

# OPUS 2

## INTERNATIONAL

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

Day 21.2

October 11, 2018

Opus 2 International - Official Court Reporters

Phone: +44 (0)20 3008 5900

Email: [transcripts@opus2.com](mailto:transcripts@opus2.com)

Website: <https://www.opus2.com>

1 Thursday, 11 October 2018  
 2 Submissions by MR HOUGH QC  
 3 MR HOUGH: Sir, the stage has now been reached that we  
 4 address you on the determination to be made by the jury  
 5 in this case and the legal directions to be given to  
 6 them. We have circulated submissions in writing, which  
 7 will be posted on the website and made available to the  
 8 press. I don't propose to go through those in full, but  
 9 only to summarise the main points so that they are  
 10 understood by all.  
 11 In outline our position is as follows. First of  
 12 all, the determination in this Inquest can and should  
 13 resolve the question of whether Khalid Masood was  
 14 lawfully killed. Conventionally such an issue is often  
 15 resolved by choosing between conclusions of lawful and  
 16 unlawful killing.  
 17 Secondly, you have an obligation not to leave  
 18 conclusions to the jury which would not be safe for them  
 19 to return, and the courts have said that where only one  
 20 conclusion is appropriate on the evidence, a coroner  
 21 should direct the jury to return that conclusion.  
 22 Thirdly, on the evidence in this case, we say that  
 23 it would be unsafe for the jury to reach a conclusion of  
 24 unlawful killing. It would be almost equally  
 25 inappropriate, given all the evidence that they have

1

1

1 heard about the confrontation between SA74 and Masood,  
 2 for them to return an open conclusion.  
 3 In the circumstances, we submit that you should  
 4 direct the jury to return a conclusion of lawful  
 5 killing, however, in fairness to them, you should  
 6 explain to them why that direction is being given.  
 7 Next, the jury should, nevertheless, be given  
 8 an important role. As primary finders of fact, they  
 9 should be asked to produce a narrative account of the  
 10 means and circumstances of Khalid Masood's death, which  
 11 will supplement and give more detail after the  
 12 conclusion of lawful killing.  
 13 Finally, we've identified, and I shall set out,  
 14 a series of matters which we say the jury could be asked  
 15 to address in their narrative, and we've set out some  
 16 directions which they should be given to ensure that  
 17 their narrative is appropriately worded.  
 18 Let me deal with the legal principles briefly, sir.  
 19 The statutory provisions and legal principles governing  
 20 inquest determinations are set out in paragraph 3 of our  
 21 document. Under sections 5 and 10 of the Coroners and  
 22 Justice Act 2009, the task for a coroner is to produce  
 23 a determination in each inquest which provides answers  
 24 to four factual questions: who the deceased was, and  
 25 when, where and how the person came by his or her death.

2

2

1 Where the coroner sits with a jury, it's the coroner's  
2 task to elicit those conclusions from the jury.

3 The determination can't go any further than  
4 addressing those matters and must not appear to  
5 determine any question of criminal liability of a named  
6 person, or any question of civil liability at all.

7 Where a coroner sits with a jury, the coroner is  
8 obliged not to leave to the jury possible conclusions  
9 which they could not properly return. The test that  
10 a coroner applies is, first of all, whether there is  
11 evidence on which the jury could properly reach  
12 a particular conclusion and, secondly, whether it would  
13 be safe for the jury to return that conclusion. Unless  
14 both of those questions can be answered yes, the  
15 conclusion should not be left to the jury.

16 That may, in some cases, require a coroner to leave  
17 only one conclusion to a jury, or direct them to return  
18 a particular conclusion as part of their determination.  
19 The Divisional Court confirmed that point in *R v HM*  
20 *Coroner for West Berkshire ex parte Thomas* [1991] JP 681  
21 at 697–8.

22 Whereas in this case Article 2 of the ECHR is  
23 engaged in relation to an Inquest, the requirement to  
24 determine how the deceased came by his or her death is  
25 read as meaning by what means and in what circumstances

3

3

1 the deceased came by his or her death. That requires  
2 the Inquest to seek to resolve the key issues relating  
3 to the circumstances of the death, and it may require  
4 an expanded form of narrative determination.

5 But, as regards Article 2, the European Court of  
6 Human Rights confirmed in the case of *Bubbins v United*  
7 *Kingdom* [2005] 41 EHRR 21 at paragraph 163, that there  
8 is no objection in Article 2 terms to a coroner  
9 directing a jury to return a lawful killing conclusion  
10 if it is the only legitimate conclusion on the evidence.

11 The Strasbourg court made clear that there is no  
12 objection in Article 2 terms to effectively the coroner  
13 making the decision that a killing was lawful, and  
14 directing the jury in that way, as our domestic law  
15 suggests.

16 We address the concept of lawful killing at  
17 paragraph 4 of our document. The lawful killing  
18 conclusion is a conclusion in an inquest that death  
19 resulted from an act which would otherwise be a homicide  
20 offence, but which has a legal justification under the  
21 criminal law. It is a criminal law concept. Both the  
22 defence of self-defence and that of lawful defence of  
23 others in the criminal law involve the application of  
24 a two-stage test: first, did the person using force  
25 honestly believe that it was necessary to do so in

4

4

1 defence of self or others? That's, as you know sir,  
2 a subjective test. Secondly, if so, did the person use  
3 no more force than was reasonably necessary in the  
4 circumstances as he or she believed them to be, and that  
5 is an objective test but by reference to the  
6 circumstances understood subjectively.

