

OPUS 2

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London Bridge Inquests

Day 23

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1 Monday, 10 June 2019
 2 (10.05 am)
 3 THE CHIEF CORONER: Good morning.
 4 MR HOUGH: Sir, the first witness is Superintendent Ross
 5 McKibbin.
 6 SUPERINTENDENT ROSS MCKIBBIN (affirmed)
 7 THE CHIEF CORONER: Good morning. Please do take a seat and
 8 make yourself comfortable.
 9 Questions by MR HOUGH QC
 10 MR HOUGH: Would you please give your name and rank for the
 11 court.
 12 A. Sir, I am Superintendent Ross McKibbin, currently
 13 working for the Specialist Firearms Command.
 14 Q. Mr McKibbin, you understand I'm asking questions first
 15 on behalf of the Coroner and then you will be asked
 16 questions by some other lawyers?
 17 A. Yes, sir.
 18 Q. You have told us that you are a superintendent in the
 19 Specialist Firearms Command. What's your particular
 20 role in that command?
 21 A. So I'm head of counter terrorism and specialist
 22 operations, which means I manage the CTSFOs which are
 23 our counter terrorist specialist firearms officers.
 24 I'm also a post-incident manager and I lead
 25 post-incident management on behalf of armed policing

1

1 which is how the MPS manage post-incident procedures
 2 following the shooting or a death following contact with
 3 the police or armed officers.
 4 Q. Thank you.
 5 A. I also lead professional standards.
 6 Q. I'll ask about your career in a moment, but is this
 7 right: that on the night of 3 June 2017, you were in
 8 overall command of the policing response to the
 9 London Bridge and Borough Market terrorist attack for
 10 around the first two hours?
 11 A. That's correct, sir, yes.
 12 Q. You made a report about the Metropolitan Police
 13 Service's response generally, dated 9 March 2019. You
 14 may refer to that and its underlying materials as you
 15 wish.
 16 A. Thank you.
 17 Q. A little about your personal background first, please.
 18 Is it right that your police career started in 1995?
 19 A. That's correct, yes.
 20 Q. When did you first join the Specialist Firearms Command?
 21 A. I think 2012.
 22 Q. In what role?
 23 A. So I joined as an inspector first of all and was
 24 a tactical firearms commander, which is the role which
 25 determines the tactics that will be used in the

2

1 resolution of a firearms incident. After that I became
 2 a temporary chief inspector managing the command
 3 portfolio, so I was practitioner lead for Tactical
 4 Firearms Command and had a role in developing the
 5 training for what we call TFCs, including how TFCs will
 6 respond to terrorism and terrorist attacks.
 7 Q. Is it right to say that over the following years you
 8 were responsible for producing a number of
 9 Metropolitan Police guidance documents regarding the
 10 response to a spontaneous or no-notice terrorist attack?
 11 A. That's correct, yes.
 12 Q. In 2015 were you responsible for producing a memorandum
 13 of understanding between the forces operating in the
 14 capital governing command of a firearms incident in the
 15 capital?
 16 A. Yes, correct, sir. So it became apparent when we
 17 reviewed our Plato response model that although we
 18 worked very, very closely with the LAS and the LFB and
 19 we worked very closely with the other police forces that
 20 operated in London, there was the potential for command
 21 confusion if all forces tried to take the lead role in
 22 the response to a large-scale firearms attack, not just
 23 a terrorist attack but any large operation that required
 24 multiple responders from the various different forces.
 25 So the memorandum of understanding that you allude

3

1 to ensured that in the event that Plato is declared,
 2 that the lead role will be under the MPS regardless of
 3 where in London the incident was occurring.
 4 Q. Were you also responsible for firearms command testing
 5 and exercising, which included live role play and
 6 table-top exercises?
 7 A. For the TFCs that's correct, yes.
 8 Q. In 2016 did you serve as a temporary chief inspector in
 9 charge of ARV operations?
 10 A. I did, that's correct.
 11 Q. In 2017, and at the time of the London Bridge attack,
 12 what was your post?
 13 A. So by the time of London Bridge, I'd left Specialist
 14 Firearms Command on promotion and taken up a role within
 15 Met CC, which is the command and control position for
 16 the Metropolitan Police Service. What that department
 17 does is twofold: it is responsible for receiving and
 18 managing all the 999 calls that the MPS receives, and
 19 dispatching appropriate assets to it. It is also
 20 responsible for command and control across the whole of
 21 London.
 22 Q. What was your job title in that command and control
 23 centre?
 24 A. So it's called the Met Grip Chief role, it's essentially
 25 the duty officer for London. Other forces sometimes

4

1 refer to it as the Force Incident Manager, but we
2 separate out some of those roles. In other forces the
3 FIM is also a TFC. Because we're so busy with firearms
4 responses we have a separate role of TFC in the pod, and
5 so the Met Grip Chief takes a more strategic overview of
6 London.

7 Q. I will ask you a bit more detail about that shortly.

8 A. Okay.

9 Q. Since holding that role, what have your jobs been?

10 A. So, since leaving the Met CC role, I've taken up the
11 lead of the Firearms Uplift Programme. This was started
12 in 2016 when I was still head of ARV operations but it
13 was a desire to uplift both the number and capability of
14 armed policing in the capital, and to provide
15 an increased footprint of armed officers in London at
16 various different role profiles and importantly to
17 sustain it, and also to increase firearms training
18 infrastructure.

19 After that, I was promoted to superintendent and
20 have returned to specialist firearms and I now have the
21 current role.

22 Q. Thank you. Is it fair to say because of your background
23 you have considerable experience in and knowledge of
24 Metropolitan Police procedures for responding to
25 terrorist attacks?

5

1 A. That would be fair to say, yes.

2 Q. Would it also be fair to say that you are very familiar
3 with principles for joint working between the emergency
4 services in such incidents?

5 A. Yes.

6 Q. As Met Grip Chief Inspector on the night of the attack,
7 where were you based?

8 A. So I was based in the special operations room at
9 Lambeth, SOR, it's called.

10 Q. Is that operations room open continually?

11 A. Yes, it's a 24/7 position.

12 Q. What is its function?

13 A. So there are a number of staff in a large control room
14 and basically they have an overview of every incident
15 that is occurring across the capital. We have the
16 capability to deploy pan-London assets. So these are
17 assets that are not geographically limited to individual
18 boroughs, what we would call borough policing, they are
19 Met-wide resources.

20 So the officers that work in SOR can monitor
21 developing incidents, supervise critical incidents.
22 I can offer advice to duty officers and I have an
23 inspector who can also offer advice to duty officers.
24 In the event of a major incident it is our
25 responsibility to consider it as to whether it's a major

6

1 incident and then it's my responsibility to consider
2 whether I need to take charge as silver or gold or both.

3 Q. Just so we can visualise your situation on the night,
4 what does the special operations room look like?

5 A. So it's a huge room with a vast number of seated
6 positions with terminals, radio positions where you can
7 talk on any channel that the Metropolitan Police uses.
8 But it's only half full. So if you imagine
9 a rectangular room of a vast size, half of the room will
10 be staffed with people permanently managing London, as
11 I've described. The other half of the room will be
12 completely empty, and it's empty so that we can expand
13 into it in the event that we have a major incident or
14 a preplanned major event, as we've seen over the weekend
15 or with visiting dignitaries that we've seen recently,
16 and then the room will be full of all of those positions
17 that are required to manage both business as usual and
18 the event.

19 Q. You've told us in brief what the Met Grip Chief
20 Inspector is, the duty officer for London. What in
21 practical terms does that officer do during a shift in
22 the special operations room before any major incident
23 develops?

24 A. It's an interesting role. I would describe it as
25 an all-or-nothing role actually, because there are some

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1 times when there is very little going on across London
2 other than business as usual, and although that might
3 sound unusual, there are some quite serious incidents
4 that happen across London that are not out of the
5 ordinary so my particular requirement is not necessarily
6 to get involved.

7 My day-to-day role under those circumstances would
8 be to make sure we've got sufficient staff on duty
9 across London to deal with the developing circumstances,
10 to make sure that we've got sufficient staff on duty to
11 deal with all the 999 calls and 101 calls that are
12 coming in, and to balance those needs accordingly. So
13 that's business as usual: it's a balancing role,
14 a coordination role and staff management role.

15 Then it only becomes this sort of role, as you're
16 going to draw out, in the event of a very serious
17 incident.

18 Q. In the event of a major incident, in summary, does that
19 officer take charge initially?

20 A. So the Met Grip Chief will consider whether they need to
21 take a lead role away from the borough duty officer and
22 take charge, yes.

23 Q. On the night in question did you record your actions as
24 the Met Grip Chief Inspector in a public order logbook?

25 A. I did, yes.

8

1 Q. We can bring that up on screen just to see what it looks
2 like, {DC7752/1}. Now, did you in this logbook record
3 for specific times with the assistance of a loggist what
4 decisions you made and the rationale for those
5 decisions?
6 A. That's correct, sir. Not all of them are captured in
7 here but that was the intent: to capture as much of my
8 decision-making as possible in this logbook.
9 Q. In format, do we have in this logbook on the left-hand
10 page, when you spread, your decisions, typically
11 recorded by your loggist? You are nodding?
12 A. Yes, that's correct.
13 Q. And then on the right-hand page, reasoning for those
14 decisions generally completed by you with some more
15 detail?
16 A. That's correct, sir. All the rationale is completed by
17 me.
18 Q. We'll look at some examples of that as we go along. We
19 can take that off the screen.
20 Now, I'm looking at page 7 of your report, and
21 paragraph 3.1. Overall how many emergency services
22 personnel attended the scene of the attack?
23 A. It was approximately a thousand.
24 Q. Were those in addition to the numbers of staff in the
25 Lambeth call centre for the Metropolitan Police, dealing

9

1 with 999 calls?
2 A. That's correct.
3 Q. And in addition to the staff at the special operations
4 room under your direct command?
5 A. Correct.
6 Q. In addition, during the night of the attack, did
7 a proactive counter terrorist operation begin?
8 A. It did.
9 Q. Is that normal in the event of a terrorist attack that
10 alongside responding to the attack, an operation begins
11 to identify who was responsible and any associates?
12 A. Absolutely normal, yes.
13 Q. We've heard and will hear evidence about various aspects
14 of the emergency services response, and I'll deal with
15 the Metropolitan Police response with you in detail
16 shortly.
17 Before I do, may I ask you a little about Operation
18 Plato. Is that the set of procedures governing the
19 operational response of the emergency services to
20 a marauding terrorist attack?
21 A. It is, sir, yes.
22 Q. May we look at some procedural documents, with which
23 I think you're familiar, to explain some of those
24 proceedings. First of all, {DC8206/1}. Do we see here
25 some national level contingency planning guidance for

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1 Operation Plato which was in effect at the time of the
2 attack?
3 A. Yes, that's correct.
4 Q. If we go to {DC8206/3}, please, do we see first of all
5 the recognition at 3.1 that there is no single
6 definition for a marauding terrorist firearms attack?
7 A. That's correct.
8 Q. Before we go on, is it right to say that the
9 Metropolitan Police has Operation Plato procedures not
10 limited to attacks involving the use of firearms by
11 suspects?
12 A. Yes, that's correct, sir, yes. So this is national
13 guidance that was written towards the end of 2016 and
14 published early 2017, by which time the
15 Metropolitan Police had developed its own guidance based
16 largely upon this national guidance.
17 We were, it could be described as ahead of the curve
18 in that regard, recognising events that had happened
19 around the world, and significantly in 2014 in China
20 with a marauding knife attack at a station in China the
21 potential for severe injury and harm as a consequence of
22 knife attacks and vehicle-borne attacks, so we developed
23 what was known as the MTFA strategy and it became very
24 much for the MPS the MTA strategy and we adopted Plato
25 and the principles behind Plato in exactly the same

11

1 regard.
2 Q. Paragraph 3.3 recognises that such an attack is
3 an extraordinary event with unprecedented demands on all
4 aspects of policing and other emergency services, and
5 presumably you would agree with that?
6 A. Absolutely, sir.
7 Q. Page 4, please {DC8206/4}, paragraph 3.8. Did the
8 guidance recognise that there were a whole series of
9 potential indications that such an attack was underway?
10 A. Absolutely, sir. If we look at that guidance, our MTA
11 guidance mirrors it, adding simply the use of knives and
12 vehicles, but you'll see multiple subjects working
13 cohesively, potentially multiple sites, indiscriminate
14 mass casualties, and a willingness to confront and
15 attack initial responders.
16 Q. Over the page to {DC8206/5}, please. Did the guidance
17 specifically recognise that such attacks may be
18 unsophisticated?
19 A. It does.
20 Q. And at 3.11, that typical examples of an unsophisticated
21 attack involved lone actors, bladed weapons and vehicles
22 as weapons?
23 A. So this is where the methodology from the national
24 doctrine has been matured over the years, because if you
25 read this documentation now and in 2018, you'll see that

12

1 this now is included in Plato response models, and
 2 forces are asked to consider whether a Plato is
 3 necessary for lone actors or for instances which are
 4 resolved relatively quickly.
 5 So an example of that, I was also the incident
 6 commander for Russell square, which might have looked
 7 very similar from the outset, but involved a single
 8 individual indiscriminately attacking people with
 9 knives, and I did not declare that Plato.
 10 Q. Is this fair: that originally there may have been
 11 a stark distinction between marauding terrorist firearms
 12 incidents, at least at the national level, and less
 13 sophisticated attacks?
 14 A. Correct.
 15 Q. There is now a recognition of a spectrum of attacks of
 16 varying degrees of sophistication and risk?
 17 A. Absolutely right.
 18 Q. And a decision has to be taken by the officer with
 19 command, as we'll go into, whether to make a declaration
 20 of Operation Plato which brings into effect a huge
 21 number of preset actions?
 22 A. That's absolutely right: careful consideration must be
 23 given.
 24 Q. Because if you do give an Operation Plato declaration,
 25 that immediately diverts efforts from other policing and

13

1 calls upon a huge range of resources?
 2 A. Yes, it affects policing by a multitude of partners, and
 3 whilst it's possible to step back from it, it is not
 4 without its difficulties.
 5 Q. Returning to the guidance, do we see at paragraph 3.14
 6 a recognition that what initially appears to be or
 7 starts as an unsophisticated attack may be a precursor
 8 for a larger or more complex attack?
 9 A. That's absolutely right, sir, so one of the
 10 considerations anyone must have when taking command of
 11 the initial status of an attack is to consider what's
 12 coming next, and you will recall that in France there
 13 were six seats of violence and my consideration from
 14 an early stage was what's going to happen next, and
 15 I need sufficient resources both to deal this and to
 16 deal with what may happen.
 17 Q. We'll see, I think, time and again from your logbook and
 18 actions on the night that there was information coming
 19 in to you suggesting that this attack might be larger
 20 and more complex than we in fact know it was?
 21 A. That's correct.
 22 Q. Page 7 next, please. {DC8206/7}. Do we see first of
 23 all, a recognition that the initial response to
 24 a marauding terrorist attack will be police-led managed
 25 within a police control room?

14

1 A. Yes, that's correct.
 2 Q. If we look at 5.8 and 5.9, the other paragraphs have
 3 been redacted, can we see that the response involves
 4 both neutralising the threat and identifying where other
 5 emergency services can save life or extract casualties?
 6 A. That's correct.
 7 Q. Page 8, paragraph 5.15 {DC8206/8}. The national
 8 guidance indicated that an initial TFC, Tactical
 9 Firearms Commander, would be responsible for deciding
 10 whether to make an Operation Plato declaration. In the
 11 capital whose responsibility would that be?
 12 A. So, again, this is where our policies diverge slightly
 13 from the national guidance, but from the same
 14 perspective. It's the tactical firearms consideration
 15 across the rest of the country and is also the case in
 16 the Met, but in addition to that, the Met Grip Chief
 17 Inspector is in a position to declare Plato as they have
 18 the greater overview of what's going on across the
 19 capital.
 20 Q. Do we see at paragraph 5.17, and is this applicable to
 21 the Metropolitan Police, that an Operation Plato
 22 declaration triggers a whole series of responses and
 23 actions?
 24 A. Absolutely correct.
 25 Q. If we go on to {DC8206/9}, please, I think we can see

15

1 some of the immediate actions set out, so first of all
 2 there is the Plato declaration at the bottom of the
 3 page, and then over the page {DC8206/10} do we see
 4 a series of initial responses that follow from that?
 5 A. Yes, that's correct.
 6 Q. So the national guidance recognises that there will
 7 initially be an unarmed police response of necessity.
 8 A. Correct.
 9 Q. Because unarmed officers will typically be closer to any
 10 event in their usual work?
 11 A. Correct.
 12 Q. Guidance to those officers to stay safe according to
 13 a set stay safe message?
 14 A. Correct.
 15 Q. And then simultaneously an immediate deployment of
 16 locally available firearms resources.
 17 A. That's correct, yes.
 18 Q. Over the page, please, to {DC8206/11}, we see the
 19 national guidance provides for immediate deployment of
 20 on-call counter terrorist specialist firearms officers.
 21 I think that's the highest cadre or grade of firearms
 22 officer.
 23 A. That's correct.
 24 Q. Informing the counter terrorism command reserve and then
 25 also informing ambulance and fire and rescue control

16

1 rooms. So that's an early action as well?

2 A. That's correct.

3 Q. The guidance we see then provides for initial working
4 strategy to be set, and both a tactical and strategic
5 firearms commander to be informed.

6 A. Correct.

7 Q. {DC8206/14}, please. We see here the national guidance
8 indicates that there should be joint operations with the
9 other emergency services with, at paragraph 11.4,
10 a three-way telecommunications link set up between the
11 police, ambulance and fire control rooms?

12 A. Yes, that's correct. So we have multiple ways of
13 communicating with our colleagues in the other emergency
14 services. Initially we can communicate over a radio
15 channel called ES5, which enables the control room at
16 SOR to speak to the other control rooms instantly, and
17 then this tri-service phone conference call can be set
18 up by one of my positions within SOR.

19 Q. The guidance goes on to say:

20 "[That] link will be maintained until
21 representatives from each of the emergency services are
22 physically co-located in an agreed control room."

23 How does that work in the London area?

24 A. So one of my staff will put in a phone call to the other
25 emergency services to enable this conference facility,

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1 and then that member of staff will stay on the line with
2 a member of staff from each of the other services and we
3 can include the BTP and the City of London Police in
4 that conference call, if need be, and those
5 representatives will stay on the line and convey what
6 they can see on their own individual incident list,
7 their CADs, things that I might be saying in the room
8 and my opposite numbers in the LAS and LFB will be
9 saying in their rooms and they will have that
10 conversation and relay information, and the goal will be
11 that that phone line will remain open until
12 representatives from those emergency services at, at
13 least sort of silver level, will co-locate to SOR,
14 they'll come to Lambeth, Lambeth is the agreed location
15 because this is always a police-led operation and we
16 have facilities to accommodate them.

17 Q. So a tactical lead for the ambulance service and
18 a tactical lead for the fire brigade will come to your
19 special operations room?

20 A. Correct.

21 Q. How long does it normally take for that to happen?

22 A. It can vary. It's incumbent on those services for them
23 to decide when it's appropriate for them to relocate and
24 they will have a number of duties to perform to ensure
25 that they have gripped their response from their

18

1 services perspective, and then when they consider on
2 balance it's appropriate to relocate, they will do so,
3 so it does vary. I can't give you an exact time.

4 Q. At 11.6, the national guidance provides for early
5 coordinated decision-making to lead to identification of
6 an emergency services RVP, or rendez-vous point, and the
7 identification of a suitable forward command post.

8 Now, we've heard those terms used a number of times
9 in these Inquests. How do you define, first of all, the
10 RVP and the FCP, what functions they serve and where are
11 they supposed to be?

12 A. Okay, so the RVP, the rendez-vous point, is where all of
13 the emergency services will muster their resources, and
14 as you can imagine in London this represents
15 a significant problem for us because there are very few
16 locations in the capital where all of the emergency
17 services can muster all of their resources that will be
18 used to resolve the incident, and bearing in mind you've
19 got the river and the attack has happened on the bridge
20 and you will have emergency services coming from the
21 north and the south, it's often normal to have more than
22 one RVP out of necessity.

23 However, the forward command point is a location
24 where the operational commanders, the bronzes, will
25 gather and conduct joint decision-making and manage the

19

1 incident from an operational perspective and a tactical
2 perspective on the ground. It's possible to have
3 tactical commanders on the ground and operational
4 commanders on the ground.

5 Q. Typically will there be one or more forward command
6 point?

7 A. For this incident there should only be one forward
8 command point.

9 Q. And that will be staffed or attended by both the police
10 bronze or bronzes and the other emergency services
11 bronze or bronzes?

12 A. Correct.

13 Q. Next, page 15, please {DC8206/15}. We see at the top of
14 the page an initial requirement for joint
15 decision-making between the emergency services leading
16 to the identification of hot, cold and warm zones and
17 a tactical plan for treating and evacuating casualties.

18 I'll ask you about hot, cold and warm zones in
19 a moment.

20 Then 12.3 to 12.4, do we see that the overarching
21 aim is to preserve life and neutralise threat, which is
22 recognised as being achieved by confronting the
23 subjects?

24 A. That's correct.

25 Q. We can take that off screen. May I ask you about hot,

20

1 cold and warm zones, which you address at pages 13 to 14
2 of your report.

3 First of all, what is a hot zone?

4 A. So it's probably, again, worth recognising that the
5 definition for hot, warm and cold zones has changed over
6 the years. As of this point in time --

7 Q. So June 2017?

8 A. No, no, as of this point in time right now, apologies,
9 it has been simplified to recognise a spectrum of risk
10 going from low, medium to high, with the hot zone
11 representing the highest risk to responders and the
12 public.

13 In 2017, at the time of this attack, the hot zone
14 was recognised to be the location where we believe the
15 suspects to currently be or the terrorists to currently
16 be, where we may or may not have a degree of control
17 over them. They might be in combat, for example, but
18 not necessarily -- not limited to that. So that's where
19 we believe the suspects to be and where the most danger
20 exists, IEDs, that kind of thing.

21 The warm zone is where we believe the suspects may
22 have been and will have the ability to return to.

23 Q. Typically adjacent to the hot zone?

24 A. Correct.

25 Q. Is a warm zone an area which has or hasn't been cleared

21

1 by officers including firearms officers?

2 A. It won't necessarily have been cleared and we cannot
3 guarantee the safety of the people operating within it.

4 Q. In your report you refer to the concept of a limit of
5 exploitation being agreed in relation to a warm zone.
6 What is one of those?

7 A. So in recognising that the warm zone, whilst it is
8 different from the hot zone, it's not entirely safe,
9 a conversation will occur between the police, the fire
10 brigade and the ambulance service, typically over the
11 bonnet of the car at the scene where the forward command
12 point is, and representatives from those forces and
13 those responders under the leadership of the
14 ground-based TFC will agree how far into the warm zone
15 they think it's suitable for us to go with the LAS and
16 the LFB where we can effectively manage their safety.

17 So we'll go that far and no further, because beyond
18 that point we don't feel that we can as effectively
19 manage -- not guarantee, but manage -- and mitigate the
20 safety of the responders. So that point will be the
21 limit of exploitation, the furthest within the warm zone
22 that we are comfortable at this stage to go.

23 Q. We've heard that there are specific types of LAS staff,
24 tactical response paramedics, HART paramedics, who have
25 the equipment and training to go into the warm zone; is

22

1 that right?

2 A. That's correct.

3 Q. But even they would only go within the limit of
4 exploitation agreed?

5 A. Correct.

6 Q. And would only go in with the support of officers?

7 A. Yes, so I will describe how that looks. So a small team
8 of LAS and a small team of LFB accompanied by some armed
9 officers, typically ARV officers, because ARV officers
10 are the ones that have the training to do this, will
11 move forward into the warm zone and carry out what
12 I would describe as treat and leave or treat and recover
13 operations on the casualties within the warm zone.

14 The armed officers can protect those first
15 responders by either moving with them or sentrying,
16 standing positions on certain roads, and providing
17 firearms cover whilst they go about their work dealing
18 with the casualties.

19 Q. Presumably whether the protection is afforded by
20 sentrying or accompanying them will depend upon the
21 scene, it's geographical characteristics, and where the
22 casualties are.

23 A. Yes, and also how much control we think we have over the
24 terrorists or suspects. What I mean by that, what
25 I mean by control in these circumstances, is whether we

23

1 know their precise location, whether we know which
2 direction, if they are to return to this area, they are
3 likely to come from, how many outstanding suspects there
4 are likely to be.

5 All of those things will be taken into consideration
6 when operating within the warm zone and considering how
7 we best protect first responders.

8 Q. Is it also right that the warm zone can be entered in
9 appropriate circumstances by explosives officers and by
10 other specialist officers?

11 A. That's correct, yes.

12 Q. Finally, the cold zone, presumably by process of
13 elimination, an area not designated as a hot or warm
14 zone?

15 A. That's correct.

16 Q. Where would the forward command post typically be
17 located by reference to these various zones?

18 A. That's a decision for the three operational tactical
19 commanders but typically it can be at the cold/warm
20 interface, so at the point at which the cold zone and
21 the warm zone meet, but it doesn't have to be. But it
22 shouldn't be in the warm zone; it should be in the cold
23 zone.

24 Q. You've indicated that the designation of the hot and
25 warm zones is a matter of joint decision-making between

24

1 the three emergency services?
 2 A. That's correct, sir, yes.
 3 Q. How is that decision recorded, first of all, when it's
 4 first made?
 5 A. So as you can imagine, these kinds of what I would
 6 describe as governance structures take time to
 7 implement, and those decisions will happen when all
 8 three representatives are co-located at the forward
 9 command point and are in position to assimilate all of
 10 the information that's been received up until this
 11 point, there are various sources of information, so they
 12 have got an understanding of what it is they're dealing
 13 with, where the suspects are, whether there are any
 14 outstanding suspects, where they think the casualties
 15 are, all of those sorts of things, and then they will
 16 make the determination about the zoning based on threat
 17 and risk.
 18 Q. May there be an initial period during a terrorist attack
 19 or suspected terrorist attack where hot and warm zones
 20 haven't been formally designated?
 21 A. Yes, there might be, and it might be the case that
 22 certain first responding units consider certain
 23 locations to be hot or warm based on their own
 24 perceptions, but they haven't necessarily been agreed
 25 with partners yet.

