

OPUS 2

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London Bridge Inquests

Day 30

June 20, 2019

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1 Thursday, 20 June 2019
 2 (10.03 am)
 3 THE CHIEF CORONER: Good morning.
 4 MR HOUGH: Good morning, sir. Before we start the evidence
 5 today, may I say something about the timetable, but not
 6 at counter-productive length.
 7 Timetabling hearings with witnesses is never easy.
 8 The timetable for this case was circulated in advance
 9 and was not suggested to be unrealistic. This week has
 10 gone a little more slowly than expected, and that is no
 11 criticism of anyone: it sometimes happens.
 12 We now need to make a proposal which will achieve
 13 two objectives: first, all interested persons, and
 14 especially the families, must be able to ask their
 15 proper questions of important witnesses. Second, it is
 16 essential to complete witnesses from the City of London
 17 Corporation, TfL and the Home Office this week so that
 18 those interested persons can prepare their submissions
 19 next week. With those points in mind, we propose as
 20 follows.
 21 Today we shall call Superintendent Isaac,
 22 Mr Woolford and Mr Hughes, and we intend to start
 23 Ms Hayward. Tomorrow we shall finish Ms Hayward and we
 24 shall call and finish Ms Nacey. To do that we
 25 anticipate it will be necessary to finish late both

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1 days, around 5.00 pm, and to leave open the option of
 2 an early start tomorrow. Mr Fulbrook of Hertz can and
 3 will be moved to Tuesday and we would be very grateful
 4 for the cooperation of all interested persons in
 5 achieving those objectives.
 6 If anyone has any objections or, indeed, support, we
 7 would be interested to hear.
 8 THE CHIEF CORONER: So far as I'm concerned, Mr Hough,
 9 obviously the most important thing is not to
 10 inconvenience witnesses, and I appreciate they know what
 11 the timetable is and many of the people who are giving
 12 evidence lead very busy professional lives, and
 13 I'm conscious that so far as we can, we should adhere to
 14 that timetable. Equally, I know that in terms of the
 15 timetable for next week, if we don't stick to that
 16 timetable it has significant confidence in terms of
 17 people being able to complete their written submissions
 18 which will help me in the task that I have to complete,
 19 so I'm hoping that everyone will work collaboratively to
 20 make sure that we do cover those witnesses that we've
 21 got to cover both today and tomorrow.
 22 MR HOUGH: Yes, sir.
 23 Again, I don't see any howls of outrage, or hear
 24 any.
 25 THE CHIEF CORONER: No, and I underline what you said at the

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1 beginning, Mr Hough: there is no criticism intended by
 2 any of these comments about witnesses. If I felt at any
 3 stage the questions were inappropriate or they'd been
 4 asked, I would intervene, and I've chosen not to
 5 intervene at any stage, partly because I can see that
 6 both Mr Patterson and Mr Adamson are properly exploring
 7 various areas and inevitably there are further questions
 8 which then follow from some of the topics that we've
 9 covered.
 10 MR HOUGH: Superintendent Isaac, sir.
 11 THE CHIEF CORONER: Thank you.
 12 SUPERINTENDENT HELEN ISAAC (sworn)
 13 THE CHIEF CORONER: Good morning, please make yourself
 14 comfortable. Take a seat if you wish to.
 15 Questions by MR HOUGH QC
 16 MR HOUGH: Would you please give your name and rank to the
 17 court?
 18 A. I'm Superintendent Helen Isaac.
 19 Q. Are you a superintendent in the City of London Police?
 20 A. Yes, sir, I am.
 21 Q. At the time with which we are concerned in the run-up
 22 to June 2017, were you also a superintendent in that
 23 force?
 24 A. Yes, sir, I was.
 25 Q. At that time, what were your areas of responsibility?

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1 A. So, I was the head of communities and engagement, which
 2 included road policing, collision investigation, the
 3 Project Servator team, policing of the Central Criminal
 4 Court, the mounted branch, mental health, to name but
 5 a few areas.
 6 Q. We have heard that the Servator tactic was a tactic for
 7 unpredictable and highly visible deployments of teams of
 8 police officers to disrupt criminal activity or
 9 preparations for it; is that a fair summary?
 10 A. It is a fair summary, sir.
 11 Q. Was your responsibility in providing and directing the
 12 deployments of those officers for the Servator tactic?
 13 A. No, sir, it was not.
 14 Q. What was your responsibility?
 15 A. So the officers on the Servator team were one team of
 16 a number of teams across uniformed policing who carried
 17 out CT taskings and deployments. They came under my
 18 remit, of course, and I was very supportive of them, but
 19 all of their taskings and deployments were produced by
 20 Security Group fortnightly.
 21 Q. We've heard of the role of CTAs in police forces, by
 22 background we understand that PC Hone at the time had
 23 been a CTA in the City of London Police?
 24 A. Yes, that's correct.
 25 Q. And that he had been, in 2016, given a role of CT

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1 coordinator?
 2 A. Yes, that's correct.
 3 Q. We've heard that he provided CT taskings, including
 4 Servator taskings for the Security Group every two
 5 weeks?
 6 A. Yes, that's correct.
 7 Q. As a result of his move to the position of CT
 8 coordinator, did you become his line manager?
 9 A. Yes, sir, it was an unusual situation created in that
 10 a PC was reporting into a superintendent.
 11 Q. We know that much of his work was for the Security Group
 12 in preparing those taskings. Were you yourself a member
 13 of the Security Group?
 14 A. No, sir, I was not.
 15 Q. As PC Hone's line manager, did you actually oversee and
 16 direct his work as CT coordinator and his role in giving
 17 taskings to the Security Group?
 18 A. No, I did not, that was a role he was already carrying
 19 out prior to taking up position in that post within our
 20 directorate.
 21 Q. Next, Cerastes, please. We know that Cerastes was
 22 a company tasked to replicate hostile reconnaissance in
 23 part to test the Servator tactic, and we know that its
 24 reports were ultimately to be considered by the Security
 25 Group. Do you understand that to be right?

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1 A. I do, sir.
 2 Q. We've heard that PC Hone liaised with Cerastes directly.
 3 What was your responsibility, if any, for Cerastes, its
 4 work and the funding of that work?
 5 A. Sir, the only responsibility I had around this piece of
 6 work was ensuring that the budget was released for the
 7 work in line with procurement guidelines held by the
 8 Corporation of London.
 9 Q. The work, we've heard, was done from late 2016 and into
 10 early 2017; were you aware because of your procurement
 11 function that that work was being done?
 12 A. I was aware, yes.
 13 Q. Were you aware that reports would be published?
 14 A. I was aware there would be a report at the end, yes.
 15 Q. May we look, please, at {WS5014/16}, please. We should
 16 see a document come up on screen. We can see on
 17 21 February, Mr Hone sent an email to some colleagues,
 18 including members of the Security Group, circulating
 19 a summary of Cerastes interim 1, as we're calling it,
 20 the first interim report from the work that was being
 21 done in late 2016 and early 2017. We see that that was
 22 copied to you, but what was the reason that it was
 23 copied to you?
 24 A. I believe it was copied to me because he was letting me
 25 know what he was doing. The vast majority of his work

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1 did not report to me, it reported into Security Group,
 2 so it was his way of letting me know that he had done
 3 something.
 4 Q. Had Mr Hone's summary of that first interim report been
 5 sent to you for approval before it was circulated to
 6 members of the Security Group?
 7 A. No, sir, it hadn't.
 8 Q. Did you read his summary of the Cerastes interim 1
 9 report?
 10 A. I cannot recall.
 11 Q. It was, however, primarily for members of the Security
 12 Group?
 13 A. It was, yes.
 14 Q. Then can we go to page 9 of the same document
 15 {WS5014/9}. We can see here an email from Mr Hone on
 16 24 February 2017 to a colleague, Mr Townsend, copied to
 17 you and others, including Mr Woolford, and he sets out
 18 there an internal communication to be sent arising from
 19 the Cerastes report he had received, and we see in the
 20 third paragraph of his email that he asks for you to
 21 check his proposed communication.
 22 What did you understand he was asking you to check?
 23 A. I imagine that he was asking me to read through it and
 24 check that I was happy with the way he'd written it and
 25 that it made sense.

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1 Q. Can you recall whether you gave any response to that?
 2 A. I can't recall, sir, no, but I'm sure if I hadn't, he
 3 would have chased me for one.
 4 Q. Then {WS5014/13}, please. We see here on the day of the
 5 Westminster attack in the evening just after the attack
 6 Mr Hone sent an email to Commander Gyford recommending
 7 more Servator deployments as distinct from traditional
 8 patrols. That was copied to you. Why was that copied
 9 to you, as far as you understand it?
 10 A. I believe that would have been copied to me for the same
 11 reason: first to make sure that I was aware of what he
 12 was doing, as his line manager, and also it mentions
 13 a member of my staff, Matt Timms further on, to let me
 14 know that Matt was also being asked to do something.
 15 Q. Then {WS5014/17} of the same document, please.
 16 23 March 2017, the next day, do we see here that Mr Hone
 17 emailed you expressing frustration at what he summarises
 18 as old style patrolling tactics rather than deployments
 19 in the Servator mould?
 20 A. I do, yes.
 21 Q. Why did he send that to you?
 22 A. He sent it to me, I believe, because he knew that
 23 I would be wanting to take action about this and that
 24 I would take action.
 25 He also phoned me, I recall. I remember receiving

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1 a number of phone calls, I believe from Matt Timms as
2 well, about their concerns with the tactics, so I would
3 imagine that's why he sent that to me specifically.

4 Q. And in the third paragraph he mentions that he doesn't
5 understand the thinking about the locations considered
6 for deployments, and then adds this:

7 "What about London Bridge during rush hours?
8 Apparently, London Bridge wasn't even mentioned during
9 last night's SG [Security Group] and I believe that this
10 is our most vulnerable location from marauding vehicle
11 attack along with [another location]."

12 Did you consider that that was a point for you to
13 address?

14 A. I considered that this is something I needed to do
15 something about, particularly as he rang me: it was
16 clearly urgent and he wanted me to do something, and
17 I did contact the silver commander, Superintendent Bill
18 Duffy, straightaway and we had a conversation about it.