7 The law does not, however, require people who are  
8 faced with a threat to calibrate precisely and minutely  
9 the amount of force to be used. Moreover, the law  
10 recognises that a person need not wait passively for  
11 an attack before using force. Where force is used by  
12 a trained agent of the state, such as a firearms  
13 officer, the legal test does not change, that's been  
14 confirmed by the courts, but the person's training must  
15 be taken into account in the application of each stage  
16 of the test.

17 At paragraph 5 of our submissions, we go on to set  
18 out authorities governing the content of a narrative  
19 conclusion in an inquest. In short, a narrative in  
20 an Article 2 case is intended to express succinctly the  
21 conclusions of the jury on the key factual issues  
22 relating to the means and circumstances of death.

23 May I turn, then, to lawful killing in the context  
24 of this case. As I've said, our submission is that the  
25 determination of this Inquest ought to resolve the issue

5

5

1 of whether the killing of Khalid Masood was lawful.  
2 It's a question which plainly can be asked upon the  
3 evidence. In our submission it should be answered both  
4 because the Strasbourg institutions have suggested that  
5 an Article 2 investigation ought to be capable of  
6 resolving such questions, and because it is, on any  
7 view, a key issue relevant to the cause and  
8 circumstances of Khalid Masood's death.

9 In our submission, as I've said already, there is  
10 only one conclusion the jury could safely reach in this  
11 regard: that Khalid Masood was lawfully killed. It  
12 would be unsafe on the evidence to hold that the test of  
13 self-defence and defence of others, applying the balance  
14 of probabilities standard to evidential questions, was  
15 not satisfied.

16 Let me take the two limbs of the test in turn, and  
17 briefly: first, the only safe conclusion about SA74's  
18 honest belief is that he honestly believed he needed to  
19 use force to defend himself and others. He had heard  
20 a loud bang, he had heard screaming and he had seen  
21 people running. As he moved towards Carriage Gates, he  
22 saw police officers running towards him, followed by  
23 a man who must, as he rightly assumed, have forced  
24 entrance to a secure area. All the circumstances  
25 suggested that this was, or at least could be

6

6

1 a terrorist attack.  
2 When Masood was first seen by SA74 he was pursuing  
3 the police officers, he was visibly wielding large and  
4 bloody knives over shoulder level. He was a large man,  
5 he was coming forward intently and he was coming forward  
6 at some speed. All those who saw the scene, bystanders  
7 and police officers, immediately perceived that Masood  
8 was intent on killing and maiming. So you will remember  
9 that that was a question asked of nearly every witness,  
10 and all answered that that was what they took his  
11 intention to be.

12 SA74 said plausibly, and movingly, that he believed  
13 Khalid Masood intended to kill him unless stopped.  
14 Masood had, of course, already inflicted fatal injuries  
15 on another officer, although SA74 didn't know that.

16 Finally, SA74 attempted to keep a gap open. He and  
17 SB73 shouted warnings. Nevertheless, Masood kept on  
18 coming, right up to the moment of the shot. That is  
19 relevant to his honest belief because it shows that he  
20 honestly believed or it supports the proposition that he  
21 honestly believed that Masood would not be deterred by  
22 anything short of force.

23 Secondly, we say that the only safe conclusion is  
24 that the amount of force used was reasonable in the  
25 circumstances, as SA74 saw them. The threat was very

7

7

1 serious. If Masood hadn't been stopped, he would have  
2 attacked the two close protection officers with knives  
3 and then gone on to attack others. That's what they  
4 perceived and, in our submission, they're very likely to  
5 be right: there were many unarmed people in the estate  
6 beyond them who they owed a duty to protect.

7 The officers had exhausted all other options.  
8 They'd attempted to deter Masood by shouting a warning.  
9 SA74 had tried to keep a gap open, and give Masood time  
10 to react. Hand-to-hand engagement wasn't a realistic  
11 proposition because it was unlikely to be effective  
12 against a man with knives, and it would only risk death  
13 or serious injury to the officers, and then death or  
14 serious injuries to those behind them.

15 If there were any question about the number of shots  
16 fired or the placing of the shots, those matters have  
17 been convincingly explained by the officers themselves,  
18 and their evidence endorsed preemptively by Chief  
19 Inspector Sheridan. Their training taught them for good  
20 reason to aim at the central body mass, because it was  
21 the area of the body most likely to be hit, and it was  
22 the area of the body most likely to achieve  
23 incapacitation. Their training taught them to shoot  
24 until the target had been incapacitated, and Inspector  
25 Sheridan, in particular, gave a good explanation for why

8

8

1 that was their training.

2 So, for those reasons we say that one couldn't  
3 safely say anything but that Masood had been lawfully  
4 killed.

5 In making the submission the jury should receive  
6 a direction to that effect, I don't wish to suggest any  
7 lack of confidence in the jury. As you've already said,  
8 our jury have evidently been attentive and I have no  
9 doubt that the points I've made aren't lost on them.  
10 But the point is that our courts expect coroners not to  
11 leave juries with conclusions which could not be safely  
12 returned. That is part of a coroner's job.