25

1 Q. Sometimes they may describe a zone as hot simply on the
 2 basis that they regard it as potentially dangerous and
 3 subject to attack?
 4 A. Correct.
 5 Q. It may then take time for the designations to be made
 6 and to be recorded?
 7 A. Correct.
 8 Q. Would they be recorded in the logs of the relevant
 9 commanders?
 10 A. Yes, so each of the three commanders or more, depending
 11 on whether we've got other police forces present at the
 12 FCP, should be keeping notes about their decisions.
 13 Q. May the hot and warm zones be adjusted over the course
 14 of an incident, the borders changed?
 15 A. They may be and they should be. So as a consequence of
 16 further information, if further information is
 17 prevailing, and we consider areas that were once hot to
 18 now be warm, to re-evaluate consistently through the
 19 progression of the incident.
 20 Q. Is it in fact essential to make those adjustments so
 21 that emergency services personnel can be sent in to
 22 extract casualties?
 23 A. That's correct, yes, but that takes time.
 24 Q. May I now ask you about another document which we will
 25 see at {DC8205/1}. This is a document

26

1 dated January 2016: joint operating principles for the
 2 emergency services in relation to marauding terrorist
 3 attacks. Are you familiar with this document?
 4 A. Yes.
 5 Q. This document, by contrast with the last one we looked
 6 at, focuses more on joint operating principles, joint
 7 working?
 8 A. That's correct, yes.
 9 Q. {DC8205/7}, please. We see, looking at the text in
 10 bold, that the document recognises that it's for police
 11 to formally make a Plato declaration?
 12 A. Yes, that's correct.
 13 Q. And then 4.2, a recognition that it's the responsibility
 14 of the police to inform other emergency services so that
 15 they can put their contingency plans into effect?
 16 A. Yes, that's correct.
 17 Q. {DC8205/8}, please. As with the previous document, does
 18 this one recognise, for the benefit of all the emergency
 19 services, that the operation is police-led and describe
 20 the three-way telecommunication link you told us about?
 21 A. Yes, that's correct.
 22 Q. {DC8205/9}, please. 4.5, does this document similarly
 23 acknowledge that the police control room has
 24 a responsibility as an early priority to identify
 25 a rendez-vous point with the other emergency services?

27

1 A. Yes, that's correct.
 2 Q. But, as you've said in the capital, that may be multiple
 3 rendez-vous points?
 4 A. Correct.
 5 Q. And page 11, please {DC8205/11}, 4.8, does this document
 6 recognise that it's for the police on-scene commander to
 7 identify one or more forward command points?
 8 A. Correct.
 9 Q. Where the bronzed from the three services will operate,
 10 and does it recognise that from those points, the
 11 specialist personnel will deploy into warm and hot
 12 zones?
 13 A. Yes, that's correct.
 14 Q. {DC8205/12}, please. At 4.10, does this document
 15 recognise that it's the police on-scene commander who
 16 leads the joint assessment of risk to determine
 17 deployment of personnel into the surrounding zones?
 18 A. Yes, we do lead the conversation, but I would hasten to
 19 add that we cannot direct the other services to do or go
 20 to a certain location, so it's by way of agreement.
 21 Q. And that will include the agreed decision about
 22 deployment of ambulance staff into warm zones.
 23 A. And what the limit of exploitations will be: how far
 24 into that warm zone we are prepared to go.
 25 Q. Then {DC8205/13}, please, do we see, consistently with

28

1 what you've told us that the document says that the
 2 boundaries of hot, warm and cold zones have to be
 3 frequently reviewed for the reasons we've discussed?
 4 A. Correct.
 5 Q. {DC8205/14}, please. At 4.14 the document states:
 6 "The primary objective for the police will be to
 7 identify, locate, confront and neutralise the threat.
 8 The provision of armed officers to escort ambulance
 9 and/or FRS personnel into warm zones cannot be
 10 guaranteed."
 11 That, presumably, recognises the common-sense fact
 12 that you may not have enough armed officers to escort
 13 other emergency services staff into particular areas?
 14 A. Yes, that's correct.
 15 Q. Then 4.15, does the document recognise the importance of
 16 communicating to the other services when a threat has
 17 been neutralised so that other emergency services can go
 18 in and deal with casualties?
 19 A. That's correct.
 20 Q. Then over the page, please {DC8205/15}, to 4.16, does
 21 the document recognise that only those in ballistic
 22 protection can be deployed into warm zones?
 23 A. Yes, that's correct.
 24 Q. Is that, therefore, an indication, as we've heard from
 25 some ambulance staff, that it's only those specialist

29

1 ambulance staff who have ballistic protection who are
 2 sent into warm zones?
 3 A. Yes, that's correct. That's true of our own specialist
 4 resources as well, FMTs and EODs should be appropriately
 5 attired.
 6 Q. {DC8205/17}, please, this is in a section on casualty
 7 management. Within warm zones the document suggests
 8 that the initial response to provide life-saving
 9 interventions is the priority.
 10 A. That's correct. But of course you achieve that in
 11 certain circumstances by neutralising the threat.
 12 Q. Yes, because presumably ambulance staff can't work as
 13 effectively if they remain under threat?
 14 A. Exactly.
 15 Q. Paragraph 6.2, does the document recognise that the
 16 management of casualties is a matter where the ambulance
 17 service takes lead responsibility?
 18 A. That's correct.
 19 Q. Then 6.3, of some importance to us, does the document
 20 recognise that staff deployed into warm zones are
 21 expected to focus upon rapid care interventions?
 22 A. That's absolutely right.
 23 Q. So would ambulance staff be expected to carry out
 24 complex or protracted treatment whilst still in warm
 25 zones?

30

1 A. They would make an assessment and make a decision as to
 2 whether or not they need to treat where they are or
 3 treat and extricate, or treat and leave, as I've
 4 described it.
 5 Q. So they may have to engage in more complex treatment but
 6 that is perhaps not the norm?
 7 A. It would very much depend on the injuries of the
 8 individual they were assessing.
 9 Q. Next page, please, {DC8205/18}, paragraph 6.4, the
 10 document provides for ambulance staff when present to
 11 direct and coordinate the casualty management process,
 12 recognising that they effectively are the experts in
 13 that field?
 14 A. That's correct.
 15 Q. But at paragraph 6.5, does the document state the
 16 decision to deploy emergency responders for the
 17 treatment and extrication of casualties shouldn't be
 18 delayed because one of the emergency services is absent?
 19 A. That's correct. Of course it will be more difficult,
 20 but essentially that is right.
 21 Q. Sometimes even in the absence of ambulance staff, the
 22 police, for example, may choose to extract casualties
 23 because of their best assessment that that's the best
 24 thing for them?
 25 A. Absolutely right.

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1 Q. Then page 19, please {DC8205/19}, do we see here at
 2 paragraph 6.7, the document recognising that casualties
 3 will be assessed at scene and categorised. Is that
 4 a reference to the triage sieve of which we've heard?
 5 A. That's correct.
 6 Q. Does 6.8 recognise that a high priority is the
 7 extraction of casualties for treatment as early as
 8 possible depending on the nature of the injuries and
 9 whether they can be moved?
 10 A. Absolutely right.
 11 Q. Then 6.9, finally, on {DC8205/20}, does the document
 12 refer to establishing a casualty clearing point where
 13 casualties who have been brought out can be assessed and
 14 sent to various hospitals?
 15 A. That's correct.
 16 Q. So we can take that off screen. Does that provide,
 17 those parts of the document we've looked at, provide
 18 a fair assessment or summary of the main principles for
 19 joint working in these sorts of events?
 20 A. Yes, that's right.
 21 Q. Can I now turn to the night of the attack and the
 22 initial response, which you deal with from page 9 of
 23 your report.
 24 We know that from the start of the attack, many 999
 25 calls came into the Metropolitan Police central command,

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1 and we've heard that those 999 calls produced Computer
2 Aided Dispatch or CAD entries. In a sentence or two,
3 what's the function of a CAD entry?

4 A. So the CAD entry can be generated by the 999 call or can
5 be police-generated by radio. It essentially is a log
6 of the information that we've received from the caller
7 and how we are going to initially respond to that.

8 So when a person dials 999, they'll speak to
9 an operator and a CHS will actually be created, not
10 a CAD, in the first instance. The CHS is an
11 acknowledgment of the call. And then if we, as the
12 police, feel we need to respond to that call, a CAD will
13 be generated, and then a CAD will be passed
14 electronically to a borough position within the same
15 building for dispatch of resources. But it can be
16 routed to multiple locations simultaneously. So at the
17 same time that it's routed to the borough pod that
18 dispatches borough resources, it is routed downstairs to
19 where I work and where my staff work for assessment for
20 pan-London consideration. So not all CADs will go
21 there, but if the people taking the report think that
22 this has got pan-London consequences, they can route the
23 CAD to multiple locations.

24 Q. In fact is that one of the jobs of the Met Grip Chief
25 Inspector to keep an eye on the CADs coming in in that

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1 way?

2 A. So it's not my job to do that, I have a team of four
3 people that do that for me, two what I call SIs,
4 supervisors, they are sergeants or police staff
5 equivalent, and two operators that work for them, and
6 those four individuals monitor all CADs that are being
7 generated across London that have a pan-London footprint
8 or feel to them, and then if they think it is serious
9 enough, they will bring to my inspectors' knowledge and
10 then if serious enough, to my knowledge. So I'm not
11 aware of all incidents across London all of the time,
12 that would be impossible, there are about 10,000 CADs
13 a day.

14 Q. Is this right: that each CAD has a sequential number
15 starting with 1 on a given day, as you say going up
16 perhaps to 10,000?

17 A. That's correct. So it starts at midnight on any given
18 day and the CADs are generated automatically and given
19 a sequential number.

20 Q. Is it right as we've seen in this case that one incident
21 can generate many, many CADs?

22 A. Yes, that's right.

23 Q. Is it then the textbook practice, at any rate, for one
24 of those to become the main working CAD?

25 A. In theory that is the aspiration that we will choose one

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1 of the CADs that has the most information on it, and
2 that will be the main working CAD, and all of the other
3 CADs would be linked and the computer system links all
4 of those CADs together so that we know how many are
5 associated with the same incident.

6 However, as you can imagine, somebody has to
7 determine which CAD will be the main working CAD, and
8 an incident can be quite mature, 10, 15 minutes in,
9 there are multiple CADs, there could be more than one
10 CAD that has a great deal of information on it. But
11 aspirationally we would like to have a single CAD which
12 is the main working CAD. Very, very difficult for
13 a major incident.

14 Q. You've told us that once a CAD has been created it's
15 sent automatically to one of the dispatch centres. Is
16 it also sent to other forces if it requires a response
17 from those forces?

18 A. Yes, we have the ability to group CADs externally. Some
19 forces have CAD systems that are completely compatible
20 with the Met, other forces have CAD systems that have
21 limited inter-operability, and some forces don't use CAD
22 at all anymore, they will have moved on to other things,
23 but we have processes for working with each of those
24 scenarios.

25 Q. Within the special operations room, do you have

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1 a specific area or section referred to as the ARV or
2 armed response vehicle pod?

3 A. That's correct.

4 Q. Is this staffed by officers who can specifically direct
5 and command armed response vehicles and armed officers?

6 A. Yes, they can, that's correct.

7 Q. Where a CAD requires an armed response, will it also be
8 communicated to that command pod?

9 A. Yes.

10 Q. And from there, can it also be circulated to appropriate
11 special units across the capital?

12 A. Correct.

13 Q. Now, if we bring up {DC7914/1}, please. We see here,
14 I think, a schedule of the CADs which were generated in
15 response to the attack.

16 A. Yes, I can see that.

17 Q. Can we see immediately from that document that a large
18 number of CADs were produced in the first few minutes
19 from 22.07?

20 A. Yes, that's correct.

21 Q. Is this right: that two of those CADs in particular
22 contain quite a bit of information as the night goes on.
23 The CAD numbered 8798 generated by Holly Jones' call and
24 the CAD number 8810 generated by Gary Blythe's call?

25 A. Yes, that's correct.

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1 Q. In total, how many CADs were created in relation to this
 2 attack?
 3 A. In my report I've calculated it as 510 CADs. I think it
 4 actually goes beyond that number, it's 546 over the
 5 entire duration of the incident and the investigation,
 6 but on the evening of the 3rd into the 4th,
 7 approximately 500.
 8 Q. To give us an idea of that -- the scale of the incident,
 9 do you tell us in your report that that number equates
 10 to around 20% of the CADs created across the
 11 Metropolitan Police area on an ordinary busy day?
 12 A. Yes, I don't think that can be right, actually. I've
 13 looked at the calculations and that can't possibly be
 14 right. If we have 10,000 calls then 500 CADs would be
 15 about 5%.
 16 Q. About 5%. But it's still a high proportion by reference
 17 to work in the capital?
 18 A. It's unprecedented. So a single incident might generate
 19 20 to 80 calls, but to have 500 calls generated from
 20 a single incident is unprecedented. You will rarely see
 21 that in your service.
 22 Q. Keeping that schedule on screen, can we see that
 23 Mr Blythe's call and, in fact, the first few calls,
 24 referred to people being struck by a van on the bridge,
 25 London Bridge?

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1 A. Yes.
 2 Q. And if we look at {DC8184/1}, please, is this the CAD
 3 entry that was created as a result of Mr Blythe's call?
 4 A. That's correct, yes.
 5 Q. And {DC8184/8}, please, can we see there the details of
 6 his call that are inputted at the start of the CAD
 7 producing process?
 8 A. That's right, that's correct.
 9 Q. Was that CAD passed to the special operations room?
 10 A. It was, yes.
 11 Q. Was it also sent to dispatchers in other forces?
 12 A. It was, yes.
 13 Q. We can take that off the screen for the moment. Looking
 14 now at your page 11, in a terrorist incident we've heard
 15 about the gold, silver and bronze command structure.
 16 How does that structure operate within the special
 17 operations room and at pan-London level?
 18 A. So the gold, silver and bronze command structure is
 19 widely recognised amongst police and emergency services,
 20 the fire brigade and the LAS, and it escalates and
 21 changes and develops as the incident grows in size.
 22 So just to give an understanding, on a critical
 23 incident that might involve just a single borough, the
 24 duty officer would become silver and that individual
 25 would be an inspector, and they could be at the scene or

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1 back at the police station, and then their sergeants
 2 would be bronzes, but that's a relatively small
 3 incident, and the silver takes the tactical lead. There
 4 might not be a gold appointed for an operation as
 5 limited in size as that. And the bronzes would be
 6 operational, they would make operational decisions and
 7 put the decisions of the tactical commander into effect.
 8 As an incident grows and becomes a major incident,
 9 then those command structures will escalate accordingly,
 10 and now you've got a much more senior person that is
 11 silver and silver overarching across the entire
 12 incident, and a number of bronzes and then even a number
 13 of sub bronzes, so a person that was once silver will
 14 become potentially a sub bronze, and a superintendent
 15 might be on the ground as a functional bronze.
 16 Q. In a terrorist incident, who initially takes the senior
 17 roles in the command structure?
 18 A. So I would take command at that point as silver, but
 19 there is no gold available, the gold is on call. So
 20 essentially I'm silver and gold for the incident and
 21 then the strategic firearms commander, who, whilst more
 22 senior in rank, isn't necessarily more senior in role,
 23 will become bronze firearms and I'll have a number of
 24 other bronzes that will deliver.
 25 The reason that is the way that it is is because it

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1 is anticipated that I will acquiesce at some point and
 2 give way to a more senior silver of at least
 3 superintendent but more normally a chief superintendent,
 4 will be silver London, that individual will be on call,
 5 and gold will be a National Police Chiefs' Council, NPCC
 6 officer, of at least commander or assistant chief
 7 constable level.
 8 Q. We'll hear about when you handed over on the night of
 9 the attack shortly.
 10 Now, we saw that the CAD 8810, the CAD generated as
 11 a result of Mr Blythe's call, was generated at 22.09
 12 after the call having been made at 22.08.
 13 A. Correct.
 14 Q. Was that CAD circulated to armed response vehicles in
 15 the following minute or two after its creation?
 16 A. Yes, that's correct.
 17 Q. When were you first informed of the incident?
 18 A. I can't be exactly sure. In my notes I've estimated the
 19 time to be 10.11.
 20 Q. If we look back at the schedule of CADs, {DC7194/1}, and
 21 if we bring it across so that we can see the times,
 22 please, by that stage, 22.11, can we see that a number
 23 of CADs were coming in and that some, for example, line
 24 14, if we scan across so that we can see line 14 in
 25 full, please, we can see line 14 refers to requesting

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1 police stating there is a terror attack on
2 London Bridge, so there is a call referring to a terror
3 attack.

4 Then line 18, if we go a few down, reference to
5 "a girl has been stabbed at the location".

6 So from the earliest stage some reference in the
7 calls to terror attack and stabbings?

8 A. Yes, that's correct as far as the CAD schedule is
9 concerned, but I won't have been aware of that.

10 Q. That was going to be my next question.

11 A. Yes, so the way this works is I'm not sat in this room
12 in front of a terminal looking at all of the CADs as
13 they come through. I'm doing a number of different
14 roles: I could be on the phone, I could be dealing with
15 any manner of different things. The four officers that
16 I described to you earlier, the SIs and their two
17 operators will be monitoring all of these CADs and they
18 will bring to my attention something that needs my
19 attention if they think it is serious, and that's
20 unusual, for the sergeant to get up from his desk, walk
21 into my office and say "Guv'nor, you need to look at
22 this CAD" is rare, because there are so many layers of
23 supervision before it gets to the chief inspector.

24 Q. So by the time you were first told, so by 10.11 on that
25 evening, what were you informed was going on?

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1 A. So one of the SIs walked into the room and said "Sir,
2 you might want to look at this CAD, a van has driven
3 into a number of people on London Bridge", and that was
4 all I knew when I left my office and walked out onto the
5 floor, it was only a few metres.

6 Q. What was your first action after hearing that?

7 A. So in front of me I remember the SI was trying to bring
8 up some CCTV which covered that area of London. As you
9 can imagine, there are thousands of CCTV cameras across
10 the capital and we have the ability to view some of
11 them.

12 I wanted an immediate overarching view and I didn't
13 want to wait, this was clearly going to be a significant
14 incident, and one of the best ways to get an overarching
15 view is via the helicopter, so one of the first actions
16 was to instruct the Air Support Unit to lift and provide
17 me with an overview with a very detailed camera view
18 from an aerial position.

19 Q. We can time that decision reasonably precisely if we
20 look at {DC8184/9}, please. The entry at 22.11.30
21 a request to the Air Support Unit for assistance; is
22 that right?

23 A. Yes. D1/9 is one of the positions that I described, one
24 of the positions within pan-London, and they have routed
25 the request through to the ASU to lift based on my

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1 request, yes.

2 Q. So we can time your decision pretty accurately according
3 to that.

4 A. So I mean, it was one of the first things I did, so it
5 was 30 seconds after I was informed. I can't be
6 absolutely accurate as to when I was informed, but that
7 gives an indication.

8 Q. What was your next action?

9 A. So as I'm making that decision, there's other
10 information coming to me so that I think the camera sat
11 on top of St Thomas' Hospital, if I recall, had been
12 turned or focused in on the bridge and I could start to
13 see what I can only describe as the carnage on the
14 bridge and I immediately thought that this was going to
15 need far more resources than could be brought to bear
16 for a business -- what I've described as a business as
17 usual type policing response so I declared a major
18 incident.

19 Q. What did you think was happening by that stage?

20 A. I was immediately concerned that this might be
21 a terrorist attack, however, it's important that I don't
22 act with haste because of the consequences of a wrongful
23 declaration. The incident in itself looked extremely
24 serious but, and as I've mentioned in my report, the
25 previous weekend I had been on duty again and a vehicle

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1 had mounted the pavement in Islington and knocked over
2 five members of the public causing serious injuries and
3 that was a drink-drive and that too would have left
4 carnage, so mindful of terrorism, open-minded, I need
5 more information.

6 Q. What was being done at that time in those early stages
7 to direct units to the area?

8 A. So the next thing I did was walk over to the ARV pod,
9 which at the time was immediately adjacent to the SI's
10 position, and I asked to make sure they were looking at
11 this CAD, because although the CAD gets sent to them, it
12 gets sent to a queue and there might be 10 other
13 incidents in the queue and the queue doesn't immediately
14 shine a spotlight on the most serious incident within
15 that queue and I wanted to make sure they had all of
16 their attention on this incident.

17 So I spoke to the TFC and the TAC advisor and said:
18 look at 8810, I think you need to be sending resources
19 to this.

20 Q. We'll hear from the Tactical Firearms Commander, who
21 we're calling V134, later today. As you gave that
22 information, could you see that they were going to act
23 on it immediately?

24 A. Yes, they did.

25 Q. What directions did they give in practice for armed

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1 units to attend?

2 A. I mean, it's written in my report, I don't know exactly
3 where, but I think it's to the effect of: go to the
4 scene, locate and confront any suspects and deal with it
5 with appropriate force.

6 Q. It's your paragraph 4.25 on page 15 if it helps. You
7 describe the tactical advisor transmitting over the
8 radio to direct all available armed units within the
9 Specialist Firearms Command to make their way to the
10 London Bridge area.

11 A. Yes. Go direct to the scene and engage with any threats
12 they encounter.

13 Q. Meanwhile we know that City of London Police officers in
14 armed response vehicles had been deploying to the scene
15 even before that, even before your conversation with the
16 TFC in the pod, and that a unit with call sign Trojan
17 City 2 acknowledged the call at 22.10; is that normal
18 practice in such an incident for armed units who are in
19 the area to self-deploy before that sort of direction is
20 given?

21 A. Absolutely, yes. So any police unit can self-deploy to
22 an incident. An armed unit can self-deploy as a police
23 officer to any unit they deem it appropriate to deploy
24 to, so any call that they think appropriate.
25 If they are deploying in an armed capacity they can

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1 make their way, but they, in order to deploy in an armed
2 capacity, they would need to wait for a declaration of
3 an armed incident from a TFC. However, that does depend
4 very much on the prevailing circumstances. So, for
5 example, if an armed officer comes across an incident
6 and they haven't been asked to go, they have either
7 self-deployed before it was known that it was going to
8 be an armed incident or they've come across something
9 directly in the street, they can respond in an armed
10 capacity.

11 So what this Trojan City 2 vehicle has done is
12 responded to the initial call, which I believe they
13 would know at the time to be a road traffic collision,
14 and that's entirely appropriate because ARV officers are
15 some of the best trained police officers in terms of
16 their emergency life support training, so that's
17 consistent.

18 Q. You tell us in your report at paragraph 4.30 that they
19 were geographically closer to the scene than the nearest
20 Metropolitan Police ARV?

21 A. Yes, that's correct.

22 Q. We know that they arrived at Stoney Street and
23 confronted and shot the attackers at 22.16. You didn't
24 hear about that immediately but quite shortly
25 afterwards, I think?

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1 A. I think I was told at 22.18.

2 Q. We'll come to the details in a moment.

3 A. Yes.

4 Q. Did Metropolitan Police ARVs also respond and arrive
5 just a minute or so behind?

6 A. Correct. So the location of the attack, London Bridge,
7 is right on the border with geographical responsibility
8 for the City of London Police and the
9 Metropolitan Police, I think the border itself is the
10 bridge and the bridge itself is within the City of
11 London Police district with Borough Market being within
12 the Metropolitan Police district.

13 Q. We've also heard that another armed unit, Trojan City 1,
14 including PC Duggan deployed to the scene, arriving on
15 the bridge at 22.11. He, similarly, would be
16 self-deploying in response to the information coming
17 over the radio?

18 A. Correct.

19 Q. We know that he went on foot to provide medical
20 treatment to those on the bridge because he had heard of
21 an incident involving multiple casualties on the bridge?

22 A. Correct.

23 Q. In doing that, was he behaving perfectly properly and in
24 accordance with his training?

25 A. Absolutely consistent.

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1 Q. Now, meanwhile were CADs generated within the
2 Metropolitan Police being passed to the London Ambulance
3 Service?

4 A. They were, that's correct.

5 Q. If we bring up {DC6468/1}, please, by way of example, do
6 we see here the CAD generated by Holly Jones' 999 call,
7 CAD 8798?

8 A. Yes, that's correct, I can see it.

9 Q. Page 9, please {DC6468/9}, if we look at the entry
10 22.12.19, an entry relating to the LAS, does that
11 indicate the CAD being communicated with the LAS?

12 A. Yes. So where the LAS figures are, if that comes before
13 the little upwards arrow, that is to the LAS from the
14 MPS, basically.

15 Q. Okay. By our estimate over the next -- over the
16 following three minutes a further eight CADs were passed
17 to the London Ambulance Service all reporting casualties
18 on the bridge?

19 A. Correct.

20 Q. Now, we can take that down. Your paragraph 4.29,
21 meanwhile were you also informed by the City of London
22 Police of a heavy object having fallen into the water at
23 London Bridge?

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

25 Q. We know that was at 22.12 and that Marine Policing Unit

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1 vessels were deployed. We've heard about the timings of
 2 those.
 3 A. And the Coastguard, RNLI, yes.
 4 Q. May we now look at your log, please, {DC7752/6}. Is
 5 this the first page of decisions that you made recorded
 6 by your loggist?
 7 A. That's correct, yes.
 8 Q. We see reference to the -- one of the initial CADs at
 9 22.08, and then at 22.16, your loggist has recorded:
 10 "[Operation] Plato declared. 2nd incident at
 11 Borough Market involving ARV."
 12 A. That's correct, yes.
 13 Q. What does that reflect?
 14 A. So by this point in the development of the incident I've
 15 started to be informed that people were being stabbed in
 16 Borough Market, so it was clear that whether or not the
 17 vehicle had mounted the pavement intentionally or not,
 18 because of course I wouldn't have known that
 19 immediately, it became apparent as further
 20 intelligence and further calls came in, there was a call
 21 that suggested that the driving of the vehicle was
 22 intentional, that was brought to my attention a few
 23 minutes later, but that would become somewhat academic,
 24 because then there were further reports of people being
 25 stabbed in Borough Market. So, putting those together,

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1 based on the doctrine and our training to this point,
 2 balanced against the impact it would cause, I declared
 3 Plato.
 4 Q. If we look at page 7 we see your reasons set out by you
 5 at decision reference 1 {DC7752/7}:
 6 "Multiple casualties on the bridge. Van driven
 7 intentionally then additional location multiple victims
 8 of a marauding stabbing attack. I was thinking
 9 multi-seated [marauding terrorist] vehicle and knives."
 10 A. That's correct, sir.
 11 Q. Was that then your assessment of the situation you were
 12 dealing with in those early minutes?
 13 A. That was my assessment, yes.
 14 Q. If we look, then, at {DC8184/13}, we can see here a CAD
 15 with an entry at 22.16.33 towards the bottom of the
 16 page, your declaration reflected very shortly after it
 17 was made?
 18 A. Correct, sir.
 19 Q. I think we see that declaration reflected in a number of
 20 CADs?
 21 A. Yes, sir, you will see the SIs will have written that
 22 onto what they considered to be the main working CADs,
 23 so there will have be two, as you have correctly
 24 identified, they have written it here and then somebody
 25 else, another SI, has written it on the other CAD.

