driving forwards on the opposite pavement. It was hitting people as it drove along the pavement and people were being flung everywhere across the road.

He saw the vehicle hit Andreea. She was thrown about 10 feet into the air and she came down into the Thames. She spun over and over and straight into the water. At first he said he didn't register what had happened, but he did a U—turn, jumped out of his van and was looking over the side of the bridge into the water. He called 999 and, whilst doing so, ran to both sides of the bridge looking for Andreea. His call was made at 14.41.

On the east side of the bridge he saw Andreea



floating face—down in the water with her arms outstretched. She wasn't moving but the current was carrying her downstream. There was a pool of blood around her. There was a boat to his left just pulling out from the pier, and he began to shout to the man in the front of the boat to get his attention. He was shouting and screaming at those on the boat. His calls were acknowledged. There was a smaller boat too and he saw it had pulled up next to the side of the bigger boat. He thought they were going to save her. He then went to the assistance of others.

On his 999 call he had spoken of a number of 20 people that had been knocked over.

Danny Cooper was the captain at City Cruises. He was the mate on board the Millennium Diamond operated by City Cruises that day. He holds a fully endorsed boatmasters' licence. Gordon Markley, another captain, was also on board and was the capital of the boat that day. There were also three cabin crew aboard.

They have a man overboard procedure to be followed in the event of somebody going over the side of a boat. That involved the use of a grab net, or a ladder, so that somebody could climb up to the side of the boat, but there was no specific procedure as to what they do if they found someone in water unconscious.

He had come across such a situation on two or three other occasions. Smaller boats are used. He said he had no experience of getting an unconscious person onto the side of a boat such as this.

They were due to leave Westminster Pier at 14.40. When they left, he was unaware of anything untoward. They left the pier and started to turn to port to turn south towards the south bank pier. He was at the helm in the wheelhouse.

5 or 10 metres off the pier he noticed what looked like a pile of bags or some garbage coming through the third arch of Westminster Bridge. He and Gordon Markley questioned it, and then they heard and saw Mr Brown looking down at them, waving and screaming. He was shouting there was someone in the water. Initially they still thought it may be debris. They decided they would go and hold onto it or collect it. As they got closer, it was clear it was a body. He was driving the boat and Mr Markley went to get the boat hook. He moved from the wheelhouse to the controls in the open air to get a better visual. There was a call that came out on the radio confirming a body in the water.

He saw that Gordon Markley had got hold of the body. This was at or about 14.42.39 that Mr Markley had hooked Andreea's clothing. There was a lot of blood that



filled the water around her. As he looked down he said to Gordon not to move her too much. At the time they didn't know how long she had been in the water. It was physically impossible to pull somebody up with a boat hook, although a natural reaction is to pull and tug, by doing so he was concerned that bits of the body would have been coming up. It was impossible to pull someone up with a boat hook, as there was simply too much of a gap.

They also had a lot of people sitting around the edges of the boat and if the body had been in the water for a long time it would not have been very nice for anybody involved, particularly the children sitting downstairs. At that stage it did not occur to him that this body had only just gone into the water.

He saw the fire boat coming towards the Millennium Diamond and they manoeuvred to come and collect the body. There was a transfer between the two boat hooks. The transfer took place at 14.44.27. The fire boat was fitted with a Jason's Cradle that can be used to roll something up the side of the boat. The transfer took place in seconds and then the fire boat went fast to the lifeboat station.

A police boat then approached them to collect a certificate that Gordon pulled from the water. It had



somebody's name on it and they thought it might help with identification. He did not think it would have been possible to get Andreea out of the water more quickly or more safely in the conditions and circumstances.

He had heard Mr Brown calling out from the bridge. There were many voices calling out that could be heard on the CCTV footage from the Millennium Diamond, and that was played in court. Also captured on the recording is Gordon Markley saying he didn't know if it was a wind-up. Mr Cooper explained that it was something they'd had before with people screaming off bridges and it had proved to be nothing.

Andreea had been hooked about two minutes after she had gone into the water. He was able, he said, to see a tattoo on the lower back of the person, but he couldn't know that it was obviously a woman at that stage. He reiterated it would have been physically impossible for Mr Markley to have pulled someone up from the distance the body was from the deck. The gap between the deck and the waterline is just over 5 foot. They didn't know what condition the body was in and had Gordon started pulling it, he may have been pulling up a dismembered body.

Although the body might only have weighed 11 stone



and the person 5 foot 5 in height, it would not have been possible for one or two of them to have used the 15-foot boat hook to lift her out of the water.

He had assumed the body had been in the water for a long time because the only bodies he had seen had been face-down and unconscious and in the water for a few days. It did not occur to him that the body had just fallen from the bridge.

He explained that the tide pushes bodies up and down all day and nobody sees them and so the initial reaction was that somebody had seen a body on the other side of the bridge, they'd come and tell them on this side. The blood around the body, he said, did not suggest a recent impact to him. He thought it may have been hit by a propeller. He assumed the body had been in the water for a while as it was unresponsive. If someone had just fallen in, there is a lot of noise, but with this, there was nothing. The attempt not to move her out of the water was because they didn't want pieces of the body coming up. There was no way that Gordon could have pulled her up to administer first aid.

Both he and Gordon Markley were first aid trained. He knew that the longer someone was immersed in water, the greater the impact it will have on their health, and he had training as to what to do in emergency situations

such as when someone goes overboard and needs to be brought back onto the vessel. Again he repeated it would not have been possible to get her onto the vessel.

Had they been able to do so, they could have given her resuscitation. The man overboard situation set out in the City Cruises manual was based, he said, on a conscious casualty that wants to get out of the water, the person can pull themselves up to a grab net or the man overboard ladder. What they had done here was to stop, he said, the body disappearing.

Mr Hough, I'm going to pause there and we will resume at 2.05 pm.

MR HOUGH: Yes, sir.

(1.04 pm)

(The Luncheon Adjournment)

(2.05 pm)

THE CHIEF CORONER: Gordon Markley has been a captain on the Thames for over 20 years, and also holds a boatman's licence. He knew of the company procedures for someone going overboard. They had a rope net which could be lowered over the side of the vessel, which will enable a person to cling to it, and a ladder which you could hang over the side supported onto the boat which you could assemble yourself and go down to the water level to retrieve a person. They had both items on board on



22 March. He was the senior captain of the vessel that day.

As Danny was manoeuvring the vessel from the pier he heard a person shouting from the bridge. Their attention was drawn to something and then they realised there was someone in the river and they jumped into action. He ran down to grab the hitcher, a boat hook, to try and get hold of the body in the water and to give assistance. A boat hook two—thirds of the actual one was brought to court so that I could handle it to gauge the weight of it.

Mr Markley saw the body coming through the bridge. He was unaware of the situation that had arisen on the bridge and presumed it was a body in the river. His first instinct was to get hold of the body rather than it floating off with the tide. There were no signs of life.

Coming across bodies in the river is not something they see every day, but he had experience of it many times. He had been fortunate to save lives, but in those cases they have seen movement and given assistance, thrown lifebelts to people, but in this case there was no sign of life until the body had got quite close to him, and he was able to grab hold of some of the material and could see there was a lot of blood



coming from part of the body. This is when he realised there was something more on there but still, he said, no signs of life. There was no indication that the person was alive.

With the hitcher he grabbed part of the clothing to hold the body near to the boat. He and Mr Cooper were trying to manoeuvre the body away from the propellers of the boat. The tide was pushing the boat away from the body and so Mr Cooper had to manoeuvre the boat to get near to the body so that he could get a hold on it and with a vessel of that side he said Mr Cooper did a great job. The vessel was some 33 metres long and 14 metres wide.

He hitched part of a rucksack he could see Andreea was wearing. He then pulled her to the side of the boat, awaiting assistance. He had not considered the possibility of using the boat hook to lift her body out of the water and bringing her onto the boat. His opinion was to leave her there in that position rather than causing any further injuries. Lifting the weight of a body might cause a spinal or neck injury. He was still presuming it was a dead body, but as it got closer, there was a vast amount of blood swirling around, which he thought was unusual, but he said this was all over in about a minute.



Although he began to harbour doubts about whether this was a dead body and whether it might be someone who was alive, there was no way in his position with the boat hook that he could have got the person onto the boat safely. The clothing might have torn or the piece of strapping on the rucksack may have torn. If he had lifted the body from the water onto the side of the boat it is approximately a metre and a half lift and to pick a body of that weight up that far he thought would have caused more damage.

With the boat hook he would not have been able to lift an 11—stone body with a person wearing water—logged clothing. He saw assistance coming immediately. He saw a police launch and then a fire launch within seconds. Both vessels approached and they ushered the fire launch to them. He walked the body to the front of the boat, keeping it clear of the propellers and then handed the body to those on the fire launch. It was about 20 seconds from him releasing the boat hook to the fire launch using the cradle and getting the body on board. The launch then moved immediately to the pier to hand the body to the emergency services.

He was just about to release Andreea, pass her to the fire launch, when it looked as if a certificate had come out of her rucksack. He quickly released her,

harpooned the certificate, flicked it onto the deck and still had time to get back hold of the rucksack strap and pass her body to the fire launch.

In a report he filed later he set out the person was probably not alive as there were no signs of life that he could see. He had also put on the report that a reason they had not retrieved the body was as it appeared dead, bloodied, and they had a boat full of children. To bring the body on the boat with that amount of passengers on board would have been distressing. Trying to retrieve the body with a boat hook on his own whilst another crew member was manoeuvring the boat would be endangering his own life and if something had happened to him, if he went into the water, then he would be leaving the boat with his colleague alone.

He hooked Andreea at about 14.42.39. About a minute later the Fireflash was in view. At 14.43.48 he had used the boat hook to retrieve the certificate, and at 14.44.28 he was transferring Andreea to the Fireflash. He didn't think they could have done that manoeuvre and the transfer any quicker.

Mr Markley was asked about a statement he had made to his employers on the day of the events. He had given explanations about why he had not pulled the body on



board. He had not included the explanation about his fear of injuring Andreea. He explained that when he had written that statement he had presumed the body was a dead body. It wasn't until later on that he had been informed that Andreea had been taken to hospital and was still alive.

He agreed with Mr Patterson that the voices calling from the bridge had a sense of urgency to them, but he had not considered getting the man overboard ladder as that would have been quite time consuming. By the time he had got the ladder, the body would have floated away. He would have needed to put the ladder into position, and it was not for him to go down to, but for someone to assist themselves out of the water. Again, he said had he seen signs of life, he would have gone down a few steps towards water level. Had there been no other assistance with them around in the sense of smaller boats, then he would have taken other steps. But with the emergency services there on hand, what did get carried out was far quicker than anything else.

He accepted that with the benefit of hindsight that he would have loved to have been able to have gone down into the water and tried at least to raise her face to see what state she was in and whether she might have started breathing. He said that what he had done at the



time he thought was appropriate.

Thomas Wolfe was the watch manager of the white Watch at Kensington with the London Fire Brigade on 22 March. He was on the Lambeth Fireflash. For him it was the first time on a fire boat. They had just passed under Westminster Bridge when they got an emergency call to a person in the river. The crew turned the boat around immediately and went towards Westminster Bridge. It took just three minutes to get there.

He saw Mr Markley with a boat hook holding something in the water. As they got closer he saw it was a female, motionless, not showing any signs of life in the water. Her arms were out and legs were going down into the water. The body was transferred to them.

There were a lot of children on the Millennium Diamond filming it and watching. The casualty was retrieved from the water using the cradle. It was a very quick process, under a minute, and perhaps 30 seconds. As soon as the cradle came up and the body rolled over he saw signs of life. He and the crew set to work immediately. He had an emergency care pack. As she was turned from face—down to face—up there was a short cough and a spurt of water came out. He noted that Andreea had a large head injury on her left side. She was not conscious. He removed her upper clothes so



that they could put the defibrillator on and start using oxygen.

Although he could not hear the commands from the defibrillator, that did not hinder the administration of first aid. They checked her airway, her breathing and circulation. He found a pulse and so they didn't actually need to use the defibrillator. Although the pulse was weak, as they moved it was gradually getting stronger. Her eyes were open and he noted one pupil was a lot larger than the other. He estimated it was about five minutes to the Tower Pier RNLI station, but it may have been only two. It was all happening very quickly. They were talking to her and trying to get a response, letting her know that they were doing the best they could for her. He saw her eyes moving. She started breathing more and as the pulse got better, her eyes opened up and he could see her eyes moving around. Andreea was then handed over to the ambulance staff.

Joanne Fant is an ambulance technician. She was contracted to the East of England Ambulance Service in March 2017. She and a colleague had transferred a patient from Basildon Hospital to the Chelsea and Westminster Hospital and had been assigned to another job in Chelmsford and so they were making their way there through Central London when a fireman flagged them

down. She was told they had got a body out of the water. He told her more of what had been going on. She asked for as much detail as she could about the body and how long the person had been in the water.

She contacted her controller to make contact with the East of England and also to ask for more back—up. She then went to the jetty. She was briefed by those with her and they could see a serious head injury. The packing on the head wound was very bloodied. The left pupil was dilated because of the injury. Her face was very distorted from the impact, which may have indicated a blown eye socket. Andreea was put in the ambulance and she continued to make observations and to provide care for her.

Andreea was wrapped in foil blankets to restore her temperature and they were looking at putting in an airway but she started choking. There were two other paramedics with her on the ambulance and they travelled to the Whitechapel hospital. As they did so, her condition was deteriorating because of the amount of blood and fluid she was bringing up. Both pupils had dilated by this stage and from the volume of fluid that was coming up, they thought she had been in the water quite some time.