13 However, in fairness to the jury, we submit that  
14 an explanation should be made as to why they are being  
15 directed to return a particular short form conclusion.

16 Finally, sir, let me deal with the supplementary  
17 narrative. Although we're submitting that the jury  
18 should be directed to return a short form conclusion of  
19 lawful killing, we say that they should be given the  
20 important task of preparing the narrative account of  
21 Masood's death, which will form part of the  
22 determination. We've set out in our document at  
23 paragraph 12 the directions they should be given in  
24 preparing that account and, in particular, we suggest  
25 they be told they can address the following subjects.

9

9

1 First, the acts of Masood immediately before the  
2 confrontation with the officers, notably his attack on  
3 PC Palmer in New Palace Yard and his pursuit of police  
4 officers.

5 Second, Masood's intentions as they appeared to  
6 others in the area, especially the close protection  
7 officers.

8 Third, Masood's movements towards Westminster Hall.

9 Fourth, the movement of the close protection  
10 officers towards Masood.

11 Fifth, any warning or challenge issued by the close  
12 protection officers.

13 Sixth, Masood's movements and actions after any such  
14 warning or challenge.

15 Seventh, the firing of the fatal shots.

16 In conclusion, sir, by the directed short form  
17 conclusion of lawful killing, and the jury's narrative  
18 given in response to those directions, the determination  
19 at the end of this Inquest will resolve the key  
20 questions concerning Khalid Masood's death.

21 Finally, we should add this: some observers may  
22 wonder why such care and effort has gone into an inquiry  
23 into the death of a terrorist killed justifiably by  
24 police officers. The short answer is that our law  
25 requires it. The longer answer is that our law requires

10

10

1 it for the good reason that any killing by state agents  
2 must be properly scrutinised and that is what we have  
3 been doing.

4 THE CHIEF CORONER: Yes.

5 MR HOUGH: Sir, those are my submissions, unless you have  
6 any questions or points to raise.

7 THE CHIEF CORONER: No. Thank you very much, Mr Hough.  
8 That's very helpful.

9 Mr Keith.

10 Submissions by MR KEITH QC

11 MR KEITH: Sir, in this Inquest, and on the evidence which  
12 the jury has heard, we respectfully agree wholeheartedly  
13 with the careful and well founded submissions of  
14 Mr Hough.

15 THE CHIEF CORONER: Yes.

16 MR KEITH: We agree that any conclusion other than lawful  
17 killing would be wrong and unsafe, primarily because  
18 there is no evidence whatsoever on which the jury could  
19 properly reach any other conclusion. It is as simple as  
20 that.

21 It follows from that primary submission that the  
22 jury must be directed that the only verdict which they  
23 can reach is one of lawful killing, in exactly the same  
24 way as the coroner in the Bubbins case directed his jury  
25 and that manner, which is set out at paragraph 94 of the

11

11

1 Bubbins report was, of course, upheld and endorsed by  
2 the European Court of Human Rights at paragraph 163 of  
3 the judgment.

4 We further agree that the jury ought, however, to be  
5 told why they must receive that direction, in essence  
6 because they could not legitimately find that the  
7 evidence did not support a finding of lawful  
8 self-defence. Putting it another way, the two-stage  
9 test for self-defence can be answered only one way.

10 In relation to the narrative, there is nothing that  
11 I can add: we agree what is proposed in relation to the  
12 issues that are identified for the jury's consideration.  
13 They must plainly, and can only address, the means and  
14 circumstances of Masood's death, and so in practice that  
15 means the acts, movements, intentions of Masood, and the  
16 acts, movements and warnings of the close protection  
17 officers. And that's it.

18 THE CHIEF CORONER: Thank you.

19 Submissions by MS WHITELAW

20 MS WHITELAW: Sir, my name is Francesca Whitelaw and  
21 I appear today on behalf of the Secretary of State for  
22 the Home Department. We are grateful for having  
23 received the comprehensive submissions of counsel to the  
24 Inquests and we don't have anything else to add to those  
25 submissions, thank you.