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1 Then there will also be a Plato CAD generated which
 2 is a CAD that has nothing else on it other than the
 3 declaration of Plato, which is circulated far and wide.
 4 Q. How quickly were the other relevant forces and emergency
 5 services told of your CAD declaration?
 6 A. Relatively quickly. It's an escalating process with
 7 a list of people that have to be informed and the list
 8 is extensive, and one of the positions within SOR, their
 9 job, their sole role from that point onwards and for
 10 a period of time is to inform everyone on the list that
 11 needs to be informed that Plato has been declared, and
 12 that takes time and it is hierarchical in terms of all
 13 the reports.
 14 Q. We can take that off screen now.
 15 While all this was going on, we know that a number
 16 of unarmed officers were responding to radio calls to
 17 the scene, Metropolitan Police officers, City of London
 18 Police officers and BTP officers. That's, again,
 19 perfectly standard in this sort of situation, I suppose?
 20 A. That's correct.
 21 Q. From 22.11 and 22.12, we know that officers were
 22 arriving at the site of the crashed van just to the
 23 south of London Bridge, and some went into the area of
 24 the Boro Bistro courtyard. I think you are now familiar
 25 with the geography of the scene?

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1 A. I am familiar with the geography, yes.
 2 Q. We know that those officers began giving first aid to
 3 some victims at 10.13, and that officers were with some
 4 of the victims in the courtyard from 10.15.
 5 A. That's my understanding, yes.
 6 Q. We also have in the early minutes some CADs reporting
 7 people stabbed in Boro Bistro, so if we look at
 8 {DC6486/1}, please. This is CAD 8869 and if we move on,
 9 please, through the following pages, {DC6486/4}, we move
 10 on to the entry.
 11 A. That just shows you the number of links.
 12 Q. No, I appreciate that, we're just getting to the right
 13 page. {DC6486/9}. There's a reference to:
 14 "Female not breathing ... has been cut and bleeding.
 15 Dr is doing CPR."
 16 A. That's correct.
 17 Q. We've got it up, a page reference at 22.15. And we also
 18 have calls to the LAS referring to injured persons in
 19 the Boro Bistro area from 22.15. If we look at
 20 {DC5221/1}. We can see here a transcript of a call
 21 answered at 22.15 referring to people stabbed in the
 22 London Bridge area, Boro Bistro, downstairs from the
 23 main road?
 24 A. Yes, that's correct.
 25 Q. So there was information coming in, admittedly amidst

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1 much other information coming in, both to the
 2 Metropolitan Police and to the LAS, referring to people
 3 who had been stabbed in that area receiving aid by about
 4 10.15?
 5 A. That's right.
 6 MR HOUGH: We can take that off the screen.
 7 I'm now about to move on to the period after your
 8 Operation Plato declaration. Sir, would that be
 9 a convenient moment for a break?
 10 THE CHIEF CORONER: It will. We will break there and we'll
 11 sit again at 11.50.
 12 (11.28 am)
 13 (A short break)
 14 (11.49 am)
 15 MR HOUGH: Mr McKibbin, before I ask you further questions,
 16 can I just make a tiny correction: that I referred
 17 previously to Trojan City 1 as being Mr Duggan's unit,
 18 Trojan City 2 being the first ARV to arrive, in fact,
 19 it's the other way round.
 20 A. Okay, thank you.
 21 Q. Moving on from actions after your Plato declaration, can
 22 I just ask you to confirm a number of steps that were
 23 taken as a direct result of that declaration. First of
 24 all, a significant number of ambulances being sent to
 25 a nominated rendez-vous point?

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1 A. Yes, that is correct.
 2 Q. I think a minimum of 30?
 3 A. 20 ambulances as you would recognise them, but then
 4 a number of other vehicles, paramedic vehicles, all
 5 sorts of others, and they have a set agreed response to
 6 a Plato.
 7 Q. Secondly an alert to the NHS?
 8 A. That's correct.
 9 Q. So that hospitals can be informed?
 10 A. That's right. Depending on what time of the day that
 11 Plato is declared the NHS might decide based on the
 12 anticipation of mass casualties to cancel certain
 13 operations that were deemed non-urgent. Of course, less
 14 relevant at 10 o'clock at night, but the NHS will be
 15 informed nonetheless.
 16 Q. Thirdly, rail companies, TfL and National Rail companies
 17 being informed so they can review transport services?
 18 A. That's correct. So depending on where the attack is
 19 located, one of the early things that we will be likely
 20 to do is to limit the availability of victims to
 21 attackers. So unsuspecting members of the public might
 22 be alighting at a railway station immediately where the
 23 attack is happening and we would want to prevent
 24 unsuspecting victims walking straight into what is
 25 effectively a deadly scenario. So certain London

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1 Underground stations might be closed, London Bridge
 2 might be closed, railway lines crossing over areas where
 3 we suspect IEDs would be would be prevented from doing
 4 so.
 5 Q. Fourthly, did the declaration result in something called
 6 the armed asset mobilisation plan being initiated?
 7 A. Yes, the armed asset coordination plan, that's correct.
 8 Q. In a sentence or two, what is that?
 9 A. It's a detailed plan written over phases, so
 10 an immediate phase, a phase over 0 to 1 hours, then
 11 2 hours, and it describes how our escalation of armed
 12 assets ought to look, where we can find additional armed
 13 resources, how they should be deployed, what our
 14 considerations should be in relation to command and
 15 control from an armed perspective and how the additional
 16 resources should be mustered that would support the
 17 initial response, the anticipation of further attacks
 18 and then what we would do after the end of the attack
 19 and after the end of the resolution of the threat in
 20 terms of reassurance to the public with an increased
 21 armed presence in the capital. That's all described in
 22 the armed asset coordination plan.
 23 Q. Fifthly, does a Plato declaration result in the military
 24 being informed?
 25 A. It does.

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1 Q. Sixthly, the OSCT, the Home Office based unit informed
 2 so that the process for briefing ministers can begin?
 3 A. That's correct, yes, the Office for Security and Counter
 4 Terrorism is a department within the Home Office that
 5 has a number of functionalities. It leads on counter
 6 terrorism planning, it also forms the link between the
 7 authority to deploy the military and also briefs
 8 Home Office ministers and is a prelude to the sitting of
 9 Cobra.
 10 Q. And notification also as a result of the Plato
 11 declaration to SO15 and intelligence commands to
 12 commence a counter terrorist investigation?
 13 A. Correct.
 14 Q. Are those the main immediate results of a Plato
 15 declaration?
 16 A. There are a raft of other people who would be informed,
 17 but they are the principal recipients of the first
 18 messages. In addition, a NPCC colleague who would have
 19 already been appointed as being on call will be
 20 notified. The MTA silver, who is another senior member
 21 of staff who is on call to perform the silver function
 22 will be notified. Hostage negotiators will be informed.
 23 A raft of other people, including Expo EOD.
 24 Q. You told us a few moments ago, or shortly before the
 25 break, that you were told that the -- that suspects had

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1 been shot at 10.18, a couple of minutes after that
 2 happened?
 3 A. Correct.
 4 Q. What else were you told about that engagement?
 5 A. I believe in that message I was informed that the
 6 terrorists who had been shot were suspected of wearing
 7 IEDs, that is explosive vests.
 8 Q. If we look at {DC6468/13}, please, we can see an entry
 9 on this CAD for 22.18 referring to potential IED and
 10 shots fired at 22.18?
 11 A. Yes, that's correct. So we are anticipating that they
 12 may have intended to be suicide bombers, which
 13 represents a significant issue when responding.
 14 Q. Because --
 15 A. Well --
 16 Q. -- the area needs to be locked down, effectively?
 17 A. Absolutely, but the suicide vest is likely to contain
 18 shrapnel, nails, which have a lethal range of some
 19 distance and will travel at significant speed in many
 20 scenarios, faster than a firearms round will travel, and
 21 will cause extraordinary damage when and if detonated.
 22 So that presents an extraordinary risk to the first
 23 responders, the police officers, that are engaging to
 24 neutralise that threat, and anyone in the area, and of
 25 course, ricochet damage can travel in all sorts of

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1 directions and for quite some significant distance.
 2 Q. You can take that document off the screen. You had been
 3 told that some attackers had been shot. Did you yet
 4 know that all the attackers had been shot?
 5 A. Absolutely not, sir. So there are a multiple of CADs
 6 that follow into the early hours of the morning that
 7 suggested that there were additional attackers and
 8 a sustained attack was in progress across the capital,
 9 what I would describe as a multi-seated attack, similar
 10 to what was seen in 2015 in Paris when the Bataclan was
 11 attacked.
 12 Q. So in this period, what steps were you taking to
 13 mobilise further officers for what was evidently going
 14 to be a major operation?
 15 A. So I had first ensured that the Strategic Firearms
 16 Commander was initiating the armed asset coordination
 17 plan as had been agreed, and that I could leave that
 18 responsibility with them, so I would concentrate on the
 19 mobilisation of unarmed resources, what we call the
 20 service mobilisation plan.
 21 The service mobilisation plan normally requires the
 22 authority of the on-call silver, the chief
 23 superintendent that I was later going to have
 24 a conversation with, a gentleman by the name of Nigel
 25 Quantrell, who has since retired, it would be his

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1 decision to initiate the service mobilisation plan, but
 2 there was no time to wait for an opportunity to brief
 3 him because the time was right at the cut-off between
 4 the end of late turn and the beginning of night duty.
 5 And to put that in context, if I wait to have that
 6 conversation I can't hold on a huge number of resources
 7 that are just about to go off duty, so the service
 8 mobilisation plan would mean stripping out night duty
 9 teams across London which significantly reduces our
 10 ability to respond to business as usual across London so
 11 by holding on the late turn and initiating the plan
 12 myself, it meant that I could do it with late turn
 13 resources thus capitalising on the fact that they were
 14 hopefully still on duty.
 15 Q. Can we look at your log, {DC7752/6}. Can we see an
 16 entry 22.20 referring to a reference to borough commands
 17 to hold late turn units on duty?
 18 A. That's correct.
 19 Q. Was that part of the decision you've just been
 20 describing?
 21 A. Yes, all late turn units across the capital, which is
 22 significant. That's about 2,500 people.
 23 Q. And if we look at the following page, {DC7752/7}, you
 24 can see at item 2 your rationale that this was going to
 25 be a major incident which would require a lot of

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1 resources and you wanted to keep these officers on duty?
 2 A. Correct.
 3 Q. Take that off screen now. Keeping the chronological
 4 narrative going, you tell us in your report that you're
 5 aware of a British Transport Police inspector, Inspector
 6 Spittlehouse with call sign AF34, arriving on the scene
 7 at about 10.20?
 8 A. That's correct.
 9 Q. What role did he assume?
 10 A. So he is an inspector within the
 11 British Transport Police, and a qualified Tactical
 12 Firearms Commander, and so he has taken responsibility
 13 for ground-based TFC, and it's not uncommon to have more
 14 than one TFC in a particular large firearms operation,
 15 and he has taken a ground-based TFC with particular
 16 responsibility for the management of the warm zone.
 17 Another TFC would have been on the ground that would
 18 have taken responsibility for the cold zone and you
 19 would still have had a TFC in the pod with me at Lambeth
 20 who would have taken overarching command and been the
 21 principal TFC.
 22 Q. We'll hear from the TFC in the pod, V134, later. Was
 23 there also on the ground a Metropolitan Police inspector
 24 who took over control as Tactical Firearms Commander for
 25 the hot zone?

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1 A. That's correct.
 2 Q. Was that Inspector Stumpo?
 3 A. That's right.
 4 Q. Did those officers, Inspector Spittlehouse and
 5 Inspector Stumpo, set up an armed command at the Bunch
 6 of Grapes pub quite close to the scene?
 7 A. A forward command point, yes.
 8 Q. But by this stage, so 10.20, when they were arriving and
 9 starting to set up that post, we've heard that armed
 10 officers were already moving through the Borough Market
 11 area?
 12 A. That's correct, yes.
 13 Q. Those were officers who had self-deployed and were
 14 moving through in accordance with their training?
 15 A. So the initial first responders of armed police that
 16 would have neutralised the threat of the attackers would
 17 have been responding on their own recognisance(?),
 18 having had the incident declared as a firearms incident,
 19 and then the inspectors no doubt would have initiated
 20 an emergency action plan, which is a prelude to their
 21 more structured deliberate search, and the initiation of
 22 hot and warm zone working. So it would have been
 23 a staged response.
 24 Q. In these early stages when those officers are first on
 25 the scene setting up the forward command post, would

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1 there have been any designated hot and warm zones?
 2 A. Not until those officers in conjunction with the LAS and
 3 the LFB had made those agreements.
 4 Q. And that might take quite some time?
 5 A. It will take time. The officers need to develop
 6 situational awareness, they need to have
 7 an understanding of what is going on, who is where.
 8 There are a huge number of CADs, over 100 CADs for them
 9 to have gained an understanding of before they can make
 10 a determination of where the threat is and where they
 11 need to demarcate in terms of threat risk.
 12 Q. If we can put a map on the screen, please, {MP0004/1},
 13 we can see here an overview map of the scene and if you
 14 get your bearings, the crashed van is just to the south
 15 of London Bridge with Borough High Street running south
 16 of there and Stoney Street where the attackers were shot
 17 at the bottom of the page; do you see that?
 18 A. Yes, it's very clear.
 19 Q. Now, we've heard that at about 10.23 or 10.24, armed
 20 officers came up Borough High Street towards
 21 London Bridge near where the van was crashed, shouting
 22 for people to get out of the area, because of concerns
 23 about IEDs. Anything surprising about that to you?
 24 A. Nothing at all. Of course you can't make any
 25 assumptions when you're dealing with an incident like

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1 this. You've got the van. The van itself might be
 2 an IED. You've got the three suicide vests which are
 3 potential IEDs, and you don't know what else has been
 4 discarded whilst the terrorists were on their route from
 5 the van to their eventual position. Of course we don't
 6 know how many outstanding suspects are in the area also
 7 wearing or carrying IEDs.
 8 Q. We also know as a result of that, some LAS staff who
 9 were at that point near the crashed van, just above the
 10 Boro Bistro courtyard, moved away from the area and that
 11 they communicated at 10.25 that they were evacuating
 12 away from that area because the scene wasn't safe?
 13 A. That's correct.
 14 Q. For the lawyers, the entries for those reports are
 15 {DC8209/41}, but we don't need to go to that.
 16 Was that right and proper practice for the armed
 17 officers in the situation which you know was pertaining
 18 on the ground to be sending people, including LAS staff,
 19 out of that area?
 20 A. Yes, that's entirely normal.
 21 Q. And that despite the fact that there had been no formal
 22 designation of hot and warm zones?
 23 A. There will be -- until a declaration is made, the LAS
 24 and the LFB when they arrive will have to make their own
 25 determinations about what is safe and what is not safe

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1 commensurate with their training and understanding of
 2 the prevailing circumstances.
 3 So it's entirely normal for appetites for risk to
 4 vary until a more structured decision has been taken by
 5 all responders as to where those delineations sit in
 6 terms of threat and risk, warm and hot zones.
 7 Q. But would you have expected those LAS staff when the
 8 armed police came by telling them to get out of the area
 9 to comply with the armed police?
 10 A. Of course. Absolutely.
 11 Q. Now, we've heard evidence from a Mr Beasley, the LAS
 12 incident response officer, that he arrived at shortly
 13 after 10.20, that he remained a short distance to the
 14 south of the van on Borough High Street, not far from
 15 where the Post Office is, and that he remained there
 16 even when told that the area wasn't safe; is that
 17 an example of somebody having a preparedness to expose
 18 themselves in the way that you've described?
 19 A. Absolutely. What I've seen in this operation and our
 20 spontaneous response to it is outstanding acts of
 21 bravery across all the emergency services, putting their
 22 lives at risk, putting the needs of the public before
 23 their own in a number of different circumstances by
 24 a number of different people.
 25 Q. Now, we're also aware that there were one or two

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1 ambulances with him on Borough High Street relatively
2 shortly in the area of the Post Office, and the point
3 has been made, I think you're aware, that there were
4 officers in the Boro Bistro courtyard who were attending
5 to casualties and weren't aware where those ambulances
6 were; do you understand?

7 A. I do, that's entirely possible.

8 Q. We've also heard that they didn't start moving their
9 casualties to street level until about 10.45, about
10 22.45, 22.46, 22.47.

11 A. That's my understanding.

12 Q. Are you able to explain why that would have come about,
13 how those officers might not be aware for a period of 25
14 minutes or so, that there were ambulances at street
15 level not far from them?

16 A. Yes. I'll attempt to do that.

17 So our technology currently only allows the police
18 service to see visually where our own assets are. We
19 can't see where the London Ambulance Service assets are,
20 their vehicles or their individual paramedics. We're
21 still struggling with technology to see where all of our
22 individual people are. We can see where our vehicles
23 are, but individual people, it's difficult, because the
24 trigger for that within the radio, if it's overused as
25 a trigger, will drain the radio, so it's a system called

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1 APLS, which is within a radio, and the shorter the
2 latency, so the shorter the period of ping to show where
3 all the assets are, the faster the radio will lose its
4 charge, so you are putting the officer at risk, and
5 there's a balance to be struck between knowing where all
6 your assets are and what I have just described as a
7 risk.

8 We don't have the ability to do that for the LAS and
9 the LFB, their own resources perhaps would do that, but
10 to have an integrated system that sees where everybody
11 is all of the time is not yet within our capability. So
12 you have got the added problem of the fact that
13 Boro Bistro is below the level of the road. So not only
14 can we not see where the London Ambulance Service have
15 mustered all of their vehicles but, more importantly,
16 the officers in Boro Bistro, which is a couple of metres
17 below ground level, won't have the ability to see beyond
18 the environment that they're in. So I can understand
19 why that might have happened.

20 Q. If you by some means in the special operations room did
21 have access, had had access to some means of knowing
22 where the LAS assets were, where the ambulances were at
23 the push of a button, or access to a person who could
24 tell you, is it possible or likely that those officers
25 in the Boro Bistro on this occasion would have been told

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1 where the ambulances were and might have got their
2 casualties out sooner?

3 A. That's a really challenging question to answer because
4 the prevailing circumstances are not clear. I don't
5 know what the individual officers are doing in terms of
6 trying to stabilise the victims that they're trying to
7 treat. They would have to make a determination about
8 whether it is safer and in the best interests of the
9 victim to wait and see if a paramedic comes to them,
10 because moving somebody who has got a catastrophic bleed
11 can make that bleed worse, and so there are a huge
12 number of factors at play in answering -- what appears
13 to be a simple question is not a simple question.

14 Then you've got the added difficulty that the area
15 isn't safe and the LAS crews themselves have determined
16 that that is an unsafe location because of the
17 likelihood of further attackers bearing down on them
18 from a number of different alleyways with very little
19 warning of their approach, and the fact that you've got
20 a van that's crashed just overhead that may in itself be
21 an IED. So it's a balancing of threat and risk and the
22 welfare and needs of the people in Boro Bistro.

23 The other thing to consider is that when we look at
24 all of the CADs that come in requesting assistance,
25 requesting LAS assistance, there are something like 146

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1 CADs between the first CAD and the time that the
2 officers decided to move their victims up towards the
3 north of the bridge where LAS crews were waiting for
4 them, and out of those 146 CADs, we don't know which of
5 those CADs relate to people who are going to die. They
6 are all potential victims.

7 Now, two years later, we know where the eight people
8 that tragically lost their lives lost their lives, but
9 we did not know that at the time. So we're responding
10 to all 146 requests for assistance and trying to do the
11 best that can possibly be done for all of them.

12 Q. We know that some of the officers in the courtyard were
13 on the radio asking for paramedics, plainly wanting
14 paramedics. If those in your special operations room
15 could tell quickly where the ambulances were, could they
16 not -- isn't it likely that they would have told the
17 officers and the officers could have made that judgment
18 about whether to take the casualties up with all that
19 they knew about the casualties' injuries?

20 A. It's possible, sir, they would have to make
21 a determination on whether that would increase the
22 likelihood of further injuries or not, but it's entirely
23 possible.

24 Q. And looking forward and for the future, is there a case
25 for having a means of your officers in the SOR being

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1 given more direct access to information about where LAS
 2 resources are with a view to saving lives in future?
 3 A. Absolutely. So there is always learning that will come
 4 from any operational deployment, from a single critical
 5 incident to a major incident, and there will be learning
 6 that comes from this incident, of course.
 7 Q. Can you help us with how, in practice, it might be
 8 possible to move towards a situation where officers in
 9 the special operations room are aware of where
 10 ambulances and other LAS assets are?
 11 A. Various emergency services that operate in London
 12 constantly re-evaluate their stance and their posture in
 13 relation to responding to incidents like this.
 14 Technology, and improving technology, will better enable
 15 that kind of situational understanding.
 16 Certain forces around the country have explored
 17 joint operations rooms where the LAS or their equivalent
 18 of the ambulance service, the firearms, the police and
 19 the fire brigade, co-locate, but that comes with certain
 20 costs and complexities, and in London given the size and
 21 scale of the policing and fire and rescue and ambulance
 22 services that we operate would be a significant
 23 challenge, but all these things can and ought to be
 24 explored.
 25 Q. Is it worth exploring, for example, having a permanently

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1 stationed one or two LAS, LFB staff in the special
 2 operations room?
 3 A. That could be explored.
 4 Q. Can I return now to the sequence of events. From around
 5 the time you declared Plato, you've told us that those
 6 in the ARV pod were directing the wider firearms
 7 response. Would they have been updating armed officers
 8 as events progressed?
 9 A. That's correct, yes.
 10 Q. You knew that this was a major incident and required
 11 police resources to be marshalled across the boroughs,
 12 and you've told us about starting work in that regard.
 13 How did the mobilisation operate? How did it work?
 14 A. So I call down into my command room, if you like,
 15 department, called the real time resources desk, the
 16 RTRD, as I call them. That's a team of officers that
 17 keep a track of all the resources that are on duty and
 18 coming on duty in the next shift, and to a limited
 19 degree what their skills are, and by what we describe as
 20 pushing the button on the service mobilisation plan it
 21 sends out a message, a general message across all
 22 boroughs to say (a) that this has been done, and then
 23 what I require from all of the resources across London,
 24 and it's a phased escalation of resources over time,
 25 starting with nine, what we call, PSUs, so that's police

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1 serial units, which consist of one inspector, three
 2 sergeants and 21 constables on three vehicles. That is
 3 a single PSU. So nine PSUs would be 225 officers. And
 4 that will build over time. I think in the end 11 PSUs
 5 were deployed: 275 level 2 officers and about 200 level
 6 3 officers. The difference between level 2 and level 3
 7 are level 2 officers receive additional training, they
 8 are public order officers, so they are able to deal with
 9 violent public order scenarios, but they have a greater
 10 understanding of how to deal with this kind of major
 11 incident. I would expect that they would have been in
 12 the service for longer, because you would ordinarily
 13 have been at least two years in service before you are
 14 eligible to be a level 2 officer, so I will know that
 15 I've got at least 275 experienced police officers on the
 16 street and then in addition to that, some additional
 17 serials of level 3 officers which will come with a whole
 18 spectrum of training.
 19 Q. Would the value of those particularly experienced
 20 officers show itself in work like evacuation,
 21 controlling panic, directing people?
 22 A. Exactly.
 23 Q. If we go to your log, {DC7752/6}, we can see there first
 24 of all the service mobilisation recorded at 22.38. Then
 25 at 22.40, you give a log entry involving a number of

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1 other actions at a command level; can you explain that
 2 entry and what you were doing at that period of time,
 3 about half an hour into the incident?
 4 A. So by this time I've overlaid a degree of command and
 5 control. I've got assets stood up or starting to be
 6 stood up, an umbrella, if you like, of command and
 7 control is being spread across the major incident, and
 8 I've got what I would describe as some grip.
 9 It's then incumbent on me to inform the people that
 10 will take over from me to ensure that they've got
 11 an understanding of what it is that they're coming in to
 12 deal with, and so you can see there that I've briefed
 13 Commander Cundy who was the on-call NPCC officer and
 14 Chief Superintendent Quantrell who became silver London,
 15 my boss at the time, Chief Superintendent Adelekan.
 16 Q. You also refer in your entry to a tri-service response
 17 being set up. Is that the three-way communication
 18 channel we saw referred to in the procedural documents
 19 for contact between the three emergency services?
 20 A. That's correct, yes. So that would have been initiated
 21 over ES5, the radio system that I've already talked
 22 about, then the tri-service conference call would have
 23 been set up.
 24 Q. Then you refer to "Open GT"; what is that?
 25 A. So when I was describing the way SOR is laid out, a room

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1 with half of the seats open and available for expansion,
 2 the call sign for business as usual across London from
 3 a pan-London perspective is "MP". When we're dealing
 4 with a major incident or a preplanned major event, we
 5 will open up the whole of the room and then the
 6 delineation between what is business as usual and what
 7 is the event will be GT. So GT is the call sign given
 8 to pan-London when dealing with a major event.

9 Q. Then you make an entry for PSUs to Peckham Police
 10 Station. Is that a mustering point for those serials
 11 you were describing?

12 A. Yes, so this recognises that no one RVP is going to be
 13 large enough to accommodate all of the emergency
 14 services, so we have muster points set up to try and
 15 reduce the impact of all of those emergency service
 16 vehicles being at one location and I have to rely on the
 17 expertise of the staff and the commander to direct the
 18 resources to the places that they consider appropriate,
 19 close enough to be able to provide an effective response
 20 but not so close as to completely bring the rest of
 21 London to a grinding halt in terms of traffic chaos. So
 22 it's a balance that needs to be struck.

23 Q. You also refer to establishing a command structure and
 24 I think we can see more detail of that if we go to
 25 page 9, item 5 {DC7752/9}, do you refer here to

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1 assigning roles to ground commanders?