Andreea was given oxygen and an ECG was being used



to monitor her heart. The head injury required constant rebandaging. At the hospital Andreea was taken to the resuscitation area. Some blood Andreea coughed up went into her eye, and so Ms Fant was admitted to A&E herself.

Dr Samy Sadek is a consultant in emergency medicine based at the Royal London Hospital. He had overseen the care of Andreea after she was brought in by ambulance. They were given a full history of the incident and a full handover. It was clear on the immediate initial assessment that Andreea had a significant head injury. She had a facial injury, bleeding from both the head and face, she was pale, she was in respiratory distress, she was struggling.

Although Andreea was breathing for herself and generating occasionally good or adequate oxygen levels, she was working very hard to achieve that. The first critical intervention was to assess and look after her airway. They thought there was a primary lung injury which they later found out was likely due to water submersion.

Andreea was an extremely complex patient. She had a number of very, very severe injuries and issues at play, one of which, that she was hypothermic and that she had lost a lot of blood. A neurological assessment was



made. Her Glasgow Coma Scale reading was 3, the lowest possible score. A chest x—ray showed quite diffuse long shadowing on both lung fields through her lungs. They intubated and ventilated Andreea. A set of CT scans were also carried out. Andreea's skull was fractured. It was quite an extensive skull fracture, extending from the side down to the base. There were quite complex and severe facial bone fractures.

She had the appearances of an injured brain. Scans led to a series of interventions. They had difficulty in maintaining ventilation to achieve good oxygen and carbon dioxide levels. They got to the stage where it as felt the only option was to put her on a lung and heart bypass machine. That decision might involve a move to Bart's Hospital, but the emergency ECMO team came from Barts to them as Andreea was too unwell and too unstable to be moved.

At 18.40 on 22 March, the intensive care team and the ECMO team took over her care.

Dr Anthony Bastin is a consultant in critical care based at Bart's. Andreea was transferred to Bart's on 23 March and Dr Bastin was involved in her care from then through to 6 April 2017. It was hoped that the ECMO support may be able to improve the oxygen levels and improve her carbon dioxide levels to improve the



conditions in an attempt to improve her recovery overall and specifically from her brain injuries.

Andreea underwent a neurosurgical procedure to remove blood from around the brain at the Royal London and was then transferred so that the ECMO support could be carried out at Bart's, which has the appropriate input to do so.

Over the period from 23 March to 6 April, there were some positive signs as well as some negative signs. Dr Bastin said it was clear to all from the outset that Andreea's injuries were very severe —— the extent of the intracranial injuries and the degree of injury to her lungs and the fact that she was requiring a lot of support in the intensive care unit to keep her alive. They were in no doubt about the likelihood of her surviving the injuries was low, but nevertheless at the early stage, and certainly in the first few days, they could not be certain of the impact of the injuries on her life later on, which is why they continued at that stage.

Despite the concerns about the poor prognosis, they were doing all they could to ensure that if Andreea did survive, she would have had as few ill effects as possible.

Andreea's condition deteriorated in early April and

following a detailed review by Professor Uff, a neurosurgeon, it was decided that as her condition had deteriorated to the point that it was no longer likely that she would survive the injuries, they should switch from an active approach to an approach aimed at palliating her condition and providing comfort and care.

On 6 April, brainstem death testing was carried out which confirmed brainstem death and the family who had been updated throughout the process and who were there with her throughout that day and were at her bedside, all other support was withdrawn and she died at 15.11 on 6 April 2017.

Dr Bastin made clear that the overriding cause of death was the brain injuries. The problems from immersion in water and the lungs contributed. Whether 2 minutes or 6 minutes in the water would have made any difference to Andreea's outcome, he thought it unlikely, but he couldn't be sure. It certainly would not have worsened things.

Dr Fegan—Earl conducted a post mortem examination on Andreea on 10 April 2017. In both his external and internal examinations, he noted evidence of head injury and lower limb injury. He noted double black eyes, not from direct injury, but as a consequence of major fractures to the base of the skull. There was an injury



to the left side of the skull. There were multiple other injuries to shoulder and upper arm, the front of the chest, pelvis, lower part of the abdominal wall, lower limbs and right buttock. The internal examination showed evidence of fractures passing across the base of the skull. That is a thickened area of bone and so the fracture is evidence of application of high levels of force. This was Andreea's only bony injury. From a neuropathological examination, Andreea was said to have suffered a severe traumatic brain injury amounting to diffuse axonal injury, the same injury he had observed in Leslie Rhodes.

Dr Fegan—Earl's examination continued to the respiratory system where he noted evidence of pneumonia which he said is an extremely common terminal finding in patients who have suffered from a significant head injury. In Andreea's case, she was further vulnerable to pneumonia on account of the time she spent underwater and the water which she accordingly inhaled.

In conclusion, Dr Fegan—Earl gave evidence that Andreea died as a consequence of an act of violence. She sustained serious head injuries, a conclusion he reached based on the neuropathology and a review of Andreea's medical notes.

That head injury rendered her immediately



unconscious. The skull injuries were most consistent with the impact from a vehicle, which Dr Fegan—Earl contrasted with injuries that might have been caused by one falling into water from a height.

He concluded that it's highly likely that Andreea would have died irrespective of whether she had entered the River Thames. The injury is likely to have rendered Andreea unconscious which subsequently made her more vulnerable to the inhalation of water, having been thrown into the river, then being unable to swim. The combination of prolonged increases in intracranial pressure and changes in the lungs due to her immersion in the river caused her major organs to fail.

The pathologist was asked a number of questions relating to the survivability of Andreea's injuries in various hypothetical situations. He suspected that she would not have survived had she been recovered from the water 2 or 3 minutes earlier. Likewise, had Andreea been attended to by a more specialist team, such as HEMS, the pathologist did not consider that this would have given Andreea a chance of survival. The pathologist supported these opinions by reference to Andreea's diffuse axonal injury. The cause of death was given as 1(a) multiple organ failure due to 1(b) head injury (operated) and immersion.



A recording was played in court setting out the detail of Andreea's life. The narrator on the recording was Magdalena Toi. The recording traced Andreea's life in Bucharest, through to her interest in fashion, her meeting Andrei and their travels together, including this visit to London. As I've said before, but repeat here, another young life cut tragically short.

I am grateful for those who organised the link from this courtroom to the British Embassy in Bucharest for some days of these Inquests so that Andreea's family have been able to follow these proceedings.

Keith Palmer. After Masood's vehicle had struck Andreea and those near her, it drove back onto the roadway before it went into the pavement for a short distance, manoeuvred around a set of traffic lights and then back onto the road. At that point, hostile vehicle mitigation barriers are in place and so the car drove around those before it was driven straight into the wall surrounding the Palace of Westminster. It struck the wall at 14.40.38. There was a group of pedestrians in the road at that point. The car struck a number of the pedestrians and the car sustained heavy front impact damage.

Masood remained in the car for approximately 10 seconds, then the driver's door opened, Masood came

out armed with two knives. He then ran around the perimeter of the Palace and encountered police officers at the north of the two vehicle Carriage Gates entrance to New Palace Yard. There were pedestrians on the pavement as Masood was running along. They were all running to keep out of his path.

PC Keith Palmer was one of the police officers on duty in New Palace Yard that afternoon. He was stationed on the north of the two sets of Carriage Gates. As Masood went through the gates, PC Palmer went forward to challenge him. It was an extremely brave thing for him to do. It was clear that he was fulfilling his job of protecting the Palace and those within it. Masood attacked PC Palmer, driving him towards the low wall around the grassed area in the yard. As Keith is stumbling, Masood continues to stab at him.

Another officer came forward and the distraction meant that Keith was able to get to his feet and away from the attack. Keith and the other officers run through the vehicles barrier in New Palace Yard, pursued by Masood. Masood passes a car on its way out from New Palace Yard and is then confronted and shot.

The attack on PC Palmer was ferocious. Masood stabbed Keith with two knives, one in each hand, causing



numerous stab wounds. There were multiple strikes at a time when PC Palmer was in an exposed position. It is clear to me that PC Keith Palmer acted with bravery. He did not shrink from his task of protecting those within the Palace of Westminster.

Carl Knight was on a 159 bus sitting upstairs. He saw Masood emerge from the Hyundai after it crashed. He saw a male pedestrian go to Masood and ask him what he was doing. Masood responded by saying "Fuck off, you don't want to mess with me". This was shouted aggressively and dominantly. As he shouted this, he raised his hands, showing a knife in each hand. The pedestrian immediately backed off, slipped off the kerb into the cycle lane, and ran away in the direction he came.

A little later, Mr Knight observed people motionless on the ground by the car. As Masood made his way to Parliament Square, Mr Knight also noticed a woman and child who said "Please don't kill me". Masood appeared to ignore her and his walk became a run. He ran past 15 or 20 people and continued to the gates.

Mr Knight described it as follows:

"It was as if there were no guards on the gate as the African male ran, still wielding the knives, into the garden area of the Palace. He made it 20 metres in,



approximately, running to his left. I then remember seeing a high visibility police officer. I'm not sure if he challenged the African male or exactly what he did, but they both began grabbing each other and then tumbling to the floor."

Mr Knight thought PC Keith Palmer was stabbed about five times before he managed to get away.

John Campbell was on a number 88 bus. He saw three or four stabs to PC Palmer by Masood. He described the knife having a very large blade of between 10 inches and a foot long.

Antonia Kerridge, then working as a senior parliamentary aide, working in the office on the third floor of Portcullis House, had an unobstructed view out to the Palace of Westminster and into Parliament Square. Just before 15.00 she heard a loud crashing sound. Although the windows are quite sound—insulated, it was loud enough that the crash could be heard in the office. She then heard what she thought initially was the sound of people cheering. She thought there had been a protest outside, but when she and colleagues went to the window they could see that the Hyundai had crashed into one of the pillars between the railings that go round New Palace Yard. There was a person under the vehicle, and another person lying on the pavement to the



right of where the car was, who was not moving and was bleeding. The driver's door was open.

She then realised that the cheering sound was people screaming. A colleague said there was a man with a knife in the street. Her attention was then diverted to the man with the knife. When she first saw Masood, he was by the corner before turning left. She could see that he was holding a knife downwards. He was moving quickly, but not sprinting. There were a lot of people in front of him running away from him to Parliament Square. He was lumbering, moving around and looking. He was waving the knife around.

When she looked back to the car, she could see that people were attending to the casualties around it.

She lost sight of Masood at the point of the confrontation by the gates. It was all happening very quickly. She next saw him at the Carriage Gates entrance. The police officers who had been at the gates had dispersed and he was chasing them into the area where cars would normally drive. She saw the police officer run forwards and then towards the left, and then the police officer collapsed just next to the barrier. She saw the attacker, Masood, went over the policeman, Keith Palmer, and started to stab him on the ground. She saw Masood raise the knife quite high and stab. She

couldn't say exactly how many stabs there were. She mentioned three or four times. From where she was stood, the blows seemed to be on the upper body and the area of the yellow jacket he was wearing.

It came to an end when Masood moved away from Keith on the ground and then turned and ran back towards the right. Masood, having disengaged from Keith, still with the knife in his hand, was looking around a lot, moving quite quickly and looking for where to go next, heading towards where the barrier is in front of Westminster Hall.

She then saw a man in a grey suit run from the restricted area where ministers would be dropped, draw a gun and go towards the attacker. The attacker was still moving forwards with the knife, waving the knife, and the man in the suit then shot him two or three times and the attacker fell to the ground.

The attack she had seen was violent and at times she had looked away. Had Masood made it to the members' entrance, he would have to pass through a number of corridors and rooms before you could make your way eventually to the chamber of the House. There are a number of doors and people that would have been in the path between the entrance and the chamber. The Prime Minister and cabinet ministers have offices in the



building and Prime Minister's Questions had taken place that day at noon.

James West was attending an event in Portcullis House. He was in room Q on the first floor. He was stood close to the window that looked out onto New Palace Yard. He saw the Hyundai crashed into the railings on the pavement. There was a body on the bonnet and a body on the pavement. A number of people were stood around it and there was a cyclist, and he initially thought there had been an accident with the cyclist. He took a photograph of what he could see.

When he first viewed the scene, people seemed to be going towards the vehicle to help the victims, but that all changed quickly and they started running in the opposite direction, at which point he noticed a man with a knife. This man, Masood, was close to the car, moving towards Parliament Square. He assumed he had come from the car. He was trying to run, but was not the most athletic of people and was lumbering, holding a large kitchen knife, with a long, straight, silver blade in his right hand, pointing it downwards towards the ground. He went towards Parliament Square.

There was a big crowd of people, some waiting to cross the road, some taking pictures of Big Ben, tourists in general, and he ran straight towards them.



Mr West then lost sight of Masood, partly because of the number of people and partly because of what was going on by the car.

He next saw Masood when he was running through the vehicle gate of New Palace Yard. The police officers were running from the gates. There were a couple, probably two officers, in high-visibility jackets and then a number just in white shirts and black trousers, the sort of standard police or security attire. He wasn't sure how many, perhaps five or six. All of the officers, bar one, ran towards Westminster Hall. He appeared to trip or stumble on a kerb where the ground is cobbled and fell, at which point the assailant starting attacking the officer on the ground. He had not noticed anything at the gate.