12

12

1 Submissions by MR HILL 2

2 MR HILL: The London Ambulance Service too are grateful for 2

3 Mr Hough's submissions. We are in agreement with them 3

4 and with what Mr Keith has just said. We note, merely 4

5 for emphasis, that in the narrative section, the 5

6 proposals of the counsel to the Inquest make reference 6

7 to the treatment of Masood, we say that is right. There 7

8 is no evidence before you that any other intervention 8

9 would have made any difference whatsoever. The 9

10 treatment is not a central or a key issue. 10

11 THE CHIEF CORONER: Thank you. 11

12 Mr Hough what I will do is to provide, as I've 12

13 indicated, the jury some directions in written form, and 13

14 I've no doubt those will be circulated to the interested 14

15 persons before they are delivered. 15

16 MR HOUGH: They will. They will be in accordance with our 16

17 written submissions. 17

18 THE CHIEF CORONER: Thank you. And in the meantime, I hope 18

19 my IT issues will resolve themselves. We will sit 19

20 tomorrow morning at 10 o'clock. 20

21 I will rise. 21

22 (12.30 pm) 22

23 (The court adjourned until 10.00 am on 23

24 Friday, 12 October 2018) 24

25

14

13

15

13

1 INDEX

2 Submissions by MR HOUGH QC .....1

3 Submissions by MR KEITH QC .....11

4 Submissions by MS WHITELAW .....12

5 Submissions by MR HILL .....13

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

14

**A**

accordance (1) 13:16  
 account (4) 2:9 5:15 9:20,24  
 achieve (1) 8:22  
 actions (1) 10:13  
 acts (3) 10:1 12:15,16  
 add (3) 10:21 12:11,24  
 address (5) 1:4 2:15 4:16 9:25 12:13  
 addressing (1) 3:4  
 adjourned (1) 13:23  
 after (2) 2:11 10:13  
 against (1) 8:12  
 agent (1) 5:12  
 agents (1) 11:1  
 agree (4) 11:12,16 12:4,11  
 agreement (1) 13:3  
 aim (1) 8:20  
 almost (1) 1:24  
 already (3) 6:9 7:14 9:7  
 although (2) 7:15 9:17  
 ambulance (1) 13:2  
 amount (2) 5:9 7:24  
 another (2) 7:15 12:8  
 answer (2) 10:24,25  
 answered (4) 3:14 6:3 7:10 12:9  
 answers (1) 2:23  
 anything (3) 7:22 9:3 12:24  
 appear (2) 3:4 12:21  
 appeared (1) 10:5  
 application (2) 4:23 5:15  
 applies (1) 3:10  
 applying (1) 6:13  
 appropriate (1) 1:20  
 appropriately (1) 2:17  
 area (4) 6:24 8:21,22 10:6  
 arent (1) 9:9  
 article (6) 3:22 4:5,8,12 5:20 6:5  
 asked (4) 2:9,14 6:2 7:9  
 assumed (1) 6:23  
 attack (4) 5:11 7:1 8:3 10:2  
 attacked (1) 8:2  
 attempted (2) 7:16 8:8  
 attentive (1) 9:8  
 authorities (1) 5:18  
 available (1) 1:7

**B**

balance (1) 6:13  
 bang (1) 6:20  
 before (4) 5:11 10:1 13:8,15  
 behalf (1) 12:21  
 behind (1) 8:14  
 being (2) 2:6 9:14  
 belief (2) 6:18 7:19  
 believe (1) 4:25  
 believed (5) 5:4 6:18 7:12,20,21  
 berkshire (1) 3:20  
 between (2) 1:15 2:1  
 beyond (1) 8:6  
 bloody (1) 7:4

body (3) 8:20,21,22  
 both (3) 3:14 4:21 6:3  
 briefly (2) 2:18 6:17  
 bubsbins (3) 4:6 11:24 12:1  
 bystanders (1) 7:6

**C**

calibrate (1) 5:8  
 came (3) 2:25 3:24 4:1  
 cant (1) 3:3  
 capable (1) 6:5  
 care (1) 10:22  
 careful (1) 11:13  
 carriage (1) 6:21  
 cases (1) 3:16  
 cause (1) 6:7  
 central (2) 8:20 13:10  
 challenge (2) 10:11,14  
 change (1) 5:13  
 chief (7) 8:18 11:4,7,15 12:18 13:11,18  
 choosing (1) 1:15  
 circulated (2) 1:6 13:14  
 circumstances (11) 2:3,10 3:25 4:3 5:4,6,22 6:8,24 7:25 12:14  
 civil (1) 3:6  
 clear (1) 4:11  
 close (5) 8:2 10:6,9,11 12:16  
 coming (3) 7:5,5,18  
 comprehensive (1) 12:23  
 concept (2) 4:16,21  
 concerning (1) 10:20  
 conclusion (25) 1:20,21,23 2:2,4,12 3:12,13,15,17,18 4:9,10,18,18 5:19 6:10,17 7:23 9:15,18 10:16,17 11:16,19  
 conclusions (6) 1:15,18 3:2,8 5:21 9:11  
 confidence (1) 9:7  
 confirmed (3) 3:19 4:6 5:14  
 confrontation (2) 2:1 10:2  
 consideration (1) 12:12  
 content (1) 5:18  
 context (1) 5:23  
 conventionally (1) 1:14  
 convincingly (1) 8:17  
 coroner (17) 1:20 2:22 3:1,7,7,10,16,20 4:8,12 11:4,7,15,24 12:18 13:11,18  
 coroners (4) 2:21 3:1 9:10,12  
 couldnt (1) 9:2  
 counsel (2) 12:23 13:6  
 course (2) 7:14 12:1  
 courts (3) 1:19 5:14 9:10  
 criminal (4) 3:5 4:21,21,23

**D**

deal (2) 2:18 9:16

death (14) 2:10,25 3:24 4:1,3,18 5:22 6:8 8:12,13 9:21 10:20,23 12:14  
 deceased (3) 2:24 3:24 4:1  
 decision (1) 4:13  
 defend (1) 6:19  
 delivered (1) 13:15  
 department (1) 12:22  
 detail (1) 2:11  
 deter (1) 8:8  
 determination (9) 1:4,12 2:23 3:3,18 4:4 5:25 9:22 10:18  
 determinations (1) 2:20  
 determine (2) 3:5,24  
 deterred (1) 7:21  
 didnt (1) 7:15  
 difference (1) 13:9  
 direct (3) 1:21 2:4 3:17  
 directed (5) 9:15,18 10:16 11:22,24  
 directing (2) 4:9,14  
 direction (3) 2:6 9:6 12:5  
 directions (5) 1:5 2:16 9:23 10:18 13:13  
 divisional (1) 3:19  
 document (3) 2:21 4:17 9:22  
 does (2) 5:7,13  
 doing (1) 11:3  
 domestic (1) 4:14  
 dont (3) 1:8 9:6 12:24  
 doubt (2) 9:9 13:14  
 duty (1) 8:6