19 Q. What did you understand he was asking you to do about
20 this problem?

21 A. Well, as you will know, sir, we have a command structure
22 for these kind of operations. I wasn't actually within
23 the command team, the command structure for this
24 particular day, it would have been the silver
25 commander's decision around the tactics used so I had to

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1 approach it in a quite a sensitive way because I wasn't
2 the silver commander.

3 So I contacted Bill Duffy straightaway and had
4 a conversation with him about the concerns and he
5 immediately met with PC Hone to discuss this.

6 Q. So Mr Hone wanted more Servator-type deployments on
7 places including London Bridge?

8 A. Yes.

9 Q. That needed to be arranged through the silver commander,
10 Mr Duffy?

11 A. Yes, it did.

12 Q. And you were the best means of getting that done?

13 A. Yes, as his line manager I think he probably felt he
14 could approach me and that I would take him seriously.

15 Q. As far as you were aware, did Mr Duffy respond to that
16 by increasing deployments of that kind in those areas?

17 A. He responded immediately, yes.

18 Q. And he agreed and took the necessary action, did he?

19 A. Yes, I recall he met PC Hone straightaway and took
20 advice from him.

21 Q. And {WS5014/29}, please. This is moving on nearly two
22 months. 16 May 2017, Mr Hone emailed you saying:

23 "Please could you check ... you are happy with the
24 document attached. I will be sending it ... to the UPD
25 [uniformed policing division] command team, Security

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1 Group members, and all DEOP's."

2 Then if we look at the next page we can see what the
3 attached document was {WS5014/30}, a summary of friendly
4 hostile recommendations. When you received this email
5 did you appreciate that what he was providing was
6 a summary of the Cerastes work?

7 A. Yes, I did. I think important to say about this
8 document is that I wasn't aware of its existence or that
9 he had been asked to provide it and I wasn't informed
10 about it before receiving the email.

11 Q. Why did you think it was being sent to you?

12 A. Because he wanted me to know that it had been done,
13 I would imagine. That's why I believe it was sent to
14 me.

15 Q. He had asked you to check it. What sort of checking did
16 you think you were being asked to provide?

17 A. Well, I will say, sir, that I think there was
18 a misunderstanding here, completely on my part.
19 I believed that he wanted me to have a read through at
20 some stage. There's nothing urgent here. The request
21 to me is not entirely clear, having read it many times
22 since, about whether he was expecting me to go back to
23 him, what it was that he wanted me to be happy with,
24 because I obviously didn't have the underlying report
25 that this was a summary of. So it was

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1 a misunderstanding on my part.

2 Q. We've heard from Mr Hone that he wasn't waiting on your
3 approval before sending it out. Did you think he was?

4 A. No, sir, I did not.

5 Q. Looking at the summary, if we go to page 31 {WS5014/31},
6 can we see it began with an account of the effectiveness
7 of Servator deployments. Then {WS5014/32}, some
8 recommendations about counter terrorism deployments.
9 Then {WS5014/33}, highlighted concern about
10 London Bridge.

11 Did you read the summary at the time or, indeed, at
12 any time before the London Bridge attack?

13 A. I did read the summary, sir, but I cannot say when
14 I actually read it. I can't recall.

15 Q. Can you say whether you read it before the attack?

16 A. I believe I would have done, but I can't be certain.

17 Q. Did anything in it strike you as needing immediate
18 consideration, either by you or anyone else?

19 A. No, sir, it did not.

20 Q. Mr Hone was recommending on this page, page 33, the
21 installation of hostile vehicle mitigation measures on
22 London Bridge because of vulnerable features of that
23 bridge. Did you consider that that was something that
24 required any urgent action?

25 A. No, I believed that this was a summary taken from the

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1 Cerastes report. What I didn't realise, because
 2 I hadn't been told about it, is that it included
 3 additions from PC Hone himself. It's clear to me when
 4 he's talking about consideration should be given to
 5 installing hostile vehicle mitigation, that this is
 6 permanent structures that are being spoken about, and my
 7 knowledge of that is that it takes considerable time to
 8 put those in place.

9 Q. Setting aside the question of time to install, which was
 10 really a matter for others, did you consider on reading
 11 this that there was anything that you had to do to
 12 inform anyone else in the force about Mr Hone's
 13 recommendations, or did you think that that would go
 14 through another body such as the Security Group?

15 A. I believed it would go through the Security Group. What
 16 I was told by him is that a number of people had the
 17 underlying report that this was a summary of, so
 18 I believed that this information was already in the
 19 hands of the right people.

20 Q. We've heard that Mr Hone went on paternity leave on
 21 19 May 2017. As his line manager, were you aware of
 22 that?

23 A. I was not in work on 19 May.

24 Q. Were you aware that he was going to be going on
 25 paternity leave?

13

1 A. I was, sir, yes.

2 Q. Did you have any concern that recommendations from the
 3 summary or, indeed, the consideration of the report,
 4 might be missed during his absence?

5 A. No, because I believed that this had been forwarded and
 6 that people had the underlying report already.

7 Q. May we look now, please, at {WS5014/34}. We can see
 8 here that Mr Hone sent a further email to you, copied to
 9 others, on 24 May 2017, two days after the Manchester
 10 attack when the JTAC national threat level was raised to
 11 critical?

12 A. Yes, I see that.

13 Q. In the second paragraph, he strongly recommended serious
 14 consideration to carrying out his suggestions from the
 15 friendly hostile report. Did you read that email at the
 16 time?

17 A. No, sir, it's very unlikely that I would have read that
 18 at the time.

19 Q. And why is that?

20 A. Because, sir, I was on the command team for the critical
 21 planned response in the City of London following the
 22 dreadful events at Manchester on the Monday night.

23 I also, on 24 May, was in charge at very short
 24 notice of an operation involving Her Majesty the Queen
 25 and the Duke of Edinburgh at St Paul's Cathedral. My

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1 attention, concentration would have been entirely upon
 2 those events, as you will appreciate, at the time.

3 Q. Fully understood. Was there any arrangement for anyone
 4 else to monitor your emails while you were taken up with
 5 that very important work?

6 A. No, sir, there was not.

7 Q. Did you read this email after the London Bridge attack?

8 A. I was shown this email in February of this year.
 9 I'm sure at some stage I would have opened it and had
 10 a look at it, but it most likely would have been
 11 following 3 June, due to the period of annual leave that
 12 I went on later on that week.

13 Q. If you had read that on the day, appreciating your other
 14 commitments, but if you had read it on 24 May, is there
 15 anything in particular you would have done about it?

16 A. Reading it now I can see that it's very much about --
 17 PC Hone would have been at home, obviously, on paternity
 18 leave. He would have been thinking that we were doing
 19 Temperer in the City of London, potentially, and we were
 20 not. It's very much to me about our CT taskings and
 21 about making sure that we were doing the Servator
 22 deployments, and having learned from the initial
 23 mistakes after Westminster that we then put in place our
 24 Servator deployments, I would have been able to assure
 25 him that we were doing that and that we were receiving

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1 tactical advice from the relevant people as well.

2 Q. So if you had read this email, and bearing in mind that
 3 quite a lot of the comments made in the email are about
 4 Servator-type deployments, you would have regarded it as
 5 Mr Hone pressing for more of those?

6 A. I think it demonstrates his professionalism. He was
 7 probably finding it incredibly frustrating being at
 8 home, not being at work and being able to help, but if
 9 I had read it at the time I would have read it and
 10 thought: yes, we're doing this and we're doing it
 11 properly.

12 Q. Is it not possible that if you had read it at the time,
 13 you would have looked back at his summary report, seen
 14 that long recommendation and that whole page about
 15 London Bridge and HVM there, and spoken to colleagues
 16 about getting that recommendation looked at?

17 A. It's unlikely, sir. The thing that I could do something
 18 about on that day in quick-time was around our taskings,
 19 which I was already doing.

20 MR HOUGH: Thank you very much. Those are all my questions.

21 A. Thank you, sir.

22 Questions by MR ADAMSON

23 MR ADAMSON: My name is Dominic Adamson, I ask questions on
 24 behalf of the family of Xavier Thomas and his partner,
 25 Christine Delcros.

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1 Could we please have back on screen {WS5014/29}.
 2 Now, this is the email which Mr Hough has referred you
 3 to on 16 May 2017 and it refers to the friendly HR
 4 report, which we can see from the attachment is Hostile
 5 Recon Report; yes?
 6 A. Yes, sir.
 7 Q. And you've made the point that this was not marked
 8 urgent, or of high importance, or anything of that
 9 nature?
 10 A. Yes, sir.
 11 Q. But it posed a question, or at least it requested you to
 12 take action, ie to review the attached document, and to
 13 check that you were happy with it?
 14 A. Yes, sir, it asked me to check.
 15 Q. Now, just so I'm clear, when do you think you first
 16 reviewed this email and attachment?
 17 A. Sir, I cannot remember. I receive hundreds of emails
 18 every week. I would be doing you a disservice if
 19 I hazard a guess.
 20 Q. Yes.
 21 A. However, normally I would look at emails and attachments
 22 if they weren't urgent within a few days of receiving
 23 them.
 24 Q. Yes. So it's likely, isn't it, that you read it before
 25 the attack?

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1 A. There is a possibility that I read it before the attack,
 2 yes.
 3 Q. Would it be commonplace for emails that you receive to
 4 be left unread for 17, 18 days?
 5 A. No, sir, but the 17, 18 days did take up part of the
 6 time where I was on a critical plan deployment and also
 7 for a considerable time whilst I was on annual leave as
 8 well.
 9 Q. Now, we've been shown what the document states about
 10 London Bridge. Could we just have another look at that,
 11 {WS5014/33}, and this is the section which concerns
 12 London Bridge, and it's a detailed analysis by Mr Hone
 13 as to why the location is a concern.
 14 A. Yes.
 15 Q. And his recommendation in relation to that location,
 16 namely consideration of the installation of hostile
 17 vehicle mitigation; yes?
 18 A. Yes.
 19 Q. And it's clear, isn't it, this flows from the Cerastes
 20 work; yes?
 21 A. Yes.
 22 Q. And we see at the bottom of that page:
 23 "If you would like to read to full friendly hostile
 24 report a copy is available from Special Branch ..."
 25 A. Yes.