The officer was on the ground and was curled up to make himself small. The attacker was bent or knelt over him and appeared to have one hand to support himself and hold the officer in place whilst the other was repeatedly stabbing the officer. He saw quite a few stabbing motions, between 8 and 10. The stabbing was downwards and he described it as something you would see in a horror film. All of the stabs were to the upper body. It was repeated and constant rather than frenzied.



The officer somehow managed to escape from under the weight of the attacker, started running in the direction of Westminster Hall where the other officers had originally run to. He was amazed, he said, that the officer had managed to get up. The attacker followed. A colleague of his suggested they should move away from the window as there could be a bomb in the car. It seemed like a sensible suggestion and so he moved away too. His colleague was a little slower to move than he was and they said "They've taken him down", by which he took to mean that the attacker had been shot.

Mr West said that he would have thought it was obvious to the attacker that the person he was attacking was a police officer and he described the attack as one of being callous and calculated.

Police Constable James Ross is an officer with the Parliamentary and Diplomatic Protection. He was on duty on 22 March and he had worked in the Palace grounds for about eight years by 2017. He was on post 8P, the pedestrian entrance off Parliament Square. It is an entrance used by passholders and Members of Parliament. Police Constables Stephen Marsh and Doug Glaze were on the south gate and Police Constables Keith Palmer and Kevin Tipple on the north gate. The equipment he and his colleagues each had that day

comprised handcuffs, an extendable baton or an asp, some incapacitant CS spray and a police radio. The radio would have been tuned to the channel for the Palace of Westminster police and security staff. They were also all wearing police body armour.

The vehicle gates were then kept open from 7.00 in the morning until 10.00 at night. The outer movable crowd control barriers would be opened and closed by officers inside as and when vehicles entered or left. The large gates, he said, were often hard to open and close as they were very heavy. The right-hand gate on the north side came in two parts and it almost took two people to close that. The barriers could be wheeled around to act as a barrier and had a metal catch thrown across the top. They could be opened or closed as and when vehicles or cyclists had to enter the premises or if there was a vote in the Parliament. If there was a vote the gates had to be open for at least eight minutes so you could not impede any MP or member of the Lords coming in to vote.

He was at his post just after 14.30 on 22 March. The main vehicle gates were open and the barriers were also open as there was a division. He was engaged in a conversation with his two colleagues on the south gate. He was not aware where the two armed officers on



duty in New Palace Yard were. He himself had been an armed officer before at the Palace, and from his recollection and memory of doing the armed role five years before this, it was a roving patrol and so you could be at the gates or down by the colonnades, down by the members' entrance; it was not static at any one point.

When he was undertaking the armed role they were to be aware of certain situations where if you've got people coming in and out, because a lot of people get dropped off by the members' entrance, you would be aware of those in and around there and mindful of that. There was no instruction to be in a particular place when the vehicle gates were open. It was not the practice of any of his colleagues to be at the vehicle gates when they were open.

What first drew his attention on 22 March was a very loud bang and crash on Bridge Street. He thought it was a car crash but was not certain. Straightaway there was screaming and he didn't know if it was some sort of demonstration, but there were people running, screaming, and they were coming around the corner and turning left towards the gates.

He was aware that PC Glaze was using the radio. What PC Glaze said and what he recalled, he said, were



two different things. He thought PC Glaze had put up saying it was a car crash. He has since heard that he said he thought it was an IED, ie a bomb. There were then people running fast, screaming and running past the entrance. He went to the entrance of the gate to stop people trying to get into the gated area. A couple had tried to run in and he barred their entrance, as he didn't know who they were.

Someone shouted in his face "There's a man with bloody big knives running this way". He stepped back and closed the gate. He then heard some noise to his right and he saw PC Palmer on the floor on his back up against the metal barrier of the down ramp, and standing right over him was the suspect, Masood. Masood had a knife in each hand, blades about a foot long, and he was stabbing Keith in and around the head area, hitting him with such force he said the blades were bending on impact.

There were two officers in front of him with asps drawn. He went behind them and he thought he could use his CS spray and was trying to get it from his belt. Then things changed. When he next looked up he was distracted by a car that was leaving the estate and when he looked back, Keith and the other officers had gone, managed to run around in an arc towards the members'



entrance, past the car. The attacker was moving towards him and he could see that he was still carrying the two knives. Then he saw a plain-clothes officer with a Glock drawn challenging Masood. He shouted at Masood "Armed police". Masood continued towards him with his knives in his hands, and then the officer shot Masood who fell down in front of him.

His time as an AFO ended in about 2013 and he had undertaken the role in the Palace for about three and a half years. There had been a fixed post at the Carriage Gates about eight or nine years ago, but then it was deemed to give more of a reaction gap they were moved further away from the gates and it became a roving patrol. The fixed post was a single post, Glock-only then the post moved back to give a reactionary gap, as he phrased it. There were always unarmed officers at the gates because they were opening and closing the gates, but the armed officers were moved back. It gave time to react. On all posts, officers were always issued with post instructions. He was shown the post instructions for the Palace of Westminster, modified on 16 January 2015, and in particular, those covering sector 3. It reads:

"Both officers are to work together, working within close proximity of each other but not specifically as

a pair. Officers to be positioned in close proximity of the gates when they are open but not outside."

He believed that to be quite similar to the instruction he had when he was an AFO, save that he thought you were allowed to be as a pair. In an AFO working relationship you do actually work as a pair as opposed to separately, but the area wasn't just Carriage Gates; it was the whole area. You were not required to be in close proximity to the two of them all the time. It was routine to patrol the entire area of New Palace Yard. The blue area on the ranger sector 3 map was the patrol area.

As an unarmed officer at the gate, he would not have expected armed officers to be present in close proximity of the gate regularly. It would be every now and then that he might see them passing by. They had quite a large area to cover. As he would have his back to them, he would be watching the gate and he wouldn't really focus on what was happening behind him.

Police Constable Douglas Glaze also on duty on that day. He was on the south gate at the Carriage Gates. He had been on the unarmed side of the Palace of Westminster policing since 2004 and prior to that, had been an armed officer in what was then known as the Diplomatic Protection Group at the



Palace of Westminster. He was with PC Marsh.

When he was an AFO and stationed at New Palace Yard the post was a static one. At Carriage Gates it would have been two officers and they would have been positioned behind the unarmed officers. He stopped being an AFO in 2012.

He joined SO17 in April or May of 2014. He was aware that the AFOs were patrolling in a different way at some time, but he wasn't sure when. In March 2017 he knew that, depending on what time it was, and if the House was sitting, that the AFOs would be in a certain area within a certain sector. He understood that area covered the area down to the colonnades.

When the attack started, he was at the south gate. He heard a noise that he could only describe at the time as an explosion. He now knew it was a car crashing. The noise was coming from over his right-hand side in Bridge Street in the Portcullis House direction. At 14.40 he sent a message:

"Patriot, Carriage Gates, just had some sort of explosion ... down near Portcullis House".

There was then a very eerie millisecond of silence, and then screaming from the area of the explosion. He couldn't see anything obvious, and he started moving backwards, trying to see what had happened, and then he



just remembered screaming and shouting, coming round past Carriage Gates, lots of people, hysterical, shouting and crying and screaming. There was a mass of people running round the corner from Bridge Street into Parliament Square and towards the gates.

He then heard PC Marsh shouting "What's happening?" and he recalled shouting something similar "What's going on?" Then he heard something that he said he will never forget. It was a female voice shouting "They're throwing grenades". This was coming from more or less directly beside the south gate. People were running past the gates. It was just too fast for him to take in, to comprehend what was happening at the time.

He thought he then started to move backwards towards the gates and thinking they needed to shut the gates and he looked over his right shoulder and saw who he now knows to be Masood inside the grounds. He noted that he was a very large man with two extremely large knives, one in each hand, walking like a robot with his arms moving up and down, swinging his arms in exaggerated movements. At the time he didn't think it was a solitary attacker; he thought it was multiple attackers in a Mumbai-style attack.

He sent a further message about 12 seconds after the end of the first one which stated:



"Knives attacking, people with knives attacking".

He thought they were going to die because they were under multiple threats. He could recall shouting "Firearms". He was being pursued backwards into the estate. He could see Masood with the knives, but not what he was doing.

He then saw PC Carlisle and possibly PC Marsh running in the direction of Masood, and then Masood started chasing PC Carlisle. They move towards the lamppost beyond the car barrier and he then saw a protection officer coming from the direction of members' entrance and then he heard the shots.

He saw that PC Palmer fell and when he went over towards him that he was injured. He called for first aid kits and they started to survey Keith to see where the injuries were. He was joined by others to look after Keith and was calling out for a paramedic and that they needed ambulances. When the HEMS team arrived, he led them to Keith.

Police Constable Nick Carlisle was stationed in New Palace Yard on Carriage Gates north at the time of the attack. He was unarmed and had never carried a firearm in the Metropolitan Police. At the time of the attack, PC Carlisle had just been relieved by PC Tipple and was preparing to head to the mess room for

a break. Therefore, there was one extra unarmed officer at the north gate compared to the usual staffing level.

PC Carlisle heard a loud bang from Bridge Street. It appeared to come from the area opposite Tesco which was on the ground floor of Portcullis House, facing towards New Palace Yard. PC Carlisle heard PC Glaze use his radio to report a possible explosion. PC Carlisle was able to see a grey 4x4 vehicle from his position and could see that it had collided with the wall and the railings at Bridge Street. He could see thin smoke floating into New Palace Yard and he inferred that there had been a high-speed collision, although he could not be certain.

PC Carlisle believes that the sight line he had of the vehicle was better than the sight line would have been from the back of New Palace Yard by the colonnades and the construction site.

The next thing he remembers is shouting and screaming from that location. It seemed to begin immediately after the loud bang. There was no noticeable delay. PC Carlisle decided to see and investigate what had occurred and stepped out of the gates towards the street. Before he made it onto the street, a man wearing a suit shouted a warning to him that there were men with knives stabbing people. That



man was 5 metres away from him. As soon as he heard those words, PC Carlisle saw Masood. PC Carlisle was not the only police officer in the mouth of the gate, but was accompanied by PC Palmer and PC Tipple.

The first thing PC Carlisle noticed were Masood's two large knives. Masood was running through the crowd, the knives were held at eye level. Masood was looking directly at the three police officers in the gates, ignoring the members of the public around him. PC Tipple shouted to shut the gates. PC Palmer was a yard or two in front of PC Carlisle, encouraging members of the public to come into the Palace. It all happened very quickly. PC Carlisle didn't remember particularly the radio transmissions that followed.

Seeing Masood, PC Carlisle and PC Tipple tried to create distance between them and the knifeman. PC Carlisle lost sight of PC Palmer. PC Carlisle backed off at least 10 metres. He could then see that PC Palmer was being driven back, his arms up, attempting to defend himself from the knife, parrying off the blows.

PC Carlisle then remembers running forwards with the intention of rugby-tackling Masood. That was a brave act on his part, seeing a colleague being attacked and a man intent on attacking others, but nonetheless, he



did what he did.

By this point, PC Palmer had stumbled backwards. Masood saw PC Carlisle and turned to face him. This allowed PC Palmer to get to his feet. Masood came at PC Carlisle with the knives and he realised it was impossible to carry out the rugby tackle that he had planned. Instead, he veered to the side and ran along with PC Palmer.

PC Palmer was shouting for armed support. He couldn't see the AFOs who were supposed to be patrolling New Palace Yard. He did see two plain-clothed protection officers with handguns already drawn. They were running up the cobbles towards the exit gate at a run. PC Carlisle immediately got out of the line of fire and indicated towards Masood. PC Carlisle described these officers shooting Masood. He then witnessed the first aiders' efforts for both Masood and PC Keith Palmer.

The Right Honourable Tobias Ellwood MP was a minister at the Foreign Office in March 2017. He had had a career in the British Army before going into politics and had annual training in first aid, including battlefield casualty training and cardiac pulmonary resuscitation training, CPR. He was at a meeting with the permanent secretary in his office as Minister for



the Middle East and North Africa when the division bell sounded. That meant he had eight minutes to get into the chamber and into the lobbies. His route took him across Parliament Street, along Derby Gate, down Canon Row and into Portcullis House. Normally he would have gone down Parliament Street which he said was a quicker route.

That was something he said he now regrets. Had he gone the usual way, he would have seen the crash, he would have been behind the terrorist, and although he made no speculation about whether he could have changed anything, he admitted he could perhaps have made things worse, but he could have stepped forward and he regretted not having that opportunity.

As he was about to go up some steps near to Portcullis House he heard a significant crash followed by screams. His interpretation was that the screams were one of shock. The sounds were coming from Bridge Street. In Portcullis House he went down the escalators that connected into Parliament. There were two waves of people running towards him. In a division bell, both escalators used to be turned to go down so that Members of Parliament could get in promptly. The police were desperately trying to get one of those or both reversed. He continued down and ran into a group

of people shouting and screaming with panic in their eyes about an incident unfolding. They were shouting "Go, go, go, go", and there were "Shots fired, go back, go back".

After a second wave of Members of Parliament and others running towards him, he went through the colonnades and it was barren. There was nobody there apart from a number of officers who were crouched looking towards the Carriage Gates which told him that's where the concern was.

His first observation was the numbers of armed police officers pointing their weapons towards Carriage Gates. He said he had never seen so many armed officers with their weapons out in the Houses of Parliament. He could see there were two bodies lying on the ground, the nearest one clearly a police officer, Keith Palmer, with other officers attempting to give him support. Masood was also having medical attention and there were also people there with weapons pointed at him.