**E**

echr (1) 3:22  
 effect (1) 9:6  
 effective (1) 8:11  
 effectively (1) 4:12  
 effort (1) 10:22  
 ehrr (1) 4:7  
 elicit (1) 3:2  
 else (1) 12:24  
 emphasis (1) 13:5  
 end (1) 10:19  
 endorsed (2) 8:18 12:1  
 engaged (1) 3:23  
 engagement (1) 8:10  
 ensure (1) 2:16  
 entrance (1) 6:24  
 equally (1) 1:24  
 especially (1) 10:6  
 essence (1) 12:5  
 estate (1) 8:5  
 european (2) 4:5 12:2  
 every (1) 7:9  
 evidence (12) 1:20,22,25 3:11 4:10 6:3,12 8:18 11:11,18 12:7 13:8  
 evidential (1) 6:14  
 evidently (1) 9:8  
 ex (1) 3:20  
 exactly (1) 11:23  
 exhausted (1) 8:7  
 expanded (1) 4:4  
 expect (1) 9:10  
 explain (1) 2:6  
 explained (1) 8:17

**F**

faced (1) 5:8  
 factual (2) 2:24 5:21  
 fairness (2) 2:5 9:13  
 fatal (2) 7:14 10:15  
 fifth (1) 10:11  
 finally (4) 2:13 7:16 9:16 10:21  
 find (1) 12:6  
 finders (1) 2:8  
 finding (1) 12:7  
 firearms (1) 5:12  
 fire (1) 8:16  
 firing (1) 10:15  
 first (6) 1:11 3:10 4:24 6:17 7:2 10:1  
 followed (1) 6:22  
 following (1) 9:25  
 follows (2) 1:11 11:21  
 force (8) 4:24 5:3,9,11,11 6:19 7:22,24  
 forced (1) 6:23  
 form (6) 4:4 9:15,18,21 10:16 13:13  
 forward (2) 7:5,5  
 founded (1) 11:13  
 four (1) 2:24  
 fourth (1) 10:9  
 francesca (1) 12:20  
 friday (1) 13:24  
 full (1) 1:8  
 further (2) 3:3 12:4

explanation (2) 8:25 9:14  
 express (1) 5:20

**F**

faced (1) 5:8  
 factual (2) 2:24 5:21  
 fairness (2) 2:5 9:13  
 fatal (2) 7:14 10:15  
 fifth (1) 10:11  
 finally (4) 2:13 7:16 9:16 10:21  
 find (1) 12:6  
 finders (1) 2:8  
 finding (1) 12:7  
 firearms (1) 5:12  
 fire (1) 8:16  
 firing (1) 10:15  
 first (6) 1:11 3:10 4:24 6:17 7:2 10:1  
 followed (1) 6:22  
 following (1) 9:25  
 follows (2) 1:11 11:21  
 force (8) 4:24 5:3,9,11,11 6:19 7:22,24  
 forced (1) 6:23  
 form (6) 4:4 9:15,18,21 10:16 13:13  
 forward (2) 7:5,5  
 founded (1) 11:13  
 four (1) 2:24  
 fourth (1) 10:9  
 francesca (1) 12:20  
 friday (1) 13:24  
 full (1) 1:8  
 further (2) 3:3 12:4

**G**

gap (2) 7:16 8:9  
 gates (1) 6:21  
 gave (1) 8:25  
 give (2) 2:11 8:9  
 given (8) 1:5,25 2:6,7,16 9:19,23 10:18  
 gone (2) 8:3 10:22  
 good (3) 8:19,25 11:1  
 governing (2) 2:19 5:18  
 grateful (2) 12:22 13:2

**H**

hadnt (1) 8:1  
 hall (1) 10:8  
 handtohand (1) 8:10  
 having (1) 12:22  
 heard (4) 2:1 6:19,20 11:12  
 helpful (1) 11:8  
 hill (3) 13:1,2 14:5  
 himself (1) 6:19  
 hit (1) 8:21  
 hm (1) 3:19  
 hold (1) 6:12  
 home (1) 12:22  
 homicide (1) 4:19  
 honest (2) 6:18 7:19 7:20,21  
 hope (1) 13:18  
 hough (8) 1:2,3 11:5,7,14 13:12,16 14:2