18

1 Q. And there's a particular reference to page 10 of the
 2 report, I don't know what's on page 10 of the report but
 3 it states that it highlights both the discouraging and
 4 encouraging factors to hostiles, so it seems to be
 5 relating to London Bridge?
 6 A. I wouldn't be able to say, sir.
 7 Q. Yes.
 8 A. I'm not sure.
 9 Q. So this is plainly important information which PC Hone
 10 is sending to you?
 11 A. Yes.
 12 Q. On 24 May, {WS5014/34}, this is immediately after the
 13 Manchester attack.
 14 A. Mm-hm.
 15 Q. And this email is identified as being of high
 16 importance, is it not?
 17 A. It is, sir, yes.
 18 Q. And PC Hone sends this email to you and it says:
 19 "I thought I'd ping a quick email ..."
 20 You know he's on paternity leave?
 21 A. Yes, I would have known by then.
 22 Q. So he has regarded the matter as being of such
 23 importance that he has taken time to email you in those
 24 circumstances.
 25 A. Mm-hm.

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1 Q. He is commenting on the threat level change.
 2 A. Yes.
 3 Q. Because the threat level had gone to critical, had it
 4 not?
 5 A. It had, sir, yes.
 6 Q. And you would have been aware of that?
 7 A. Oh yes.
 8 Q. Yes. And then he says this:
 9 "I HIGHLY RECOMMEND that serious consideration is
 10 taken to carry out my suggestions from the friendly
 11 hostile report."
 12 A. Yes, sir.
 13 Q. Yes. So he appears to be referring back to the material
 14 that he had sent to you on 16 May, does he not?
 15 A. Possibly. However, he goes on to talk about CT taskings
 16 and Op Temperer in some detail, which was the quick-time
 17 action that could have been taken at that time.
 18 Q. Well, we can go back to it if necessary, but the email
 19 dated 16 May is titled with the subject "Friendly HR
 20 report findings", and we know that the attachment was
 21 called "Hostile Recon Report"?
 22 A. It was, yes.
 23 Q. So he seems to be referring back to, in this chain of --
 24 or in this email, to the hostile report which he had
 25 sent to you on 16 May. Do you agree?

20

1 A. Yes, sir, I would agree but, as I said, I would not have
 2 read this email at that time, and I had no phone call to
 3 let me know that there was something of huge importance
 4 in my inbox that I needed to see.
 5 Q. I know it seems like a silly question: how do you get
 6 access to your emails?
 7 A. I log on to my laptop, sir.
 8 Q. Do you have access through a phone or anything of that
 9 nature?
 10 A. Sometimes, but I -- in this particular circumstance, my
 11 full attention would have been on the critical plan
 12 operation and on members of the royal family at
 13 St Paul's during the time of critical . I would not have
 14 been being distracted by my inbox.
 15 Q. Now, as I understand it, in terms of implementation of
 16 recommendations from the hostile recon report that
 17 PC Hone has provided, that wouldn't have been a matter
 18 for you?
 19 A. No, sir, it would not.
 20 Q. Nor would taking the decision whether or not
 21 a particular recommendation should have been progressed;
 22 that wouldn't have been a matter for you either?
 23 A. No, it wouldn't, no.
 24 Q. So is there an organisational inefficiency here that
 25 you're being sent materials from PC Hone which contain

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1 important recommendations, I would suggest to you --
 2 A. Mm-hm.
 3 Q. -- and you have no responsibility for deciding whether
 4 or not those recommendations are good ones, whether they
 5 should be pressed, and yet, it's being sent to you for
 6 your review?
 7 A. It's something that we've learnt from, sir, I agree. It
 8 was not the right place for that post to be, within
 9 community policing, it happened because I volunteered
 10 a post to allow that position to be created. As
 11 a result of what's happened here, that post and that
 12 person are now sited within the CT Command and have
 13 nothing to do with community policing or myself.
 14 Q. Would you agree that had the report that PC Hone
 15 prepared been properly considered at that time, there
 16 would have been an opportunity for an urgent discussion
 17 as to whether or not something more needed to be done in
 18 relation to London Bridge?
 19 A. No, sir. This was not an urgent email that he sent me.
 20 It would have resulted in going into our governance,
 21 into Security Group, the following Thursday, because it
 22 was not in extremis. They were already aware and
 23 already having discussions including London Bridge,
 24 which were going to be part of the Corporation's board
 25 meeting at the end of June, so there is nothing within

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1 this that would have affected the train of events that
 2 were already taking place around this location.
 3 Q. You say this wasn't urgent. I agree with you the email
 4 of 16 May doesn't suggest that it's urgent, but the
 5 email of 24 May does suggest it was of high importance,
 6 and it includes within its text -- and we can see there
 7 "I HIGHLY RECOMMEND", and that's in capitals?
 8 A. Yes, it is, sir, but as I said, I wouldn't have seen it
 9 at that time, and also reading it now, I can see that
 10 it's all about CT taskings and the importance of getting
 11 those right because, no doubt, PC Hone would have been
 12 thinking about the initial response after Westminster
 13 and wanting to make sure that we were doing it right
 14 from the off this time.
 15 Q. But it's not necessarily just about CT taskings though,
 16 is it, because it says:
 17 "I HIGHLY RECOMMEND that serious consideration is
 18 taken to carry out my suggestions from the ... hostile
 19 report."
 20 The first question, I suggest to you, if you read
 21 that sentence is: well, what are the recommendations in
 22 the hostile report?
 23 A. Yes, it would be, but the only recommendation from that
 24 report that was available as an option to us,
 25 quick-time, during this operation, was the one around

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1 deployments and how we were deploying our officers.
 2 Q. And so when do you think, realistically, you read this
 3 email?
 4 A. It would have been when I returned from annual leave,
 5 sir, most likely, which I believe was 6 June.
 6 MR ADAMSON: Thank you very much.
 7 A. Thank you, sir.
 8 Questions by MS AILES
 9 MS AILES: Superintendent, I ask questions on behalf of
 10 a number of the families, including that of
 11 Christine Archibald, who died on the bridge.
 12 Your role, as I understand it, is in the uniformed
 13 policing directorate?
 14 A. It is, yes.
 15 Q. That's part of community policing?
 16 A. Community policing is part of uniformed policing.
 17 Q. Yes.
 18 A. Yes.
 19 Q. So your role is community policing?
 20 A. It is, yes.
 21 Q. And that encompasses a very wide range of activities
 22 from collision investigation to the mounted branch to
 23 schools and youth liaison?
 24 A. It does, yes.
 25 Q. Not that you are doing all of those things personally,

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1 but no doubt you have teams underneath you --
 2 A. I do, yes.
 3 Q. -- who are carrying out those things. But amongst the
 4 projects for which you have responsibility was, I don't
 5 know if it still is, Project Servator?
 6 A. Yes, it was, so the Project Servator team sat within
 7 community policing.
 8 Q. Does that remain the case?
 9 A. Yes, it does.
 10 Q. You were the direct line manager for Police Constable
 11 Hone?
 12 A. Yes, I was.
 13 Q. And you said that that was something of an unusual
 14 situation.
 15 A. Yes, it was.
 16 Q. Because Police Constable Hone was quite a long way,
 17 wasn't he, by that time, from being an ordinary police
 18 constable on his first beat straight out of training or
 19 even still in training?
 20 A. Yes, he's a very experienced officer.
 21 Q. A very experienced officer indeed, and a very able
 22 officer?
 23 A. Yes, I would absolutely agree.
 24 Q. You must be very proud of him?
 25 A. Very proud.

25

1 Q. He is highly trained, of course --
 2 A. Yes.
 3 Q. -- in what he does, but in fact it really goes beyond
 4 that, doesn't it: he is not just being trained by other
 5 people, he is at the cutting edge developing and
 6 researching the response to the terror threat that we
 7 face?
 8 A. Yes, he's a very innovative officer, as I'm sure came
 9 over yesterday.
 10 Q. Very much so. Were you here when he gave his evidence?
 11 A. No, I was not.
 12 Q. And he is now delivering training in that to other
 13 police forces in order to spread the work that he is
 14 doing?
 15 A. Yes, he's part of a team who now do that, yes.
 16 Q. And, I mean let's be blunt about this, the intelligence
 17 that the police and MI5 had did not indicate that this
 18 attack was coming, but your officer, PC Hone, did
 19 identify that London Bridge was the most vulnerable
 20 location for a marauding terror attack, didn't he?
 21 MS BARTON: That's not quite right. A specific type of
 22 attack.
 23 MS ALLES: Yes. A vehicle attack, followed by a knife
 24 attack, with a 2.5-tonne vehicle was the specific type
 25 of attack that was identified by PC Hone and Cerastes,

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1 wasn't it?
 2 A. I'm not sure.
 3 Q. Now, he had, as I understand it, something of a dual
 4 role: he was sending taskings to the Security Group and
 5 he also had his Servator role?
 6 A. So he was -- the bulk of his work was tasked and
 7 reporting into Security Group. He was doing a small
 8 piece of project work for communities around training
 9 for the business community.
 10 Q. You yourself were not on Security Group?
 11 A. No.
 12 Q. And not within the Counter Terrorism Command?
 13 A. No, not at all.
 14 Q. Which is why you say that your role as his line manager
 15 was anomalous and that's now been corrected?
 16 A. That's correct.
 17 Q. Certainly on the Servator side of things, we've seen
 18 that when he made recommendations, you very promptly
 19 actioned what he recommended?
 20 A. When I was in a position to see them then yes, I did.
 21 Q. You understood, for example, that he needed your help in
 22 the approach to Mr Duffy?
 23 A. Yes, I did.
 24 Q. He is a police constable.
 25 A. Yes.