Mr Ellwood could see that those tending to Keith could do with some help and assistance and he ran forward. He made clear who he was so as not to compound the situation. He said that he was medically trained and one of those there asked him to tell him what to do. He started going through the drills to provide first aid



support. He was aware that he was putting his own safety at risk and that there was a risk of a secondary attack, and he spoke about his own brother who was killed by a secondary attack in Bali.

He assumed that the terrorist, Masood, would have liked to have taken the vehicle through the Carriage Gates so had there been an IED on it, there could have been some form of follow-up attack.

There was a puddle of blood around Keith. He had lost a lot of blood and was still conscious. He checked the pulse and found one, which he thought to be good news for CPR. The lacerations on Keith's arm, whilst significant, had not breached any major artery. It was the stab wound near the armpit area that he later recognised as piercing into the lung that was a huge concern, a critical injury.

He wanted to explore more of the status of the injuries and asked for some heavy-duty scissors to cut off the flak jacket and other garments. Keith was unconscious and pale, his eyes were dilated. He was told that an ambulance was on its way. The wound under the arm was continuing to bleed and he applied direct pressure to it. He considered a tourniquet but there was no point as the lacerations on the arm, whilst down to the bone, were not causing significant loss of blood.



Keith had lost a huge amount of blood. His heart stopped, as did his breathing, and so he commenced CPR. They had to ensure that pressure was maintained on that and they had to go through the CPR process. Someone else asked if they could help and he checked that they knew what they were doing. Although one might normally alternate with compression and breathing, Mr Ellwood explained that he was competent and strong enough to continue and did so; he didn't want to break the pattern. He continued with chest compressions and the other person dealt with the breathing.

The paramedic team and he continued with the CPR. He explained what he and the others had been doing and they advanced into putting in drips, injections and other things. The HEMS team also arrived.

Mr Ellwood said it was very silent in Westminster, so the noise of the helicopter landing made a lot of noise. The HEMS team also asked him continue. Within a number of minutes, they had assessed that unless dramatic action was taken, they would lose Keith. The HEMS doctor gave the instruction to move Keith from the wall to give more space. The doctor, Dr Anthony Hudson, made two insertions on either side of the ribcage, took a large, sharp pair of scissors and proceeded to cut open the ribcage across the top, before then placing



a clamp-type device in the incision and using a crank device to open up the torso to reveal the internal organs. The procedure took about 35 seconds.

A valve had been placed in Keith's mouth and he was operating the air ball providing air to the lungs. The right lung was going up and down and the other severely lacerated, and the doctors pulled the lung back and tried to suture out the pool of blood that had collected beneath it.

At this stage it was very critical and one of the doctors started to squeeze the blood through the system in his arm and the doctor grabbed the heart directly and started squeezing it. Mr Ellwood stated that he had unfortunately seen some horrific injuries, some that had failed and some that had been successful, and he was going to continue until told otherwise. The sheer loss of blood was proving significant and there were no indications of an improvement. It was clear that Keith was not responding.

The doctors felt they had done everything to try and keep Keith alive. Mr Elwood looked at the doctor and said:

"Sir, you're going to have to tell me to stop, you must order me to stop and you need to make that decision".

The doctor replied:

"Sir, you've done your best but you need to stop. There is nothing more we can do."

The doctor pronounced death at 15.15.

Mr Ellwood said that in his capacity as an MP, he had given thought to the adequacy of the security arrangements on the gate. He had visited many parliaments around the world and in the UK we have an unusual set up of the tourist attraction, the front—of—house of what Parliament is being the same location as our functional and principal entrance for members of the House of Commons, and that had always worried him. There is a sense of vulnerability because it is slow getting through, but accepted the police have to do their checks. Mr Ellwood paid tribute to the work they do in having to make difficult decisions with tourists who want to have their pictures taken and are simply friendly, to dealing with agitators and other things and worst case situations like this of somebody wanting to cause harm.

He accepted that everyone recognised there was a particular vulnerability. It is an iconic symbol of democracy across the world. Its openness, its transparency is key to the work Parliament does, and that's why they continued and didn't shut down the day



after the attack. There is also the practical challenge in the movement of Members of Parliament and the public wanting to visit and keeping out those who wish harm.

Mr Ellwood explained that there is a significant armed presence on the estate and there had been occasions when he had come through the gates where there's not been the armed presence that he would like to see. He was not involved in security arrangements at the Palace of Westminster and he would not have known what the deployment of armed officers was on that day.

He also expressed the view that he believed those working on the estate should be protected, but that they must also continue the transparency for the public. He added that we must not become so risk averse and so reliant on our security forces that that encourages and almost allows these events to take place. He felt it important that all of us as individuals, although the official advice is to step back and report it, that we counter that somewhat because if more step forwards, as happened with the Manchester attacks or London Bridge and, indeed, at Westminster, the message will get through, he said, that no terrorist is going to win. No matter what they do, they will not succeed, they will not change our way of life, they will not challenge our values. His worry was that the more we become a tower



of protection, it changes the face of what Parliament is all about, what we are about, and the terrorist may ultimately die on the day, but then wins as they have affected who we are.

Anthony Davis was visiting the Palace of Westminster for an event to promote charity work associated with boxing. After the event he was leaving through a route that let into New Palace Yard. He'd started to film using his phone in the Grand Hall. He put his phone away when he heard an altercation. Things happened very quickly. After seeing people running, the mood changed and he saw a black man enter the gates and start attacking one of the policemen. That man was carrying the two knives.

He must have put his phone in a pocket with it still recording. He saw the police running away in his direction. They were shouting "Run, run, they've got knives." He jumped over the fence and tried to help as best he could.

He then saw a man who he thought at the time was a marksman put three rounds into Masood, then he saw Keith fall to the ground. He too had some first aid training. He tried to turn Keith to assess the situation he was in and he saw a large head wound that was bleeding profusely and applied pressure to that. He



checked Keith's airway. His eyes were open and he was breathing. The carotid pulse seemed weak. He asked an officer to get a medic and others were there very quickly. He was trying to reassure Keith. He then noted blood on the cobbles on the ground and wondered where that was coming from. He moved Keith's arm and then saw the wound. He had tried to apply pressure to that too. He said that Mr Ellwood was soon on the scene and those all around Keith worked as a team, trying to tend to him whilst they waited for an ambulance.

Keith's condition deteriorated over time and he was trying to inject some urgency into what they were doing. They started CPR before the HEMS team arrived. He described Dr Hudson, the HEMS doctor, as "One switched—on cookie" who gave clear leadership and carried out surgery after they had moved Keith a short distance.

Dr Hudson was a registrar in pre—hospital emergency medicine working for HEMS. A doctor/paramedic team is available 24 hours a day across London. One team is always available at any given time and he said a third member of the team sits in the ambulance control screening all calls made to the ambulance service and it's their job to interrogate those calls and make a decision as to whether the HEMS team would benefit the

case. The criteria depended on the severity of the injury and their ability to recognise the need of those additional resources. The HEMS team is based on the helipad on the roof of the Royal London Hospital.

He said there is a standard operating procedure in place to mobilise more teams should they be required. The first stage for that to happen would be a declaration of a major incident and then it would be dependent on the time it takes for other teams to assemble at the helipad and that would depend on the time of day.

Within a 24-hour period the average number of jobs the HEMS team is dispatched to is between three and five. The flight time from helipad to Westminster would only be a couple of minutes. The decision as to where they can land is a matter for the pilot, but there are restrictions based on the size of the landing area required. They landed in Parliament Square that day.

When they got the call, he saw on the instructions they were going to a road traffic collision on Westminster Bridge. When they got to the aircraft a second message came, saying that the number of casualties had increased and the number of patients estimated to be 20.

As a team, they appreciated they were going to



something more significant than simply a person unfortunately hit by a vehicle and en route they started to discuss amongst themselves what they might do. He thought the initial call came at 14.43. They were at the scene very quickly, but they couldn't land immediately. The area is very highly built up, highly populated with people going about their activities, and there was a need to sanction a landing at a site like Parliament Square. But also they were trying to gather as much information from the air as to what it was that was happening on the ground.

They were using the time above the bridge to get a sense of the scale of the incident and the number of patients. They could see from the air a number of grounds of people being tended to on the ground. The helicopter landed at 14.56. Police then escorted them to the Palace of Westminster. They had a discussion that there were a number of casualties on the bridge, but given the geography of the scene, those at the Palace of Westminster were not fully aware of the extent of the incident, stretching back to the south side of Westminster Bridge.

Those at the Palace were aware of a small number of casualties where the vehicle had come to a stop against the fence on the Palace of Westminster, but he was told



they had only minor injuries.

A decision had to be made as to whether they would deploy the wider scene across the bridge or those in the Palace. As they were presented with two patients in traumatic cardiac arrest in the Palace, the decision was that they were best served by attending to them. As they came through they could see two patients on the floor and he went to Keith Palmer. He was advised that he was the patient with greatest need. Patients in cardiac arrest having received a stab wound are more likely to be resuscitated successfully than someone who has received a gunshot.

He made an assessment of the injuries Keith had sustained and his condition. He asked that the CPR stop momentarily and noted that Keith had a weak central carotid pulse and was taking some agonal gasps. There were some signs of life at that point. The resuscitation efforts being performed were of good quality. They were going to replace the blood lost with a transfusion and whilst doing that Keith returned to cardiac arrest and so a plan for surgical intervention was made. He carried out a thoracotomy.

He also tried to perform a hilar twist, where the lung is mobilised, twisted on its pedicle, to try and reduce blood loss, and he also attempted to put a clamp



across the hilum to further reduce blood loss and massage the heart directly, attempting to restore its filling and pumping. The heart was not filling with blood and he formed the view there was no chance of resuscitation.

Even in the setting of a theatre or an emergency department, it would be an extremely rare event to successfully resuscitate anyone from the position that Keith was in, and he instructed the team to stop.

Dr Robert Chapman, a Home Office pathologist, carried out the post mortem examination on Keith Palmer on 24 March 2017. He noted a cutting wound to the back of the head, 9.6 centimetres in length, passing forward from Keith's right side to his left. This wound went through the full thickness of the skull and was so deep as to score the skull underneath. He recorded a second stab wound to the upper mid-line of Keith's back of 1.9 centimetres in length with a depth of about 1 centimetre, but this did not penetrate the chest cavity.

There was a larger stab wound of 8.5 centimetres in length to the left side of Keith's back, passing from Keith's left side to the right and slightly upwards, through the rib space beneath the left third rib, fracturing the left fourth rib and continuing into the

chest cavity to strike the upper lobe of the left lung. That same wound then continued through a branch of the pulmonary artery, one of the major blood vessels within the lung, and some of the airways of the lung. The track then continued further to strike part of the left atrium, the upper chamber of the heart on the left side of the heart, penetrating through the heart, a 1.5 centimetre—wide track. The wound had a depth of 18 centimetres.

A fourth wound was a cutting wound to the upper part of the right shoulder measuring 5 by 2 centimetres. The fifth and sixth wounds were both smaller, both passing into the muscle of the chest wall, but not penetrating into the chest cavity and both about 1 centimetre deep.

The next stab wound was to the mid—left upper arm, about 11 centimetres in length on the surface and 11 centimetres deep, passing straight through Keith's arm. The pathologist also noticed reddened abrasions to Keith's left wrist and a superficial cut on the palm of the left hand. On the back of the right hand Keith suffered a cutting wound about 2.5 centimetres in length, alongside a blunt force injury to the back of the hand.

There was also bruising to the back of the left hand. Keith had a graze on his right elbow. He had



a stab wound on the front of his left lower thigh, penetrating to a depth of about 1 centimetre.

The wound which passed through Keith's arm was caused by moderate force, in the pathologist's opinion. The 18 centimetre wound was caused, said the pathologist, by a severe force, given the damage which it caused the fourth rib. Some but not all of Keith's injuries were indicative of being caused whilst defending himself. Although the post mortem showed some cerebral swelling, Dr Chapman gave evidence that it was not a significant finding and was incidental to the other injuries.

Dr Chapman gave the cause of death as haemorrhage as a result of a stab wound to the chest, the fatal wound having caused immediate and profuse blood loss. Keith's collapse would have been rapid and his injury was not survivable.

Paul Fenne, the principal engineer in the Physical Protection Group for the Metropolitan Police, examined the body armour worn by PC Palmer. What was clear from his examination is that where the body armour covered the area where Keith was stabbed, the wire mesh within the armour prevented either of the two knives from penetrating through to the skin. One of the two knives had been bent out of its normal shape. Even with the



level of force required for that to happen, the blade would not have penetrated the body armour.

There were a number of marks to the front and back of the armour consistent with a knife attack. The area where the fatal wound was inflicted was not covered by the armour.

Mr Fenne demonstrated that no armour then, or currently available, would provide protection for this area, save for some body armour designed for use by the army in Afghanistan, known as Kestrel, but that armour would not be suitable for the work being undertaken by a police officer in the position of PC Palmer as it would prevent him moving his arms through much of their range of movement. He dealt with the balance between wearability and the protection requirements of body armour.

Keith's sister, Angela, read a moving tribute. She set out his life away from his work, his wish to become a policeman, and the importance to him of the job that he did. She also set out the picture of Keith as a family man and the impact on all his family of his loss.

Chief Inspector Sawyer also spoke about Keith, the policeman, from his own perspective, and from two close colleagues, PCs Sean Wright and Nick Carlisle. In the



course of these Inquests, I have met both of Keith's sisters.