houghs (1) 13:3  
 however (4) 2:5 5:7 9:13 12:4  
 human (2) 4:6 12:2

**I**

identified (2) 2:13 12:12  
 immediately (2) 7:7 10:1  
 important (2) 2:8 9:20  
 inappropriate (1) 1:25  
 incapacitated (1) 8:24  
 incapacitation (1) 8:23  
 index (1) 14:1  
 indicated (1) 13:13  
 inflicted (1) 7:14  
 injuries (2) 7:14 8:14  
 injury (1) 8:13  
 inquest (11) 1:12 2:20,23 3:23 4:2,18 5:19,25 10:19 11:11 13:6  
 inquests (1) 12:24  
 inquiry (1) 10:22  
 inspector (2) 8:19,24  
 institutions (1) 6:4  
 intended (2) 5:20 7:13  
 intent (1) 7:8  
 intention (1) 7:11  
 intentions (2) 10:5 12:15  
 intently (1) 7:5  
 interested (1) 13:14  
 intervention (1) 13:8  
 into (3) 5:15 10:22,23  
 investigation (1) 6:5  
 involve (1) 4:23  
 issued (1) 10:11  
 issues (4) 4:2 5:21 12:12 13:19  
 its (2) 3:1 6:2  
 ive (5) 5:24 6:9 9:9 13:12,14

**J**

job (1) 9:12  
 jp (1) 3:20  
 judgment (1) 12:3  
 juries (1) 9:11  
 jury (30) 1:4,18,21,23 2:4,7,14 3:1,2,7,8,11,13,15,17 4:9,14 5:21 6:10 9:5,7,8,13,17 11:12,18,22,24 12:4 13:13  
 jurs (2) 10:17 12:12  
 justifiably (1) 10:23  
 justification (1) 4:20

**K**

keep (2) 7:16 8:9  
 keith (6) 11:9,10,11,16 13:4 14:3  
 kept (1) 7:17  
 key (5) 4:2 5:21 6:7 10:19 13:10  
 khalid (7) 1:13 2:10 6:1,8,11 7:13 10:20  
 kill (1) 7:13

kill (4) 1:14 6:11 9:4 10:23  
 killing (16) 1:16,24 2:5,12 4:9,13,16,17 5:23 6:1 7:8 9:19 10:17 11:1,17,23  
 kingdom (1) 4:7  
 knives (3) 7:4 8:2,12  
 know (2) 5:1 7:15

**L**

lack (1) 9:7  
 large (2) 7:3,4  
 lawful (15) 1:15 2:4,12 4:9,13,16,17,22 5:23 6:1 9:19 10:17 11:16,23 12:7  
 lawfully (3) 1:14 6:11 9:3  
 least (1) 6:25  
 leave (4) 1:17 3:8,16 9:11  
 left (1) 3:15  
 legal (5) 1:5 2:18,19 4:20 5:13  
 legitimate (1) 4:10  
 legitimately (1) 12:6  
 let (3) 2:18 6:16 9:16  
 level (1) 7:4  
 liability (2) 3:5,6  
 likely (3) 8:4,21,22  
 limbs (1) 6:16  
 london (1) 13:2  
 longer (1) 10:25  
 lost (1) 9:9  
 loud (1) 6:20

**M**

maiming (1) 7:8  
 main (1) 1:9  
 making (2) 4:13 9:5  
 man (3) 6:23 7:4 8:12  
 manner (1) 11:25  
 many (1) 8:5  
 masood (18) 1:13 2:1 6:1,11 7:2,7,13,14,17,21 8:1,8,9 9:3 10:1,10 12:15 13:7  
 masoods (8) 2:10 6:8 9:21 10:5,8,13,20 12:14  
 mass (1) 8:20  
 matters (3) 2:14 3:4 8:16  
 meaning (1) 3:25  
 means (5) 2:10 3:25 5:22 12:13,15  
 meantime (1) 13:18  
 merely (1) 13:4  
 minutely (1) 5:8  
 moment (1) 7:18  
 more (2) 2:11 5:3  
 moreover (1) 5:9  
 morning (1) 13:20  
 most (2) 8:21,22  
 moved (1) 6:21  
 movement (1) 10:9  
 movements (4) 10:8,13 12:15,16  
 movingly (1) 7:12  
 ms (3) 12:19,20 14:4

**M**

maiming (1) 7:8  
 main (1) 1:9  
 making (2) 4:13 9:5  
 man (3) 6:23 7:4 8:12  
 manner (1) 11:25  
 many (1) 8:5  
 masood (18) 1:13 2:1 6:1,11 7:2,7,13,14,17,21 8:1,8,9 9:3 10:1,10 12:15 13:7  
 masoods (8) 2:10 6:8 9:21 10:5,8,13,20 12:14  
 mass (1) 8:20  
 matters (3) 2:14 3:4 8:16  
 meaning (1) 3:25  
 means (5) 2:10 3:25 5:22 12:13,15  
 meantime (1) 13:18  
 merely (1) 13:4  
 minutely (1) 5:8  
 moment (1) 7:18  
 more (2) 2:11 5:3  
 moreover (1) 5:9  
 morning (1) 13:20  
 most (2) 8:21,22  
 moved (1) 6:21  
 movement (1) 10:9  
 movements (4) 10:8,13 12:15,16  
 movingly (1) 7:12  
 ms (3) 12:19,20 14:4

much (1) 11:7  
 must (7) 3:4 5:14 6:23 11:2,22 12:5,13

**N**

name (1) 12:20  
 named (1) 3:5  
 narrative (11) 2:9,15,17 4:4 5:18,19 9:17,20 10:17 12:10 13:5  
 nearly (1) 7:9  
 necessary (2) 4:25 5:3  
 need (1) 5:10  
 needed (1) 6:18  
 nevertheless (2) 2:7 7:17  
 next (1) 2:7  
 notably (1) 10:2  
 note (1) 13:4  
 nothing (1) 12:10  
 number (1) 8:15