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1 Q. We've seen from the minutes of the Security Group that
 2 in practice, he was attending and providing advice to
 3 inspectors, chief inspectors, superintendents, chief
 4 superintendents, even trainee commanders?
 5 A. Yes, he was.
 6 Q. But he does need a certain amount of clout, as it were,
 7 from senior officers in order to get things done,
 8 doesn't he?
 9 A. At times, yes, although I would say that the senior
 10 officers in our force are very open to receiving advice
 11 from anybody, regardless of rank.
 12 Q. But as his line manager you recognised that part of your
 13 role was to give him the clout that he didn't
 14 necessarily by virtue of his rank have commensurate with
 15 his abilities?
 16 A. Yes, possibly, although PC Hone is a very confident
 17 officer. He wouldn't have known who the person in the
 18 operation was on that day responsible for making those
 19 changes, and actually it wasn't me. I, as you say, had
 20 some clout, to speak to somebody, but he wouldn't have
 21 known who the silver commander was to approach.
 22 Q. Could we have [WS5014/29], please. This is the email
 23 that you say you have read many times since the attacks.
 24 You don't now know when you read it?
 25 A. I don't, no, I can't recall.

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1 Q. You were, however, aware of the Cerastes work because
 2 you had been involved in the procurement of it?
 3 A. Yes, of course.
 4 Q. We've only seen a summary because, understandably, the
 5 subject is regarded as sensitive, but is it my
 6 understanding that Cerastes were tasked to look at what
 7 might be an effective response through Project Servator
 8 to the threat, in other words, what policing actions
 9 might deter terrorists who were attempting to carry out
 10 reconnaissance?
 11 A. So I wasn't involved in putting together any kind of
 12 specification or agreeing what work they were actually
 13 going to be doing in any detail. That was done through
 14 PC Hone and the Crime Directorate.
 15 My understanding of it, that they were going to be
 16 coming in and doing some penetration testing and
 17 I didn't know a huge amount more than that.
 18 Q. Servator is part of the City of London response to
 19 hostile reconnaissance and hostile attacks?
 20 A. So yes, it's all about deterring and detecting hostile
 21 reconnaissance in the planning stages, yes.
 22 Q. So penetration testing is surely relevant to that work?
 23 A. Yes, of course, but Project Servator isn't one team of
 24 officers. We are a Project Servator force and all
 25 officers carry out Project Servator-style deployments.

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1 Q. If you've got people who are in the field acting as mock
 2 terrorists and they report back on their reconnaissance
 3 efforts and what seems attractive to them, that's going
 4 to give you an indication, surely, of how effective
 5 Project Servator is proving?
 6 A. Yes, it would have given the force an indication of how
 7 successful and how effective it was, yes.
 8 Q. Given that and given your involvement in procuring it,
 9 were you not interested in seeing the findings of the
 10 Cerastes report?
 11 A. Yes, I was hugely interested. The report didn't come in
 12 to me and what I did was I went along to a briefing
 13 later on from Cerastes after June where they came in and
 14 they went through their findings in detail with a number
 15 of us so yes, I was very interested.
 16 Q. Looking at the email that we see on the screen, we see
 17 the subject line there, "Friendly HR report findings".
 18 I understand that to mean friendly hostile recon report
 19 findings, and we see that that is the title of the
 20 attachment; would you have understood it in that way?
 21 A. Yes, I would.
 22 Q. Would it not have been evident to you simply from the
 23 subject line of the email that this was that very
 24 interesting work?
 25 A. Yes, it would have been obvious to me that it was

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1 something to do with that work. However, that work
 2 wasn't being directed by me, it was being directed by
 3 Security Group and by CT.
 4 Q. Could we have {WS5014/33}, please. You have told us
 5 that it was not clear to you that this was PC Hone's
 6 recommendations rather than Cerastes?
 7 A. Yes, I believe when I read this summary that this was
 8 a summary of Cerastes' findings and recommendations.
 9 I didn't realise that PC Hone had put in some of his own
 10 additions.
 11 Q. Where you see there in bold "Consideration should be
 12 given to installing hostile vehicle mitigation on
 13 London Bridge", is it of particular importance whether
 14 that firm recommendation in bold is one by PC Hone or by
 15 these experts? Does it even matter whether you thought
 16 this was Cerastes or PC Hone telling you this?
 17 A. It matters in that PC Hone had told me a short time
 18 before that the report had gone to a number of key
 19 people within the areas that would be responsible for
 20 considering this kind of work. So I read this, whenever
 21 I did read it, with the understanding that people
 22 already had the information in the form of the
 23 underlying report.
 24 Q. At the top of the page do we see "the reasons why
 25 I highlight this location and due to many factors which

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1 are listed below"; can you see that on screen?
 2 A. Yes, I can see that, yes.
 3 Q. Did that use of first person not indicate to you that
 4 this was PC Hone rather than the company?
 5 A. No. No, it didn't, no.
 6 Q. And where PC Hone says at the bottom of the page:
 7 "If you would like to read the full friendly hostile
 8 report ..."
 9 Did that not indicate to you that this was PC Hone
 10 providing you with this document rather than Cerastes?
 11 A. No, it did not, no.
 12 Q. PC Hone says there:
 13 "I would strongly recommend reading page 10 of the
 14 report in particular ..."
 15 Again, does this not give you an indication that
 16 this is his gloss on the report that ...?
 17 A. No, it doesn't. I mean, I wasn't told that this was
 18 what had been done and if you see on that document as
 19 well, it comes under a dotted line which, to me,
 20 separates out what's above the line from something that
 21 is from PC Hone himself with his name at the bottom.
 22 Q. Could we have page 34, please {WS5014/34}.
 23 "I HIGHLY RECOMMEND..."
 24 In capital letters, in an email to you from
 25 an officer who is on paternity leave with high

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1 importance.
 2 A. Mm-hm.
 3 Q. The first thing in his email is not about
 4 Project Servator, is it?
 5 A. No. No, it's about Operation Temperer, which we were
 6 not doing.
 7 Q. You accept, though, that "I HIGHLY RECOMMEND that
 8 serious, is taken to carry out my suggestions from the
 9 friendly hostile report" includes that recommendation
 10 that we have just seen to hostile vehicle mitigation?
 11 A. I would be surprised if it did because PC Hone would
 12 have known that that particular recommendation would
 13 have taken months, if not years, to progress, and this
 14 is about a high importance urgent action that he is
 15 clearly asking for which, to me, is all around how we're
 16 running our CT taskings.
 17 Q. In actual fact, this email could have said anything,
 18 couldn't it, because you've told us that you didn't read
 19 it until after the attacks?
 20 A. No, it's highly unlikely that I read it during that
 21 week. I would say it was one of the busiest weeks of my
 22 22-year career. It was exceptionally busy.
 23 Q. So it could, in actual fact, have been a recommendation
 24 to do something where everybody would have accepted that
 25 there was a fast-time tactical response that could have

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1 been deployed but you would never have seen that email?
 2 A. I wouldn't have been looking at emails during this time.
 3 When we're on an operation like this we work on phones
 4 and meetings and on police radios, we do not look at our
 5 emails in general.
 6 Q. You can understand, I'm sure, how frustrating it is for
 7 the families that I represent that there is an officer
 8 who has recommended hostile vehicle mitigation on
 9 London Bridge and his supervisor doesn't even read that
 10 email?
 11 A. He has recommended a permanent solution for hostile
 12 vehicle mitigation knowing that there is no tactical
 13 option available for any kind of fast-time measures. He
 14 would have known that that would have taken months, if
 15 not years, as I said. As a CTSA, he would have that
 16 knowledge.
 17 Q. Given that we now know that after the attack, hostile
 18 vehicle mitigation, a temporary solution that has
 19 remained in place for quite some time --
 20 A. Two years, yes.
 21 Q. -- was turned around within a day, was being installed
 22 by Sunday, 4 June. Can you understand how frustrating
 23 it is for the families to be told that institutionally
 24 it was all too difficult to get that done in fast-time?
 25 A. I think to my knowledge it took longer than a day to do

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1 that. I believe it was a very complex operation to get
 2 that HVM up on those bridges in such a short period of
 3 time, and the circumstances and the climate had
 4 completely changed, and I know Lucy D'Orsi was here
 5 earlier this week and talked about why she had made that
 6 decision. That was not the climate on the lead-up to
 7 this particular incident.
 8 Q. Does it amount to this: as an institution, police forces
 9 will only take swift action after the horse has bolted.
 10 "In extremis" means after an attack has occurred?
 11 A. No, that's not correct, because had there been any
 12 intelligence around this particular location, clearly it
 13 would have been considered completely different and
 14 I know that PC Hone would never have sent intelligence
 15 to me, that would certainly not be appropriate, but that
 16 intelligence did not exist at the time and that was
 17 a requisite for putting any temporary measures in
 18 a particular location.
 19 MS AILES: Thank you, that's all I ask.
 20 Questions by MS BARTON QC
 21 MS BARTON: Superintendent Isaac, can I just ask you one or
 22 two questions about your understanding of PC Hone's
 23 intentions when he sent the email that has been just
 24 referred to. Let's just have it back on the page, thank
 25 you very much.

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1 High importance, what's the title of that email?
 2 A. It's "Servator/Op Temperer".
 3 Q. Can you just explain to us, on 24 May, you have told us
 4 that there was an operation in place; what was the
 5 operation that was in place at that time?
 6 A. 24 May?
 7 Q. Yes.
 8 A. Yes, so there were two operations for which I was
 9 responsible that day. One was the critical plan, as the
 10 tactical commander, and one was an operation at
 11 St Paul's Cathedral for the OBE service where the Queen
 12 and the Duke of Edinburgh were attending.
 13 Q. Just help us with the critical plan. What critical plan
 14 did that relate to?
 15 A. So that was the critical plan that we had in place in
 16 response to the threat level change after the terrible
 17 incident in Manchester.
 18 Q. So effectively, on 24 May, the force was on high alert
 19 and putting a specific plan into place following the
 20 Manchester events?
 21 A. Yes, that's correct.
 22 Q. And you were involved in that?
 23 A. Yes, that's correct.
 24 Q. Even now, reading through that email which is entitled
 25 "Servator/Op Temperer", was there anything in it which,