2 A. Yes, that's correct.

3 Q. You refer to Superintendent Smith at the bridge and
 4 Superintendent Walker at Borough Market; were you
 5 effectively dividing the ground command into two sites?

6 A. Yes, that's right. So these officers were, are, senior
 7 officers, they are also trained as public order cadre
 8 officers, they have a detailed understanding of
 9 responding and managing major incidents like this
 10 together with major pre-planned events, and I believe
 11 they were already on duty having dealt with football
 12 games, in the policing department at football, so we
 13 rerouted them from there to this location to take
 14 command of the assets that I had mobilised as part of
 15 the service mobilisation plan, recognising that there's
 16 no point in mobilising huge numbers of police resources
 17 unless you also mobilise people that can take effective
 18 command of them on the ground.

19 Q. What was the division of responsibility between those
 20 ground commanders and the tactical firearms commanders
 21 who were setting up stall at the Bunch of Grapes?

22 A. So the way I would describe this is the firearms command
 23 structure deals with incident resolution. They deal
 24 with the management of the risk relating to the hot zone
 25 and the neutralisation of the terrorists.

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1 So you could in effect create a bubble around the
 2 incident. Everything inside that bubble is the
 3 responsibility of the TFC and the firearms command
 4 structure, and that is incident resolution. Everything
 5 outside of the bubble, outward facing, is consequence
 6 management and so I would expect the two bronze
 7 commanders that I deployed to the ground to be dealing
 8 with consequence management, supporting what is going on
 9 for the firearms responders, and the firearms response
 10 becomes part of the overarching response, so it sits
 11 underneath consequence management.

12 Q. Would those two superintendents, bronze ground
 13 commanders, have responsibility for creating and
 14 managing a huge cordon around the area?

15 A. That's correct, yes. So that cordon serves two
 16 purposes: firstly it prevents, as I've described
 17 earlier, additional people walking into the scene
 18 unbeknownst, and it also protects and keeps the scene
 19 sterile so it serves a public safety function and also
 20 supports the investigation that is going to follow.

21 Q. Now, you tell us in your report that while this was
 22 going on, the special operations room had contacted the
 23 SO15 reserve in accordance with the Plato preset
 24 actions, and that a small team from SO15 came to the
 25 special operations room; is that right?

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1 A. Yes, so SO15, or the Counter Terrorism Command, will
 2 respond in a number of different ways. Part of that
 3 team will deploy to the scene, part of the scene will
 4 open up their own operations room for the continuation
 5 of the investigation, and some of them will come to SOR
 6 to assist me and form a link between the investigation,
 7 intelligence-gathering capabilities, and my own need to
 8 command and control.

9 Q. You had suspected IEDs at the scene, and you've referred
 10 to the need for explosives officers to go to the scene
 11 to assess those and, if necessary, take action against
 12 them. Whose responsibility was it to call in the
 13 explosives officers?

14 A. You will find that there are a number of redundancies
 15 built into our systems. So the TFC can call out the
 16 EOD, I can call out the EOD. As a consequence of Plato
 17 being declared, the EOD are already called out so there
 18 are various different layers of redundancy. So I can't
 19 be certain which one of those routes was the first
 20 route, but I'm confident that one of them or all of them
 21 resulted in the EOD being deployed.

22 Q. Now, we'll hear that the tactical firearms commander in
 23 the pod called for Expo, explosives officers, at 22.24,
 24 so at a very early stage; would that be consistent with
 25 the usual way these things work?

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1 A. Entirely consistent.
 2 Q. We also know from CCTV that the explosives officers came
 3 into view in Stoney Street at 23.16 and spent the next
 4 seven minutes or so searching the attackers. So that's
 5 a period of a little under an hour between the call for
 6 explosives officers and them actually being with the
 7 suspects near the suspected devices. Is that
 8 an ordinary or expected delay period?
 9 A. Yes, you would expect there to be a delay between them
 10 being called out, between them deploying, arriving at
 11 the scene and then they will need to have discussions
 12 with the TFC on the ground about how they will move
 13 forward, whether they will take with them some armed
 14 protection, what the current prevailing risks are, you
 15 have already heard me describe there are hundreds of
 16 CADs coming in so the TFC will want to think to
 17 themselves: I've got three suspects neutralised, I have
 18 got a number of IEDs, I need these gentlemen to
 19 neutralise the IEDs, I've got CADs about a number of
 20 other shootings or potential suspects, how do I best
 21 manage the need to mitigate the risk from the IEDs and
 22 the safety of the officers that I'm going to push
 23 forward to do that, and that will take time.
 24 Q. Do the EOD officers also have to make decisions about
 25 equipment that they have to use and so on?

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1 A. Yes, so all they've got is a description of the IEDs so
 2 they'll have to make a determination based on the
 3 various items of kit they carry how best to neutralise
 4 or make safe an IED without knowing what type or form or
 5 size or scale or what triggering device the IED will
 6 have.
 7 Q. Now, we understand that very shortly after the
 8 explosives officers went into the scene at
 9 Stoney Street, an SO15 forensic management team went in,
 10 23.36. Would that be a normal action as well?
 11 A. Absolutely.
 12 Q. In order to gather evidence about who the attackers were
 13 and whether they might have associates?
 14 A. Correct.
 15 Q. Returning to the forward command post and the two
 16 inspectors there, would they have been managing
 17 increasing numbers of armed officers coming under their
 18 command at the scene?
 19 A. Yes, that's correct.
 20 Q. What, in practical terms, were they doing as these armed
 21 officers came to their disposal?
 22 A. They will be attempting to determine where the greatest
 23 risk and threat lies. They will be wanting to in the
 24 first instance find and neutralise any additional
 25 suspects, so you increase the safety of the public by

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1 neutralising the threat. So the first priority is to
 2 make sure the threat is neutralised, because that
 3 prevents any further deaths to the public. So they'll
 4 be wanting to carry out emergency searches of the
 5 streets around the area to ensure that they do their
 6 best to find, identify and then confront any additional
 7 suspects as they are presented, and there are a number
 8 of CADs that describe the potential for additional
 9 suspects, because of course we know now that there were
 10 only three, but at the time we didn't know that, and
 11 couldn't be certain that this attack was limited to
 12 three for some time. They were calls to additional
 13 suspects for hours after the three suspects were
 14 neutralised.
 15 Q. Meanwhile is it right that various reports were being
 16 received suggesting that hostages were being held in
 17 various locations in the Borough Market area?
 18 A. That's correct.
 19 Q. We can see one of those if we look at {DC6501/8}, at the
 20 top of the page, 22.17, "Male with [a] machete, [some]
 21 people [held] hostage."
 22 A. Correct, and that's typical of a number of calls that we
 23 had that went into the small hours of the morning.
 24 Q. So if we go back to your log {DC7752/10} we see you
 25 recording at 22.55, checking whether hostage negotiators

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1 have been called, and whether negotiators were on scene.
 2 A. Yes, that's correct.
 3 Q. Over, please, to page {DC7752/12} of your log. Do we
 4 see at 23.07 you were being updated on casualties, and
 5 aware at that stage of 20 people having been stabbed?
 6 A. That's correct.
 7 Q. And incorrect information suggesting that a woman had
 8 been shot?
 9 A. That's correct.
 10 Q. Again, does this give us an impression of the slightly
 11 chaotic picture of information in the early stages with
 12 a fair amount of inaccurate information coming in to
 13 somebody in your position?
 14 A. Yes. That's right. There was a huge amount of
 15 information that came through to me, some of which is
 16 conflicting, and it goes to illustrate the sense of
 17 panic and terror that the members of the public in
 18 Borough Market and on London Bridge were facing. Some
 19 of the messages have delays. This might be the first
 20 opportunity that the caller has had to call the police
 21 after seeing what they've seen or hearing what they've
 22 heard, so sometimes there is a delay between the call
 23 coming in and it being made available to me and the
 24 actual incident that it relates to, which causes some
 25 confusion for us because we might have already dealt

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1 with that and then 20 minutes later we're getting a call
 2 about it with very detailed information.
 3 And you've got members of the public calling us
 4 about things that they can hear as opposed to things
 5 that they can see, so they felt they were under
 6 sustained automatic gunfire which, of course, we now
 7 know was not the case, but at the time we had to take it
 8 very seriously. So from our perspective this did not
 9 look like a simple knife attack -- well, there is
 10 nothing simple about a knife attack, but it didn't look
 11 as simple as it subsequently came to be. We thought we
 12 were under sustained attack from multiple attackers and
 13 that the attack not only involved vehicles and knives,
 14 but also involved firearms.
 15 Q. So as far as you were concerned, this was looking like
 16 a Mumbai-style attack?
 17 A. Absolutely.
 18 Q. If we look over the page at page 14 {DC7752/14}, we see
 19 further indications of this, information about a hostage
 20 at the Bank pub, 20-25 people trapped in the basement at
 21 Black & Blue, and so on?
 22 A. Absolutely.
 23 Q. Then {DC7752/16}, please. You record here at 23.24
 24 something called a silver suite meeting. What was this
 25 meeting and what happened at it?

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1 A. So once the representatives from the other emergency
 2 services are present in SOR, we then will have a meeting
 3 with the representatives of the LAS, LFB, City of London
 4 Police, British Transport Police, so the relevant senior
 5 managers are all co-located and then we will discuss
 6 what our understanding is and what we're going to do
 7 next, and those meetings tend to happen every 30 minutes
 8 or an hour, depending on the needs of silver and the
 9 amount of information that is coming in.
 10 The meeting will be led by the police and it will be
 11 led by whoever the silver is, and it's at this point
 12 that Nigel Quantrell has arrived, an SOR, and I'm in the
 13 process of handing over to him when this first silver
 14 meeting is called.
 15 Q. In handing over to Mr Quantrell, you didn't, however,
 16 cease work?
 17 A. No, well it takes a while to actually hand over. There
 18 is so much that has happened, it's probably taken us
 19 a good amount of time to go through everything that I've
 20 done, all the decisions that I've made, what my
 21 understanding is, what the current intelligence picture
 22 looks like and what the people on the ground are doing,
 23 and then after I've handed over, I will continue to
 24 support the management of this operation until it's
 25 finished.

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1 Q. If we can just address for a moment the hot and warm
 2 zones, and if we can first of all look at the log for
 3 the London Ambulance Service's bronze Plato, Marc
 4 Rainey, {WS1370/3}, and then if we move a couple of
 5 pages in, please {WS1370/4}. Page 5, yes, we've got it
 6 here {WS1307/7}, now, the entry at 23.25 refers to
 7 Mr Rainey being on scene at the tactical firearms
 8 command forward control point and receiving a briefing
 9 that the hot zone that encompassed the south side of
 10 London Bridge and Borough High Street, and if we go on,
 11 we see also designated as hot the area of the covered
 12 market itself, bounded by Cathedral Street, Winchester
 13 Walk, and Stoney Street; do you see that?
 14 A. I can see that, yes.
 15 Q. Now if we can compare that to the notes of the TFC at
 16 the ground, Mr Stumpo, at {WS0923/4}, 23.58 refers to
 17 evacuation from Borough Market, and then over the page
 18 to {WS0923/5}, please, 00.08 -- I'm sorry, the previous
 19 page, towards the bottom {WS0923/4}, 00.08:
 20 "Hot zone: Stoney Street/Winchester Walk/Cathedral
 21 Street/Montague Street/Close/ A3."
 22 Now, that suggests that Mr Stumpo similarly was
 23 recognising as the hot zone the area of the covered
 24 market of Borough Market bounded by Stoney Street,
 25 Winchester Walk and Cathedral Street, but also Borough

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1 High Street, the A3, and the area immediately to the
 2 north of the covered market. Was that your
 3 understanding of where the hot zone was designated?
 4 A. Yes.
 5 Q. Now the first record of that hot zone being designated
 6 that we see is Mr Rainey's -- or that we're aware of, is
 7 Mr Rainey's log at 23.25, is that your understanding
 8 too?
 9 A. Yes, I think it's also captured on body-worn video.
 10 Q. Based on what you know, and the researches you've
 11 carried out, was that the time at which the police TFC
 12 on the ground and the emergency service colleagues were
 13 able to designate the hot and warm zones?
 14 A. Yes.
 15 Q. About 11.20, 11.25?
 16 A. That's when they started doing it and then you'll see
 17 from various people's notes that they've continued to
 18 review and reflect on those zone determinations
 19 throughout the development of the incident.
 20 Q. If we move to the next page of Mr Stumpo's notes,
 21 {WS0923/5}, we can see, 00.31, further areas designated
 22 hot zone: Pickford Wharf, Golden Hinde, London Bridge,
 23 and so on. Does that suggest that he was extending the
 24 hot zone to an extent?
 25 A. Yes.

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1 MR HOUGH: Thank you very much, we can take that off screen.
 2 Now, sir, Mr Adamson has one short topic about which
 3 he wishes to ask this witness. He needs to be away by
 4 1.00 pm.
 5 THE CHIEF CORONER: Yes.
 6 MR HOUGH: I was going to suggest that we interpose his
 7 questions at this stage.
 8 THE CHIEF CORONER: Certainly. Mr Adamson.
 9 Questions by MR ADAMSON
 10 MR ADAMSON: Superintendent McKibbin, my name is
 11 Dominic Adamson, I act on behalf of the parents of
 12 Xavier Thomas and his partner, Christine Delcros.
 13 Xavier Thomas is the victim, who you will recall,
 14 entered the River Thames.
 15 You've explained your role in the declaration of
 16 Operation Plato and we can see from the CAD 8810, that
 17 that happened at around 22.16.33.
 18 We have also been given the benefit of examining the
 19 Coastguard's incident log. Would the Coastguard be one
 20 of the organisations to whom the declaration Plato would
 21 ultimately be communicated?
 22 A. Yes, that's correct.
 23 Q. And if we could call up on screen, please, {DC6822/7},
 24 please. Sorry, {DC6822/9}, I do apologise. We can see
 25 there on the Coastguard's log. Just by way of the

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1 background, where it says to 21.32, that's actually
 2 10.32, it says "Operation Plato declared", where would
 3 the Coastguard being notified of the declaration be on
 4 the hierarchy? Presumably rather lower down than some
 5 of the other organisations?
 6 A. Yes, as you can imagine, the Coastguard doesn't have
 7 a major part to play unless the river is involved, and
 8 of course it has become involved. So it will be
 9 an addition, but not particularly high up the hierarchy.
 10 Q. Yes, I understand that.
 11 The entry then be says:
 12 "From CCTV London Bridge River Thames is not within
 13 [Operation] Plato sphere."
 14 Is the Thames within Operation Plato sphere or does
 15 that depend on the nature of the declaration?
 16 A. I think it does depend very much on the nature of the
 17 declaration, whether the attack is on the water, so on
 18 something that is on the water, or whether we think the
 19 attackers have access to the water or whether we think
 20 that people in the river are likely to become at
 21 an increased risk as a consequence and that is an
 22 a determination that would need to be assessed by
 23 someone.
 24 Q. And is that something that would have formed part of
 25 your assessment on the night?

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1 A. In that there was no information that the attackers were
 2 trying to gain access to the water it didn't form part
 3 of my thinking because the intelligence and information
 4 didn't take me in that direction.
 5 Q. Yes. We've heard evidence from one of the commanders on
 6 the marine police unit that was deployed, there were two
 7 marine police unit boats deployed to the scene, and
 8 we've also heard that there were two RNLI boats that
 9 were deployed to the scene, I think those are facts that
 10 you're aware of?
 11 A. Correct.
 12 Q. In terms of the way in which the marine police units
 13 carried out their duties, would you expect to be
 14 informed about precisely what they were doing in the
 15 course of their duties or was that something that would
 16 be managed lower down the chain?
 17 A. So, I wouldn't need to get involved in that. There are
 18 a number of supervisors that work for me at all levels
 19 across the entire responding sphere that will do that.
 20 But they will be looking for people that will have
 21 fallen from the bridge or been knocked from the bridge,
 22 and they will be aware that that will be their
 23 responsibility.
 24 Q. The timeline that we have is that Xavier entered the
 25 water at almost precisely 22.07. The marine police

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1 units arrived at the scene at around 22.14, and the RNLI
 2 boats arrived at about 22.20.
 3 We've also heard evidence that the two marine police
 4 units were involved in warding people on the banks of
 5 the River Thames away from the danger area. Again, is
 6 that something that you would be kept informed of, or is
 7 that something you would have just expected them to do
 8 in the ordinary course of their activities?
 9 A. Just expect them to do. I wouldn't be informed of all
 10 that level of detail.
 11 Q. Yes. We've heard from the Coastguard, Mr Hayday, that
 12 he was unaware that the marine police units were
 13 carrying out those sorts of duties, he assumed that they
 14 were involved in searching duties. Again, is that
 15 something that you would be expected to be informed of
 16 or is that an issue of communication as between marine
 17 police unit and Coastguard?
 18 A. Between the two units. So police officers of various
 19 different ranks have a degree of autonomy and they will
 20 carry out some duties as they see fit based on the
 21 prevailing circumstances. Communication between the
 22 RNLI and the marine police unit goes on all the time,
 23 they are two agencies that work very closely together
 24 and they are best placed to determine their function in
 25 the water, based on all of their training, which far

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1 exceeds mine in relation to the waterways and safety
 2 within the waterways.
 3 Q. So, so far as any improvements in the degree of
 4 communication between those two units are concerned,
 5 that's not something upon which you can offer this court
 6 any particular assistance?
 7 A. Not personally. I mean, as I've expressed, there will
 8 always be learning that will come out of any incident
 9 and we need to be open to that and embrace it fully and
 10 implement anything that we think will improve the lives
 11 and the welfare of the people of London, and while I've
 12 got the opportunity, you represent the family and
 13 I would like very much to offer my most sincere
 14 condolences to the family of the victims in this
 15 incident who were not amongst the people that we were
 16 able to save and it is regretful and a regret of mine
 17 that we were not able to save everyone.
 18 MR ADAMSON: They are sat to your right. I'm sure they are
 19 grateful for that indication. Thank you very much.
 20 Questions by MR HOUGH QC
 21 MR HOUGH: Mr McKibbin, may we return to the order of
 22 events.
 23 We got to the point where you were handing over at
 24 23.24 and simultaneously, at about the same time, just
 25 before 11.30, the hot zone and warm zones were being, or

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1 starting to be designated on the ground?
 2 A. Correct.
 3 Q. If we return to your log, please, {DC7752/16}, do we see
 4 at 23.30 you record that eight of the 25-member PSU
 5 serials were on their way to the scene?
 6 A. That's right.
 7 Q. And three two Peckham Police Station. Were they to
 8 operate as a sort of reserve?
 9 A. Yes, that's correct. What isn't clear there is whether
 10 they're actually at the scene or en route. By 23.30,
 11 I would have expected them to be well on their way, but,
 12 as you will understand, these things take time.
 13 Q. Yes.
 14 Meanwhile, 23.35, your loggist records a CAD
 15 reporting a man running towards Vauxhall station with
 16 a machete.
 17 A. Yes, that's right. So my loggist has tried to keep
 18 abreast of all of the CADs that are coming in, but as
 19 you will understand there were hundreds, about 500, so
 20 she's got a snapshot of some of the relevant CADs.
 21 Q. Then {DC7752/18}, an entry at 23.44 referring to
 22 shooting on the north side of the bridge, shots being
 23 heard in the Elephant and Castle area, further incorrect
 24 information but it has to be taken into account at the
 25 time?

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1 A. Absolutely. I mean, these were the perceptions of the
 2 public. These people that called us weren't trying to
 3 divert resources unnecessarily. It's my understanding
 4 that they genuinely felt they were under attack and so
 5 we have to respond accordingly.
 6 Q. Page 20, please {DC7752/20}. An ANPR, so Automatic
 7 Number Plate Recognition camera, produced a hit
 8 suggesting a vehicle had been in convoy with the suspect
 9 vehicle and was now northbound on the M1?
 10 A. So this is an action that I requested to be done. This
 11 doesn't happen automatically. I wanted to know whether
 12 the vehicle that had been used in the attack had been in
 13 sustained convoy with any other vehicles on any of the
 14 dates leading up to the attack and, if so, where were
 15 those vehicles now.
 16 Q. Then down the page at 00.09, we see a record from your
 17 loggist of another CAD which she was entering as part of
 18 the process you have described referring to sounds of
 19 bangs heard at the Novotel on Southwark Bridge Road?
 20 A. Yes, that's correct.
 21 Q. That required an evacuation of that building?
 22 A. Yes, the residents of that hotel, the guests again felt
 23 they were under attack from firearms.
 24 Q. And then {DC7752/22} at 00.34, a second silver meeting.
 25 Was this a further command team meeting involving you in

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1 the SOR?
 2 A. That's correct, sir, yes.
 3 Q. And if we go over the page to 24, {DC7752/24} we see
 4 your loggist recording that it was still unknown if
 5 there were more than three suspects, even at that stage,
 6 12.30?
 7 A. Yes, that's correct.
 8 Q. Meanwhile the LAS trying to confirm the number of
 9 casualties?
 10 A. Correct.
 11 Q. It was around this time, shortly after this time, that
 12 a team of HART paramedics were sent into the scene. May
 13 we look, please, at {WS1370/4}. This is back to
 14 Mr Rainey's log. I'm sorry, I've given the wrong
 15 reference number again.
 16 THE CHIEF CORONER: I think it's the right document, it's
 17 probably just a bit further on in the ...
 18 MR HOUGH: It is the right document. Mr Moss is just
 19 getting it for me. I think it will be the following
 20 page, page 8, please. I'm sorry, page 9, please
 21 {WS1370/9}, and over the page to {WS1307/10}, please.
 22 Do we see here at ... I think it's probably best if
 23 we pick this up at 2 o'clock and I can give the
 24 reference more precisely.
 25 THE CHIEF CORONER: We will do that, indeed. 2 o'clock.

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1 (12.56 pm)
 2 (A short break)
 3 (2.02 pm)
 4 MR HOUGH: Good afternoon, officer.
 5 A. Good afternoon.
 6 Q. Just before lunch I was asking you about the period
 7 12.30 until 1.00 overnight, 3 and 4 June, the early
 8 hours of 4 June, and I was asking you about a time
 9 coming when HART paramedics were sent into the scene.
 10 If we can bring up, first of all, {DC5028/5}. We
 11 can see here a log kept by Mr Beasley, an
 12 incident response officer for the LAS, and if we look at
 13 an entry for 00.03, so just after midnight, we see
 14 a series of teams had been assembled and one of them,
 15 team 4, included a witness that we heard from,
 16 Gail Collison. We can also see an entry referring, the
 17 next entry referring to Borough Market being a hot zone;
 18 do you see that?
 19 A. I can see that, thank you, yes.
 20 Q. And then next, please, {WS1370/40}, this is a log kept
 21 by Mr Rainey, the LAS bronze Plato, and we can see that
 22 he has recorded at 01.03 a discussion with the Tactical
 23 Firearms Commander and an incident response officer
 24 about moving a team forward to the crashed van at
 25 London Bridge, and a discussion about armed support for

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1 that team; do you see that?
 2 A. Yes, sir.
 3 Q. And then at 01.05 we can see reference to various teams
 4 in the area, and 01.07, there is a report from team 4
 5 which included the witness we heard from, Gail Collison,
 6 reporting from Boro Bistro the deceased persons there;
 7 do you see that?
 8 A. Yes.
 9 THE CHIEF CORONER: And that's 01.07?
 10 MR HOUGH: 01.07. And then at 01.13, from Mr Rainey's log
 11 we see:
 12 "Discussion with [Tactical Firearms Commander] and
 13 [incident response officer] regarding Southwark
 14 Cathedral. Lead assault team to use explosive MOE..."
 15 Is that a method of entry?
 16 A. Yes.
 17 Q. "... to enter and search cathedral. Still hot zone.
 18 [Explosives officers] to enter".
 19 By that stage, 01.13 do we see further confirmation
 20 that the area around the cathedral was still being
 21 regarded as a hot zone?
 22 A. That's correct, because we're still looking for
 23 potentially outstanding suspects. I believe there was
 24 an individual with a red jacket that was being
 25 circulated and being searched for for quite some time.

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1 Q. Yes, we've heard confusion was created because one of
 2 the attackers was wearing a red jacket almost to the end
 3 of the attack and then discarded it shortly before the
 4 end, but that reports that there was somebody wearing
 5 a red jacket involved in the attack continued to cause
 6 confusion afterwards?
 7 A. Yes, so you've got armed units that are looking for that
 8 suspect and using method of entry techniques to gain
 9 access to every property in Borough Market, so you can
 10 imagine how long that takes, and where we can't
 11 immediately gain entry we have to force entry because
 12 they could have gained entry and secured the door behind
 13 them.
 14 At the same time we've got officers, the LAS and the
 15 LFB, looking for casualties. So all this is going on
 16 dynamically in Borough Market and takes a long time to
 17 do systematically.
 18 Q. So although the teams were being assembled around
 19 midnight, as we saw, it took time for decisions to be
 20 made for them to be sent into various areas?
 21 A. Everything takes time, sir. So the officers, the TFC,
 22 needs to consider how they effectively balance risk and
 23 they are responsible, once they deploy, for the welfare
 24 of the LAS and the LFB and the armed officers under
 25 their command, so they have to understand the

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1 consequences and do so thoughtfully and with attention
 2 to the prevailing circumstances and the intelligence
 3 that they're receiving.
 4 Q. We have heard that before this time, in fact long before
 5 this time, casualties were being brought out of the
 6 areas of danger, both before and after they had been
 7 declared hot zones, and taken ultimately to ambulances,
 8 and that again is what you would expect, is it?
 9 A. I would expect that, yes.
 10 Q. We can take that off screen now.
 11 As the night went on, was a casualty bureau opened?
 12 A. Yes. So at some point in the evening I requested that
 13 the casualty bureau be set up. The casualty bureau has
 14 a number of functions to provide a single location or
 15 a single point of contact where members of the public
 16 that are concerned about their loved ones who may have
 17 been involved in this, can make inquiries or leave their
 18 inquiries to be progressed by us so that we can link
 19 their information with the information we've got about
 20 the casualties that we've recovered that we've looked
 21 after and sent off to hospital. So it's a way of
 22 marrying up what is effectively a missing person report
 23 with a casualty that we've got in hospital that may not
 24 be able to speak for themselves at that point.
 25 That's in simple terms, it does have a number of

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1 other responsibilities but that's effectively one of the
 2 major elements of the casualty bureau.
 3 Q. According to your log that casualty bureau was open by
 4 3.22 in the morning?
 5 A. Yes, that takes quite some time because the staff that
 6 perform the role within casualty bureau are volunteers
 7 spread across the Met Police and the City of London
 8 Police and quite a number of the home counties, so we
 9 draw those volunteers in and we send them to a central
 10 location, I think Hendon was used, and it's the normal
 11 location, and it takes time to set up all the telephone
 12 lines that will be used. So it's not by any means
 13 a quick process.
 14 Q. You tell us in your report, paragraph 5.49 on page 25
 15 that over 7,500 calls were received by the casualty
 16 bureau in the days that followed?
 17 A. That's correct, sir, yes.
 18 Q. With staff from 33 forces across the UK assisting as
 19 call handlers?
 20 A. That's correct, and we're deeply grateful to those
 21 officers for lending their assistance to that as they
 22 would.
 23 Q. Now, you've described how, over the hours that we've
 24 been discussing, you were coordinating a huge range of
 25 efforts by the police and liaising with a huge number of

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1 other agencies. I think your shift only ended at
 2 7 o'clock the following morning.
 3 A. That's correct, sir, yes.
 4 Q. I appreciate it's virtually impossible to capture in
 5 evidence of this kind everything that you cover during
 6 a period like that. Is there anything else in your
 7 experience of that night and your actions that night
 8 which you would like particularly to draw to our
 9 attention?
 10 A. I just emphasise that it was the single most difficult
 11 incident that I've ever had to manage in 24 years of
 12 policing. It's not the sort of incident that any police
 13 officer of any rank expects to be faced in the line of
 14 their duty, and to coordinate that kind of a response in
 15 the manner in which it was delivered was a significant
 16 undertaking but by no means a single effort, so
 17 I'm immensely grateful and proud of the officers who
 18 completed a variety of tasks, obviously putting
 19 themselves in significant potential danger, and
 20 I'm extremely grateful for their work and their efforts
 21 to save as many people as they possibly could. I think
 22 it's a testament to their bravery and professionalism
 23 that as many people were saved as were saved. That
 24 includes all of the staff for the LAS, the LFB, the City
 25 of London Police and the British Transport Police.