New Palace Yard. There were two AFOs on duty covering New Palace Yard, Police Constables Lee Ashby and Nicholas Sanders. By March 2017, PC Ashby had been a police officer for about 20 years, and an AFO for 13 of those years. He had spent much of those 13 years working at the Palace of Westminster and was on a permanent team there for about six of those years.

On 22 March, PC Ashby was tri—armed, carrying a Heckler and Koch G36 carbine, a Glock 17 pistol and a taser. He believes that he was using the PaPD dispatch 1 radio channel deployed to sector 3.

PC Ashby referred to a set of laminated maps of the sectors on the wall of the base control room in the car park beneath New Palace Yard. PC Ashby relied upon the blue shading as showing sector 3, depicting the approximately rectangular area of New Palace Yard, stretching from Carriage Gates to the colonnades. He said that every other AFO shared this understanding. Save for on Wednesdays, the days on which there were an unusually high number of high profile Members of Parliament around the area of members' entrance, PC Ashby said there were no particular areas of New Palace Yard which the AFOs were instructed to patrol

at particular times.

He explained that AFOs were, until 18 months or two years before the attack, on a fixed post near to Carriage Gates, standing behind the armed officers.

PC Ashby carried a very similar blue highlighted map in his patrol uniform at all times to remind him of the sectors. When he subsequently spoke to Commander Usher some months after the attack, he produced a laminated copy of this map dated 25 July 2012 to support his understanding.

PC Ashby was not aware of any post instructions or post notes. In his words:

"As far as I'm aware, my post instructions are what we can see on the screen here."

Referring to the map with the blue highlighting on the base room wall.

When asked whether he was aware of the January 2015 and December 2015 post notes which both describe that officers were to work in close proximity of one another and be in close proximity to Carriage Gates when the gates were open, PC Ashby was clear that he was not.

The Parliamentary and Diplomatic Protection Command, PaPD, maintains a computer system referred to as ADAM, standing for Armed Deployment Authorities Management system. It serves a number of purposes, one of which is



to contain the definitive version of post notes. PC Ashby accepted that he had not accessed ADAM since 29 June 2015, but explained he was never asked to do so.

At the time of the attack, PC Nicholas Sanders had been a police constable for approximately 15 years and had more than five years as an AFO. Four of those have been at the Palace of Westminster. Like PC Ashby, he was tri-armed, but carried an MP5 carbine rifle in place of PC Ashby's G36. PC Sanders cited the same blue highlighted laminated map as the source of his post instructions as to the limits of sector 3. His understanding was that AFOs were expected to be unpredictable in their movements so as to avoid hostile reconnaissance and to be available to deploy anywhere within the sector. He did not believe there was any expectation to be at the Carriage Gates at any specific time, and as with PC Ashby, was not aware of either of the 2015 iterations of the post notes.

He justified this understanding by relying on the fact that the Palace of Westminster was the only place on the PaPD command where one patrolled in sectors.

PC Sanders was aware of the ADAM system and accepted that he was aware that he was under an obligation to access the system from time to time. Despite there being a record to the contrary, PC Sanders believed he



had used the ADAM system before 22 March 2017. He accepted, though, that he had not used it in relation to duties at the Palace of Westminster. This is because, to his mind, his post instructions for the Palace of Westminster were entirely clear and they were as posted on the wall of the base room. PC Sanders accepted that had he logged onto the system it would have been straightforward to locate the post notes.

Both PC Ashby and PC Sanders recognised the vulnerability of Carriage Gates and knew that by being on a roaming patrol, they would be out of sight of the gates at times. PC Sanders recalled a briefing sent by email and subsequently given orally by Superintendent Simon Causer and Superintendent Amanda Dellar in February 2017 which reaffirmed his understanding of sector 3. He produced a copy of a map received at that briefing to substantiate his understanding.

In short, PC Ashby and PC Sanders both believed that their orders on 22 March 2017, as on any other day on which they were protecting sector 3, was to conduct a patrol throughout the entire sector. In contrast, the most recent post notes, produced on 14 December 2005, required officers to remain at Carriage Gates whilst the gates were open and only ever conducting a short patrol into New Palace Yard.



When asked whether they accepted that the blue highlighted map was not a patrol map but an alarm map showing the location of alarms within the sector, both officers denied this to be their understanding.

CCTV shows the movements of PC Ashby and PC Sanders before the attack. It also shows PC Gerard, with whom PC Sanders patrolled until PC Ashby came on duty at around 14.00 hours. There is a short period of time, 14 minutes, during which PC Gerard and PC Sanders stand near Carriage Gates in the hours before the attack, but after 2.00 pm, PC Sanders and PC Ashby do not go near the gates. Instead, the CCTV shows them standing in the colonnades for most of the time until the time of the attack.

During that time it is known that they spoke with Acting Commissioner Craig Mackey who was leaving after a meeting at the Palace of Westminster. PC Sanders says they spent their time under the colonnades because it was busier than normal in that area with cabinet ministers and MPs. Similarly, PC Ashby said it was likely because there was likely to be higher profile individuals in that area than in other areas at that time.

When the car collided with the wall, PC Ashby and PC Sanders both describe hearing a sound which they

initially believed to be an explosion. They moved towards the sound, stopping at the top of the ramp which connects New Palace Yard to the underground car park. They used the ramp as cover, not knowing the threat which they faced. They subsequently heard the sound of shots being fired.

PC Sanders told PC Ashby that the sound was coming from behind them, and together they began to move around New Palace Yard clockwise to the point at which Masood had been shot. They didn't move straight to the point of the shooting, but again, went into the colonnades. PC Sanders says that from all the noise and confusion he understood that there may be an armed terrorist in the colonnades.

PC Ashby could see it was unusually busy near the members' entrance. Their training is immediately to confront and contain a deadly threat.

Upon realising what had in fact occurred the two AFOs walked towards the locations at which Masood and PC Palmer were lying on the ground.

When moving from the ramps to the point at which the shots had been fired, it is clear from the CCTV that PC Ashby and PC Sanders moved at walking pace. PC Sanders gave evidence that this was because he was undertaking a continuous threat assessment, not knowing



what had occurred, and whether any threat was extant. At no point before the attack did either PC Ashby or PC Sanders hear any relevant radio transmission.

PC Sanders accepted that his areas of patrol on that day were typical of his actions when on sector 3. When asked whether he accepted that his actions did not constitute a short patrol, within the wording of the December 2015 post notes, PC Sanders agreed, though of course emphasising he had not seen those notes.

PC Sanders was aware of a binder of documents in the base room containing documents as to the AFO daily duties. He referred to this as the duty binder. Asked whether had the officers been positioned at the gates they would have taken a shot at Masood, they both agreed they would in certain circumstances.

Mr Hough, I'm going to suggest we break there. I'm conscious that I have been speaking for some time. We'll just have a short break, and certainly to give the shorthand writers a break too.

MR HOUGH: Yes, sir.

(3.18 pm)

(A short break)

(3.32 pm)

THE CHIEF CORONER: Commander Usher is the protection commander with strategic responsibility for the Royalty



and Specialist Protection Command and the Parliamentary and Diplomatic Protection Command. He has held that role since April 2016.

He has never, himself, been an AFO, or acted as a firearms commander. However, he is trained as a firearms commander. He has a responsibility to provide protective security to the Palace of Westminster, among other roles. His department works alongside the Parliamentary Security Department under a civilian Director of Security, Eric Hepburn. Operational decisions at the Palace of Westminster are informed by tactical assessments carried out by a security coordinator from the Metropolitan Police Service.

Commander Usher referred to the desire of Parliament that Carriage Gates are open as far as possible, being symbolic of an open and democratic Parliament. The ornate metal gates were left open during sitting hours and external crowd control barriers were opened and closed to allow vehicles to enter through the gates.

During a division, for those eight minutes, the barriers remained open. The barriers were first installed as a temporary measure and at the time of the attack it was intended that they would be replaced in time with a structural and permanent barrier. The



ornate metal gates were too heavy to open and close with ease and any frequency. They have since been replaced with a modernised version.

Inspector Stephenson completed a tactical planning review dated November 2014. At that time, the review stated that there were two AFOs on Carriage Gates, one of whom would perform a short foot patrol around the yard, whilst the second remained at the gates. The post notes, based on that review dated January 2015, stated that officers are to be positioned in close proximity to the gates when they are open, but not outside. The post notes did not mention the occasional short patrol by one of the two officers.

In January 2015, the national threat level was raised to severe in respect of the threat to officers. A second tactical review was carried out in June 2015. This review recognised that the gates, when opened, represented one of the weakest points in the physical perimeter of the estate. The same recommendation as to a short patrol was made.

The 14 December 2015 post notes following this review stated that:

"Officers are to work together, working with proximity of each other, but not specifically as a pair. Officers are to be positioned in close proximity to the

gates when they are open, but not outside. Both officers are to be positioned in line of sight of each other, with the ability to respond to Cromwell Green entrance search point and should include a short patrol into New Palace Yard towards the exit point of the Cromwell Green estate."

Those notes remained in force on 22 March 2017.

Commander Usher accepted that even a failure to have an armed officer at the gates for 10, 20 or 30 per cent of the time would be a weakness in security arrangements. He said that following the 2015 review, that would be a problem.

Commander Usher was asked about older post notes, including the 2012 post notes, which referred to a patrol of the sector shown on the highlighted map. That map was not attached to the post notes, and it was not clear to which map it referred.

Commander Usher said that the highlighted map was not the same blue highlighted map as on the wall of the base room and in PC Ashby's pocket. Instead, Commander Usher believed that the 2012 map had made reference to a shaded area which was between Carriage Gates and the vehicle search point as opposed to extending to the back of the yard.

Commander Usher accepted that the 2014 post notes



did include patrols on both sides of New Palace Yard with the officers walking on either side of the central grassy area.

He also gave evidence about a parliamentary security report from 2004, which made reference to the risk of officers on the gates being rushed by an attacker. He gave evidence about Operation Standfast, a covert penetration testing exercise that took place some years before the attack, highlighting the deterrent and disruptive effect of armed police officers, and identifying the gates as a very busy entrance point onto the estate.

A 2013 report had noted that pedestrian entrances remained vulnerable to a determined and hostile attack and recommended that armed officers should be in positions set back from the outer physical protective security boundary. There was a 2015 review specifically of security at Carriage Gates, identifying a risk to officers stationed there.

I heard evidence of a number of concerns that were raised by and to senior officers, including an email chain with Chief Inspector Nick Aldworth, as he was then, that issues with officers' patrols were becoming "a bit too frequent for our liking" in February 2015.

Commander Usher had himself visited the Palace of



Westminster on a number of occasions before 22 March 2017. He could not recall where he had seen officers positioned. Whatever the meaning of "short patrol", Commander Usher accepted it would not include a patrol to the back of New Palace Yard by the colonnades. He was clear that the post instructions were mandatory, not advisory.

Evidence was given about the consideration of arming officers with tasers. This was raised as an option in a 2015 report. There was not the sufficient training capacity for this to be possible. The decision was not made to arm unarmed officers with tasers, but that AFOs would continue to carry taser.

He was asked about the ADAM system. He said that officers were told to access it regularly, but he was not aware of any definition of "regularly".

After the attack, he met with PC Ashby and PC Sanders for, he says, a review of occupational health procedures. In the course of the meeting he asked about their locations on the day of the attack and, having recently read the post notes, realised they were not acting in accordance with the notes. There are no notes of the meeting, and nobody else was in attendance.

Early on in the meeting, Commander Usher recalls PC Ashby producing a copy of a laminated map from his



pocket and explaining that he always carried it as an aide—memoire. Commander Usher spoke frankly and explained that he believes that PC Ashby was probably aware before that meeting that there was a potential problem as to where he had been patrolling. Commander Usher found it unusual that PC Ashby claims to have been told every day before patrolling to patrol in accordance with the highlighted map. He found it unusual that PC Ashby produced the map so quickly in the meeting.

Commander Usher reported the two AFOs to the Department of Professional Standards to conduct a review. The DPS concluded that the officers were in the wrong positions, but that their beliefs were reflective of a wider misunderstanding amongst AFOs. It was found that there were a number of officers who had not registered for the ADAM system. I know from seeing further evidence disclosed by the MPS after Commander Usher's evidence, that only 13 per cent of officers in the PaPD had logged into ADAM between December 2015 and 1 August 2016. PC Ashby had not used the system since 2015; PC Sanders had never used it. Commander Usher said that officers who had not logged onto ADAM might have seen post notes in hard copy instead. I had no evidence from any PCs who had viewed

the notes in hard copy. The investigation resulted in organisational learning, but no sanctions in respect of the two AFOs.

Inspector Stuart Rose was a deputy inspector in the Diplomatic Protection Group stationed at the Palace of Westminster between November 2015 and May 2017. He was a trained AFO. He's now an inspector in the Holborn custody suite. During Inspector Rose's time at the Palace he understood sector 3 to be a sector patrol which involved a short patrol within the area of the sector, but with a large focus of the attention on Carriage Gates. He would have expected AFOs to patrol the area around Carriage Gates, as well as the barriers at the vehicle search area. He would also expect the AFOs to be mindful of the point where the subway enters into the colonnades, but would not expect them to patrol in the colonnades. He would not have expected AFOs to be static at any point, but to be on a moving patrol around the yard. He recognised that by carrying out a patrol in this way, officers would at times have a far from perfect view of Carriage Gates.

Inspector Rose had a copy of the post notes in a binder in the supervisor's office. He also knew they were on the ADAM system. He doesn't know whether there was a similar binder in the officers' base room, but he



knows that PCs were expected to check the post notes on ADAM.