**O**

objection (2) 4:8,12  
 objective (1) 5:5  
 obligation (1) 1:17  
 obliged (1) 3:8  
 observers (1) 10:21  
 o'clock (1) 13:20  
 october (2) 1:1 13:24  
 offence (1) 4:20  
 officer (2) 5:13 7:15  
 officers (14) 6:22 7:3,7 8:2,7,13,17 10:2,4,7,10,12,24 12:17  
 often (1) 1:14  
 open (3) 2:2 7:16 8:9  
 options (1) 8:7  
 others (6) 4:23 5:1 6:13,19 8:3 10:6  
 otherwise (1) 4:19  
 ought (3) 5:25 6:5 12:4  
 outline (1) 1:11  
 over (1) 7:4  
 owed (1) 8:6

**P**

palace (1) 10:3  
 palmer (1) 10:3  
 paragraph (7) 2:20 4:7,17 5:17 9:23 11:25 12:2  
 part (3) 3:18 9:12,21  
 parte (1) 3:20  
 particular (5) 3:12,18 8:25 9:15,24  
 passively (1) 5:10  
 pc (1) 10:3  
 people (3) 5:7 6:21 8:5  
 perceived (2) 7:7 8:4  
 person (5) 2:25 3:6 4:24 5:2,10  
 persons (2) 5:14 13:15  
 placing (1) 8:16  
 plainly (2) 6:2 12:13  
 plausibly (1) 7:12  
 pm (1) 13:22  
 points (3) 1:9 9:9 11:6  
 police (5) 6:22 7:3,7 10:3,24

position (1) 1:11  
 possible (1) 3:8  
 posted (1) 1:7  
 practice (1) 12:14  
 precisely (1) 5:8  
 preemptively (1) 8:18  
 preparing (2) 9:20,24  
 press (1) 1:8  
 primarily (1) 11:17  
 primary (2) 2:8 11:21  
 principles (2) 2:18,19  
 probabilities (1) 6:14  
 produce (2) 2:9,22  
 properly (4) 3:9,11  
 11:2,19  
 proposals (1) 13:6  
 propose (1) 1:8  
 proposed (1) 12:11  
 proposition (2) 7:20  
 8:11  
 protect (1) 8:6  
 protect (5) 8:2  
 10:6,9,12 12:16  
 provide (1) 13:12  
 provides (1) 2:23  
 provisions (1) 2:19  
 pursuing (1) 7:2  
 pursuit (1) 10:3  
 putting (1) 12:8

**Q**

qc (4) 1:2 11:10 14:2,3  
 question (6) 1:13 3:5,6  
 6:2 7:9 8:15  
 questions (6) 2:24 3:14  
 6:6,14 10:20 11:6

**R**

r (1) 3:19  
 raise (1) 11:6  
 reach (5) 1:23 3:11 6:10  
 11:19,23  
 reached (1) 1:3  
 react (1) 8:10  
 read (1) 3:25  
 realistic (1) 8:10  
 reason (2) 8:20 11:1  
 reasonable (1) 7:24  
 reasonably (1) 5:3  
 reasons (1) 9:2  
 receive (2) 9:5 12:5  
 received (1) 12:23  
 recognises (1) 5:10  
 reference (2) 5:5 13:6  
 regard (1) 6:11  
 regards (1) 4:5  
 relating (2) 4:2 5:22  
 relation (3) 3:23  
 12:10,11  
 relevant (2) 6:7 7:19  
 remember (1) 7:8  
 report (1) 12:1  
 require (3) 3:16 4:3 5:7  
 requirement (1) 3:23  
 requires (3) 4:1  
 10:25,25  
 resolve (5) 1:13 4:2  
 5:25 10:19 13:19  
 resolved (1) 1:15  
 resolving (1) 6:6  
 respectfully (1) 11:12  
 response (1) 10:18

resulted (1) 4:19  
 return (10) 1:19,21  
 2:2,4 3:9,13,17 4:9  
 9:15,18  
 returned (1) 9:12  
 rightly (1) 6:23  
 rights (2) 4:6 12:2  
 rise (1) 13:21  
 risk (1) 8:12  
 role (1) 2:8  
 running (2) 6:21,22