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1 Q. You have described a number of the agencies with which
 2 you had to coordinate and cooperate. You summarise some
 3 of their actions in your report, I won't go through
 4 those with you because we're hearing from members of
 5 those agencies directly, but in addition to the City of
 6 London Police, British Transport Police, London
 7 Ambulance Service, Coastguard and so on, and the fire
 8 brigade, the helicopter service, did you also have to
 9 deal with the local authority concerning a large number
 10 of displaced persons?
 11 A. Yes, that's correct. So there were a significant number
 12 of displaced individuals from hotels, businesses, homes,
 13 residences, and the local authority are involved and
 14 provide emergency reception centres and have
 15 a significant role to play in, again, what I would
 16 describe as consequence management, and I'm immensely
 17 grateful to the chief executives of the local
 18 authorities that brought their resources to bear.
 19 Q. Now, in terms of the police resources deployed to the
 20 scene, you have set those out helpfully in a table in
 21 your report which we can look at, {DC6825/1}, it will
 22 come up on the screen in front of you, and it is
 23 page 30. {DC6825/30}. Top of the page. If you can
 24 maximise that table, do we see a total of 965 police
 25 officers deployed to the scene?

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1 A. Yes, that's correct.
 2 THE CHIEF CORONER: I think some of those are casualty
 3 bureau who wouldn't be deployed to the scene.
 4 A. Yes, you're quite right, sir.
 5 THE CHIEF CORONER: But they are 965 in total here involved.
 6 MR HOUGH: Even if we deduct those casualty bureau officers,
 7 over 900 officers deployed to the scene.
 8 A. Correct.
 9 Q. Including, as we see, the large number of level 2 and
 10 level 3 officers that you described, as well as firearms
 11 officers, counter terrorism officers and so on?
 12 A. Yes, that's correct. A significant undertaking.
 13 Q. You can take that off screen now.
 14 Finally some general questions, please, and can we
 15 go back to that map at {MP0004/1} for these questions.
 16 Now, the concern raised by the facts of this case as
 17 you've heard is that police officers were attending the
 18 scene at multiple stabbings in the Boro Bistro area from
 19 about 10.13 or 10.14 and were proceeding with CPR there;
 20 that we have the ambulances starting to arrive from
 21 about 10.20, a short distance from the south, but that
 22 casualties were only brought up from about 10.45 pm.
 23 That's the chronology.
 24 We also know that if Mr Beasley hadn't insisted, he
 25 would have been still further away with less ability to

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1 assist with the injured and direct ambulances in the
2 area?
3 A. Yes, that's correct, sir. He has put his life at risk
4 in order to remain where he was and do his function,
5 along with, I believe, Keir Rutherford.
6 Q. You have described an impressive and large-scale
7 operation. Just for the benefit of the bereaved
8 families, can you explain, as fully as you're able, why
9 this area from which emergency calls were made from
10 a very early stage, wasn't entered by paramedics and why
11 officers weren't sent to bring casualties up earlier
12 than in fact happened?
13 A. So I think what we're looking at with Borough Market and
14 Boro Bistro in particular is a number of factors
15 overlaid on top of each other which exacerbated the
16 circumstances for those victims in that location.
17 You've got an area of Borough Market with, as I've said
18 before, about 194 different calls for help that we are
19 trying to wade through and provide resources to and
20 either get the victims from or send LAS resources to,
21 and what compounds the issue for people in Boro Bistro
22 is that you've got the van that's crashed overhead,
23 which is a potential IED, we now know it was full of
24 petrol bombs but it could easily have been full of nail
25 bombs and improvised explosive material. You've also

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1 got a topography issue with its particular location:
2 Boro Bistro is recessed below ground level, so the
3 people that are in Boro Bistro helping the victims, the
4 police officers that are at risk from further attacks,
5 are in a very secluded part of Borough Market surrounded
6 by walls on all side, a huge tree that is in the middle
7 of the forecourt and then a raised road level. So
8 whilst they're performing their duties they don't know
9 whether an attack is going to come from any one of about
10 three or four different alleyways with no warning, which
11 is why I think you've heard evidence of a police officer
12 with her baton out ready to respond. No one can see in
13 effectively or clearly as would be possible on
14 the bridge or the thoroughfare through Borough High
15 Street, and they can't see out.

16 So you've got a number of different exacerbating
17 factors that have had an impact in the decision-making,
18 in the coordination and in the treatment that was given
19 to those individuals.

20 And then in addition to that, because you've got
21 LAS, or rather because you've got police officers
22 performing first aid, they will have been trying to make
23 their own determination with far less training about
24 whether it is okay to move these individuals. They're
25 trying to perform CPR, they've asked for the LAS,

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1 they're not getting the LAS because of all the factors
2 I've just described.

3 In addition, you've got that that area is a hot
4 zone, once that area has been designated a hot zone.
5 Before the area was designated a hot zone, you've got
6 the LAS considering it as such before a formal
7 declaration has been given, so that has confounded the
8 issue, and then at a point when the police have decided
9 that they have waited long enough, they have performed
10 CPR, they really need to extricate these individuals,
11 they've made the decision to do so.

12 Q. We're also aware that there were some injured people in
13 buildings in the vicinity for whom it took some time to
14 get them out to a place of safety and aid. So, for
15 example, we've heard about an injured person, Helen
16 Kennett, who was in a pub just to the north of
17 Boro Bistro, called the Mudlark, who wasn't brought out
18 of there until just after 11.00 pm, and hadn't up to
19 that point been attended by paramedics. Should there be
20 any concern about that sort of thing happening?

21 A. Again, it's the circumstances that you've got to
22 understand: 140-odd calls up until the point that the
23 people were removed from Boro Bistro, hundreds of calls
24 over the course of the evening, all requesting LAS and
25 police, and what the TFC on the ground has had to do is

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1 wade through all that information, make sure we've got
2 all of the understanding about where everybody is, where
3 the reported sightings of the suspects have been, and
4 make sure that he sends teams of officers with the LAS
5 and LFB to all of those locations to make sure that we
6 have found every single possible victim, and to search
7 for victims that haven't necessarily been able to make
8 calls, because there could be victims that are bleeding
9 out that haven't been in a position to make any calls to
10 the police at all which is why every single building was
11 searched and searched thoroughly and at the same time as
12 they're doing that they're sending other teams out to
13 look for potential suspects.

14 So a huge undertaking for the TFCs on the ground
15 without the comfort of desks and chairs to make notes on
16 as effectively as perhaps we are able to in an office,
17 so a very difficult job, very effectively delivered, in
18 my opinion.

19 Q. We saw from the -- from those final log entries that
20 I was showing you that even by 1.00 am, it was only just
21 that LAS staff were being sent into the area where we
22 know the majority of fatal injuries were inflicted. In
23 fairness, casualties had been extricated long before
24 that. Should that be a matter of concern that it took
25 until that point in time before the HART paramedics

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1 could safely be sent into what was by that stage known
 2 to be the epicentre of the attack?
 3 A. I'm not surprised by that, sir. We have trained
 4 a number of times to deliver what we consider to be warm
 5 zone working and we train a variety of facilities in
 6 collaboration with the LAS and the LFB in what we call
 7 live play, where we will put bodies, you know, pretend
 8 bodies out in the street, and we'll give them lots of
 9 conflicting information to wade through and we'll ask
 10 them to consider where their limits of exploitation are,
 11 all of the things I've described in my evidence this
 12 morning they will practice as a tri-service response,
 13 and even in a training scenario, when you've got
 14 a relatively safe learning environment, it takes time to
 15 absorb the information, process it, organise your
 16 resources, pick the teams who are going to go out
 17 together, discuss with the LAS and the LFB where the
 18 limits of exploitation will be, then send the teams out
 19 and record who you have sent out and with whom, then
 20 those teams have to go out armed with a map and they
 21 know that they're going to this location because another
 22 team is going to a different location, and there's no
 23 point everyone going to the same locations.
 24 All of that takes a huge amount of coordination and
 25 time and effort, so I'm not surprised, in fact I think

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1 they have done an exceptional job to have done all the
 2 things they have done as quickly as that, you have seen
 3 some really good pieces of work, and although on paper
 4 that might sound like a long time, but in the context of
 5 what is effectively a war zone on the streets of London
 6 for a period of time, I think they've done exceptionally
 7 well.
 8 Q. Now, we know and we've heard time and again that in
 9 a war zone there are well known slogans of the vertical
 10 hour, or the golden hour, the platinum minute,
 11 emphasising the importance of very early medical
 12 treatment. We've also heard that police medics were
 13 able and prepared to enter the scene, and in some cases,
 14 gave care while other officers were in the vicinity
 15 standing guard. I think you're aware of that evidence?
 16 A. Yes.
 17 Q. We've also heard that their skills, the skills of the
 18 police medics and their equipment, have some
 19 limitations, so, for example, they can't perform
 20 a needle chest decompression, a procedure which is often
 21 needed to reduce pressure of blood on the heart and the
 22 like.
 23 A. That's correct, sir, yes.
 24 Q. Let me just ask you this question: is there a case for
 25 having a cohort of police officers, police medics, who

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1 are medically trained to a superior level, perhaps even
 2 to paramedic level, for this sort of situation and,
 3 indeed, situations of serious violent crime?
 4 A. This is a really difficult question without significant
 5 research. My understanding is that to be a paramedic
 6 takes a great deal of time and study, so three years,
 7 a degree, and lots of additional training on top of
 8 that, exposure to new techniques, continuation of
 9 training to maintain your skill level.

10 If we were to consider that for police officers,
 11 they would have to do that in addition to their police
 12 training and the most appropriate resources to do that
 13 would probably be the police officers that deal with the
 14 most violence, so that is your armed response vehicle
 15 officers, who already undertake training every 16 weeks.
 16 They will have to build that in to an already crammed
 17 training diary. I'm not sure how realistic it would be
 18 to take officers up to that level. It can be explored
 19 and we already add modules to what we call the ballistic
 20 emergency life support, the BELS course, which is what
 21 our ARV officers do. They are significantly better
 22 trained than basic police medics and can do things that
 23 basic police medics can't do.

24 In many cases they can do things in terms of sucking
 25 chest wounds that lots of other ELS-trained individuals

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1 cannot. To take that a step further will be explored
 2 and I think it's work that we probably need to do in
 3 collaboration with the LAS in terms of which modules of
 4 their training we need to consider adding to our own and
 5 whether that is both practical and sustainable.
 6 Q. We can all understand why LAS staff can't sensibly be
 7 asked to go into areas of extreme danger until some
 8 effort has been made to clear them and protect them with
 9 armed officers, but we also understand that unarmed
 10 policemen routinely go into areas of danger and provide
 11 medical treatment. Is it worth, based on the facts of
 12 a case like this, looking at the possibility of
 13 upskilling some unarmed police medics to provide that
 14 additional level of skill in those crucial early
 15 minutes?
 16 A. Strictly speaking those unarmed police officers
 17 shouldn't have been there either, so that's the first
 18 thing that we need to consider and understand. They
 19 were there because their individual appetite for risk in
 20 the prevailing circumstances was at the level it was:
 21 they were putting their lives at risk by being there,
 22 and I think we need to acknowledge that because we could
 23 train additional police resources but should we be
 24 putting them in that position of risk without
 25 appropriate firearms cover? Potentially no.

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1 It's always worth exploring what the opportunities
 2 are after a situation like this and seeing how we can
 3 improve the capability that we offer the public and so
 4 it will be something I will be involved in. To where
 5 that leads us after this inquiry, we'll have to see.
 6 THE CHIEF CORONER: Might there be some sense also in
 7 liaison with the army, soldiers. We all know that in
 8 fact there are on the battlefield now soldiers with
 9 quite good paramedic skills who have been able to assist
 10 colleagues who have been shot in combat and provided
 11 some really quite excellent first aid skills beyond
 12 those of a normal first aid practitioner?
 13 A. You're absolutely right, sir. One of the stages of
 14 Plato, if Plato becomes a protracted response and we
 15 still haven't neutralised the threat is the army medical
 16 corp would be part of the MACA, and so we would be using
 17 the Armed Medical Corp to do exactly what you would
 18 expect under these circumstances but of course, that
 19 again, takes time for them to muster and deploy to the
 20 scene by which time casualties with catastrophic
 21 injuries are likely to have succumbed to them.
 22 It is difficult for me now in the witness box to
 23 explain what we will do without further explanation and
 24 without further research about what the art of the
 25 possible is.

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1 MR HOUGH: But worth, perhaps, exploring?
 2 A. Worth exploring, sir, absolutely.
 3 MR HOUGH: Thank you very much. Those are all my questions.
 4 Questions by MR PATTERSON QC
 5 MR PATTERSON: Superintendent, I ask questions on behalf of
 6 the six families who lost their loved ones on the night
 7 and can I make it plain on their behalf that they
 8 recognise the efforts that were made by you and your
 9 colleagues, they recognise the challenges that you faced
 10 on the night, and would face the next time one of these
 11 attacks takes place.
 12 They are also mindful of the dangers of hindsight,
 13 but nevertheless they do have questions and they do have
 14 concerns about lessons that might be learned for the
 15 future to keep the public safe and to keep your police
 16 officers safe, to keep all first responders safe and to
 17 see if the procedures might be tightened. So it's in
 18 that spirit that I pose these questions.
 19 A. I understand that, sir, and I appreciate it and again,
 20 as I said to your colleague this morning, I offer my
 21 most sincere condolences to the families of the victims
 22 that we were not able to save.
 23 Q. That will be gratefully received.
 24 The Mumbai marauding terror attack in 2008 was
 25 a really significant event when considering your

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1 preparations for likely attacks of that sort in this
 2 country?
 3 A. That's correct.
 4 Q. The Paris attacks, with a number of different locations,
 5 including not just the Bataclan, but also bars and
 6 restaurants elsewhere in the city, another significant
 7 event; is that correct?
 8 A. Absolutely, and there was also Kunming in China in 2014,
 9 there was a knife attack at the railway station, Nice
 10 and Berlin market, in fact, a whole range of attacks
 11 that have honed and developed our thinking.
 12 Q. And learning from all of those has fed in over the years
 13 to your procedures?
 14 A. Correct.
 15 Q. And before we got to the night of this attack there had
 16 been planning, and you've told us about some of the
 17 documents that had been put in place. There had also
 18 been exercises involving the police working with other
 19 emergency responders such as the ambulance service. So
 20 that had all taken place before the night of this
 21 attack; is that correct?
 22 A. Correct, sir, yes.
 23 Q. When the attack occurred, there were no armed police
 24 officers patrolling that general area, were there?
 25 A. Well, I don't know where all of the ARVs would have been

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1 posted that night or how far away they were, but the
 2 response time suggests that they were relatively close.
 3 Q. Forgive me, there were no armed police officers on foot
 4 patrolling Borough Market --
 5 A. I see.
 6 Q. -- or on the bridge, or in the general area where the
 7 attack ultimately took place?
 8 A. So we don't tend to have any armed police officers
 9 patrolling on foot outside of buildings. The
 10 British Transport Police will deploy armed patrols on
 11 foot to the areas that they protect and they might go
 12 beyond the curtilage of the building. The armed
 13 officers that we post to Heathrow again will patrol on
 14 foot but in terms of general patrols around London, it's
 15 not something that we tend to do.
 16 Q. So we might see them inside one of our major railway
 17 stations?
 18 A. Correct.
 19 Q. BTP armed officers?
 20 A. Correct.
 21 Q. There were none sadly available on the night who were
 22 able to come quickly to the scene; is that correct?
 23 A. That's my understanding. I don't know where BTP deploy
 24 their assets, based on threat and risk and their
 25 understanding of risk for their facilities.

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1 Q. And of course we all recognise you can't patrol every
2 square inch of the city, but just going back to one of
3 your earlier answers, am I to understand the position
4 that there are not, as a matter of routine, armed
5 firearms officers patrolling different locations in the
6 city?
7 A. Yes, we do patrol locations in cars, and --
8 Q. Yes, on foot?
9 A. Not on foot, no.
10 THE CHIEF CORONER: And I think you added the caveat
11 "outside the curtilage of the buildings", so there will
12 be armed officers on patrol at certain buildings, but
13 they won't be on patrol on foot generally on the
14 streets?
15 A. That's correct, sir, yes. Let's just clarify that to
16 make sure there's no ambiguity: BTP in their stations on
17 foot; Ministry of Defence police, in and around the
18 buildings that the Ministry of Defence protect on foot,
19 and where we have AFOs, not ARV officers, so an AFO is
20 a slightly less well trained firearms officer, in and
21 around Parliamentary and Diplomatic Protection premises,
22 so the diplomatic footprint in London, on foot; Royalty
23 and Specialist Protection around Palaces and the
24 Palace of Westminster, again which the DPG protect on
25 foot. These are bespoke patrols on foot for a specific

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1 function, they are not --
2 Q. Linked to a particular location?
3 A. Linked to a particular location, and they may well
4 patrol on foot around the curtilage of that building,
5 but not generally in the streets of London.
6 Q. Since this attack has that principled distinction been
7 reconsidered, namely that as a general rule, we do not
8 have mobile authorised firearms officers on foot?
9 A. So you have to balance how you are going to most
10 effectively supply the best trained officers to deal
11 with whatever incident you've got that's developed
12 anywhere in London.
13 Q. Yes.
14 A. And the best trained firearms officers are ARV officers
15 and it takes a great deal of time to train ARV officers
16 so they need to be as mobile as possible, because if
17 they're on foot in one particular location and they're
18 required a significant distance away, they need to be
19 able to get there quickly. So we have increased our
20 armed capability in London of all role profiles, so
21 that's the basic AFO level --
22 Q. You spoke about -- "uplifting" I think was the word that
23 you used?
24 A. Correct.
25 Q. Have the numbers been uplifted since the London Bridge

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1 attack?
2 A. So the numbers have been in continual uplift since 2016,
3 and without identifying the exact number of ARV officers
4 that we have on patrol in London at any given time which
5 I don't think is advisable --
6 Q. Yes.
7 A. -- we have more than doubled -- more than doubled -- the
8 number of patrolling ARVs that we had on duty prior to
9 2016 to now, and that is still in uplift because we have
10 not yet achieved the goal.
11 Q. So it is intended to increase the resources even
12 further; is that the position?
13 A. Correct.
14 Q. All of this in the context, of course, of a highly
15 political decision, I appreciate, but in the context of,
16 so far, a refusal to increase the arming of police
17 officers more widely in this country?
18 A. Refusal from who?
19 Q. Well, to this day, broadly speaking, it is a principled
20 approach, as we understand it, that police officers
21 won't be armed?
22 A. Yes, so this is a decision for individual forces' chief
23 constables --
24 Q. Yes.
25 A. -- in collaboration with discussions with the

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1 Home Office, and the political structure.
2 To arm every officer in the country isn't
3 necessarily an advantage over the current situation.
4 Q. No one is suggesting, officer, arming every last police
5 officer in the country, but the Metropolitan Police and
6 its huge resources of officers, is there not a potential
7 for increasing, not to any widespread level, but
8 increasing the number of officers who are armed?
9 A. Absolutely, and that's what we're doing, and you have to
10 decide where best to place those resources and that
11 investment because, if I can draw a comparison with
12 other responders in other countries, the first
13 responders on scene, if they have basic AFO training,
14 they're not trained to enter a building and carry out
15 emergency search operations with carbines; they've been
16 only trained for four weeks and they might only have
17 a pistol.
18 So you have to think about is it more effective to
19 train everybody and risk the first responders being less
20 well trained, or is it better to train a smaller number
21 of people and have their training be significantly
22 greater with greater capability to carry out a range of
23 tactics that may ultimately lead to the rescue of people
24 in need and I think there's a balance to be struck
25 there.

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1 Q. Of course.
 2 A. And we think that is the effective balance which is why
 3 we have increased the number of ARV officers.
 4 Q. Of course if an officer does come upon an attack at the
 5 second or third minute of the attack, as happened, armed
 6 only with a baton, but showing great fortitude tries to
 7 bring it to an end, and despite heroic efforts fails,
 8 an attack that could have been ended after the second or
 9 third minute can then continue with further casualties,
 10 something in the region of a further 20 injured people,
 11 and an attack that ultimately continued for something
 12 like 9 or 10 minutes; do you see the point I'm making?
 13 A. I do see the point you're making, but there is a lot of
 14 what-ifs there and there are a number of additional
 15 what-ifs that follow that if I may. So in order to
 16 guarantee that the first possible officer that comes
 17 across an attacker is armed, you've got to arm
 18 everybody. There's no way of not doing that because you
 19 can't guarantee which police officer is going to come
 20 across an attack and where. So then you've got to train
 21 everybody, so then you can't train your more specialist
 22 assets to a higher degree because there's only so much
 23 firearms training infrastructure in the country, and
 24 there are only so many instructors. So that's the first
 25 thing.

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1 If that officer is to be armed and he is on foot
 2 patrol, he is highly likely to be patrolling just with
 3 an SLP as opposed to a carbine, and it's far more
 4 difficult to respond to three moving targets that are
 5 attacking you with knives with a single SLP that has
 6 an effective range of less than 18 metres or 18 feet.
 7 Then you've got an additional situation that if that
 8 attack is successful, you have then got an SLP that is
 9 in the hands of the terrorists, so you've got terrorists
 10 now in possession of a firearm, so you have to weigh up
 11 what is the most effective response. Is the most
 12 effective response to have much better trained ARV
 13 officers that are able to respond in cars and in
 14 numbers, in significant numbers, which is why we have
 15 three ARV officers in every car, or is it more
 16 appropriate to give weapons to every patrolling officer
 17 and give them the ability to defend themselves, and
 18 that's the balancing act that we constantly achieve in
 19 policing all the time through a process called the APSRA
 20 process, the armed policing strategic risk assessment
 21 which in incumbent on chief officers to do throughout
 22 the year to decide where best they balance the threat
 23 and risk that I've described.
 24 Q. But it doesn't have to be an all-or-nothing situation,
 25 does it, officer? Surely there could be steps taken to

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1 increase the number of armed officers across the city?
 2 A. And that's exactly what we have done.
 3 Q. Are you aware of police -- the Met federation, some
 4 surveys which suggest that quite a few officers feel
 5 that there should be increased armed officers in the
 6 city and, indeed, some of them even suggesting that they
 7 feel at threat when they're trying to carry out their
 8 duties as unarmed officers?
 9 A. Yes, I understand that, sir, I understand that that is
 10 the case. It's a very difficult topic, this.
 11 Q. I think it's being looked at by the NPCC and the
 12 Home Office; is that correct?
 13 A. I think it's in constant review and there's no easy
 14 answer.
 15 Q. No.
 16 A. But what I wouldn't want is the increase in a lower role
 17 profile of armed officer to detract from far better
 18 trained armed officers that are able to intervene in
 19 a variety of different scenarios.
 20 Q. And from what you say, superintendent, it may be, as is
 21 often the case, resources will play a part and how much
 22 the Home Office can get for the police?
 23 A. Absolutely, and I must emphasise that I don't
 24 make policy here.
 25 Q. Of course not.