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1 in your view, required fast-time action in respect of
 2 hostile vehicle mitigation?
 3 A. No, absolutely nothing.
 4 Q. Have you had the opportunity of reading -- because
 5 I don't think you were in court yesterday -- Sergeant
 6 Hone's evidence from yesterday?
 7 A. Yes, I have read it.
 8 Q. It was not his expectation, was it, that there would be
 9 fast-time action resulting from that email in respect of
 10 HVM?
 11 A. Yes, that's absolutely correct.
 12 Q. You know Sergeant Hone very well as a colleague, don't
 13 you?
 14 A. I do, yes.
 15 Q. What would your expectation have been of Sergeant Hone
 16 if he had wanted you, or indeed any other more senior
 17 officer to do something swiftly?
 18 A. He would have followed it up with a phone call, as he
 19 did with a previous incident.
 20 Q. So the earlier incident where he had noticed patrols
 21 that were not Servator patrols following the Westminster
 22 attack, he sent a high importance email and made a phone
 23 call?
 24 A. Yes, he did.
 25 Q. In respect of the -- perhaps I ought to ask this

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1 question: was there any phone call accompanying this
 2 email to you?
 3 A. No, there was not.
 4 Q. And in respect of the Servator tactics which he was
 5 asking for on the email of 24 May, were they already in
 6 place?
 7 A. Yes, they were.
 8 MS BARTON: Thank you very much.
 9 MR HOUGH: Thank you, superintendent. Those are all the
 10 questions we have for you. Thank you for your evidence.
 11 A. Thank you very much.
 12 THE CHIEF CORONER: Thank you very much indeed, thank you.
 13 MR HOUGH: Sir, the next witness is Mr Woolford.
 14 THE CHIEF CORONER: Thank you.
 15 MR RICHARD WOOLFORD (sworn)
 16 THE CHIEF CORONER: Good morning, Mr Woolford.
 17 A. Morning.
 18 THE CHIEF CORONER: Please take a seat and make yourself
 19 comfortable.
 20 A. Thank you very much, sir.
 21 Questions by MR HOUGH QC
 22 MR HOUGH: Would you give your full name to the court,
 23 please.
 24 A. Before I start, may I please offer my sincere
 25 condolences to the family.

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1 Q. Yes, please.
 2 A. I offer my heartfelt sincere condolences to yourselves
 3 who have lost a loved one, the people who have been
 4 injured and everybody who was impacted by this tragic,
 5 horrific, murderous act, and I do apologise you have had
 6 to face what you have been through.
 7 Q. Mr Woolford, what is your current job, your current
 8 role?
 9 A. My current role is the strategic director for security
 10 for the City of London Corporation, a post that
 11 I started in August 2017, having retired from the City
 12 of London Police on 3 July 2017.
 13 Q. I'll ask you about what your current role comprises
 14 shortly, but beginning with a chronology of your career,
 15 did you join the Metropolitan Police Service in 1987?
 16 A. I did indeed, sir.
 17 Q. Did you move to the City of London force in 2014 as
 18 a chief superintendent?
 19 A. I did indeed, sir.
 20 Q. In December 2015, were you assigned as Temporary
 21 Commander Operations in the City of London Police?
 22 A. I was, sir.
 23 Q. In late November 2016, did you have surgery and were you
 24 then off work until mid or late January 2017?
 25 A. I was, sir.

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1 Q. In February 2017, in anticipation of retirement from the
 2 City of London Police, were you seconded to the City of
 3 London Corporation?
 4 A. I was indeed, sir, but just for clarification, I did
 5 return back to the force for about two to three weeks.
 6 Q. So that was a brief interregnum, January/February 2017?
 7 A. Indeed it was, sir.
 8 Q. You were then on secondment at the City of London
 9 Corporation February to July 2017?
 10 A. February to, yes, indeed, yes. 3 July I retired.
 11 Q. And then you took up your current full-time post in the
 12 Corporation in August 2017?
 13 A. That is correct, sir.
 14 Q. Had you had experience of counter terrorist or
 15 protective security work within the police before
 16 joining the Corporation?
 17 A. I was the Commander of Operations, so I used to chair
 18 the Security Review Group, sir.
 19 Q. So in that capacity you were familiar with the counter
 20 terrorist deployment work of the City of London Police?
 21 A. I was indeed, sir, yes.
 22 Q. Were you also familiar with the work of counter
 23 terrorist security advisors and matters of protective
 24 security such as the police advising on protection of
 25 buildings?

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1 A. At a strategic level, not at the level that Matt Hone
2 was, sir.
3 Q. So you knew what went on?
4 A. Indeed.
5 Q. You saw it from the strategic level, but you didn't get
6 involved in the nuts and bolts?
7 A. CTSAs like PC Hone, Sergeant Hone as he is now, and all
8 the other CTSAs have a vast knowledge of experience as
9 you have heard. My role was at a strategic level.
10 Q. Moving on to your City of London Corporation role,
11 between February and July 2017, and looking at page 2 of
12 your witness statement, what was your role, in a few
13 sentences, over that period?
14 A. In a few sentences, I was seconded into grip, my
15 terminology, to provide direction and clarity, in
16 relation to four highly vulnerable locations that had
17 been subject to multiple counter terrorism security
18 advice reports that the Corporation had had for some
19 period of time. A company had been secured by the name
20 of AECOM, who were providing recommendations to mitigate
21 those, and there had been a Cross-Cutting Board set up
22 to try to work out how to mitigate around it. By 2017,
23 I was then sent in to provide clarity and direction so
24 that we could get it in front of the members to secure
25 the funding to get the work done.

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1 Q. So, taking that in stages, before February 2017, there
2 had been advice from CTSAs to the Corporation about
3 sites of high risk or high vulnerability?
4 A. There were four locations, sir, that had multiple threat
5 terrorist concerns and there were multiple mitigations
6 needed in relation to those, including hostile vehicle
7 mitigation, bomb blast mitigation, CCTV, control room
8 and guarding issues, as well as access control, and
9 I was sent in to provide clarity around that.
10 Q. Your role was, as you've indicated, to focus upon those
11 sites and to review work that was going on in relation
12 to them; is that right?
13 A. That's correct, sir, yes.
14 Q. Did you have any broader remit regarding counter
15 terrorism or protective security for the Corporation?
16 A. I was to provide advice in relation to security-related
17 matters and to assist in relation to creating a security
18 culture across the organisation, which had also started
19 back in January 2016, and I was there to help.
20 Q. What, in practice, did you do from day-to-day in that
21 job?
22 A. When I first arrived, my reporting was to Peter Lislely,
23 the Assistant Town Clerk and the Town Clerk, I met them
24 to understand what my role was. On a day-to-day basis
25 I was then working with the building managers

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1 responsible for those four locations, and also in
2 relation to this AECOM company who provided multiple
3 options and then working with counter terrorism security
4 advisors to understand the threat, understand what the
5 proportionate mitigation measures would be rather than
6 a raft of options provided by a private company, and
7 then to make sure that could then be translated into
8 threat, risk, options and recommendations to go in front
9 of the members, which I got sorted out by 8 June.
10 Q. So you were dealing with the people responsible for the
11 protective security on these high-risk locations --
12 A. Indeed.
13 Q. -- the consultants and the building people, you were
14 dealing with the CTSAs from the police about those
15 buildings and upgrades to them; were you also involved
16 in any kind of systematic assessment of the
17 Corporation's area, its roadways, concerning security
18 risks?
19 A. Not at that point, sir, no.
20 Q. In the course of your secondment were you made aware of
21 something called a matrix prepared by or on behalf of
22 the Corporation?
23 A. I was, indeed, sir.
24 Q. What was the genesis of that matrix?
25 A. My understanding of it, it was created in May 2016, it

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1 was based around a small amount of money that had been
2 set aside to provide improvements to the security
3 measures needed, and because of the demands from
4 multiple sites and multiple departments within the
5 Corporation, Peter Lislely, who was the Assistant Town
6 Clerk, tasked a private consultant to come up with
7 a matrix that could be utilised to prioritise, based on
8 threat and risk, fundings at that time and out of that
9 there were five locations that were prioritised, one
10 that had already had some work done, so the focus then
11 was on the four, and that was the four that I was sent
12 in to grip -- my words -- to provide clarity of
13 direction, and also I was asked to review the fifth
14 location that had also had work been done on it.
15 Q. Over the time before you came in, had the Corporation
16 been receiving engagement and advice from CTSAs about
17 places in the Corporation area?
18 A. The CTSAs had provided advice in relation to those five
19 locations.
20 Q. Were the five locations chosen by the CTSAs or by the
21 Corporation?
22 A. By the CTSAs. They fell in line with the crowded places
23 work. There were three of those designated as crowded
24 places.
25 Q. Were any of those five places London Bridge?

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1 A. No, they were not, sir .
 2 Q. To your knowledge, had any of the CTSA advice related to
 3 London Bridge?
 4 A. Not at all, sir . Not until I asked PC Hone to review
 5 the matrix at the end of April when for the first time
 6 London Bridge was brought up as a particular concern.
 7 Q. We'll come to that later . When you arrived in early
 8 2017, was there anybody in the Corporation mentioning to
 9 you about London Bridge being a potential target or
 10 a high-risk area before the end of April?
 11 A. No, sir .
 12 Q. You've said that a modest security budget had been
 13 provided before your arrival . Was the scale of the
 14 budget on your arrival a matter of concern to you?
 15 A. Yes, it was, sir .
 16 Q. What was the nature of that concern?
 17 A. In relation to the amount of work that was required in
 18 these buildings that had not been modified for a long
 19 time, and the amount of work that was being recommended
 20 by the counter terrorism security advisors to mitigate
 21 that, the small budget set to one side was insufficient
 22 to meet that, which is why I then found out about the
 23 matrix, which is why I then briefed the Town Clerk, the
 24 Assistant Town Clerk, in relation to what was being
 25 required with the recommendations coming, and that's

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1 when we then -- they call it a Gateway 4, but it's
 2 a project management approach which the Corporation uses
 3 that you then take to members, the local politicians ,
 4 who then agree the funding that you can have within
 5 an envelope, and that was more or less tripled by the
 6 time it went to them on 8 June which was agreed and
 7 authorised that then allowed for the detailed design and
 8 information and procurement of those works.
 9 Q. When did you secure additional funding for the
 10 additional -- for the sites which you had been focusing
 11 on in the early part of 2017?
 12 A. It started with my work in February, so as soon as
 13 I arrived in February 2017 I realised there was
 14 insufficient funds that had been set to one side. So
 15 between February and March I was doing the work in
 16 relation to that, and by the end of April, I had done
 17 sufficient work with the CTSAs and with the team
 18 reporting to Peter Lisle and the Town Clerk that the
 19 project manager from the City Surveyor's Department
 20 could then take to the members that decision, and that
 21 took place, there were two meetings in May that it had
 22 to go through and the final sign-off for the funding was
 23 on 8 June.
 24 Q. And that original pressure for funding was you pressing
 25 for funding for the works on those four sites which

