

IN THE CENTRAL CRIMINAL COURT

**INQUESTS ARISING FROM THE DEATHS IN THE WESTMINSTER TERROR
ATTACK 22 MARCH 2017**

**WRITTEN SUBMISSIONS ON BEHALF OF
THE FAMILY OF PC KEITH PALMER
REGULATION 28**

1. It is submitted that the matters identified below give rise to the concern that circumstances will continue to exist that will create a future risk to individuals at locations that require the protection of Authorised Firearms Officers (“AFOs”).
2. It is further submitted that action should be taken to prevent the reoccurrence or continuation of the circumstances identified below to eliminate that risk.

POST INSTRUCTIONS

3. Post Instructions have been shown to be insufficiently clear and capable of misinterpretation.
4. Post Instructions do not appear to have been widely accessible or visible beyond the ADAM system.
5. No maps and/or visual aids are said to have accompanied the Post Instructions accessible on the ADAM system.

6. The maps that were provided to the AFOs of Sector 3 of New Palace Yard (“NPY”) did not accord with the Post Instruction.
7. Changes to Post Instructions were not adequately communicated and/or understood by AFOs in respect of Sector 3 and NPY.
8. Post Instructions were not amended after significant terrorist attacks, leading to changes in practice that were contrary to the Post Instructions.

SUPERVISION

9. There is evidence that a substantial number of AFOs and/or supervisors regarded Post Instructions to be advisory rather than mandatory.
10. There is evidence that supervisors had expectations of AFOs that were not reduced to writing and not communicated in a uniform and clear way.
11. There is evidence that the record keeping of checks on AFOs by supervisors was inadequate and incomplete.
12. There was undue reliance on the part of senior officers on individual AFOs accessing ADAM and understanding written instructions, as opposed to ensuring that the briefings given were in accordance with Post Instructions and provided clear guidance.
13. There is limited evidence of any checks to ensure that AFOs had in fact read emails and accessed relevant Post Instructions on ADAM.

14. The patrol maps provided to the supervisors giving the briefings to AFOs, are misleading and inaccurate with regards to the area that AFOs are required to cover.

TRAINING

15. There has been no evidence that AFOs and unarmed officers deployed in NPY have ever been involved in collective training, with one another, or been provided with guidance, that would have informed them as to the appropriate action to take in respect of a marauding terrorist attack involving possible distraction techniques.

16. There has been evidence that PCs Ashby and Sanders were not sufficiently aware of relevant radio communications from officers at Carriage Gates suggesting that this was not adequately addressed in training.

17. There has been no evidence of any appropriate table-exercise at NPY, notwithstanding the clear risks of a terrorist attack at this location. The only evidence was of a table-exercise involving an attack from the Thames.

TACTICAL FIREARMS REVIEWS

18. There is evidence that relevant information within the Tactical Firearms Review was not passed on to the AFOs, namely the areas that had been assessed to be of highest risk and the most vulnerable persons at such locations.

19. Tactical Firearms Reviews do not appear to have sufficiently taken account of significant terrorist incidents that suggest the need for greater numbers of AFOs to deal with a marauding terrorist attack involving possible distraction techniques.

WHISTLEBLOWING/OFFICER SUPPORT

20. There has been evidence that suggests that officers at POW felt unable to effectively raise their concerns about changes to security arrangements at Palace of Westminster, particularly in respect of their belief that a patrol of NPY would leave others more vulnerable.

**SUSANNAH STEVENS
THOMAS COKE-SMYTH
Q.E.B. HOLLIS WHITEMAN
12th October 2018**