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1 A. I deliver the policy of others. I'm expressing my
 2 individual opinion based on my understanding of the
 3 situation.
 4 So in order to arm significantly more armed officers
 5 than we are arming now you would need a great deal of
 6 investment in firearms training infrastructure, so
 7 ranges, training sites. By far in excess of what we
 8 currently have.
 9 Q. Now, turning to ARVs, which you have mentioned more than
 10 once, we know that on the night at a very early stage
 11 there were radio requests for ARV vehicles to go to the
 12 scene?
 13 A. Correct.
 14 Q. And you covered the timeline with Mr Hough. We know
 15 that the ARV which ultimately got to the scene, located
 16 and engaged with the terrorists and neutralised them was
 17 a City of London ARV; is that correct?
 18 A. Yes, that's correct.
 19 Q. We know that there was a slight delay in that vehicle,
 20 in it setting off, because it was in the middle of
 21 a road traffic stop that had to be concluded before it
 22 could begin to travel to the scene. I dare say you are
 23 aware of that?
 24 A. That's my understanding.
 25 Q. However, at the same time, the second City of London ARV

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1 received the call to go to the scene and we heard
 2 evidence that that was Trojan City 2 and that those
 3 officers arrived within a very short space of time, as
 4 I think you agreed with Mr Hough, at something like
 5 10.11.
 6 A. Yes, and when you consider the call came in at, what,
 7 10.07, it needs time to be routed to generate a CAD at
 8 10.08, then that CAD needs to be vocalised over the
 9 radio to officers, so that takes time, so yes,
 10 a tremendously quick response time.
 11 Q. Absolutely. By good fortune, it was up somewhere near
 12 Liverpool Street Station, it was able to speed south
 13 down Gracechurch Street and very quickly was on the
 14 bridge.
 15 So far as we can tell from studying the evidence,
 16 that was the first ARV in the general scene.
 17 A. Yes, sir.
 18 Q. Do you agree; is that correct?
 19 A. That's my understanding, yes, followed quickly by
 20 a number of Metropolitan Police ARVs.
 21 Q. Yet when the vehicle got to the bridge, the armed
 22 officers got out of the car and began to start triaging.
 23 This is despite the fact that over the Met firearms
 24 channel, TJ99, there were messages to the effect of
 25 "ARVs are to go to the scene to find out what is

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1 happening and to act appropriately".
 2 A. Yes, that's my understanding.
 3 Q. Should that have happened, or should that very valuable
 4 resource, two armed officers, highly trained ARV at the
 5 scene fortuitously quickly, should they not have done
 6 exactly what their colleagues did, namely try and locate
 7 and neutralise?
 8 A. I think it depends very much on what was transmitted
 9 over City Ops 1, whether or not the ARV was listening
 10 into Trojan 99 or the hailing group for the MPS, whether
 11 they heard all of that. There's a number of factors.
 12 Q. In fairness to the officer he confirmed that they were
 13 receiving TJ99 but that he missed messages to the effect
 14 of -- he didn't hear or pick up messages to the effect
 15 of: go to the scene, find out what is happening and act
 16 appropriately.
 17 A. It's entirely possible. So in a fast-moving highly
 18 stressful situation, officers can suffer from something
 19 called perceptual distortion, so their recollection of
 20 events can be distorted. They can also mishear, or
 21 things aren't received in a quick and chronological way,
 22 so it's entirely possible that they've missed messages.
 23 The way they've responded is not completely -- is
 24 not not in keeping with their training.
 25 Q. Let's go back to training. Is that what the training

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1 really would have suggested, because surely the training
 2 of such a significant armed officer would be, in this
 3 sort of scenario, to find out what's going on before you
 4 then unpack your first aid bags and begin to triage?
 5 A. So that would very much depend on the mindset of the
 6 officers as to what they are dealing with. If it is
 7 that early on in the situation, ie I have not declared
 8 Plato and it depends what they've heard over the radio,
 9 it could be that they -- the London City ARV are
 10 responding to what they think is a severe road traffic
 11 accident, and ARV officers, as I've already alluded to,
 12 come with BELS training so they have additional first
 13 aid training beyond that of a basic police officer. So
 14 if they haven't yet formed the mindset that this is a
 15 terrorist incident and they are responding to what they
 16 can see in front of them, they may not have made that
 17 connection, and then as radio transmissions have
 18 increased and we have greater understanding of what is
 19 going on, then the situation changes and they need to
 20 adapt to that.
 21 Q. Have you looked into this since the events of the night
 22 to consider whether training needs to revisit this topic
 23 to make sure that it doesn't happen the next time you
 24 might have one of these terrorist attacks?
 25 A. I think if you've got police officers responding to

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1 stabbing injuries and you've got suspects outstanding,
 2 then I would expect the police officers to -- and this
 3 might sound unsympathetic -- but to step over the
 4 injured in order to get to the people that are carrying
 5 out the attack to neutralise them. That is the most
 6 effective way of preventing further people being
 7 injured, so that's absolutely right.
 8 But that's when it's clear what you're dealing with.
 9 If you turn up to the scene of a road traffic accident
 10 and you haven't immediately made the connection that
 11 this is a terrorist attack, then that is less clear.
 12 Q. One of the officers we heard from was a Police Constable
 13 Stephen Attwood who was firearms trained, who was on
 14 duty but not armed, and when he entered the courtyard at
 15 the Boro Bistro, he told us -- and this was his evidence
 16 to the Coroner -- that through his training and his
 17 firearms training they are taught as firearms officers
 18 to locate the threat, contain the threat, and neutralise
 19 it, and he did step over, as it were, some of the
 20 casualties that he found on the ground, carried on round
 21 out of the courtyard beyond the Mudlark pub, checked
 22 that there were no suspects in the area and only then
 23 began to turn his mind to paramedic duties, he also
 24 being trained specifically over and above the basic
 25 first aid with stab wound and ballistic training.

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1 A. So that's absolutely right and proper, and it's highly
 2 probable that that officer is in full awareness of the
 3 prevailing circumstances, has heard all the radio
 4 messages and understands what it is that he is facing.
 5 Q. In fact, his evidence was that he hadn't and he had
 6 been --
 7 THE CHIEF CORONER: But he obviously was aware that there
 8 were stab injuries, Mr Patterson.
 9 MR PATTERSON: Yes, he hadn't heard radio messages.
 10 THE CHIEF CORONER: So that is a significant feature of --
 11 MR PATTERSON: A distinction.
 12 THE CHIEF CORONER: -- he may not have heard it, but he has
 13 seen it for himself as to what's there.
 14 MR PATTERSON: Yes.
 15 You understand the point the families have about
 16 this: that if there was a missed opportunity for an ARV,
 17 the first ARV at the scene, to find and neutralise the
 18 targets, that would be a matter of significance,
 19 wouldn't it?
 20 A. I understand the point that you are making,
 21 Mr Patterson. Our response time was unprecedentedly
 22 quick. Whether there was another opportunity earlier
 23 than the time at which we intervened, I wouldn't like to
 24 speculate. The officers responded to what they could
 25 see in front of them.

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1 Q. Now, Mr Hough asked you questions about those who were
 2 injured down and in and around the Boro Bistro
 3 courtyard. So that's not just that courtyard at the
 4 Boro Bistro but round in the area of the Mudlark public
 5 house, and quite a few people who were either killed or
 6 very seriously injured, particularly with serious neck
 7 stab wounds, were attacked in that general area.
 8 As you've agreed, I think, we have references in the
 9 CADs at quite an early stage, do we not, to that
 10 location, the Boro Bistro, and references also to the
 11 Mudlark?
 12 A. Yes, that's correct.
 13 Q. And as I think you recognise, that in a marauding
 14 terrorist attack, frequently there will be casualties
 15 with serious injuries, bleeding injuries, stab wound
 16 injuries for whom time really is of the essence if they
 17 are to survive?
 18 A. Yes, absolutely.
 19 Q. And we know that from an early stage London Ambulance
 20 Service resources were gathering on Borough High Street;
 21 that's right, isn't it?
 22 A. Yes, that's correct.
 23 Q. We also know that from about 10.15, members of the
 24 public were at risk down in the courtyard trying their
 25 best to give first aid?

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1 A. Yes.
 2 Q. We had members of the public who were in a nearby
 3 restaurant and having a meal with friends but rolled up
 4 their sleeves and did their best to try to give first
 5 aid. We had a bunch of off-duty GPs who were at a table
 6 inside the Boro Bistro restaurant themselves, one of
 7 whom, Dr Saira Khan in particular, despite the risks to
 8 herself, remained and assisted more than one of the
 9 casualties?
 10 A. Yes, sir, I think they all showed tremendous bravery and
 11 professionalism.
 12 Q. As did your own officers, probationers, some rather
 13 inexperienced young female officers, Police Constable
 14 Kerr, Police Constable Orr, PC Wallis, a large number of
 15 them who in the minutes that ticked by, 10.20, 10.25,
 16 10.30, 10.35, 10.40, 10.45 remained at risk as they
 17 tried everything they could with their limited
 18 experience of first aid and their limited equipment to
 19 do what they could. You're aware of that general
 20 chronology?
 21 A. Yes.
 22 Q. The senior LAS officer on the scene was their bronze
 23 medic, Mr Beasley; is that correct?
 24 A. That's my understanding, sir, yes.
 25 Q. At that early stage. And, as you said, he was there

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1 from about 10.20 to 10.27, some time around then, and he
 2 agreed that his responsibility did include extraction
 3 and he did agree, eventually, that his responsibility
 4 was logging the number and location of casualties?
 5 A. Yes.
 6 Q. So all of this will have been gone through with the LAS
 7 in previous exercises, no doubt: that in a marauding
 8 terrorist attack it is important to identify the
 9 location of the casualties?
 10 A. Yes, that's correct.
 11 Q. His evidence was that he was not an expert in Operation
 12 Plato. Should he have been? Should London Ambulance
 13 Service IROs, incident response officers, be familiar
 14 with these requirements?
 15 A. I don't think it's my place to speculate. The LAS have
 16 a number of people that are trained to work in warm
 17 zones. They have different tiers of paramedic trained
 18 to the different levels and I think with my very limited
 19 experience of their operations and how they deploy
 20 themselves, I'm not sure I'm the right person to pass
 21 comment.
 22 Q. Can you help us to this extent: from your experience in
 23 dealing with the guidance and amending the guidance and
 24 your involvement in exercises, working with other
 25 agencies like the LAS, would you agree that often the

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1 first LAS person at the scene will be somebody who is
 2 just perhaps an advanced paramedic or a more senior LAS
 3 official who needs to be able to deal with these
 4 situations if they arise?
 5 A. Yes, I would agree with that, sir. So the LAS, it's
 6 incumbent on the LAS, the LFB and the police to ensure
 7 they have sufficient people on duty at any given time
 8 with the capability to respond to a variety of different
 9 circumstances which include providing a response to
 10 Plato.
 11 Q. In your statement you say this at page 8:
 12 "All responding organisations at all grades were
 13 aware of what a marauding terrorist attack was and what
 14 it meant to be involved in a response to it."
 15 A. That's right.
 16 Q. Was that your understanding before the London Bridge
 17 attack?
 18 A. That's my understanding.
 19 Q. And for the procedures to work, would you agree with
 20 this: that the London Ambulance Service needs to be
 21 aware of the importance of liaising closely with the
 22 police as to this issue of locating casualties, finding
 23 out where they are?
 24 A. Yes, absolutely. I mean, that's fundamental to the way
 25 we operate in the forward command point with both LAS

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1 and LFB and police practitioners at senior level making
 2 those determinations and having that common
 3 understanding of where the threat and risk is, where the
 4 people are that need rescuing.
 5 I mean, it's important, I think, that we recognise
 6 that whilst this attack resulted in the tragic loss of
 7 life that it did, eight people lost their lives, we must
 8 also recognise that through the work that the fire
 9 brigade, the LAS and the police did, we saved the lives
 10 of 48 people, a significant number of which had severe
 11 injuries.
 12 Q. But you touched more than once on issues of visibility
 13 and what could be seen given the topography, I think was
 14 the word that you used, but none of this was new on
 15 3 June 2017, was it? Mumbai, Paris, all of these
 16 attacks have made it plain, haven't they, that often the
 17 casualties will be out of sight of the nearby first
 18 responders or the ambulances or those trying to get them
 19 help?
 20 A. You're absolutely right, so every place, every scenario
 21 and every incident will present its own challenges, and
 22 those challenges could include personnel challenges, not
 23 having enough people, it could include the layout of the
 24 landscape and the buildings and access, which is why the
 25 TFCs on the ground have made the right and sensible

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1 decision to search every single venue, which is a big
 2 decision, because that is a lot of damage they're
 3 causing to all of the places in Borough Market. They
 4 physically searched every place.
 5 Q. But in those early minutes which you've already agreed
 6 are crucial, the evidence of the senior LAS official at
 7 the scene, Mr Beasley, was that he was unaware, he was
 8 unaware that there were all these casualties in and
 9 around that courtyard described by Mr Hough as the
 10 epicentre of the attack.
 11 Now, we know that the LAS had been informed quite
 12 early on of this location from the CAD messages, and we
 13 were taken to some examples of them. From your analysis
 14 of what did and didn't happen on the night, can you
 15 explain why that is the case? Why their senior officer
 16 on the ground in those crucial early minutes was unaware
 17 of casualties being in and around the Boro Bistro?
 18 A. So I can't answer on behalf of the officer. All I can
 19 provide the court with is the fact that by the time
 20 those people were removed from Boro Bistro, there are
 21 143 different CADs that related to people needing help.
 22 So whilst we know now where the location was that
 23 the most people lost their lives, we won't have known
 24 that then. So the LAS and the police are trying to
 25 respond to all of those 143 cries for help not knowing

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1 where the most seriously injured are, and the number of
 2 CADs do relate both to the LAS and from the police to
 3 the LAS that relate to Boro Bistro and, indeed, lots of
 4 other places.
 5 But as to why the individual officers weren't aware,
 6 I cannot -- I cannot answer that.
 7 Q. He frankly admitted that he was not, as his own guidance
 8 required, he was not logging the number and location of
 9 casualties that required recovery. You would agree,
 10 wouldn't you, that at an early stage, the ambulance
 11 service does need to be proactively trying to find out
 12 where the casualties are?
 13 A. Yes, I agree, completely.
 14 Q. You took us earlier to one of those documents, the NPCC
 15 document that spoke about joint dynamic decision-making
 16 about identification and about evacuation; that's the
 17 wording that was there?
 18 A. Absolutely right, sir.
 19 Q. Making this very point before the London Bridge attack;
 20 do you agree?
 21 A. I do agree, completely.
 22 Q. You need somebody to take a grip and ask "Where are the
 23 casualties?" That's what you need; would you agree?
 24 A. I do agree with that. Again, you need to understand the
 25 prevailing circumstances. Whilst you are right, it's

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1 one thing to say that in a normal scenario where there's
2 relatively low risk, there's relatively little
3 confusion, but you need to take it in the context of
4 what we're dealing with. This is an unprecedented
5 attack on the streets of London. There is mass
6 confusion. Those LAS officers that you're asking to
7 perform their duties in the way that you have described
8 are fearful of their own lives.

9 Q. Of course.

10 A. Immediately next to them you've got a van that could
11 explode at any moment. You've got loads of calls from
12 the public asking for help across a significant area,
13 which is quite a complex area of intertwined streets and
14 alleyways and buildings.

15 So I'm not surprised that as a combined response
16 they found it very difficult to do everything that we
17 would ask of them.

18 Q. But you appreciate this, officer: there's a difference
19 between somebody applying their mind to locating
20 casualties and concluding that we don't yet know where
21 everyone is but we're searching, or we're making
22 inquiries on the one hand, and then on the other hand
23 somebody who is not applying their mind at all to
24 locating and identifying the locations?

25 A. Well, I don't know whether they weren't applying their

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1 mind at all, I mean, that is, again, a question for
2 them, but what I can tell you is that at 22.30 there's
3 another attempt to make sure we know absolutely where
4 all of the victims are. I think there's a radio
5 transmission here that Inspector Jackson has made. He's
6 trying to absolutely narrow down where all of the
7 victims are, so there are repeated attempts, you have
8 the CADS --

9 Q. That's a Metropolitan Police officer, is it?

10 A. Well yes, I can't answer for the LAS of course.

11 Q. I'll come later to the HART paramedics and the valuable
12 role that they can play, if they get there early, but
13 given that they didn't get there for something
14 approaching 3 hours, that brings us back to the
15 possibility of other highly trained paramedics getting
16 in at an early stage and we know that there were
17 tactical response unit paramedics who were there at
18 an early stage, before hot or warm zones had been
19 categorised or formally declared, but none of their
20 valuable skills were deployed either on the night;
21 you're aware of that? That they were present at the
22 scene quite early on but they weren't used in that
23 sense.

24 A. Well, it takes time to overlay a sense of control to
25 what is essentially chaos, so bringing order to chaos in

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1 an incident like this takes time and the TFC working
2 alongside the LAS commander and the LFB commander will
3 need time to gain situational awareness, make decisions
4 about where the threat and risk is, where the casualties
5 are. You can't instantly know everything as soon as you
6 turn up and deploy all of your resources across all
7 three disciplines instantly. That all takes time.

8 So during that time I know that people will have
9 lost their lives, but that is an inevitability of the
10 fact that it takes time to gain control.

11 Q. The LAS officer, Mr Beasley, it was suggested to him
12 that he should have arranged for paramedics to work with
13 the ARV officers to try locate and evacuate, and he said
14 that that wasn't his responsibility, but that it was the
15 responsibility for the incident command for Plato. Now,
16 just on that in terms of responsibility, you took us to
17 some documentation earlier in which you were at pains to
18 make it plain that although the police lead the joint
19 assessment of risk, it's very much a matter also for the
20 London Ambulance Service to consider risk and the issue
21 of deploying into an area and evacuating from an area;
22 would you agree?

23 A. So in a Plato, no one of the services responds in
24 isolation. It's a shared understanding of all the
25 threat risk, which is why it's called the joint decision

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1 model, the JDM which is part of the JESIP principles.

2 Q. Yes.

3 A. So the TFC, the LAS commander and the LFB work together
4 and they bring their priorities, their individual force
5 or service priorities to that discussion and they are
6 balanced off. So the TFC is bringing their
7 understanding about where the threat is represented
8 from, where the suspects are, where the IEDs are. The
9 LAS are bringing where their understanding of where the
10 casualties are and the LFB are bringing their
11 understanding of where the hazards are and their
12 understanding of how they can extricate injured people
13 and what kit and equipment they're going to need to do
14 that.

15 They all bring that to the party and at that meeting
16 a joint understanding of all of their needs will take
17 place and decisions will be made that affect all three
18 services. So no one service will act in isolation of
19 the others.

20 Q. But certain it is that the LAS and the LFB they have to
21 be proactive themselves in considering this issue
22 working alongside the police?

23 A. Absolutely. Everyone has value and brings value to the
24 meeting.

25 Q. In those early minutes when those individuals were in

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1 that courtyard, at that stage I don't think you had
 2 instructed Superintendent Smith or Superintendent Walker
 3 to have scene responsibility; is that correct?
 4 A. I will have to take your word for it based on the
 5 timings, if that's your understanding.
 6 Q. Can you help us with when it was that they had that
 7 scene responsibility, that on-the-ground responsibility.
 8 Do you have a time for that?
 9 A. Bear with me. (Pause).
 10 So I think they were in a position to either or --
 11 take an effective command on the ground at 23.12. Is
 12 that consistent with your understanding?
 13 Q. I wouldn't disagree with that. So in those early
 14 minutes it was you who had responsibility, is that
 15 right, from Lambeth for these things going on on the
 16 ground, or were you able to appoint somebody on the
 17 ground at an early stage?
 18 A. So I've got effective command of the entire response,
 19 that's true, but from a strategic perspective --
 20 Q. Yes.
 21 A. -- so I'm ultimately responsible for it all, however, we
 22 have to be realistic --
 23 Q. Absolutely, that's why I am asking was there somebody on
 24 the ground?
 25 A. Yes, I am not going to know absolutely everything,

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1 I can't be and nobody would expect me to be the oracle
 2 of all knowledge around this particular incident. As
 3 you've already heard, there are 500 CAD responses and
 4 I've got a 1,000 people deployed across a number of
 5 disciplines. I trust their Individual response and they
 6 all have managers who manage their response and very,
 7 very quickly I've got Mike Delta 1 who is the duty
 8 officer from Southwark, I've got the TFC from the City
 9 and I've got the TFC from the Met deployed and they are
 10 my operational commanders on the ground who have
 11 an exceptionally important role in doing the things that
 12 you would expect to be done at the scene, because in the
 13 control room what I lack is situational awareness and
 14 that is incumbent on the people on the ground to have.
 15 Q. Absolutely.
 16 A. So I can take a strategic overview and ensure that
 17 everyone is doing their jobs and that we have sufficient
 18 resources and everything is going in the direction that
 19 I would expect in accordance with the plans that we have
 20 practised to, but I must trust the people on the ground
 21 to do their jobs and I am confident that they delivered
 22 them effectively.
 23 Q. So help me, superintendent: how do we prevent this
 24 problem from recurring if there were to be an attack
 25 tomorrow? Why were those officers in that courtyard not

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1 made aware at an early stage that the ambulances were
 2 100 yards or so up above them on street level?
 3 A. That is a really good question. It's difficult for us
 4 to, at this point in time, understand exactly how we
 5 track all of the emergency service assets in one
 6 location, and you will have heard my answer to your
 7 colleague --
 8 Q. Yes.
 9 A. -- about the direction that the emergency services could
 10 take. I think it would be unwise with very limited
 11 research, sat here in the witness box, to make
 12 a decision that affects all three emergency services
 13 over the coming years, I think a tremendous amount of
 14 work would need to be taken in order to understand the
 15 complexities of how we make improvements that ultimately
 16 affect the lives of people in London.
 17 There's always, always learning that comes from
 18 these incidents.
 19 Q. But you would agree that it is highly desirable that
 20 your operation room is informed about the arrival of the
 21 ambulance service and the location of the ambulance
 22 service?
 23 A. Highly desirable, of course.
 24 Q. And it's highly desirable that you can get that
 25 information straightaway to the officers on the ground

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1 in what might be a rather wide-ranging geographical
 2 area, down below street level in a dark corner, worried
 3 that he would be overlooked, as one of the officers told
 4 the Coroner?
 5 A. Yes, exactly, highly desirable, and the complexities and
 6 the topography of Boro Bistro won't be in isolation
 7 across London, so there will be other scenarios where
 8 that could be repeated, and it's important that we gain
 9 a situational understanding very, very quickly, but
 10 let's not lose sight of the fact that this was
 11 an incredibly complex policing operation and so whilst
 12 on paper we can list a number of things that we would
 13 like to see happen, I'm sure that there will be other
 14 difficulties and other complexities if this horrendous
 15 act of terrorism were to be repeated on the streets of
 16 London and it would be incumbent on us to respond in the
 17 way that we have here and improve if that is at all
 18 possible.
 19 Q. One suggestion was that there should be a London
 20 Ambulance Service presence in your operation room from
 21 an early stage or, indeed, on an ongoing basis.
 22 What did happen was that quite early on, there was
 23 the three-way phone call, wasn't there, which as we
 24 understand it, took place as early as 10.26.
 25 A. Yes, that's correct.

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1 Q. The tri -service response phone line, so was you speaking
2 over the telephone with the ambulance service and with
3 the fire brigade, is that correct?
4 A. It 's not me speaking --
5 Q. Somebody in your operations room?
6 A. Correct. So I think I have somewhere between 19 and 25
7 people working in the special operations room for me
8 doing a number of tasks. One of those individuals will
9 be in direct communication with their equivalent in the
10 LAS control room and the LFB control room and they will
11 keep that phone line open for the entire duration of the
12 incident, and what they'll be doing is they will be
13 looking at a number of the CADs that you will be aware
14 of, and they'll be relayed information to ensure that
15 there is a joint understanding, and if I am making
16 decisions, those decisions will be passed to them and
17 passed over the phone line and vice versa.
18 Q. But despite that working according to plan, still there
19 was a breakdown in communication, still the police
20 officers on the ground didn't receive the information
21 that the ambulance service resources were available up
22 on street level?
23 A. I wouldn't say it was a breakdown in communication, sir.
24 I would say it is a consequence of the sheer volume.
25 I don't think I had ever been involved in an incident

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1 where a single incident generates 500 different CADs.
2 Q. So you can't rule out it recurring tomorrow if there
3 were to be another similar sort of incident?
4 A. There are always possibilities .
5 Q. But would you agree with this: that it is something that
6 ought to be looked into to see if improvements can be
7 made?
8 A. All three services should take considerable time to
9 carry out debriefs, operational, tactical and strategic
10 debriefs across all of their different functions to
11 ensure that any learning is captured and we will do that
12 in spite of growing procedures and add to it the
13 findings of this Inquest.
14 Q. And that would include this particular topic that
15 I'm asking you about?
16 A. Absolutely, it would include all topics. We are open
17 minded and will fully embrace feedback, internal and
18 external. It would be foolhardy not to.
19 Q. You state in your report that the fire brigade can play
20 a very great role in these sorts of situations dealing
21 with getting into dangerous areas and providing
22 assistance; is that correct?
23 A. That's correct.
24 Q. Can you help us with why that didn't happen on the night
25 in terms of assisting paramedics to get in there at

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1 an early stage?
2 A. I think it did happen, it depends what your
3 understanding of an early stage is because of course the
4 fire brigade response would be quite different from the
5 police and LAS response in that we would have been
6 called immediately to what looked at first glance to be
7 a road traffic accident. So you've got the LAS and the
8 police responding straight away. Whereas the fire
9 brigade won't be called upon until a declaration of
10 Plato and then obviously they're behind us in terms of
11 their response, because they wouldn't be required before
12 that so they -- there's no criticism in relation to
13 that.
14 Q. And then you've been asked by Mr Hough about the three
15 hours or so before the HART teams went in. Do you agree
16 with this: in light of all of the safety issues that
17 arose that led or fed into that delay, it sounds as
18 though it's highly likely that there will always be
19 significant delays of that sort before those specialist
20 paramedics will be able to get into the ground in this
21 sort of attack? So we had better recognise that there
22 are going to be significant delays?
23 A. So the three services that have responsibility for
24 delivering these functions in London have a number of
25 assets across London at any given time. It takes time

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1 for them to muster their specialists that response to
2 CBRN, that respond to firearms, Plato, that respond to
3 a variety of different scenarios. That takes times.
4 That is an inevitability of the reality that we work in.
5 Otherwise we would have to have a standing army on duty
6 all the time at great expense to the public purse when
7 these things happen very, very rarely .
8 So what is incumbent on all forces, on all services,
9 is to balance, effectively, the need to have this
10 capability in sufficient numbers either on call or on
11 stand-by or on duty, in order to provide an effective
12 response when and if this scenario happens. But to have
13 them on duty all of the time instantly able to deploy in
14 large numbers as I've said would require a standing
15 army, so there's a balance to be struck.
16 Q. If I suggested it was a matter of real surprise that
17 those specialist paramedics were at the scene at
18 something like 11.20 or 11.30 but they didn't go into
19 this epicentre until something in and around 1.00 in the
20 morning by which stage, as we understand it, there
21 wasn't a single casualty who was treated, what was done
22 was declarations of life extinct were made, you would
23 say that that's not a matter of surprise: that that's to
24 be expected in this sort of situation; is that right?
25 A. I think we must recognise that these things do take time

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1 and we will have to go back and look at the plans and
 2 the working assumptions that we've got and see if that
 3 can be improved upon, it needs to be practised, it needs
 4 to be fine-tuned, but there needs to be
 5 an understanding, of course, that this was all based on
 6 an understanding of where the hot zone is and where the
 7 warm zone is and this is all based on the fact that we
 8 have got lots of calls from the public about ongoing
 9 firearms attacks, so if we knew then everything what we
 10 know now, I'm sure the TFCs on the ground would have
 11 been in a position to deploy more teams and further into
 12 Borough Market, because it would have been much clearer,
 13 but of course it wasn't. We've got the advantage of two
 14 years and a great deal of investigation.