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1 didn't include London Bridge?
 2 A. It didn't, that's correct, sir, it didn't include
 3 London Bridge. Those four sites were the ones I was
 4 working with the CTSAs at the time.
 5 Q. At the end of April 2017, did you have communications
 6 with PC Hone about him reviewing the matrix which had
 7 been prepared and which you had within the Corporation?
 8 A. I had, sir, but I'd been working with PC Hone from the
 9 whole time that I was within that environment. PC Hone
 10 was one of the original counter terrorism security
 11 advisors for one of the locations that I was working on.
 12 Post Westminster Bridge PC Hone and I did a re-review of
 13 one of those locations and found additional mitigations
 14 that were required at one of those locations to mitigate
 15 against vehicle-as-weapon, that was included in that
 16 work so I was working with PC Hone throughout.
 17 In addition to that, PC Hone had provided guard
 18 training for me to 50-plus -- I can't remember the exact
 19 number, sir -- but there were over 50 guards that were
 20 trained which were including Corporation guards and
 21 private guards in relation to the hostile mitigation
 22 work that is done by the Project Servator -- it was
 23 called Project Servator React, very specifically in
 24 relation to guard.
 25 So throughout that time period I was working with

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1 PC Hone and at the end of April, because we had got
 2 ourselves in relation to those priority locations that
 3 were highly vulnerable, that were subject to multiple
 4 CTSA reports and three of which were designated crowded
 5 places, once I had got that into a structure, I then
 6 asked PC Hone to review this matrix that I'd been made
 7 aware of so that we could make sure that we had all the
 8 vulnerability locations that the Corporation owned
 9 captured within that so it could then go in front of the
 10 Town Clerk and then the committee.
 11 Q. Before you had that exchange about the matrix at the end
 12 of April, through all these communications with PC Hone,
 13 had he told you that he regarded London Bridge as
 14 particularly vulnerable?
 15 A. Not at that point. I was very surprised when I saw the
 16 tone of those emails. PC Hone and I worked closely
 17 together. At no point had that been said to me until
 18 such time as he replied back to me in relation to that
 19 matrix, and then I met him, I think it was either 10 or
 20 11 May, but it was as soon as after he sent that email.
 21 Q. So you were working with him for some time
 22 between February and April discussing vulnerable sites,
 23 including after the Westminster Bridge attack?
 24 A. Indeed.
 25 Q. But he mentioned nothing about London Bridge's

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1 particular vulnerabilities , a topic on which we've heard
 2 him give evidence yesterday?
 3 A. No, sir , because I was not involved in those meetings
 4 that he would be dealing with. He was working
 5 specifically in relation to long-term permanent
 6 solutions at four locations and that was the working
 7 conversations we had.
 8 Q. If we can bring the matrix up, it 's {WS5014/18}, that's
 9 the cover page, and {WS5014/19} is the matrix itself .
 10 A. That is correct, sir , that was the one that the
 11 Corporation had had in place by their consultant.
 12 Q. So that had been produced by a consultant before you
 13 arrived in the Corporation, and it had identified
 14 a number of places which you say the CTAs had been
 15 advising upon?
 16 A. That is -- well, the top five all related to counter
 17 terrorism security advisory reports. The ones beneath
 18 were the locations that the Corporation had also had on
 19 there and they were reviewing and that's where the bids
 20 were coming in to Peter Lisley in relation to funding.
 21 Q. Help me to understand this: the matrix has a scoring
 22 system, we can see --
 23 A. It does sir , yes.
 24 Q. -- where for each location , characteristics are
 25 identified , whether it's a business location, whether

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1 it's a critical building, whether there's been
 2 a previous terror attack, and scores are allocated
 3 depending on whether it falls into each of those
 4 categories?
 5 A. Yes, it does.
 6 Q. Were the list of places for inclusion in the far left
 7 column, and therefore for scoring on this matrix, chosen
 8 by CTAs, by the consultant or by somebody else?
 9 A. Sorry, sir , can you repeat the question?
 10 Q. In order to score the buildings --
 11 A. Yes.
 12 Q. -- you've got to chose them in the first place.
 13 A. Yes.
 14 THE CHIEF CORONER: Or the venues, I think.
 15 MR HOUGH: Or the venues.
 16 Who chose the venues, was it the CTAs, the
 17 Corporation or somebody else?
 18 A. Without a doubt the CTAs had provided recommendations
 19 for five locations. The other locations, I believe --
 20 I wasn't involved in this -- I believe were chosen by
 21 the Corporation. I don't know who, sir, but it was
 22 included on the matrix by them.
 23 Q. And in choosing the top five , was the list determined by
 24 the scoring system on this document or by the advice of
 25 the CTAs?

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1 A. It was by the overall risk score on the right-hand side.
 2 So on the right-hand side in the purple where you see
 3 23, 23, 22, 21, 15, they would be in the top five
 4 because of their overall risk score.
 5 Q. So the CTAs had been talking to you about a number of
 6 sites , but the top five for consideration were
 7 determined by the scoring system?
 8 A. The ones that I worked with, which is different to how
 9 this was started, the work that I was doing with the
 10 counter terrorism security advisors were very much in
 11 relation to the top five because they had submitted
 12 reports, the reports that had been done were in relation
 13 to highly vulnerable locations , all five of which had
 14 access to the public at all times. All five -- well,
 15 four were designated on there as iconic , one could argue
 16 all five were iconic. Without saying the name of the
 17 place I think most people in the room would say it was
 18 iconic, but it's not been scored as it . Four of those
 19 regularly hosted internationally acclaimed events and
 20 three of those were designated crowded places under the
 21 tiering system. So that was the work that I was doing
 22 and they were on locations that the CTAs submitted
 23 reports that the Corporation had had for a long time and
 24 needed urgent mitigation when I got involved in it .
 25 Q. But not all were crowded places by the official system?

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1 A. The official system, three of them were. I think it
 2 actually shows you on there, I think, sir .
 3 Q. Yes, there's a score depending on whether a place is
 4 a crowded place as advised by the CTA?
 5 A. Yes, I think on that one it actually shows that all five
 6 of those were crowded places, but I think on the updated
 7 version that PC Hone sent me back it's actually three.
 8 Q. Now, London Bridge wasn't on that matrix; it hadn't been
 9 selected by that system?
 10 A. Not at all, sir , no.
 11 Q. Can we now look at {WS5014/21}. In response to your
 12 request, did Mr Hone send an email back to you after he
 13 had done his work reviewing the matrix?
 14 A. Absolutely, he did, sir .
 15 Q. And we can see from his covering email that he explains
 16 that the new score which he had applied, had changed the
 17 ranking order of some sites.
 18 A. That is correct, sir .
 19 Q. He had made some changes to columns and so on to arrive
 20 at the new scorings?
 21 A. He did, sir .
 22 Q. And he added that London Bridge should be considered the
 23 most vulnerable for low sophisticated attacks using
 24 a weapon?
 25 A. Absolutely sir , he did.

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1 Q. Then {WS5014/23}, please, do you see he had added
 2 London Bridge and he'd identified a number of factors in
 3 relation to it, including that it was a critical area,
 4 performed critical functions, and that it was a business
 5 location?
 6 A. That's correct, sir. The top five -- as you can see, he
 7 has reduced the score on every single location. He had
 8 introduced, exactly as I had asked him to in relation to
 9 alternative locations, the top five he had readjusted in
 10 their positions but they remained the top five most
 11 urgent aspects for the Corporation to be working on, but
 12 he had now included London Bridge for the first time,
 13 quite rightly, sir, as I'd asked him to.
 14 Q. And he had identified it as iconic?
 15 A. He had.
 16 Q. When you saw London Bridge on this matrix in the list of
 17 top areas, and saw his particular reference in the
 18 covering email to it being the most vulnerable to low
 19 sophistication attacks with a vehicle, did that ring
 20 alarm bells with you?
 21 A. It did, indeed, so that's why I asked to meet him.
 22 Q. Now, you would have been aware at that time of the
 23 recent Westminster Bridge attack and the attack with
 24 a vehicle as a weapon in Stockholm at the start
 25 of April, about a month before?

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1 A. I was, indeed, and also other attacks that had taken
 2 place.
 3 Q. Here was Mr Hone adding London Bridge to the list and
 4 describing it as very vulnerable to the type of attack
 5 which has been seen in recent months. Was that a matter
 6 of concern for you?
 7 A. It was, that's why I asked to meet him. He sent me the
 8 email, I think it was at 9.54 pm on 8 May, that's
 9 recollection, I can't remember when I read it but
 10 I arranged to meet him as soon as I possibly could.
 11 I think it was 10 May but it was certainly before the
 12 Security Board meeting on 11 May. So it was around
 13 about 10 or 11 May.
 14 At that point in time I sat down and spoke to him,
 15 we talked through the matrix and I categorically asked
 16 at that point: is there any urgent action required by me
 17 or by the Corporation in relation to this, to which he
 18 said, no, it had been discussed in police meetings and
 19 conversations that I had not been party to or was aware
 20 of at that time but he was going to give me
 21 recommendations in relation to this long-term permanent
 22 solution.
 23 Q. So let's take that in stages. You were concerned about
 24 the addition of London Bridge?
 25 A. Indeed.