He also recalls that whenever there was a substantive change to post notes, it would be conveyed at the next parade briefing, and he expects that emails would be sent to all officers. Inspector Rose was aware of the December 2015 post notes. He was aware of the phrase "short patrol". In his view, the post notes were open to a degree of interpretation. The inspector does not remember the detail of the laminated map that's on the wall of the base room, but recalls there was a laminated map there.

When asked to consider the map in his evidence, he said that it appears to show the patrol area for sector 3. He accepted the shading appeared to suggest the patrol should be the entirety of the area.

Chief Inspector Aldworth gave evidence on two distinct topics of relevance to different victims of Masood's attack. He is currently a chief superintendent working for the National Counter Terrorism Policing Headquarters. He was previously the OCU Commander at Protective Security Operations, which is a Metropolitan Police service unit.

Because of that role, he was able to give relevant evidence concerning barriers on the bridge on



22 March 2017. However, he had previously held the role of Chief Inspector for Operations at the Palace of Westminster from March 2014 to December 2015. He was, therefore, also able to give evidence about security procedures in New Palace Yard, as well as specifically the posting of armed officers.

Chief Superintendent Aldworth had responsibility for security across the estate, including New Palace Yard. He did not recall patrolling instructions which were given to armed officers in sector 3 when he was first posted to the Palace. On 16 January 2015, when the threat assessment increased in respect of individual officers, Chief Superintendent Aldworth sent an email to various colleagues saying it was necessary to change the positioning of armed officers in order to provide better protection to staff and visitors. He wished to have armed officers closer to the Carriage Gates. He sent a document containing interim measures to supervisors. This included an expectation that patrols would be carried out by supervisors to ensure compliance with the amended posting at least twice every shift.

He set up a way for records of these to be checked, to be retained on CAD, although no records have been located for disclosure by the Metropolitan Police Service.



The officer was asked about a series of emails concerning officers failing to comply with post notes. In one email in February 2015, Chief Superintendent Aldworth said that such complaints are becoming too frequent for his liking. He said in evidence that he would have considered it a serious problem if officers were not in the correct positions given the raised threat level.

He was asked about the review of security at Carriage Gates which he commissioned in May 2015. One of the recommendations of that review was that armed officers should be deployed behind unarmed officers at Carriage Gates, but he didn't remember details about the specific recommendation.

Chief Superintendent Aldworth was asked about a disagreement he had with an unarmed police constable. A meeting followed and Chief Superintendent Aldworth accepts, to his embarrassment, that he lost his temper and used inappropriate language. I didn't receive detailed evidence as to the substance of this disagreement which led to this meeting, although I understood it to be said to relate to post instructions at St Stephen's entrance.

As to the issue of barriers on the bridge, Chief Superintendent Aldworth described the Centre for

Protection of National Infrastructure, CPNI, sets the engineering standard for protective measures and the technical standard for practice. Those measures are then fed through to the NaCTSO which feeds the relevant professional developments and standards into the counter terrorism security network. The CT security advisors are then employed locally by police forces. There are around 200 such advisors across the country. They give guidance to government and industry regarding crowded places, amongst other roles.

Chief Superintendent Aldworth was asked about a definition of crowded place:

"Crowded places are locations where a terrorist attack may cause many deaths and casualties, and/or sites which offer the prospect of an impact beyond loss of life alone. They are designated following an assessment against a specified criteria and are commonly privately owned places to which the public have access. The criteria, and the national list, sit at a high security classification."

NaCTSO maintains a list of crowded places and works alongside the Office for Security and Counter Terrorism, a department of the Home Office, in maintaining the list, and the criteria for meeting the definition.

Chief Superintendent Aldworth did not have the power



to mandate any specific protective security measures be put in a specific place. His mandate is to give advice to the owner of the structure of the public authority owning the highway or location. Where his advice is rejected, he has no way to oblige the step to be taken.

The hostile vehicle mitigation barriers around Parliament at the end of Bridge Street are specifically there to protect the building and were not constructed to protect pedestrians. In Westminster, Chief Superintendent Aldworth described there being something like 1,900 roads. In relation to a small number of specific areas Chief Superintendent Aldworth had been pushing for redevelopment for reasons of counter terrorism.

In relation to bridges, Chief Superintendent Aldworth said there had been no appreciation that might be the focus of terrorist threats. No consideration had been given to putting barriers on Westminster Bridge specifically, and Westminster Bridge did not meet the definition of a crowded place.

Some bridges, indeed, could not support appropriate hostile vehicle mitigation measures and barriers. After the London Bridge attack, barriers were installed across bridges within eight or nine days. The combination of Westminster Bridge and the London Bridge attacks was the



catalyst for this action.

Eric Hepburn is the Director of Security for Parliament. He took up that post on 1 September 2016. He is responsible for the operational security of Parliament. The Parliamentary Security Department, PSD, first came into existence on 1 January 2016 following a review on security by Sir Paul Jenkins QC. Security is provided by a combination of police officers and security staff. The police contingent fall into the Parliamentary and Diplomatic Protection division under Chief Superintendent Johnson and she reports to Commander Usher.

The responsibility for security in Parliament is his responsibility on a day—to—day basis, but is undertaken in partnership with the Metropolitan Police. In the event of an emergency at the Palace, operational control passes to the Metropolitan Police. There are periodic meetings between him and the police to consider risks that might be posed to security and the safety of Parliament.

There are also meetings to discuss strategic issues. On a daily basis, briefings are provided to his staff and to the police about what meetings are taking place, whether there are any particular people coming to the Palace, and what kinds of cars they would need to be



aware of.

Armed police are the responsibility of the Metropolitan Police. They rely on them to give advice and guidance. If he or his staff strongly believe that armed officers were needed in a particular area, or to be moved from one place to another, it is something they would bring to the attention of the police, but it is not something they would seek to interfere with. He was aware that armed police on the Palace estate worked in accordance with post notes. He did not have access to the post notes. His team would have their own post notes.

A balance had to be struck between openness and security. It is an important democratic right for people to be able to come to Parliament, to meet with their Member of Parliament and to visit the organisation. The Palace, he said, has more than a million visitors a year. No advance permission is needed for visiting and the only ticketing is for Prime Minister's Questions.

Mr Hepburn dealt with the physical security barriers in and around the estate. The hostile vehicle mitigation barriers at the base of the Elizabeth Tower on Bridge Street were installed to guard against assessed infrastructure risks to the Parliamentary

estate. They were not intended as a barrier to protect pedestrians.

As at March 2017, both sets of vehicle gates at Carriage Gates, north and south, were open and left open whilst the House of Commons was sitting. The external crowd control barriers were closed, except when vehicles were entering and leaving, and also during divisions. Had anyone wanted to express concern about the practice of leaving the crowd control barriers open during the divisions, it could have been raised with his department and, if necessary, they would have taken it through the House.

For crowd control barriers it would have been a decision taken in the Parliamentary Security Department, but no one had expressed concern about it as a security matter. With the gates being open or closed, that could have been raised by the Metropolitan Police with his department, and it would have been put to both speakers of the Houses to make a decision.

On 22 March there were three security officers from his department in New Palace Yard and a doorkeeper at the members' entrance. His officers wear body armour and are issued with personal radios. The radios are turned to a channel shared with the police officers at the Palace.



He was aware in March 2017 that Carriage Gates had been identified by the police in tactical assessments and security views as a particularly vulnerable entry point for any attacker onto the estate. He was very comfortable with the recommendations from the police to put armed police at the perimeter of the estate, including New Palace Yard, but he would not know where the armed officers would actually be posted, nor would he or anyone from his department monitor where they were deployed.

Chief Superintendent Dawn Morris is now in charge of protective security operations for the Metropolitan Police. For four years to June 2018, she was part of the Public Order and Resources Command and led on the Prepare strand of the Government's anti-terrorist CONTEST strategy for the Met Police.

In her evidence she set out the training given to Met officers in the period running up to March 2017. There is a document called the MPS Response to Terrorist Attack Guidance, so as to ensure there is a coordinated multi-agency response should there be such an attack. The document was first produced in January 2016 and has been revised on a number of occasions.

Versions of the document predating March 2017 considered marauding firearms attacks and knife attacks.



Such an attack would be a multi-seated marauding attack or an ambiguous attack. She said that an ambiguous attack would include firearms, knives, vehicles or explosive devices. The document used scenarios based on the Paris attacks from November 2015 and the Nice attack in 2016.

Training carried out included training for the command structure used where there is a significant event. There is a trained cadre of people that can take on the roles of "gold" strategic lead, "silver" tactical lead, and bronze on-the-ground command in such eventualities. There have been a number of large-scale exercises conducted to test and enhance preparedness for attacks. One such exercise was carried out in March, on 19 March 2017, to test the capability to respond to a threat on the River Thames. That exercise tested not just the command and control structure, but also the armed officer response.

She spoke about a number of other specific exercises and need to check how the approach worked with other agencies and how their response would be coordinated. She also spoke about the Hydra training where large teams are presented with a range of audio, video and different text-based materials in order to immerse themselves into a scenario and work through a decision



process, and Operation Plato, which is the national codename used to activate an enhanced multi-agency response to a terror attack. The Westminster Bridge attack was the subject of an Operation Plato declaration at 14.55 on 22 March.

Masood. Detective Chief Inspector Dan Brown is the deputy senior investigating officer on Operation Classific. One area of his responsibility has been the life and background of Masood. He also led the investigation into the planning and preparation for the attack on 22 March. Masood was born on 25 December 1964. His birth was registered in the name of Adrian Russell Elms, his mother is Janet Ajao and he was known either as Adrian Elms or Adrian Ajao until 2004. He formally changed his name to Khalid Masood in 2005.

Masood went to secondary school initially in Lewisham and then the family moved to Tunbridge Wells. Janet Ajao tried to get him into a local grammar school but those efforts failed and he went to Huntley Boys' Comprehensive School.

Age 14, he first came to the attention of the police when he was arrested and later cautioned for shoplifting. Although Masood's mother described him as displaying normal boisterous behaviour in his school

years, his brothers suggested he was a violent but clever person who would not back down from an argument. He left school at 16 and went to Tunbridge College of Further Education and undertook a BTEC course in business studies.

Detective Chief Inspector Brown and his team then traced the life the Masood onwards and the other occasions on which he came to the attention of the police. In 1992, he formed his first serious relationship with Jane Harvey and they had two children, in 1992 and 1998. Jane Harvey described Masood as intelligent, powerful and persuasive, with a charming personality. However, she also said she would regularly go out drinking and call for her help when he returned.

Masood did a three—year degree course at Falmer University in Brighton. Most notable of his scrapes with the police was a prosecution for wounding in 2000 which led to him serving a sentence of imprisonment, and then in 2003 where an extremely serious incident of violence occurred. There had been a number of other reports of incidents of violence in the police system in the interim, which Detective Chief Inspector Brown dealt with.

The incident in 2003 led to Masood being charged with attempted murder. The details of the offence are



extremely serious. The victim sustained the most horrific injuries. Masood stood trial, the issue was self—defence. Ultimately he was acquitted of the most serious charges.

Evidence on this offence was also called from Detective Constable Stuart Black from Sussex Police. He said that the injuries sustained by the victim in that case are some of the worst he has ever seen. The knife had been used on the victim with sufficient force that it had gone through the upper mouth plate and into the lower jawbone where the tip broke off and remained embedded in the jaw after the attack.

The periods Masood served in prison, serving a sentence in 2000 and then on remand in 2003, are of some significance. The prison records show that when Masood left prison on the second occasion, his religion was given as Muslim. He clearly developed his interest in the religion whilst there, even though, whilst there, there was nothing to show that he formed or expressed extremist views.

Masood went to work in Saudi Arabia after leaving prison in 2003. He married Farzana Malik in 2004, but that marriage did not last long. He went to Saudi Arabia again in 2005, the same year that he changed his name by deed poll.



In 2006, he met and subsequently married Rohey Hydara. They lived in Luton initially and Masood returned to work in Saudi Arabia. When he returned, they moved to Chadwell Heath. Whilst there, Rohey had a recollection of Masood meeting a friend in a park, somebody he told her was wearing a tag in relation to a terrorism offence, and where he would not take his mobile phone.

Masood returned to Saudi Arabia in 2008 through to 2009, and on his return, they moved to Luton, and Masood worked for ELAS. Whilst there, he met Craig O'Donaghue. Craig O'Donaghue's recollection was that Masood wanted to convert him to Islam. It is at this stage that Masood started to use the gym and began to use steroids. He had anger issues and their marriage —— this is the marriage to Rohey Hydara —— had its problems.

In 2012 Masood went to live in Birmingham, where he set up an English language teaching business. He and Rohey separated and she returned to London. At this time Masood used an Islamic dating site called Pure Matrimony and exchanged emails with a woman in which he described various parts of his life.

In 2015 he was making plans for a return to Saudi Arabia. In 2016 he received a job offer from a university there. In early 2017, he was living in



Birmingham and the family were in London.

He met a man called Ahmed El Farsi, a Moroccan man, who had a home in Morocco. Masood expressed an interest in travelling to Morocco. A text recovered from Masood to El Farsi speaks about a trip on 26 March 2017.

On 7 March 2017 Masood sent an email to his mother. A number of topics are covered in that communication, including a business opportunity in Morocco.

Detective Chief Inspector Brown and his team investigated Masood's finances. Masood was struggling for money and was in debt at the time of his death. An application for a loan in December 2016 had been refused.