15 Q. The public are told to run, hide and tell. Is one of
 16 the lessons from what happened that night that if
 17 a member of the public is injured and is waiting in the
 18 hope that a paramedic will come to them, as some of them
 19 were in the Mudlark public house, for example, that
 20 there may come a time when they shouldn't wait in
 21 expectation that a paramedic should come, but they
 22 should proactively themselves try and flee the scene,
 23 something that happened with at least one person with
 24 a serious neck injury ultimately whose life was saved
 25 when she left?

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1 A. So we need to be careful before we give that kind of
 2 advice because we may be encouraging injured members of
 3 the public to flee from a relatively secure place in a
 4 building where there is some degree of protection
 5 afforded them by the fact that the owners of the
 6 building it, to then run out into the street to be
 7 confronted by a fifth, sixth, seventh or second wave of
 8 an attack.

9 I think what this shows is that there are no easy
 10 answers to a very dangerous and complex situation.

11 Q. The families I represent would particularly like to
 12 commend the efforts of certain very experienced police
 13 medics on the night, and I think you are familiar with
 14 a number of conspicuous demonstrations of proactive
 15 treatment by officers who went into that area, the
 16 courtyard?

17 A. That's right, sir. So many of the officers that
 18 responded that night went above and beyond what I would
 19 call a normal response.

20 Q. Would you agree that that's a particularly useful
 21 resource, those police medics?

22 A. Absolutely, yes.

23 Q. And his Lordship touched earlier about the possibilities
 24 of learning from military medics and learning that might
 25 be available from other areas of work in dangerous

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1 areas, very well trained medics can go in in difficult
 2 circumstances and make a real difference with their
 3 specialist paramedic treatment.

4 Is there any reason why that resource, those police
 5 medics, could not be considered for an increase in
 6 resources and numbers and, indeed, skills?

7 A. I think we can explore that, but I think we should
 8 explore it with the LAS and our partners across London
 9 to see where the best response sits and who is in the
 10 best position to deliver that response.

11 But it should definitely be explored, of course.

12 Q. A few final matters, if I may, please. Airwave radios.
 13 A number of witnesses gave evidence that they struggled
 14 to get through on their radios due to the volume of
 15 traffic on the night. One officer, Police Constable
 16 Balfour, spoke about being unable to get through because
 17 of the volume of his traffic and that he had to use
 18 an emergency button at one stage but it didn't work
 19 either, and spoke about white noise and problems of that
 20 sort.

21 Can you help us with that? Are there any lessons
 22 that can be learned in terms of improving the ability to
 23 use radios when there is a surge in traffic?

24 A. Yes, this is, again, something that I'm familiar with.
 25 The radio system that we have in operation across all of

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1 the services is limited by the fact that only one person
 2 can speak at any given time. Everyone can listen to
 3 that person, but of course only one person can transmit.
 4 That's where it's not quite a conference call facility :
 5 it's a single person speaking.

6 So that is the current technology, that is what we
 7 have to work with, and here we can see that when you
 8 have a huge incident with multiple responders, multiple
 9 responders all trying to talk and they've all got very
 10 important things to say, that it's very difficult for
 11 them to transmit.

12 Q. From where you sit presumably you would welcome anything
 13 that could be done to improve the efficacy of the
 14 radios?

15 A. Of course. So Airwaves as a system is on its way out
 16 and will be replaced by a new radio system in the
 17 future, and the technology is always improving and
 18 I think the people in charge of that project, the
 19 introduction of a new emergency service radio system,
 20 should of course be looking at this -- these proceedings
 21 and seeing what additional technology exists to help and
 22 remove exactly this problem, but that's the difference
 23 between being present at the scene and being able to
 24 talk to people and using a radio to transmit. It's
 25 never going to be as good.

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1 Q. A different matter, please: you mentioned at one stage
2 there was an intelligence source suggestion that a car
3 that may have been in convoy with the van used by the
4 attackers was being considered and it was tracked using
5 Automatic Number Plate Recognition up to Bedfordshire,
6 I think you said.

7 A. That's correct, yes, we stopped that vehicle.

8 Q. Can you help us: what became of that inquiry?

9 A. We stopped it and it had nothing to do with it, so the
10 fact that it was in convoy with the van that was
11 involved in the attack was pure coincidence but it was
12 an avenue that needed to be pursued in case that was
13 another vehicle that was ready to commit another attack
14 somewhere else in London, so we left no stone unturned
15 ensuring that we were prepared to deal with what came
16 next.

17 Q. The possibility of an IED in the van. We have heard
18 some evidence that at a very early stage some armed
19 response officers searched the van and concluded that
20 there was nothing suspected inside the van.

21 Can you help us with why it is that that concern
22 continued to arise as the evening progressed?

23 A. So we need to be clear on the definition of what
24 "cleared" means. So ARV officers will have cleared the
25 van. What they mean at that early stage is they've

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1 cleared it of suspects. They are not in a position to
2 determine whether it is safe from a perspective of IEDs.
3 So they have cleared it, ie there are no suspects there
4 and there are no suspects that could present a threat,
5 however, it's not cleared in terms of IED, and I realise
6 that's the same terminology, until an EOD officer has
7 been present and has determined that it is not an IED
8 and it is just full of patrol bombs.

9 But of course, being full of petrol bombs in itself
10 presents a risk because you have an electrical system in
11 the van that can ignite spilling petrol and if that goes
12 up, then all the petrol bombs go up and you've still got
13 an unintended IED.

14 Q. Finally this, superintendent: trying your best, what do
15 you think didn't go well on the night?

16 A. I'm mindful of the points that you have raised and of
17 course the service will be mindful, as will our
18 colleagues and partners.

19 Getting a grip of a huge amount of information and
20 making sense of it and making sure that we leave no one
21 out and that we don't leave members of the public
22 unaccounted for is of course a principal concern and
23 I will take that away, as will the service.

24 MR PATTERSON: Thank you very much for your help.

25 A. Thank you.

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1 Questions by MS BARTON QC

2 MS BARTON: I'm going to ask just one or two questions, if
3 I may, on behalf of the City of London Police. Could
4 you just help me with a few topics.

5 The first one is CADs. The City of London Police
6 share a CAD system with you, don't they?

7 A. That's correct.

8 Q. And in fact the procedure is an automatic one, as
9 I understand it, that when you receive a message that
10 relates to the City of London Police force area, and
11 that location is put into the CAD, the CAD is
12 transferred to the City of London for their
13 consideration?

14 A. That's correct.

15 Q. So it's an automatic process?

16 A. Yes.

17 Q. London Bridge is part of the City of London force area,
18 as you've already indicated, isn't it?

19 A. Yes.

20 Q. Sadly on this night, this incident took place over the
21 boundary of the two areas, London Bridge and
22 Borough Market.

23 A. That's right.

24 Q. Where you received CAD messages or 999 calls from
25 members of the public about events in Borough Market,

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1 they would not automatically go to the City of London
2 because that's your force area, the Metropolitan Police?

3 A. That's correct.

4 Q. So the situation that we got in terms of incoming
5 information for the City of London Police was that they
6 had a picture of what was happening on the bridge and
7 you had a picture of what was happening in
8 Borough Market and on the bridge?

9 A. That's absolutely right, which goes some way to explain
10 why the officers on the bridge may not have been aware.

11 Q. That's exactly what I was coming to, because the next
12 issue is although firearms officers are trained to, and
13 I use your terms, locate, contain and neutralise, they
14 have to know that there is something to locate, contain
15 and neutralise, don't they?

16 A. So just by way of correction, I know that is a phrase
17 that has been used, it's actually locate, confront and
18 neutralise in a Plato. It's locate, contain and
19 neutralise on a normal firearms deployment that's not
20 terrorist-related but yes, you're absolutely right.

21 Q. Whichever of those two phrases we use, the officers are
22 entirely dependent upon the information they have
23 available to them?

24 A. Of course.

25 Q. And as you very fairly said, quite often it's difficult

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1 to assimilate a lot of information at one time?
 2 A. Absolutely.
 3 Q. What we heard from the officers who were in that first
 4 ARV to arrive on the bridge, PC Duggan, was that when he
 5 heard "London Bridge", in fact it was on a BTP radio
 6 which he had had on in the ARV, he immediately turned to
 7 the City Ops 1 channel. That is the main channel for
 8 the City of London Police, isn't it?
 9 A. That's correct.
 10 Q. And is that something that you would have expected him
 11 to do?
 12 A. Yes, ma'am.
 13 Q. Yes. And you would expect him to do that because that's
 14 where he would get the best information about what's
 15 happening on London Bridge?
 16 A. Absolutely.
 17 Q. And what we've heard from him, and we can see from the
 18 Airwave transmissions for City Ops 1, is that there is
 19 nothing about a stabbing in Borough Market. Now, that
 20 wouldn't surprise you either, would it --
 21 A. No, that would not surprise me.
 22 Q. -- because of the way the CAD system works?
 23 A. Exactly.
 24 Q. It was put by Mr Patterson that the ARV arriving on the
 25 bridge at 22.11, if they had carried on over the bridge,

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1 there might have been an opportunity to save lives. In
 2 fact, we know now that sadly the last person to suffer
 3 fatal injuries on that night had already suffered the
 4 fatal injuries before the ARV arrived on the bridge. We
 5 know that that was at 22.10. So any opportunities after
 6 that stage wouldn't have been to save lives, would they?
 7 A. Well, you're correct, but of course we wouldn't know
 8 that.
 9 Q. No.
 10 A. So the people that had what I would describe as
 11 catastrophic injuries, are likely to have succumbed to
 12 their injuries before we were able to put into effect
 13 our myriad of response processes, but they wouldn't have
 14 done any good for the people that in this incident sadly
 15 lost their lives, no, that's right.
 16 Q. And can I just ask you about this issue as well, please:
 17 the increase in numbers of ARVs and the way that armed
 18 officers are used in London, it's right to say, isn't
 19 it, that there is a constant review across the police
 20 forces both in London and nationally, of how armed
 21 resources or assets can be best used?
 22 A. Absolutely, so the APSRA process that I alluded to takes
 23 place every year, and during the course of that year
 24 whoever from the National Police Chiefs' Council has
 25 responsibility for armed policing in each force in

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1 collaboration with the chair of the NPCC from armed
 2 policing which is Simon Chesterman, will have a review
 3 of their armed capability and making sure it is
 4 commensurate with the intelligence and the planning
 5 assumptions in relation to the threat that we face, both
 6 from armed criminality and terrorism.
 7 Q. And the pattern, certainly in London, whether it be the
 8 MPS or BTP in London or the City of London Police has
 9 been for a strategic uplift over a number of years which
 10 is continuing?
 11 A. Absolutely right.
 12 Q. And just lastly, once the Operation Plato is declared,
 13 the City of London ARVs become a Metropolitan Police
 14 resource under Plato to be commanded by you; is that
 15 right?
 16 A. That's absolutely right, so one of the important
 17 elements of Plato is that the Metropolitan Police who
 18 are in possession of all the information and
 19 intelligence as you have correctly identified, will take
 20 command of all armed assets, even if they are not their
 21 force's, that is the memorandum of understanding that
 22 I drafted back in 2015/2016.
 23 Q. And perhaps that's the clearest example that we could
 24 have of the extent to which the forces work together
 25 very closely, whoever the assets are owned by, they are

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1 commanded by one organisation for the purpose of Plato?
 2 A. Yes, that's absolutely right and from a chief
 3 constable's perspective that's a big ask. You're giving
 4 up your assets to another force and allowing them to
 5 take command.
 6 But what all the forces in London recognise is that
 7 it's absolutely important that a single person or
 8 a single command chain, rather, is responsible for
 9 making all of the decisions and taking the response
 10 forward, otherwise you create either a command vacuum or
 11 you create people pulling in all sorts of different
 12 directions, so I think everyone has rather sensibly
 13 agreed that that will be the response, and so that's why
 14 you've got a BTP officer, an inspector, a TFC, working
 15 to Met Police command structures.
 16 Q. And what we see as a result of this is that the way that
 17 all of the responders worked together on that night
 18 meant even though this was an exceptionally fast-moving
 19 event, it was dealt with in terms of the neutralisation
 20 of the threat very quickly?
 21 A. Exceptionally quickly.
 22 Q. And one of the disadvantages of dealing with something
 23 that is so fast moving and is dealt with so quickly is
 24 that in those very early stages, the availability of
 25 information and the assimilation of information is

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1 extremely difficult in that short time frame?
 2 A. Extremely difficult .
 3 MS BARTON: Thank you.
 4 Questions by MR HORWELL QC
 5 MR HORWELL: Mr McKibbin, just a few questions. You have,
 6 obviously from your evidence, enormous experience and
 7 expertise in firearms and police operations involving
 8 firearms and the evidence of which I'm sure you are well
 9 aware in terms of the timetable is that the van first
 10 mounted the pavement just before 10.07 that night. At
 11 10.07 there was the first 999 call. The first CAD was
 12 completed at 10.09. Timings are not always perfect, but
 13 the time that has been put forward as the first police
 14 vehicle to arrive, an armed City Police vehicle, 10.11.
 15 There was then an unarmed MPS vehicle at 10.12,
 16 a City of London van, unarmed, at 10.13. An MPS ARV at
 17 10.14 to the crash site, and then I will put times with
 18 minutes and seconds because we know these from CCTV
 19 images.
 20 The City of London ARV that arrived in Stoney Street
 21 and the three armed officers who shot the terrorists
 22 arrived in Stoney Street at 10.16.42, and then at
 23 10.17.05 two MPS ARVs arrived in Stoney Street. Now,
 24 those are the first 10 crucial minutes of these events
 25 and the police -- and by police I mean the police in

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1 general -- response to them. How effective, how quick
 2 was that from your experience as an armed police
 3 officer?
 4 A. So when you consider that we have to respond across the
 5 whole of Greater London from one side of the
 6 Metropolitan Police area to the other, I would say that
 7 that response is exceptional and is remarkable and
 8 a testament to the quick-thinking of all of the officers
 9 that were involved in that deployment, including the
 10 officers themselves that chose to deploy and went as
 11 quickly as they could, armed and unarmed, they all got
 12 there incredibly quickly.
 13 Q. Now, it's been suggested, wouldn't it be better to
 14 protect the public to have armed officers on foot in
 15 London. Now, I think we can all have in our minds the
 16 number of popular places in London which terrorists
 17 might attack. What is your response to that?
 18 A. As I've said before in an earlier answer, I think we
 19 need to be realistic. We have thousands of police
 20 officers on patrol at any given time across London and
 21 we are patrolling a tiny percentage of the available
 22 locations that we could possibly patrol, and the only
 23 way to ensure that every officer that comes across
 24 something has the capability to respond with a firearm
 25 is to train all of them which is, for the reasons that

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1 I've already explained, not necessarily desirable.
 2 Even if you were to have that eventuality there
 3 would be a huge number of locations where there are no
 4 patrolling officers on foot and there are no ARVs
 5 nearby, and so you will have to wait for a response from
 6 armed officers and that response will come from ARVs
 7 that are mobile in fast response vehicles.
 8 So it's for that reason I think the most appropriate
 9 balance of threat and risk and the mitigation of that
 10 threat and risk is to have the best possible trained
 11 resources that are trained up to ARV standard to respond
 12 in numbers capable of neutralising the threat with
 13 accurate carbines, taking into account the fact that
 14 they won't want to increase the risk by inaccurate
 15 placement of shots which is more effectively achieved
 16 with a carbine than a pistol.
 17 Q. In terms of the planning and preparation for such
 18 horrific events as these, you have referred to the
 19 police armed uplift programme that began in 2016.
 20 A. That's correct, sir.
 21 Q. And although you have said that it's plainly a sensitive
 22 matter as to how many armed police vehicles there are
 23 operating in London, you said in your statement that
 24 post the 2016 uplift and before this attack, the
 25 Metropolitan Police increased the number of ARVs on duty

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1 during a shift by more than double?
 2 A. That's correct.
 3 Q. And the training and preparation that has gone into
 4 a Plato operation in the months and years before this
 5 attack, can you just describe that briefly, please?
 6 A. So there's a huge amount of training that's gone into
 7 preparing armed officers, the relevant members of staff
 8 from the LAS and LFB in delivering this and it's been in
 9 development since 2008, following Mumbai, and then
 10 developed further following the other attacks that
 11 I have alluded to that have happened internationally.
 12 Learning has been introduced and in addition to the
 13 training that the ARV officers already go through, and
 14 that's a 10-week course, so every ARV officer has been
 15 trained for 10 weeks now, we've added another week to
 16 every ARV course that we deliver that is purely and
 17 simply around response to marauding terrorist attacks.
 18 So it used to be a 9-week course, now it's a 10-week
 19 course because of that additional week of terrorist
 20 training.
 21 In addition to that, every ARV officer has to have
 22 a number of required contact hours with a firearms
 23 instructor throughout the year and is required to
 24 reclassify. But over and above what we are required to
 25 deliver, which is described by the College of Policing,

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1 we add additional content and additional training
 2 elements so that ARV officers can work with colleagues
 3 from the LAS and the LFB on developing and understanding
 4 this warm zone working, response to a Plato, and in
 5 addition to that we have table-top exercises where
 6 commanders can experience in sort of real time the
 7 decision-making that will be incumbent on them.

8 So TFCs, SFCs will work with their equivalents from
 9 the LAS and LFB around the table, an evolving complex
 10 terrorist scenario will be played out in real time and
 11 the officers will be put under the spotlight in terms of
 12 their decision-making, and we will test our
 13 understanding of where our protocols are fit for purpose
 14 and where they need polishing.

15 Then on other occasions we join those two together
 16 so they will have life play where officers from ARVs
 17 will be dealing with a scenario out on the estate where
 18 we have training facilities and in the classroom we'll
 19 have the officers actually commanding it. So their
 20 decisions affect things on the ground.

21 So a huge amount of work has been undertaken over
 22 the last several years which has really intensified
 23 since 2015 when we saw the escalation in attacks
 24 internationally and continues to this day.

25 Q. A chronology is being prepared for the Coroner, of which

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1 you have a draft. It's entitled "Timeline for casualty
 2 evacuation and initial scene management".

3 A. I have it here, thank you.

4 Q. It's yet to be finalised but on the basis that
 5 everything in it is accurate, Mr McKibbin, how effective
 6 was the execution of Operation Plato that night in your
 7 opinion?

8 A. I would say that it was very effective. Very, very
 9 effective.

10 Q. And you come to that conclusion, if you can just
 11 summarise for the Coroner, please?

12 A. So when you're looking at the amount of information that
 13 the officers have had to assimilate and understand and
 14 the timings involved, the things that I've seen that
 15 they've achieved in the times that they've achieved them
 16 are extraordinary.

17 So you've got the officers arriving and
 18 understanding all of the different CADs that have
 19 proceeded their arrival. You've got individual officers
 20 acting on their own recognisance(?) to either help the
 21 public or extricate the public, lots of people acting
 22 independently, and then within 30 minutes you've got the
 23 commanders on the scene having already assimilated some
 24 information and starting to make decisions about where
 25 the hot and warm zones are, and I think that's

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1 remarkable based on the sea of information and the
 2 confusion that must have been present at the time.

3 Q. With the benefit of hindsight, it might be said that
 4 this was a relatively straightforward police operation:
 5 three terrorists only and they were neutralised, shot,
 6 at 10.16 and at some subsequent stages thereafter, when
 7 it was thought they might be detonating their IEDs.

8 So, with the benefit of hindsight, a relatively
 9 straightforward and quick police operation, but in your
 10 statement, part of which you have repeated in evidence
 11 today, you have said:

12 "This was an extremely complex policing operation.
 13 It is therefore very difficult (in fact impossible in
 14 a report such as this) to properly summarise everything
 15 that happened that night and all decisions that were
 16 made. It was without doubt the most challenging single
 17 shift I have ever experienced in 24 years of operational
 18 policing."

19 Why the two extremes, Mr McKibbin?

20 A. I think it's an example of the amount of confusing
 21 information that came in following our ability to
 22 neutralise the suspects. Even though we know now what
 23 had happened, at the time it was increasingly confusing,
 24 and becoming more confusing because the public were
 25 panicking. They were fearful of a prolonged and

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1 sustained attack and they could hear gunfire and they
 2 could hear what they thought was sustained gunfire,
 3 which I now believe to be the distraction devices that
 4 we were using to clear the premises as we were searching
 5 for further suspects and further victims that might be
 6 in need of our help.

7 All of that noise made the public fearful of
 8 a sustained attack and, of course, they were calling the
 9 police, telling us that they were under sustained
 10 gunfire, and we were responding to all of these calls.

11 So it became extremely complex and we thought we
 12 were under a sustained, as I've said, Mumbai-style
 13 attack, whereas in reality we'd neutralised the threat
 14 very, very quickly, and if we knew that the threat was
 15 neutralised very, very quickly and there were no other
 16 suspects outstanding because, of course, you will recall
 17 there were reports of six, five, and then this fourth
 18 suspect with the red jacket, if we knew now -- if we
 19 knew that then, then the response may have looked
 20 different. But, of course, we have to deal with what we
 21 are receiving at the time and so that made it then
 22 an incredibly challenging policing operation and
 23 an incredibly challenging ask for all of those involved
 24 to cut through the chaff, as it were, and get to the
 25 reality of the situation we were facing, but eventually

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1 we managed to do that but of course it prolonged it
 2 considerably and made it much more difficult.
 3 Q. I'm sure it's obvious, Mr McKibbin, but sometimes
 4 statements of the obvious have to be made: you are not,
 5 of course, criticising members of the public who made
 6 those 999 calls, they were all genuine?
 7 A. Of course, of course, and as I said earlier on, I don't
 8 criticise the public for responding as they do, we rely
 9 on the public to tell us the information they can see
 10 and hear, and if they hesitate or they choose not to,
 11 then vital information might not be passed, but as
 12 a reality of that, and different people's perspectives
 13 and different people's understanding of what they can
 14 see and hear, we get all of it, and it's then our job to
 15 try and cut through all of that and try and find the
 16 crucial bits of information which in a volume of calls
 17 of 500 CADs it makes it incredibly difficult.
 18 MR HORWELL: Thank you.
 19 A. Thank you.
 20 MR HOUGH: Those are all the questions we have for you.
 21 Thank you very much for giving evidence and for your
 22 efforts on the night.
 23 A. Thank you.
 24 THE CHIEF CORONER: Just before I go, can I simply just
 25 thank you very much for the clarity of the answers

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1 you've given during the course of today. You have been
 2 quite rightly asked a number of searching questions
 3 about whether there are lessons to be learned and your
 4 openness and the response to say: actually, well we
 5 always look at these things to see what can be learned.
 6 Thank you very much indeed for that clarity of thought,
 7 and as I say, the openness with which you have said if
 8 there are things to be learned, we need to address them.
 9 Thank you.
 10 A. Thank you, sir.
 11 MR HOUGH: Sir, the next witness is witness for whom special
 12 measures apply. She is a relatively brief witness, but
 13 I suggest we have our afternoon break before she is
 14 called.
 15 THE CHIEF CORONER: Yes, what we will do, Mr Hough, is
 16 perhaps try and keep the break as short as we can. What
 17 I am going to say is it's 3.50 now, let's sit again at
 18 4 o'clock.
 19 (3.50 pm)
 20 (A short break)
 21 (4.05 pm)
 22 MR HOUGH: Sir, the next witness is V134. In your order
 23 dated 19 November 2018 you ordered that the name of the
 24 witness be withheld from disclosure; no question may be
 25 asked which might lead to her identification; she give

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1 evidence screened from the public, and you also made
 2 an order under section 11 of the Contempt of Court Act
 3 1981 precluding publication of her name or any
 4 identifying information about her.
 5 THE CHIEF CORONER: Thank you.
 6 V134 (sworn)
 7 THE CHIEF CORONER: Thank you. Please do take a seat
 8 because the microphone is directed -- that's it. My
 9 apologies if we have kept you waiting.
 10 Questions by MR HOUGH QC
 11 MR HOUGH: Officer, you appreciate that you are being known
 12 in these proceedings as V134?
 13 A. That's correct.
 14 Q. You also understand that I'm asking you questions first
 15 on behalf of the Coroner and you may then be asked some
 16 more questions by other lawyers.
 17 What's your current role?
 18 A. I'm Tactical Firearms Commander in the
 19 Metropolitan Police.
 20 Q. If you can try to keep your voice up and into the
 21 microphone, because somebody has to interpret what you
 22 say into French.
 23 On the night of 3 June 2017, what was your duty
 24 role?
 25 A. On 3 June I was the Tactical Firearms Commander

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1 pan-London for the Metropolitan Police.
 2 Q. Based, I think, in the command and control centre at
 3 Lambeth where Mr McKibbin was?
 4 A. That's correct.
 5 Q. You made a witness statement about these matters on
 6 7 June 2017 which you may refer to as you wish.
 7 A. Thank you.
 8 Q. When did you first join the Specialist Firearms Command?
 9 A. I joined the Specialist Firearms Command 19 at the end
 10 of May 2016.
 11 Q. Did you receive training as a Tactical Firearms
 12 Commander?
 13 A. Yes, I received a week's training in relation to
 14 being Tactical Firearms Commander and I've also been
 15 further trained a couple of years later in TFC 2, which
 16 is the cadre office, which is for the preplanned
 17 operations.
 18 Q. And as part of that training have you been trained and
 19 exercised in -- if you can try to keep your voice up,
 20 once again, we have an interpreter who may occasionally
 21 look worried if she can't hear.
 22 In your training as a Tactical Firearms Commander
 23 have you trained and exercised for dealing with a range
 24 of incidents, including marauding terrorist attacks?
 25 A. Yes, I have. I've also done tri-service training with

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1 the London Ambulance Service and the London Fire Brigade
 2 Service in regards to Op Plato exercises .
 3 Q. Is this right: at the time of the attack there would
 4 typically be on duty in the special operations room
 5 a tactical firearms commander in what was described as
 6 the ARV pod to direct armed response vehicle officers ?
 7 A. That's correct.
 8 Q. Would there also be on duty a mobile tactical firearms
 9 commander who could become the ground commander if any
 10 incident required?
 11 A. Generally, yes. Otherwise we will use Trojan 1, which
 12 is obviously a mobile TFC, as well.
 13 Q. In a sentence or two, what was your responsibility as
 14 the Tactical Firearms Commander in the pod that night?
 15 A. With regards to being a Tactical Firearms Commander in
 16 the pod I'm responsible for pan-London incidents that
 17 come in. I have to assess them to see whether they want
 18 a firearms response. If I declare them then I will
 19 command them. If it's not declared then the borough
 20 will send unarmed officers to attend and deal with the
 21 incidents. I'm also responsible for special schemes for
 22 the out of hours office and also any ANPR markers or
 23 fast time operations that need to be dealt with.
 24 Q. On the night of 3 June 2017, when did you come on duty
 25 in the ARV pod?