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1 Q. You arranged to meet him within, I think, a couple of
 2 days?
 3 A. I think it was 10 or 11 May from the way my diary in my
 4 head was working.
 5 Q. You sat down with him and amongst other things you asked
 6 him whether there was anything that needed urgent
 7 action?
 8 A. From me or the Corporation, to which he categorically
 9 said: no, it had been discussed in police meetings and
 10 conversations, he was bringing it to my attention for
 11 long-term permanent solutions, knowing the role that
 12 I had at the time and that he was working with me in
 13 relation to long-term permanent solutions, and
 14 I immediately took that to Peter Lisley, the Assistant
 15 Town Clerk, who was the decision-maker in relation to
 16 the Corporation.
 17 Q. Now, we know by that stage that he had produced a --
 18 that he was working with a company called Cerastes on
 19 hostile reconnaissance work and penetration testing.
 20 Did he mention that to you?
 21 A. He did, indeed, sir, and I actually, after our
 22 conversation, asked to take a copy from him so I could
 23 brief the relevant building manager for the work.
 24 The conversation I had with him was in two parts:
 25 the first part was in relation to this matrix. The

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1 first part was relating to the top five being confirmed
 2 that they were still the top five locations as they were
 3 subject to multiple terrorist threat methodologies and
 4 required multiple mitigations. He then talked about
 5 London Bridge, and London Bridge at that point in
 6 relation to me was for long-term permanent solutions and
 7 that he would provide recommendations to me.
 8 He then talked about the Cerastes document.
 9 Cerastes, I was already aware of from the Cerastes 1,
 10 but the Cerastes -- this is interim terminology, as has
 11 been discussed in the court this week -- Cerastes
 12 interim 2 had five locations in it. All five of those
 13 he had risk-assessed and included into this matrix. One
 14 of those was London Bridge. One of those was another
 15 location lower down in relation to that, but was
 16 a location that now needed to be considered as well, and
 17 three of those related to the top five locations that
 18 I was working on, including the top location and
 19 a location -- I think it's the -- that PC Hone was the
 20 original CTSA for and had worked with me at that
 21 location, and the focus of that conversation was all
 22 about guarding, it related to the guards that he had
 23 trained on 28 March 2017.
 24 At that training session it was called Project
 25 Servator React which is now known, and I think PC Hone

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1 referred to it yesterday as Action Counter Terrorism, so
 2 ACT, SCan, See, Check and Notify, that is the new model
 3 that's been taken under NaCTSO. But at the time with
 4 CPNI it was created Project Servator, React he delivered
 5 that training for me. At that training he told them
 6 there would be friendly hostile reconnaissance and he
 7 would provide feedback. This was him providing the
 8 feedback to me so I could then take it back to those
 9 building managers, to which I did.

10 I met the two locations that he was specifically
 11 talking about, briefed those building managers in
 12 relation to it. One of those was the chair of a new
 13 body that had been formed on -- I can't remember the
 14 exact date, but it was in February, called the Security
 15 Advisory Board. This was a board that had been set up
 16 on behalf of the Town Clerk and Peter Lisley to bring
 17 consistency of security across the Corporation and
 18 I briefed that person not only in relation to their
 19 building, because that was the number one most
 20 vulnerable location on the system, but also in relation
 21 to the generic points around guarding so that person
 22 could cascade it across the organisation.

23 The other building, I briefed them as well, as
 24 an individual person, and then I had taken all of this
 25 to Peter Lisley, the Assistant Town Clerk, so that it

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1 could then be discussed and it was set to go to the June
 2 Security Board.

3 Q. You have given us a lot of information there.

4 A. Sorry, sir, I was trying to give you everything.

5 I apologise.

6 Q. In the course of the meeting you say that you discussed
 7 the Cerastes work.

8 A. Yes, we did, yes.

9 Q. You say that you knew that that work was ongoing before
 10 you met Mr Hone on around 10 May because it had been
 11 raised when he had been training people for guarding
 12 work?

13 A. In relation to the second Cerastes that was about to
 14 take place, yes. The first Cerastes, do you want me to
 15 explain that?

16 Q. Please, briefly.

17 A. The first time I ever became aware of Cerastes is when
 18 I came back from injury and my operation. I was --
 19 I had just started in the Corporation. PC Hone invited
 20 me to a presentation, which was at Wood Street Police
 21 Station where CPNI, Centre for Protection of National
 22 Infrastructure, the leads in relation to
 23 Project Servator, were there with a company called
 24 Cerastes. The first time I'd ever heard of them or seen
 25 them.

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1 At that presentation, there was a talk about the
 2 history of Servator, how it worked, and how they were
 3 monitoring and providing feedback in relation to
 4 Servator tactics. I remember at the time thinking: this
 5 is a brilliant initiative because it is no longer police
 6 monitoring police, it's an independent company
 7 monitoring CT taskings and performance.

8 During that they talked about three locations, none
 9 of which related to London Bridge, and during that
 10 conversation, I remember specifically saying this is a
 11 brilliant initiative but you need to follow that up with
 12 CTSA advice in relation to any vulnerability, which
 13 I was told was going to happen. They also talked about
 14 communication aspects in relation to how that works with
 15 Servator to which I had made advice, because that was
 16 only my role at that point in relation to an advisory
 17 role, that that should be communicated force-wide,
 18 because it's the first I'd heard of it, and everyone in
 19 the force needs to know this was taking place in case
 20 they came across it and also in case it was reported.

21 So that's what took place, and the third part of
 22 that was then very much focused around the importance of
 23 guards and how they can have an impact on hostile
 24 reconnaissance, and as a result of that, that's how
 25 I got PC Hone booked to deliver this new course on

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1 behalf of CPNI and myself into the City of London
 2 Corporation, guards and private guards on 28 March.

3 Q. Okay, simplifying --

4 A. Sorry.

5 Q. -- at the start of 2017, you became aware of the work
 6 with Cerastes --

7 A. Yes.

8 Q. -- in the way you've described, and then you became
 9 aware as time went by of the second part of the study?

10 A. Yes.

11 Q. You then discussed the actual report from that second
 12 part of the study on or around 10 May with Mr Hone?

13 A. Absolutely.

14 Q. And you were interested, so you asked for and were given
 15 a copy of the report?

16 A. I asked for a copy so I could brief the building
 17 managers in relation to this, and also briefed
 18 Peter Lisley, Assistant Town Clerk, the fact that this
 19 had taken place, linked to London Bridge being
 20 identified as well.

21 Q. Now, we're not using a full copy of the report because
 22 it contains so much sensitive information, but we're
 23 looking at an abbreviated version which contains direct
 24 lifts.

25 A. Understood.

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1 THE CHIEF CORONER: If we're going to go to the report would
 2 it be sensible to take our short break there, Mr Hough,
 3 then we can do it as a piece. And it may just give us
 4 the chance to catch up. No criticism at all, it was
 5 quite a lot of information condensed into a quite
 6 a short period, but we can distil that whilst we have
 7 our break.
 8 A. Sorry, sir, I was just trying to share everything with
 9 you.
 10 THE CHIEF CORONER: That's no problem at all. We'll sit
 11 again in 10 minutes' time.
 12 (11.26 am)
 13 (A short break)
 14 (11.43 am)
 15 MR HOUGH: {WS5015/15}, please.
 16 Mr Woolford, I was just about to ask you about the
 17 content of the Cerastes report which was given to you at
 18 that meeting around 10 May. We know that much of the
 19 report was concerned with the effectiveness of
 20 Project Servator deployments; do you recall that about
 21 it?
 22 A. I do, sir, yes.
 23 Q. But it also contained, as we see from the bottom of this
 24 page, a graphic which identified London Bridge as
 25 vulnerable or attractive from a terrorist perspective,

1 particularly identifying use of vehicle as a weapon as
 2 the means of attack, and adding comments in the
 3 right-hand column:
 4 "High levels of predictable crowds.
 5 "Attractive and relatively iconic site.
 6 "Viable and attractive in either direction, or
 7 slightly more so going southbound due to concentration
 8 of coffee standards and bus stop at southern end."
 9 A. I see that now, sir, but that's not in the interim
 10 report 2. It says it in the sentence above.
 11 Q. I see. That's in the final version of the report; that
 12 wasn't seen in the interim version?
 13 A. Yes.
 14 Q. Could we look at {WS5015/17}, then, please. We see here
 15 a description of London Bridge as lending itself to
 16 a ramming attack with no physical barriers in place to
 17 prevent a vehicle from mounting the pavement in either
 18 direction. Was that something that you read in the
 19 report you received on 10 May or thereabouts?
 20 A. I have read that, sir, I don't recollect when I read
 21 that, but that was not part of the conversation PC Hone
 22 and I had at the time. PC Hone advised me that that was
 23 inside the document and that he was going to give me
 24 long-term permanent solutions in relation to it --
 25 sorry, recommendations about long-term permanent

1 solutions.
 2 Q. So you don't recall reading in the report that the
 3 bridge might be an attractive target for a vehicle
 4 ramming attack?
 5 A. I do remember reading that at some point. Which point
 6 of the timescales, I don't remember. I do remember the
 7 conversation I had with PC Hone: PC Hone told me that
 8 that was in the report but we had already discussed
 9 London Bridge when we were discussing the matrix and he
 10 said that there was no immediate action required by me,
 11 it had been discussed in police meetings and in
 12 conversations I hadn't been part of and he was going to
 13 give me recommendations in terms of long-term permanent
 14 solutions.
 15 The focus of our conversation is: you haven't got
 16 this in this redacted document, but I think you've seen
 17 the whole document.
 18 Q. I have.
 19 A. And it's all to do with three high-risk locations and
 20 there's maps and there is red zones and blue zones and
 21 that's the sole focus of our conversation in relation to
 22 this document, but I have read this. I honestly cannot
 23 remember at what point I read that particular part of
 24 that document, but I was waiting for the
 25 recommendations, which was going to come to us, but I'd

1 already told Peter Lisley, the Assistant Town Clerk,
 2 this was coming, and it was going to the June senior
 3 Security Board to be discussed.
 4 Q. Just to be clear, you accept that the interim 2 report
 5 does contain sections --
 6 A. It does.
 7 Q. -- identifying London Bridge as an attractive target?
 8 A. It does.
 9 Q. And if we look over the page to {WS5015/18}, we see in
 10 the abbreviated version a reference to how it could be
 11 used for a southbound attack, first of all, mounting the
 12 pavement, attacking pedestrians on the pavement, and
 13 then starting attacks with a bladed weapon at the end of
 14 that?
 15 A. It does, sir, yes.
 16 Q. Is that something you recall reading at the time or
 17 being told about by PC Hone?
 18 A. I don't remember being told by PC Hone. I remember the
 19 conversation with PC Hone, as I said, in relation to the
 20 matrix, and he identified that London Bridge was the
 21 most vulnerable to a low sophistication vehicle attack.
 22 I had asked the question was there any immediate action
 23 required by me or the Corporation, he had said no, he
 24 was going to give me recommendations in relation to
 25 a long-term permanent solution.