They made extensive investigation of Masood's periods in custody. Part of those records showed his conversion to Islam in 2000, but that he really accepted the religion in the course of his second term in prison.

On 8 March 2017, Masood had carried out internet research on 4x4 vehicles, including Hyundai vehicles, and he then reserved a car through Enterprise cars in Birmingham. The period of hire was from 16 to 20 March 2017. He emailed his mother about visiting her on 16 March.

On 9 March 2017, he went to a Tesco store local to him in Birmingham and bought two knives, one of which is

believed to have been used in the attack. He also made inquiries about Calor Gas consistent with the potential use of a canister as a weapon.

On 14 March 2017, his eldest daughter contacted her sister, saying that their father was leaving the country and a reference to their grandfather, Masood's stepfather, who was in hospital.

Also on 14 March, Masood was making internet searches about speed tests and crash tests for the Hyundai Tucson, and on 15 March, he sent between his two email addresses the document entitled "Jihad".

On 16 March he visited Enterprise car hire, collected the car he had booked online, and then drove from Birmingham to Wales to meet his mother and stepfather. In conversation with his mother he mentioned that he was thinking of moving to a Muslim country, but he couldn't go back to Saudi Arabia because of his criminal record, and a friend in Morocco with a property was a possibility. As he left, he said:

"They'll say I'm a terrorist. I'm not."

On 17 March he went to Brighton and checked into the Preston Park Hotel.

On 18 March he drove to London, and at 12.44 that day was crossing over Westminster Bridge in the Hyundai. He crossed back over that bridge at 12.52. This was



clearly a reconnaissance for 22 March.

He then drove to Cobham and checked into the Days Inn. He extended his stay and on the 20 March he watched a number of videos about terrorist attacks. On 21 March he extended the hire of the car for a second time, checked out of the Days Inn and went back to the Preston Park Hotel in Brighton.

On 21 March, he had a video call with his wife and young children, as well as a call with his eldest daughter. She thought he was going to Morocco.

On 22 March, Masood was searching on the internet for Prime Minister's Questions and vehicle-borne improvised explosive devices. He checked out of the hotel and drove back to London. He travelled across Westminster Bridge from south to north, and then across Parliament Square and down Victoria Street. He turned around and then went down Whitehall and then back to Parliament Square before crossing south over Westminster Bridge. This was at about 10.30 am, and appears to be further reconnaissance.

His car is seen at 11.18 on the A3 travelling south. The next time his car is picked up on the CCTV is at 13.52 when it is travelling north. The car is seen parked in a car park in St Thomas' Hospital until about 14.36 when Masood drives out of the car park towards the



approach to Westminster Bridge.

Masood sent texts and other messages at 14.26 and 14.29 with the "Jihad" document attached. Amongst other people it went to was his wife, Rohey. She sent a text at 14.32 saying she needed to speak to him urgently, and at 14.51 asking what it is that he had sent her. At 14.38 he is in the bus lane before he sets off on his murderous attack.

In the course of questions from Mr Patterson, Detective Chief Inspector Brown was asked about the radicalisation of Masood, the information from prisons, from those who knew him and from materials he had looked at online and the books in his possession. Detective Chief Inspector Brown was also asked about the links between Masood and others of concern in the Crawley area, particularly those with links to ALM.
Mr Patterson explored areas where Masood had been involved in seeking to convert others. The material on the internet in hard copy form and on the memory stick was also explored in the course of these Inquests.

Mr Patterson also questioned Detective Chief Inspector Brown about the links between terrorists and previous disposition to serious violence. Detective Chief Inspector Brown was asked about other terror incidents also involving the use of hire vehicles, as



well as the use of WhatsApp for the sending messages that presents serious difficulties for those involved in law enforcement. The questions and topics for Detective Chief Inspector Brown were wide-ranging and throughout it seems to me he gave clear and candid answers to all the important topics raised by Mr Patterson and then Mr Adamson about the background of Masood, the details of the planning and the preparation of this atrocious attack.

Janet Ajao is the mother of Khalid Masood. She gave evidence about his childhood and schooling. She recalled that he was arrested for shoplifting at 14. Janet continued describing her son's life, including his time in prison and his partners. She was aware that he took up the Islamic faith upon leaving prison, some time after 2003.

In detail she explained the extent to which Masood would often want to talk about nothing but religion, describing that she could put down the telephone, go and make a cup of tea, come back and find that he was still in the course of a monologue. She did not recall him ever expressing hostility or hatred towards the West or other religions or on views in support of terrorist violence. Nor did she recall any associations he had with people with extremist views.

Janet understood that Masood had moved to Crawley in 2004 because a man whom he had met in prison had told him to go and live somewhere near a large Muslim community. Janet was shown emails which Masood had sent to her, one in May 2013. In that email, he complained about his mother not seeing his children and complained about his life having been blighted by being sent to a comprehensive school. Janet said this had deeply upset her.

During his last visit to see her, Masood made his mother repeat a number of religious phrases to the effect that Allah was the one true God and Mohammed the Prophet. She understood that he was then travelling to London, assuming that it was to be see his wife and children. The next morning, shortly before he left Janet's home, Masood spent time looking at a large road map on the kitchen table, which Janet said was similar to the map on which we know Masood made a series of handwritten notes.

As he was leaving, he said to her "They'll say I'm a terrorist, but I'm not". Janet did not say anything in response, not understanding what he meant. It did not cross her mind that he was planning a terrorist attack. She was very clear about what she would have done had she understood this to be the



meaning. In her words:

"I'd have done anything, believe me. I think I would have phoned directly on 999 and someone would have come out to me".

Rohey Hydara is the widow of Khalid Masood. They met in 2006 and married soon after their meeting. Masood was more strongly religious than she was: he was stricter in his dress sense and in eating halal food than she was. At times in their marriage Masood worked in Saudi Arabia. They had lived in various locations, including Chadwell Heath, Luton and Birmingham. When they married Masood had told her that he had been in trouble and had been to prison. She knew that he had been to prison for as long as two years and he had told her of his acquittal.

As to his conversion to Islam he spoke about someone he met in prison who was there on drugs charges and that that person gave him the message of Islam. He told her he became more religious when he went to Saudi Arabia. Masood was loving towards their children, but otherwise he had an angry and controlling temperament. This would get very bad when he was on steroids. He would rant and complain over every little thing.

They had separated on a number of times in the course of their marriage. The reason was his temper.



On a number of times he went as far as to speak the Islamic formula to divorce. On one occasion it was because he had asked her to stop wearing trousers. On another occasion it was because she had asked him to stop using steroids and he refused.

Rohey said she was never aware of Masood associating with anybody who was a member of an extremist group. She did not recall him ever discussing the 9/11 attack on New York. As far as she was concerned, Masood was polite to people of other religions and those of no faith.

Some years before the attack she covertly recorded a number of conversations she had with Masood. In one of those conversations he can be heard speaking vehemently about the importance of him being the head of the household and being obeyed. When he was using steroids, as during that recording, his tone was different to when he was not using any drugs.

Masood kept a hammer and pocketknife at the side of the bed, saying he needed those to protect himself against a burglar. He had a knife in the boot of the car. He had a knife in a backpack on another occasion.

Rohey moved to London in November 2016. She understood that Masood was preparing to move to Saudi Arabia to take up a job offer. When he had



difficulties with a visa application, he became frustrated. Rohey was aware that Masood was settling a number of debts, although money was tight. He paid an outstanding electricity bill and a second bill from Birmingham Council. In the last few months of his life he prayed more often and was more focused upon religion.

Rohey spoke to Masood by FaceTime on the night of 21 March. She said that apparently he told her he was going to spend the night in prayer. His face was visibly reddened. On the morning of 22 March, Rohey received text messages from Masood which she considered to be relatively normal, but perhaps more loving than usual. Then at about 2.30 received a message with the document "Jihad". She messaged Masood and received no response. She then began to receive automatic news notifications that there had been an attack in London. She was immediately worried. As soon as she saw a photograph of the London attacker lying on the ground, she realised that it was her husband.

When asked her opinion of what he did on 22 March, Rohey spoke succinctly and forcefully, "It was evil". When it was suggested that she knew more about his radical beliefs than she is now willing to admit, she firmly denied this, saying:

"I knew I was living with a man that had anger

issues, but I didn't know he would do something like this. If I did, I would have told the police, just like I did when I realised it was him, I called the police."

Professor Cowan is a professor of pharmaceutical toxicology. Samples were taken from Khalid Masood post-mortem and those samples were analysed. Analysis shows that nandrolone, an anabolic steroid, had been taken by Masood within a week before his death. It is a steroid that is effective when given by injection. Professor Cowan wasn't able to say that it had been used over a period of time from the hair sample taken from Masood. However, from a document where the handwriting is attributed to Masood that lists a number of substances, and where two were of particular interest: one preparation containing testosterone, and the other nandrolone, as the document sets out sums of money involved and some regularity of orders, he had concluded that Masood was a steroid user over a period of time, albeit not a particularly heavy user.

He had looked at evidence from people who knew Masood as well as from various analyses and, based on all of that material, he didn't see any note that suggested when Masood was using steroids he became aggressive and that when he was off them he was depressed. He said in large doses steroid use can cause



aggression. Anabolic steroids come within the Misuse of Drugs Act and specifically Schedule 4 as a class C drug. To sell them without a medical prescription he said would be an offence.

Dr Chisholm is a consultant clinical psychologist. He gave evidence of a psychological profile he had undertaken on Masood. In carrying out his assessments, he had looked at a collection of witness statements, some recordings of Masood made by his wife, as well as material about Masood's offending. His opinion is that Masood was not suffering from a psychotic illness or from any psychotic symptoms. Masood met criteria sufficient for anti-social personality disorder, and that it was probable, although he was less confident, that Masood also met the criteria for narcissistic personality disorder. At the time of the attack Masood was able to think logically and rationally.

Detective Chief Superintendent Peter Holdcroft was Head of Operations and part of SO15 as at March 2017. He led the proactive response of SO15 units. They were looking to see if there was a wider threat from other suspects linked to Masood to see if there was anyone else involved in the commission, preparation or instigation of the attack and to take steps in order to mitigate any further threat.



They arrested Rohey Hydara but she was released after interview and after inquiry showed there was no evidence to implicate her. They had arrested six individuals at addresses connected to Masood, or to the details given on the car hire document, but again there was shown to be no connection and no involvement in the attack.

Ahmed El Farsi was arrested and interviewed on the basis of the links in February 2017. That interview and further investigation showed no evidence implicating him as being involved in the attack.

Yusuf Kumar was arrested and interviewed. Extensive inquiries were made into him but, as with the other individuals arrested and interviewed, there was nothing to implicate any of them. The extensive investigation showed that Masood acted alone in this attack.

Witness L has been with MI5 since 1991. He is the Deputy Director for International Counter Terrorism responsible for policy, strategy and capability. His job involved looking at the challenges the country faces in international counter terrorism and considering the strategic changes that might be made to address them. He gave evidence in the London bombing Inquests in February 2011 before Lady Justice Hallett. He set out the functions of MI5 and the legal framework in



which it acts. He also set out the investigative processes adopted by MI5, including the approach to subjects of interest and the tiers applied to such people.

He dealt with a number of reviews undertaken by MI5 following the Westminster Bridge attack: the post-attack review; an Operational Improvement Review, and an insurance process conducted by David Anderson QC, as he then was.

A particular focus of the Operational Improvement Review was the assessment of Subjects of Interest, or SOIs. MI5 had around 3,000 SOIs in March 2017 with around 500 investigations being pursued into individuals and groups linked to Islamic terrorism. There were approximately 20,000 closed SOIs. The scale of the work, he said, was unprecedented.

David Anderson in his report had endorsed as appropriate the processes followed by the review teams. He had praised MI5 staff as frank and open to criticism in meetings.

Masood first came to the attention of MI5 in April 2014, when his telephone number was found in the contact list of another SOI. This was part of Operation Crevice, known commonly as the fertiliser bomb plot. Masood has never been identified as having any

connection to the plot, and it would have been straightforward to identify Masood from his telephone number, but Witness L was clear it would not have been proportionate.

Later, a long standing associate of Masood's was investigated as an SOI between 2004 and 2009. During this time Masood's personal contact details came up in that investigation. Some of those contact details were attributed to Masood at that stage and some were not.

The information on Masood did not suggest he was involved in the activity under investigation. Again, it would have been practical to identify Masood but not proportionate to do so, there being no evidence that he was involved in any activities of concern.

In 2009 and 2010, a person called Khalid Masood was thought to be in a position to assist in travel to the FATA, an extremist in Saudi Arabia. MI5 thought that this might be the Khalid Masood with whom this Inquest was concerned, but he was ruled out as a suspect. Masood was given a holding code during this investigation as an SOI. When it was ruled out that he was the person facilitating trouble, his holding code was downgraded. That was in March 2010. Masood's identity had not been established at that time with any confidence.



By December 2010 MI5 completed a full identification of Masood and had his PNC record. There was no evidence that he was involved in any form of extremism. Although his PNC record showed violent offending, Witness L does not think this would have weighed heavily in an investigator's mind, being about seven years before that date.

Masood was closed as an SOI, the decision being taken in December 2010, although he wasn't formally closed until October 2012. Between those dates there was some intelligence indicating that he was involved with other SOIs, but this was only on the margins of extremism. There was absolutely no evidence of direct involvement in extremism or attack planning, but there was an indication that he consumed extremist material. That, he said, is not enough to keep somebody as an SOI. If it were, there would simply be an unmanageable number of SOIs.