**S**

sa74 (7) 2:1  
 7:2,12,15,16,25 8:9  
 sa74s (1) 6:17  
 safe (4) 1:18 3:13 6:17  
 7:23  
 safely (3) 6:10 9:3,11  
 same (1) 11:23  
 satisfied (1) 6:15  
 saw (3) 6:22 7:6,25  
 sb73 (1) 7:17  
 scene (1) 7:6  
 screaming (1) 6:20  
 scrutinised (1) 11:2  
 second (1) 10:5  
 secondly (4) 1:17 3:12  
 5:2 7:23  
 secretary (1) 12:21  
 section (1) 13:5  
 sections (1) 2:21  
 secure (1) 6:24  
 seek (1) 4:2  
 seen (2) 6:20 7:2  
 self (1) 5:1  
 selfdefence (4) 4:22  
 6:13 12:8,9  
 series (1) 2:14  
 serious (3) 8:1,13,14  
 service (1) 13:2  
 set (6) 2:13,15,20 5:17  
 9:22 11:25  
 seventh (1) 10:15  
 shall (1) 2:13  
 sheridan (2) 8:19,25  
 shoot (1) 8:23  
 short (6) 5:19 7:22  
 9:15,18 10:16,24  
 shot (1) 7:18  
 shots (3) 8:15,16 10:15  
 should (15) 1:12,21  
 2:3,5,7,9,16 3:15 6:3  
 9:5,14,18,19,23 10:21  
 shoulder (1) 7:4  
 shouted (1) 7:17  
 shouting (1) 8:8  
 shows (1) 7:19  
 simple (1) 11:19  
 sir (8) 1:3 2:18 5:1 9:16  
 10:16 11:5,11 12:20  
 sit (1) 13:19  
 sits (2) 3:1,7  
 sixth (1) 10:13  
 speed (1) 7:6  
 stage (2) 1:3 5:15  
 standard (1) 6:14  
 statutory (1) 2:19  
 stopped (2) 7:13 8:1  
 strasbourg (2) 4:11 6:4  
 subjective (1) 5:2  
 subjectively (1) 5:6  
 subjects (1) 9:25

submit (2) 2:3 9:13  
 submitting (1) 9:17  
 succinctly (1) 5:20  
 suggest (2) 9:6,24  
 suggested (2) 6:4,25  
 suggests (1) 4:15  
 summarise (1) 1:9  
 supplement (1) 2:11  
 supplementary (1) 9:16  
 support (1) 12:7  
 supports (1) 7:20

**T**

taken (1) 5:15  
 target (1) 8:24  
 task (3) 2:22 3:2 9:20  
 taught (2) 8:19,23  
 terms (2) 4:8,12  
 terrorist (2) 7:1 10:23  
 test (9) 3:9 4:24  
 5:2,5,13,16 6:12,16  
 12:9  
 thank (5) 11:7 12:18,25  
 13:11,18  
 thats (5) 5:1,13 8:3  
 11:8 12:17  
 themselves (2) 8:17  
 13:19  
 theyd (1) 8:8  
 theyre (1) 8:4  
 third (1) 10:8  
 thirdly (1) 1:22  
 thomas (1) 3:20  
 threat (2) 5:8 7:25  
 through (1) 1:8  
 thursday (1) 1:1  
 time (1) 8:9  
 today (1) 12:21  
 told (2) 9:25 12:5  
 tomorrow (1) 13:20  
 too (1) 13:2  
 took (1) 7:10  
 towards (4) 6:21,22  
 10:8,10  
 trained (1) 5:12  
 training (4) 5:14  
 8:19,23 9:1  
 treatment (2) 13:7,10  
 tried (1) 8:9  
 turn (2) 5:23 6:16  
 twostage (2) 4:24 12:8

**U**

unarmed (1) 8:5  
 understood (2) 1:10 5:6  
 united (1) 4:6  
 unless (3) 3:13 7:13  
 11:5  
 unlikely (1) 8:11  
 unsafe (3) 1:23 6:12  
 11:17  
 until (2) 8:24 13:23  
 upheld (1) 12:1  
 upon (1) 6:2  
 used (3) 5:9,11 7:24  
 using (2) 4:24 5:11

**V**

v (2) 3:19 4:6  
 verdict (1) 11:22  
 visibly (1) 7:3

**W**

wait (1) 5:10  
 warning (3) 8:8  
 10:11,14  
 warnings (2) 7:17 12:16  
 wasnt (1) 8:10  
 way (4) 4:14 11:24  
 12:8,9  
 website (1) 1:7  
 west (1) 3:20  
 westminster (1) 10:8  
 weve (3) 2:13,15 9:22  
 whatsoever (2) 11:18  
 13:9  
 whereas (1) 3:22  
 whitelaw (4)  
 12:19,20,20 14:4  
 wholeheartedly (1)  
 11:12  
 wielding (1) 7:3  
 wish (1) 9:6  
 witness (1) 7:9  
 wonder (1) 10:22  
 worded (1) 2:17  
 writing (1) 1:6  
 written (2) 13:13,17  
 wrong (1) 11:17

**Y**

yard (1) 10:3  
 youve (1) 9:7

**1**

1 (2) 1:25 14:2  
 10 (3) 2:21 10:25 13:20  
 1000 (1) 13:23  
 11 (3) 1:1 11:25 14:3  
 12 (4) 9:23 12:25 13:24  
 14:4  
 1230 (1) 13:22  
 13 (2) 13:25 14:5  
 14 (1) 15:  
 163 (2) 4:7 12:2  
 1991 (1) 3:20

**2**

2 (7) 2:25 3:22 4:5,8,12  
 5:20 6:5  
 2005 (1) 4:7  
 2009 (1) 2:22  
 2018 (2) 1:1 13:24  
 21 (1) 4:7

**3**

3 (2) 2:20 3:25

**4**

4 (2) 4:17,25  
 41 (1) 4:7

**5**

5 (3) 2:21 5:17,25

**6**

6 (1) 6:25  
 681 (1) 3:20  
 6978 (1) 3:21

**7**

7 (1) 7:25

**8**

8 (1) 8:25

**9**

9 (1) 9:25  
 94 (1) 11:25