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1 A. I took a handover at 18.30 hours.
 2 Q. I think that night you had a tactical advisor and
 3 a constable to assist you?
 4 A. That's correct.
 5 Q. Was there anything remarkable on the handover or in the
 6 early part of that evening?
 7 A. Nothing. The handover, there was nothing that went on
 8 prior to my arrival or handover. That evening we had
 9 a few operations that warranted firearms response with
 10 regards to policing, so visible policing as a deterrent,
 11 such as an O2 arena concert that was happening there,
 12 and that was all from the Manchester bombings. They
 13 assigned directed patrols to those areas.
 14 Q. I think you also declared one incident a firearms
 15 incident before the London Bridge attack?
 16 A. That's correct.
 17 Q. Shortly after 10.00 pm were you informed by Mr McKibbin
 18 of a CAD which required particular attention?
 19 A. Yes. Superintendent McKibbin came over to the pod area,
 20 which is where I sit with my officers, and asked me to
 21 review a CAD that came in, I believe it was CAD 8110 --
 22 sorry, 8810. I looked at it and I agreed with him that
 23 it was a potential Op Plato.
 24 Q. That CAD referred to a van driven along London Bridge
 25 crashing into around seven people; do you recall that?

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1 A. That's correct.
 2 Q. You concurred with Mr McKibbin that it was a potential
 3 Plato incident, did you?
 4 A. Yes.
 5 Q. Were you aware of him subsequently making the
 6 declaration that this was an Operation Plato matter?
 7 A. We both declared it as such. Obviously we've got
 8 different responsibilities .
 9 Q. How does that declaration work? Does he make the
 10 declaration supported by you, or are there separate
 11 declarations?
 12 A. Either one of us can declare it within our roles.
 13 Q. Following the Operation Plato declaration, what was it
 14 your immediate responsibility to do?
 15 A. My responsibility is to mitigate the threat, basically
 16 mitigate the risk and neutralise the threat.
 17 Q. Did you therefore take some steps immediately to deploy
 18 armed resources to the scene?
 19 A. Yes, I assigned armed officers straight to the scene to
 20 save life with Op Plato being declared, which means that
 21 it puts certain things in place and the mindset of the
 22 officers attending.
 23 Q. Did that involve you initially informing the tactical
 24 advisor and deploying ARVs to the scene?
 25 A. Yes.

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1 Q. But also keeping some armed response vehicles back in
 2 case of a multi-seated attack with events elsewhere?
 3 A. That's correct.
 4 Q. I think you also informed the strategic firearms
 5 commander at an early stage?
 6 A. That's correct.
 7 Q. Although at that stage, at that very early stage, you
 8 were initially told of the incident involving a van
 9 striking people, how confident were you that this was
 10 likely to be a terrorist attack?
 11 A. It was gut feeling. Obviously I hadn't dealt with
 12 a terrorist attack before, but something felt wrong
 13 about it. That's why we declared it.
 14 Q. Did you also declare the incident a firearms incident?
 15 A. Yes.
 16 Q. It may be obvious to you, but what's the meaning and
 17 effect of that declaration?
 18 A. With regards to a firearms incident, the definition of
 19 it is an officer -- sorry, bear with me two seconds,
 20 sorry. I have reason to suppose that officers may have
 21 to protect themselves or others from a person that has
 22 immediate access to or is in possession of a firearm,
 23 other potential weapon, lethal weapon, is otherwise
 24 dangerous, or as an operational contingency, or the
 25 destruction of animals.

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1 Q. So that declaration has the effect, does it, of
 2 justifying the deployment of armed officers --
 3 A. Yes.
 4 Q. -- and the use of weapons at the scene?
 5 A. Yes.
 6 Q. Radio communications in the early stage, please. Were
 7 you initially aware which channel was being used for the
 8 main communications about this incident?
 9 A. No, I wasn't.
 10 Q. Did that mean that you couldn't make declarations
 11 readily on a single channel?
 12 A. That's correct.
 13 Q. But were you confident, however, as you sat there and
 14 heard the communications going in and coming out that
 15 the Operation Plato declaration was being widely
 16 communicated?
 17 A. Yes. The -- Superintendent McKibbin would have done the
 18 pan-London, and I note on my way he said on the radio
 19 there and I made my officers aware.
 20 Q. Did you, however, shortly become aware that the City Ops
 21 1 channel was being used for communications?
 22 A. I was aware of that and I don't know if I found it or
 23 one of my colleagues found it for me.
 24 Q. We've heard that on that evening the radio traffic was
 25 generally very busy, lots of people trying to get

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1 through with calls for urgent assistance?
 2 A. That's correct.
 3 Q. Were you aware of officers calling both from the
 4 London Bridge area and further to the south in
 5 Borough Market?
 6 A. I was aware there was a lot of radio traffic and I was
 7 trying to monitor everything whilst trying to direct my
 8 resources.
 9 Q. In practical terms what were you doing to direct your
 10 resources? How would you communicate with them to get
 11 them into the right places at the right time?
 12 A. I directed them to Borough Market, directly to
 13 Borough Market. They obviously knew it was a Plato,
 14 Op Plato, so they knew the directions because we're
 15 trained to deal with Operation Platos. And also make
 16 a couple of phone calls to other departments to support
 17 us.
 18 Q. What arrangements did you make to have a Tactical
 19 Firearms Commander at the scene?
 20 A. I made contact -- or my tactical advisor made contact
 21 with Trojan 1 and we decided they were going to go
 22 ground assigned.
 23 Q. Was that Inspector Stumpo --
 24 A. Yes.
 25 Q. -- who went to the scene, as we have heard? How quickly

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1 were you able to contact that officer and send him to
 2 the scene?
 3 A. Straightaway.
 4 Q. Now, we know that the three attackers were shot at
 5 22.16. How quickly were you informed of the shooting
 6 taking place?
 7 A. A short while afterwards.
 8 Q. Were you initially aware that these were attackers --
 9 A. No.
 10 Q. -- who had been shot? Did you, however, become aware
 11 fairly quickly that they had been?
 12 A. Yes.
 13 Q. And also of their suspected IED vests?
 14 A. Yes.
 15 Q. Were you informed that they were in the Borough Market
 16 area?
 17 A. I didn't know exactly where they were.
 18 Q. What steps did you take immediately to have the IEDs
 19 dealt with?
 20 A. I arranged for Expo to go direct to them and liaise with
 21 them.
 22 Q. Expo is explosives officers, is it?
 23 A. Yes, sorry.
 24 Q. Can we look, please, at {DC6525/7}. Now, if you look at
 25 the bottom of this CAD, you will see an entry at

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1 22.24.30, referring to "Expo advised" at 22.24, as we
 2 see. Was that the time at which you made the
 3 communication calling for explosives officers?
 4 A. I can't confirm that because there were so many
 5 different CADs.
 6 Q. We can take that off the screen now.
 7 We've heard of a rendez-vous point being established
 8 at an early stage; were you involved in selecting
 9 an initial rendez-vous point?
 10 A. I believe so, because I needed to get other units
 11 running, such as our tactical support group who were
 12 arming up as AFOs.
 13 Q. Where did you select as the initial rendez-vous point?
 14 If it assists you, it's page 8 of your statement towards
 15 the top in my copy. Page 8 of 10. (Pause).
 16 You indicated in your statement that you named
 17 a rendez-vous point of Great Maze Pond?
 18 A. Oh yes, sorry. Yes. I've got different pages.
 19 Q. We know that Great Maze Pond is to the southeast of the
 20 Stoney Street area, near Guy's Hospital. Was there any
 21 particular reason you selected that as the area to which
 22 to direct the emergency services?
 23 A. I believe I probably spoke to one of the officers on
 24 scene and they suggested a place.
 25 Q. Would a rendez-vous point be selected because it was

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1 an area where vehicles could easily muster but
 2 sufficiently close to the scene to be able to deploy
 3 there quickly?
 4 A. Yes, and also it was deemed safe.
 5 Q. Now, Mr Stumpo arrived at the scene just before 10.30,
 6 we understand. Whilst he was there did he take command
 7 at the forward control point?
 8 A. Yes.
 9 Q. What were your further actions after he had taken
 10 command at the scene?
 11 A. Following taking command, I was, as such,
 12 an outward-facing TFC so I was looking after pan-London.
 13 I was also reviewing all CADs that came in from the
 14 Borough Market area to review with regards to anything
 15 that needed to be actioned, passing it down to Trojan
 16 control, and also arranging for TSG to go to the RVP.
 17 Q. TSG, help us?
 18 A. Territorial Support Group.
 19 Q. And what sort of officers are they?
 20 A. They are public order officers that have been trained as
 21 AFOs, which is firearms officers. They're generally
 22 used for leading ambulance and fire into warm zones.
 23 Q. As you monitor the CADs coming in, what were the
 24 principal actions they required you to carry out?
 25 A. If there's any actions with regards to either shots

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1 fired or sieges or anything like that, that would be
 2 passed straight down to Trojan control, Trojan 1, to
 3 deal with inward-facing.
 4 Q. So you were acting, to an extent, as a channel of
 5 communication between the information coming in through
 6 the CADs to the special operations room and
 7 Inspector Stumpo on the ground at the forward control
 8 point?
 9 A. That's correct, and obviously if he needed any resources
 10 or anything like that I would liaise directly with
 11 Superintendent McKibbin to arrange those.
 12 Q. Did you also deal with matters such as having trains
 13 stopped as required?
 14 A. Yes.
 15 Q. Having messages sent out to other forces from time to
 16 time?
 17 A. Correct.
 18 Q. Giving instructions for people to be held inside venues
 19 for their own safety?
 20 A. That's correct.
 21 Q. Also, we've heard that armed officers would be stationed
 22 at airports. Did you draw upon armed officers at one or
 23 more airports to provide additional support at the
 24 scene?
 25 A. The Heathrow officers moved down towards central London

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1 to support us in central London and we received support
 2 from Thames Valley Police to look after the airports.
 3 Q. Were you involved in coordinating that effort too?
 4 A. I arranged -- I asked for that to be done.
 5 Q. We have seen that as the night went on, CADs came in
 6 referring to people being held hostage, to shots being
 7 fired and to explosions. We've heard some explanations
 8 of those. Were you passing that information too to the
 9 Tactical Firearms Commander at the ground?
 10 A. Yes.
 11 Q. Did a time come when you were notified that explosives
 12 officers were at the scene?
 13 A. I believe so, yes.
 14 Q. We have a CAD entry suggesting that those officers were
 15 at the scene by about 11.00 pm -- for the lawyers the
 16 reference is {DC6559/11}. Once they got to the scene,
 17 did they require any further direction from you or was
 18 that handled at ground level?
 19 A. That was handled at ground.
 20 Q. We know also that there was a large-scale emergency
 21 search of all premises followed by a deliberate search,
 22 a slower time search. What role did you play in
 23 coordinating that?
 24 A. That was left to the ground TFC to deal with.
 25 Q. You made a number of manuscript notes over the course of

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1 the evening which refer to a number of areas being
 2 cleared. What was going on to clear those areas so far
 3 as you knew?
 4 A. Armed officers would have gone into the premises and
 5 carried out searches of them to clear them of any
 6 suspects.
 7 Q. Were you informed what the hot and warm zones were and
 8 how they were developed over the course of the evening?
 9 A. I became aware with regards to a radio transmission of
 10 what were the hot zones.
 11 Q. We've seen from Mr McKibbin's evidence that there was
 12 a report of a man in the Vauxhall area with a machete,
 13 so that's an area a little away from the seat of the
 14 attack. Were you informed of that to take action
 15 against it?
 16 A. Yes, I was informed of that and obviously bearing in
 17 mind what was happening in central London we considered
 18 what -- well, I considered that it might be multi-seated
 19 or sited attack, and so we deployed armed officers to
 20 that location to carry out a search.
 21 Q. Were those from some of the officers you had been
 22 holding in reserve?
 23 A. Those officers were ones that were at the O2 --
 24 Q. I see.
 25 A. -- and they'd been released.

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1 Q. We have also seen that there were reports of shots heard
2 by people in the Novotel, which I understand is a little
3 to the west of Borough Market?
4 A. That's correct.
5 Q. The time given at 00.23. Was that another incident with
6 which you had to deal?
7 A. That's correct, and obviously 216 were also assigned to
8 that. 216 had an inspector in the car who was also
9 attached, a firearms commander.
10 Q. 216 is a Trojan call sign, is it?
11 A. Yes.
12 Q. Did you also play a part in directing DPG, so Diplomatic
13 Protection Group officers into certain key areas?
14 A. Yes, I moved them into crowded places as a visible
15 deterrent.
16 Q. In your witness statement you tell us that by 01.32 am
17 on 4 June you had been informed that three subjects had
18 been neutralised, five members of the public had died,
19 there were seven priority 1 casualties and seven other
20 casualties; is that the information that was coming
21 through at that time?
22 A. I believe so, yes.
23 Q. You also tell us at page 9 of your statement, towards
24 the end of the statement, by 02.20 -- so 2.20 in the
25 morning -- that the emergency search of the entire hot

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1 zone had been completed?
2 A. Yes.
3 Q. By that stage a slower time, more extensive search was
4 being carried out?
5 A. Yes.
6 Q. You give a time of 02.58 hours for the time that you
7 were relieved of your post?
8 A. That's correct.
9 Q. We've gone relatively briefly through what you did that
10 night because we've heard a more extensive overview from
11 Mr McKibbin. Is there anything more about the
12 developments that night and your part in them which you
13 would particularly like to convey?
14 A. No.
15 MR HOUGH: Thank you very much, those are all my questions.
16 A. Thank you.
17 Questions by MR PATTERSON QC
18 MR PATTERSON: Inspector, I ask questions on behalf of the
19 families of six of those who were killed. Can I have
20 your help with just a few matters, please.
21 You've explained how you made arrangements for armed
22 response vehicles to go to the scene, and if we could
23 just remind ourselves of some evidence that we had
24 earlier today from your colleague, Superintendent
25 McKibbin, {DC6825/30}, please, and if we could expand

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1 that. We saw this part of his report briefly earlier
2 today, I don't know if you were in court for his
3 evidence, but this was a list of various resources that
4 were involved in the deployment at the scene and we saw
5 that in relation to Trojan officers at the scene, it's
6 the second line, a total of no fewer than 78. And,
7 indeed, some were held back in reserve, line 3, a total
8 of 12. You played a part, no doubt, in arranging for
9 the attendance of those officers who went to the scene;
10 is that right?
11 A. Yes.
12 Q. You mentioned TSG, the Territorial Support Group.
13 Further down in that table we can see a number of
14 entries that relation to the TSG; is that correct?
15 A. Yes.
16 Q. 55 against an entry that reads "Commissioners reserve"
17 and 94 that refers to "Other duties". Were some of
18 those officers armed as well?
19 A. Not all of TSG are armed but, basically, on our command
20 they will go and arm up and obviously they will be armed
21 then. They're not routinely armed.
22 Q. No. And did some of those who went to the scene include
23 armed TSG officers?
24 A. Yes.
25 Q. So in the minutes and hours that followed the

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1 declaration of Plato, an enormous number of armed
2 officers of one kind or another were deployed to the
3 scene; is that correct?
4 A. That's correct.
5 Q. We have heard evidence that in terms of paramedics going
6 in to certain locations that were deemed dangerous,
7 there was a period of something approaching three hours
8 before they could go in because of safety issues. But
9 from the efforts you made on the night it sounds as
10 though there was no shortage of armed officers who could
11 accompany them into these areas once they were declared
12 safe; is that correct?
13 A. It is once they're warm. If they're hot zones it's too
14 dangerous for them to go in --
15 Q. Yes.
16 A. -- and we would try and deal with the threat at the
17 time.
18 Q. But if it were to be thought that perhaps there was
19 a delay caused because there was an insufficient number
20 of armed officers to accompany these trained paramedics,
21 that wouldn't be the case: there was a huge number of
22 armed response vehicle officers there in the minutes and
23 hours that followed; is that correct?
24 A. There was a lot of armed officers, yes.
25 Q. And those TSG officers, again, do they have specialist

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1 training?
 2 A. Yes.
 3 Q. Does that include going into warm zones?
 4 A. Yes, they do the tri-service training which TFCs do as
 5 well with regards to working with ambulance and fire.
 6 Q. Tri-service training, did you say?
 7 A. Yes, so it's police, ambulance and fire.
 8 Q. In your statement you spoke about communication issues,
 9 and you made reference to the fact that City Ops 1 was
 10 being used; can you explain, please?
 11 A. Different areas have different channels so when you're
 12 in the pod you have a radio -- a desk of radios, as in
 13 live desk -- and you select which channels you want to
 14 speak on. Some are selected and some aren't. At the
 15 time, City Ops 1 wasn't selected.
 16 Q. We've heard that there were two City of London ARVs on
 17 duty that night and then obviously there were the
 18 Metropolitan Police ARVs. Does it follow, therefore,
 19 that you have to consider more than one radio channel
 20 when communicating with these different ARVs?
 21 A. Yes, however City of London do listen to our hailing
 22 group, which is our local link, our firearms link.
 23 Q. We've also heard from one of the City of London ARV
 24 officers that there was listening in by him and his
 25 colleague to your Trojan 99 channel; is that correct?

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1 A. The hailing group, yes.
 2 Q. That's what you describe as a hailing group. So those
 3 City officers would have to consider at least two
 4 channels, their own City Ops 1 channel, plus your
 5 Metropolitan Police Trojan 99 channel?
 6 A. Yes.
 7 Q. Presumably none of this assists in the ease of
 8 communication between you in the pod and these various
 9 ARVs?
 10 A. Our ARV officers listen to various channels: they listen
 11 to the local channel, the hailing group and the
 12 back-to-back channel.
 13 Q. But in a fast-moving episode, if you have an increased
 14 number of channels, there is a greater risk, presumably,
 15 of an officer trying their best to listen out to
 16 everything, missing something.
 17 A. With a fast-going incident yes, that could be possible.
 18 Q. And we've heard evidence that there were certain
 19 messages being put out on the Trojan 99 channel about
 20 locating and getting to the scene and dealing with the
 21 suspects which were missed by one of these City of
 22 London ARV officers?
 23 A. Right. I can't comment on that I am afraid.
 24 Q. In your statement you indicate that you were trained in
 25 the use of tasers; is that correct?

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1 A. That's correct.
 2 Q. Do you yourself deliver training?
 3 A. No, I've been trained to use a taser.
 4 Q. Tasers are not something that are automatically issued
 5 to all Metropolitan Police officers; is that correct?
 6 A. That's correct.
 7 Q. Does an officer have to show a willingness or a desire
 8 to be specifically trained in carrying a taser?
 9 A. Generally it's response drivers that are issued with
 10 tasers, or it was at that -- other -- more officers have
 11 been trained since then.
 12 Q. And so in terms of the proportion of Metropolitan Police
 13 officers who carry a taser, can you help us in general
 14 terms?
 15 A. At that time there was very few.
 16 Q. Very few?
 17 A. But since there's a lot more, and I couldn't tell you,
 18 I am afraid.
 19 Q. Are we talking 5%, 10%, can you help us in general
 20 terms?
 21 A. I couldn't, sorry.
 22 Q. They can be of use in stopping an attacker; is that
 23 correct?
 24 A. Yes.
 25 Q. They can, in certain circumstances, bring an attacker to

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1 the ground; is that correct?
 2 A. In the majority of cases.
 3 Q. In the majority of cases when used they will bring the
 4 attacker to the ground and incapacitate them?
 5 A. If there are -- obviously there are certain issues with
 6 tasers, like they can misfire --
 7 Q. Of course there can be --
 8 A. But also it depends if people have taken substances or
 9 if they're under any influence of anything or if they
 10 have mental health issues, it all affects how tasers
 11 react to them.
 12 Q. Yes, in this case we're unaware of any mental health
 13 issues or any substance abuse other than the suggestion
 14 of some low levels of steroid use, but for a typical,
 15 healthy young person, a taser can incapacitate them and
 16 bring them to the ground; is that correct?
 17 A. In the majority of cases, yes.
 18 Q. And finally this, you indicate in your report that at
 19 one stage, I think quite late on in the events, you sent
 20 some armed officers to Oxford Street; can you help with
 21 us that?
 22 A. I received information that there might be some activity
 23 in the Oxford Street area so as a visible deterrent, and
 24 obviously because it's such a busy area, it was part of
 25 my plan with regards to if there was any multi-sited

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1 attacks to cover that area as well.
 2 Q. So that was sending in a vehicle to that area as
 3 a deterrent?
 4 A. Armed officers, yes. So they could react if anything
 5 occurred in that area.
 6 Q. We've heard evidence that a telephone that was used by
 7 the attackers which was found in the van contained
 8 a reference on a satnav application with directions to
 9 Oxford Street; is that what caused you to send --
 10 A. Yes.
 11 Q. -- an ARV to Oxford Street?
 12 A. Yes.
 13 MR PATTERSON: Yes, thank you very much. That's all I ask.
 14 A. Thank you.
 15 Questions by MR HORWELL QC
 16 MR HORWELL: Literally a question or two. No one wants you
 17 to guess, obviously, but do you have any idea how many
 18 TSG officers were armed that night?
 19 A. No.
 20 Q. And once at the scene, the decision how they are
 21 deployed, armed officers, that's a decision made by
 22 those on the ground?
 23 A. That's correct.
 24 MR HORWELL: Thank you.
 25 Further questions by MR HOUGH QC

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1 MR HOUGH: Just very briefly, officer: tasers. Is this
 2 right: there are limitations about tasers as a form of
 3 defensive or offensive weapon?
 4 A. Yes.
 5 Q. Officers receive particular training in the sorts of
 6 situations where they can and can't be used?
 7 A. Yes.
 8 Q. Are there any difficulties or limitations about trying
 9 to use a taser in a very fast-moving incident involving
 10 a number of people wielding knives?
 11 A. Yes, obviously with regards to -- you've got to
 12 risk-assess every time you deploy. With regards to
 13 a taser if you misfire, you will be closed down by those
 14 attackers with machetes and you will be attacked.
 15 Q. So sometimes might an officer who had a taser,
 16 confronted with that sort of attacker, choose to use his
 17 baton nevertheless, or her baton?
 18 A. Potentially.
 19 MR HOUGH: Thank you very much. Those are all the questions
 20 that I have. Thank you very much for coming to give
 21 evidence.
 22 A. Thank you.
 23 MR HOUGH: I'm sorry you have had to wait.
 24 A. That's okay.
 25 THE CHIEF CORONER: Thank you very much indeed for coming.

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1 A. Thank you.
 2 THE CHIEF CORONER: I'm just going to ask my usher to escort
 3 the witness out.
 4 Mr Hough, we're obviously not sitting tomorrow and
 5 we resume on Wednesday when we turn to Witness L.
 6 MR HOUGH: Yes, on Wednesday and Thursday Witness L will be
 7 giving evidence and there will be a range of special
 8 measures applying --
 9 THE CHIEF CORONER: Yes.
 10 MR HOUGH: -- which are set out in an order you made, which
 11 should be available on the Inquests website. It's
 12 an order you made following, I think, the last hearing.
 13 THE CHIEF CORONER: Yes. I mean I suspect the order is very
 14 similar, if not identical, to the order I made in
 15 respect of the Inquests into those who died on
 16 Westminster Bridge.
 17 MR HOUGH: It certainly has the same practical effects.
 18 THE CHIEF CORONER: The only reason I was going to flag it
 19 up is that I know on the last occasion certainly
 20 a member of the press, if not more than one member of
 21 the press, made a number of observations about the
 22 nature of the restrictions that it imposed on the use,
 23 for example, by members of the press of electronic
 24 devices to make their notes, and certainly what I did on
 25 the last occasion in fact was not to use a computer

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1 myself to make it clear that, in fact, if anyone was
 2 being disadvantaged, it was me as much as anybody else.
 3 In fact, if we had had the evidence today it would
 4 have been a great blessing because my computer has not
 5 been working today, but there we go, that's by-the-by.
 6 The only reason for raising this now is that
 7 I'm conscious that the link is still running down to
 8 court 19 and I'm fairly confident, looking at those from
 9 the press who have been here this time, many of them
 10 were here last time, but it was just to reinforce that
 11 I had obviously very properly considered the specific
 12 points which were raised by members of the press on the
 13 last occasion and if the same points were raised again
 14 today, it's likely that I would make the similar
 15 observations that I did last time, but it was really
 16 just to underline if there were fresh people who weren't
 17 here on the last occasion, it is worth their while
 18 bearing in mind that we did give this anxious thought
 19 last time round.
 20 MR HOUGH: Indeed, we did. Sir, the solicitors to the
 21 Inquest will be sending out an email to the press
 22 reminding them of the arrangements. Also, if they wish
 23 to see the directions, they are at paragraph 6 of the
 24 directions from the procedural hearing held on
 25 12 April 2019, which is on the website and it provides

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1 at 6(g) that:
 2 "Electronic devices in court should be turned off
 3 during Witness L's evidence save for devices required
 4 for official transcription of evidence, devices required
 5 for the use of the Opus system for the hearing, and
 6 laptop computers and tablets of legal representatives."
 7 THE CHIEF CORONER: Yes.
 8 MR HOUGH: We will, however, do our best to assist the
 9 press, including by providing transcripts of the
 10 evidence at lunchtime and in the evening --
 11 THE CHIEF CORONER: Yes.
 12 MR HOUGH: -- to allow them to report promptly.
 13 THE CHIEF CORONER: Thank you. Very well, we'll meet again
 14 at 10 o'clock on Wednesday.
 15 (4.44 pm)
 16 (The court adjourned until 10.00 am on
 17 Wednesday, 12 June 2019)
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