Between 2012 and 2016 Masood did continue to appear on MI5's radar. He appeared intermittently as a contact of a number of SOIs. There was never any evidence that he was a member of ALM. There was never any intelligence that he might be directly involved in extremist activity. This did not reach the threshold for further investigation into Masood.



In 2013 specific intelligence was received that Masood had expressed contentment with the violent actions such as the World Trade Centre attack on 9/11 had attracted people to Islam. Such sentiments, he said, are depressingly common. It was not enough to make Masood an SOI once again.

Looking back at all of the factors of which MI5 was aware, Witness L maintains MI5's view that there was no reason to reopen the investigation into Masood. Because Masood appears to have planned the attack on his own, Witness L thinks it very unlikely the plot would have been noticed by MI5, even had he been reopened as an SOI. Even with hindsight Witness L did not believe there was anything which MI5 could practicably have done to prevent this type of attack by a person with Masood's record and background.

The reasons for a decision to close an SOI did not get recorded by MI5. Witness L gave evidence that this is appropriate because it would be an inappropriate use of resources to do otherwise. Instead reasons were given when a positive decision is made to do something intrusive. This process has since changed and more records are kept.

Siwan Hayward is the Director of Compliance, Policing and On—Street Services for Transport for



London, or TfL. She is responsible for managing TfL's relationship with its policing and enforcement partners.

TfL has a duty to maintain GLA, Greater London Authority, roads and a power to effect appropriate improvements. It has a specific power to provide and maintain rails, fences, barriers and so on. It has a further right to take steps to keep the traffic flowing. The Westminster Bridge Road is such a road. TfL is both the highway authority and the traffic authority for it.

TfL is the decision—maker for changes to the roadway but would typically consult with the neighbouring local authorities. TfL would often ask for advice from CTSAs, Counter Terrorism Security Advisors, as described by Chief Superintendent Aldworth. TfL has a duty to take all reasonable measures to reduce the risk of crime, including terrorism. Ms Hayward said that bridges in general, and Westminster Bridge in particular, were not identified by TfL as particularly vulnerable to a terrorist attack.

TfL received guidance documents through police channels about the terrorist attacks in Nice and Berlin in 2016. The first guidance resulted in TfL reviewing how large crowds at public events are protected and to work alongside the police in that respect. As to the

Berlin guidance, which suggested using pedestrian barriers as a slowing mechanism, TfL did not regard that to be specifically relevant to them in respect of crowds on bridges.

TfL did not undertake any subsequent review of hostile vehicle mitigation on roads and bridges. Ms Hayward was clear that pedestrian guardrails that existed on other bridges at the time were not appropriate as hostile vehicle mitigation device, but were to keep pedestrians out of the carriageway.

Ms Hayward was also asked questions regarding heights of the balustrade on Westminster Bridge. The balustrade in places is approximately 99 centimetres, she was told. Ms Hayward said that the recommended height was a minimum of 100 centimetres and this small discrepancy would not have been sufficient to trigger any remedial work.

That concludes my summary of the evidence that's been called in the course of these Inquests. In relation to the Article 2 questions, my decision is this.

It is common ground, and I agree, that Article 2 is not engaged in any of the Inquests concerning the victims on the bridge, but in respect of PC Keith Palmer, my decision is that Article 2 is



engaged, and I will provide full reasons for that decision in due course.

I need, then, to make a formal determination in respect of each person.

So turning first of all to Kurt William Cochran. The date and time of his death was 22 March 2017 at 17.34 hours on Lower South Bank Walk, London, near Westminster Bridge. The medical cause of his death was multiple injuries.

Then, turning to the determinations. Kurt Cochran was unlawfully killed. On 22 March 2017 Kurt Cochran was on a visit to London. He had been walking with his wife, Melissa, across Westminster Bridge. They had reached a point near the south bank side when a Hyundai vehicle was driven deliberately into the pavement where they stood. This was part of a terrorist attack.

Showing no concern for himself, Kurt instinctively and courageously pushed Melissa away from the path of the vehicle and as a result, was struck with full force by the vehicle. He was thrown over the parapet of the bridge to the embankment below, falling from a height of 5.12 metres. In the fall he sustained a serious head injury which was not survivable. Despite early medical attention from a nurse, an ambulance crew and a hospital doctor, he died at the scene.



Leslie Arthur Rhodes. His date and place of death was 23 March 2017 at 20.44, and that was at King's College Hospital, London. The medical cause of death in his case is also head injury.

Turning to the determination in his case, Leslie Rhodes was unlawfully killed. On 22 March 2017 Leslie Rhodes was walking from the south bank side of Westminster Bridge towards the north bank side. He was struck from behind by a Hyundai vehicle which had been deliberately driven into the pavement where he was walking. This was part of a terrorist attack.

Leslie was carried along into the carriageway a distance of 33 metres. As a result of the impact, he suffered a devastating brain injury which was not survivable. He was unconscious from the time of the impact until his death. Despite early medical intervention, attention from a hospital doctor and paramedics at the scene, and despite proper treatment at King's College Hospital, Leslie died on 23 March 2017 in hospital.

Aysha Frade. The date and place of her death was 22 March 2017 at 15.08 on Westminster Bridge. The medical cause of death in her case was head and chest injuries.

Aysha Frade was unlawfully killed. On



22 March 2017, Aysha Frade was walking across Westminster Bridge towards Parliament Square on her way home from work. While walking on the pavement, she was struck from behind by a Hyundai vehicle which had been deliberately driven towards her. This was part of a terrorist attack.

Aysha was thrown into the air and into the path of the nearside rear wheels of a bus. Those wheels passed over her, inflicting injuries which were immediately fatal. Aysha would not have suffered. She was assessed as dead at the scene by a paramedic and by a doctor.

Andreea Cristea. The date and place and time of her death was 6 April 2017 at 15.11 at St Bartholomew's Hospital. The medical cause of death in her case, 1(a) multiple organ failure, 2, head injury (operated) and immersion.

The determination in her case. Again, Andreea Cristea was unlawfully killed. On 22 March 2017, Andreea Cristea was walking across Westminster Bridge with her boyfriend, Andrei Burnaz, on the Parliament Square side. She was stopping at times to take photographs with her mobile phone. Whilst on the pavement, she was struck by a Hyundai vehicle which was being deliberately driven towards pedestrians on the pavement. This was part of a terrorist attack.

Andreea was thrown into the air and over the parapet of Westminster Bridge, landing in the River Thames below. She was carried by the current a distance of 100 metres and was in the water for around 5 minutes before she was recovered by the London Fire Brigade boat. She was treated by fire officers and then by an ambulance crew and paramedics before being taken by ambulance to hospital.

Whilst in hospital she received extensive and complex medical care over the following days. Despite the best efforts of clinicians, she died on 6 April 2017.

Keith David Palmer. The date and place of his death, 22 March 2017 at 15.15, at the Palace of Westminster in London. The medical cause of death in his case is, 1(a) haemorrhage, 2, stab wound to the chest.

Turning to the conclusions as to death, determination. PC Keith Palmer was unlawfully killed. On 22 March 2017, PC Keith Palmer was on duty as an unarmed police officer stationed at the Carriage Gates entrance from Parliament Square into the Palace of Westminster estate.

An attacker who had driven his vehicle into multiple pedestrians on Westminster Bridge entered the gates.



PC Palmer stepped forward to challenge him. He immediately began attacking PC Palmer with knives, driving him back into the New Palace Yard area. PC Palmer stumbled against a low wall and the attacker continued his assault. In the attack, PC Palmer suffered a number of injuries, one of which was a serious stab wound to the chest. Although he was able to move away from the attacker, PC Palmer collapsed shortly afterwards. Despite prompt and capable medical attention at the scene, he suffered a cardiac arrest and could not be saved.

Before the start of the attack, the armed officers stationed at New Palace Yard had not been in close proximity to the Carriage Gates entrance. They had been some distance away and out of view of the entrance because they had understood their duty to involve a roving patrol around the yard.

In fact, tactical advice and written instructions stated that armed officers should be stationed close to the Carriage Gates entrance so as to protect those in the estate and their unarmed colleagues. Due to shortcomings in the security system at New Palace Yard, including the supervision of those engaged in such duties, the armed officers were not aware of a requirement to remain in close proximity to the gates.



Had they been stationed there, it is possible that they may have been able to prevent PC Palmer suffering fatal injuries.

I should make clear that the determination sheets will be posted on the website and made available to the press.

In terms of the Prevention of Future Death Reports, the directions I make are as follows: that any interested person wishing to propose points to be made in any Prevention of Future Death Report beyond those set out already in the submissions should file those submissions with the solicitors to the Inquest by 4.00 pm on 12 October this year, identifying the points to be made and the proposed addressees of any report. And, secondly, that any interested person wishing to respond to those proposals or others for points to be made in any Prevention of Future Death Report, should file submissions with solicitors to the Inquests by 4.00 pm on 9 November 2018.

After considering those submissions, I will produce a report, if necessary, and circulate it to all interested persons, as well as sending it to the appropriate addressees.

It would be wrong for me not to say a few other words of thanks. Can I simply repeat what I have said



a number of times: to thank all of those representing the interested persons in the course of these Inquests. You have each helped me enormously in the difficult tasks that I have faced, and I thank you all very much for your oral and written submissions.

Can I also, please, thank those who have been looking after the witnesses who have come from the witness care team and the coroners' court support services at this court.

I would particularly like to express my sincere thanks and appreciation for all the painstaking work that's been undertaken by the Metropolitan Police counter terrorism team over the many months since these awful attacks, led by the senior investigating officer, Detective Superintendent Crossley, and his deputy, Detective Chief Inspector Brown, but also Detective Inspector Eastwood and their team of approximately 40 officers who have investigated these events on 22 March, and then have acted in effect as my coronial officers in providing disclosure and investigating matters at the request of the Inquests team.

I would like to specifically mention the contributions to the coronial investigation by Detective Sergeant Walker, Detective Constable Osland, Detective Constable Needham and Detective Constable Overall, as

well as the work of all of those in the family liaison team, the family liaison officers and, as I've indicated, the witness support teams.

Mr Hough, that concludes these Inquests. We move, tomorrow morning, to start the Inquest in relation to Masood. That, in fact, I think will be listed in this court at 10.45 tomorrow morning.

MR HOUGH: Sir, yes. Before I finish, may I say on behalf of your team how impressed we have been by the dignity of the bereaved families and their representatives, to thank them for that, and to express our sincere condolences to them once again.

THE CHIEF CORONER: Yes. Mr Hough, right at the very first review hearing that I carried out, I expressed my condolences to the families, and I repeat them. I have had, as I have indicated, the opportunity of meeting not all but many of the families in this process, and it has been an important part of the process for me to do so. I know that words can never really cover what has happened, but they certainly have my sincere condolences.

MR PATTERSON: Sir, I wonder before we rise may I, on that theme, echo what you say, sir, about the families. As counsel instructed to represent some of the families of those killed on 22 March, it would be wrong to conclude



without my making mention of those who have been at the heart of this whole process. As you have very thoughtfully observed already, they have shown dignity throughout, sir, despite facing evidence that has been upsetting and harrowing at times for them and regular reminders of what happened. They have attended conferences with us, the lawyers, they have assisted us and in the process been assisting you in the Inquest hearings, and as their representative I would like to recognise publicly their dignified approach and express our appreciation for their input.

Could I also take this opportunity, sir, in relation to eyewitnesses who have come to court ——

THE CHIEF CORONER: Yes.

MR PATTERSON: —— who have had to relive at times what must be difficult for them to relive, what they saw. As you know, sir, where particular thanks were appropriate for the assistance that they gave on the day, this has been expressed by the representatives of the families, and in expressing the families' gratitude to those individuals, those words of gratitude were very sincerely meant.

Finally, sir, could I also take this opportunity to thank you, sir, for the sensitive way that you have presided over these hearings. From first to last you have shown sensitivity to the families. You have wanted



to know more about the loved ones who lost their lives. You asked for evidence about each of the deceased in order to ensure that they weren't just treated as persons about whom we know little beyond their name and age, but as real people with distinct personalities and interests and families and friends.

You met with family members where you could, and that really helped, and I know that that assisted the families considerably, and I thank you for that, sir. You took steps to set up a video link to assist some family members to follow your proceedings from afar, and that was gratefully received. You ensured that their concerns were explored in evidence and their questions answered, and when we consider, sir, the recent reforms to coronial law that were made with the intention of putting the needs of the bereaved at the heart of the system, we would submit, sir, that these Inquests have sought to do just that.

So on behalf of the families, could I express our gratitude and appreciation for the care and humanity and sensitivity that you have shown to them.

THE CHIEF CORONER: Thank you very much, Mr Patterson.

MR ADAMSON: Sir, I also wish to express on behalf of my clients their thanks to you. It is clear from your detailed summing—up that you have heard and listened to



all of the evidence that has been put before you. I would also like to pay tribute to the families for the way in which they have conducted themselves throughout this process. They have, as all have said, behaved with impeccable dignity when they find themselves in the cruellest of spotlights.

THE CHIEF CORONER: Thank you.

MS STEVENS: Sir, can I add my words to those that have just been advanced by my learned friends. The dignity and the strength of Police Constable Palmer's family throughout has been remarkable, and mirrors the qualities of Keith Palmer himself.

It would be impossible not to have been humbled by the dignity and strength of all the families. May I too offer my condolences to all.

THE CHIEF CORONER: Thank you. I'll rise.

(4.39 pm)

(The court adjourned until 10.45 am on Thursday, 4 October 2018)

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