1 I do remember reading this. At what point
 2 I remember reading this I do not recollect, sir, but the
 3 focus of our conversation was all about those other
 4 locations.
 5 Q. Did he mention in your conversation that not only did he
 6 regard London Bridge as highly vulnerable but that
 7 Cerastes had identified it as vulnerable as well?
 8 A. I don't remember the conversation with him at the time
 9 in relation to Cerastes identifying it highly
 10 vulnerable. Cerastes were tasked by PC Hone to go to
 11 five locations to assess how easy it was for them to
 12 carry out hostile reconnaissance in relation to how
 13 effective and efficient the CT taskings, so basically
 14 the performance monitoring of the work he had sent out.
 15 Q. I appreciate that, but the report, in forming a view of
 16 the effectiveness of Servator, and in preparing hostile
 17 reconnaissance, looked at methods of attack?
 18 A. It did, at all the locations.
 19 Q. And it identified methods of attack as viable or
 20 non-viable according to the views of those carrying out
 21 the exercise?
 22 A. It did. In actual fact it also offered contrary advice
 23 in relation to certainly where PC Hone had given me
 24 advice in relation to a location -- being careful not to
 25 say the location. We had, post-Westminster Bridge, gone

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1 back to that location together with the company called
 2 AECOM who had given the recommendations.
 3 When we went to that, PC Hone gave me
 4 recommendations about vehicle-as-weapon at that
 5 location. This document which you haven't got on here,
 6 but you've seen the full document, it says that is
 7 an unattractive option and they wouldn't carry it.
 8 I will always go by the recommendations of a CTSA over
 9 a private company and this, without a doubt, is valid
 10 because it tragically, horrendously happened, that he
 11 was going to give me recommendations for a long-term
 12 permanent solution to take to --
 13 Q. What I'm just trying to establish at this stage is,
 14 you've told us very clearly that Mr Hone had told you
 15 about the vulnerability of London Bridge from his
 16 perspective?
 17 A. He had, yes.
 18 Q. In a word, before the attack, were you aware that
 19 Cerastes had also identified London Bridge as
 20 vulnerable?
 21 A. I knew it was in the document, sir, yes.
 22 Q. So you knew around this time, around 10 May, that
 23 London Bridge had been identified as vulnerable not only
 24 by the CTSA whose advice you respected over all else,
 25 but also and separately by the private company carrying

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1 out this exercise we've heard described?
 2 A. That private company, any location you send them to,
 3 will find vulnerabilities and will give you attack
 4 methodologies. So yes, it was in that document, but
 5 PC Hone and I had spoken about it and he was clear to me
 6 when I asked the question, there was no immediate action
 7 required by me or the Corporation in relation to this,
 8 he was going to give me long-term permanent solutions
 9 that had been discussed in meetings and conversations
 10 that I had not been party to in the role that I had at
 11 that time.
 12 Q. On 11 May did you attend the City of London Police
 13 Security Group meeting which we know took place that
 14 day?
 15 A. I did, sir, yes.
 16 Q. Do you recall any discussion of the Cerastes report and
 17 what would be done with it at that meeting?
 18 A. Only in that he had mentioned -- I think the words "pen
 19 testing" was often referred to in relation to this: that
 20 he had got it, that it would continue to take place and
 21 that he would be providing a summary of that with
 22 recommendations, which is the same conversation he had
 23 with me, that he was going to give me recommendations
 24 which I never saw or received.
 25 Q. He said he told the group he was going to produce

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1 a summary with his own recommendations?
 2 A. That's correct.
 3 Q. You thought that that would come to you as well?
 4 A. Yes, indeed.
 5 Q. But you didn't receive it?
 6 A. I never received it. But I had already taken it and
 7 actioned this with the Corporation to go to the June
 8 Security Board.
 9 Q. In the period between 11 May and 3 June 2017, did you
 10 chase Mr Hone for his summary and recommendations?
 11 A. Between what period, sir?
 12 Q. Between 11 May and 3 June?
 13 A. No, I didn't, because we had had the tragic events of
 14 Manchester taking place. We had gold groups taking
 15 place in relation to that and at no point was
 16 London Bridge or any other location brought up in that
 17 way of any concern, so no, I didn't, I was waiting for
 18 it. But even if I had received it, unless I had been
 19 told that there was any urgency or intelligence, in
 20 which case we would have gone down a different route
 21 with the gold group, at this point it was very much in
 22 relation to long-term permanent solutions, I had
 23 arranged that with the Corporation to go into the June
 24 Security Board.
 25 Q. So the background was that you were going to be going to

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1 the Corporation in June for funding and support for
 2 whatever recommendations PC Hone produced in relation to
 3 the identified sites which now included London Bridge?
 4 A. The June Security Board would have discussed
 5 London Bridge, it would also have discussed other
 6 locations that were included in it. One of the
 7 recommendations I'd also made to Peter Lisley and the
 8 Town Clerk was to expand the size and membership of the
 9 senior Security Board because by this point I'd worked
 10 out the importance a department called the Department of
 11 Built Environment had, who are responsible for the
 12 public realm, and they were not part of the senior
 13 Security Board.

14 So they would have been there and they would have
 15 been the ones to pick up and action work in relation to
 16 London Bridge specifically, but also I was having
 17 conversations at the time with Special Branch and
 18 a chief superintendent by the name of Paul Barnard and
 19 we were discussing other locations that were not owned
 20 by the Corporation, that were causing us concern in
 21 relation to vulnerabilities across the City.

22 It's been discussed this week, crowded places and
 23 crowded spaces. These were the crowded spaces part
 24 outside of crowded places, without wishing to get bogged
 25 down in that area, it's areas that are owned by

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1 a private company which have mitigation around it, they
 2 are coming across that to another area and there may be
 3 another building which has got mitigation to protect it,
 4 but suddenly you've got an area in the middle which is
 5 then very crowded and there is no protection, how do we
 6 mitigate that, and there were two specific locations
 7 that I was discussing in relation to that which is why
 8 I had also said to Peter Lisley: you need to have
 9 a conversation around crowded places and spaces. All
 10 that was going to the June Security Board.

11 Q. During that busy period and your conversations with
 12 Mr Lisley and others, did you discussed the revised
 13 matrix with anyone?

14 A. With Mr Lisley? Yes, absolutely.

15 Q. Or with any of your colleagues at the Corporation?

16 A. Yes, the Town Clerk, Mr Lisley, both of them were made
 17 aware in relation to the fact that the matrix had been
 18 rescored, readjusted, London Bridge had been included
 19 and that was all going to that June Security Board.

20 Q. Did you discuss the Cerastes report and what Cerastes
 21 had said with anyone?

22 A. I had, I'd told them in relation to the locations that
 23 were inside it, the actions that I'd taken in relation
 24 to briefing the building managers and also in relation
 25 to the fact that this all linked into the matrix, all

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1 being scored, and that was going to the June Security
 2 Board.

3 Q. If the London Bridge attack had not happened when
 4 in June was the Security Board going to look at these
 5 matters?

6 A. It's normally six weeks after, so I think there was
 7 a board meeting on the 9th. The date it actually sat
 8 was 27 June, but whether that was the date it was meant
 9 to have been, I can't remember, but that's when it
 10 actually sat. But in between there there had been,
 11 I think, two or three gold groups in relation to
 12 Manchester linked with the Extraordinary Security Group
 13 meetings which had taken place to which the Town Clerk
 14 had chair, which also had the City of London Police in
 15 attendance.

16 Q. Based on what you say, it sounds as though the -- what
 17 would have happened in the absence of the attack is some
 18 time in June you would have gone to the Security Board
 19 with details of Mr Hone's revised matrix, the places for
 20 focus and some proposals based on his recommendations
 21 for what to do?

22 A. Not just me, but I would have also had more police
 23 officers in attendance that would acknowledge that.
 24 PC Hone had gone off on paternity leave, but we would
 25 have made sure that there was CTSA representation, there

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1 was a sergeant in charge of that unit, he would probably
 2 come. I -- it's hypothetical as to who would have, but
 3 we would have definitely had a discussion at that June
 4 board and the aspiration I'd always try to get to was in
 5 relation to how we can then take on new work on top of
 6 the -- bearing in mind how long the CTSA reports had
 7 been outstanding for, I was focusing on that but I then
 8 wanted us to then start looking to future work and how
 9 we could prioritise and move forward and that would have
 10 all been discussed and there would have been an action
 11 plan which we now have in place called the Public Realm
 12 Board which is what I was aspiring the Corporation to
 13 get to.

14 Q. We now know that Mr Hone's recommendations included
 15 a clear and firm recommendation to include a particular
 16 type of hostile vehicle mitigation, some form of
 17 physical protective measures, on London Bridge. If that
 18 had come to your attention in late May or early June,
 19 before the planned Security Board, and if the
 20 London Bridge attack had never happened, what would have
 21 happened to that recommendation, do you think?

22 A. Once I -- I have now seen that recommendation on the
 23 screens, I had not seen that before. Seeing it worded
 24 like that, I would have repeated the question back: is
 25 there any immediate action required of me or the

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1 Corporation? If there was, I would have been suggesting
2 to the Town Clerk there was a gold group. If it was the
3 same conversation that I had had in relation to this is
4 a long-term permanent solution then it would have
5 continued going to the June board at the pace and set it
6 was going.

7 Q. Is it fair to say that even if the Security Board had
8 accepted the recommendation based on what Mr Hone had
9 said, it would then have taken months or perhaps years
10 for that -- those physical measures to be put in given
11 that they were permanent and had to go through
12 a process?

13 A. Yes, it would, and the conversation would have been then
14 with the police in relation to the mitigation that
15 they're doing in exactly the same way as we were
16 mitigating in relation to other locations whereby you
17 can mitigate it by having guards or police outside doing
18 stuff, the same mitigation would have been taking place
19 with the police. Whilst we're in this steady state,
20 I think Commander Gyford referred to it as, but at
21 a point when there was no intelligence, and I am very
22 conscious that we should not be policing by intelligence
23 and building by intelligence, that's been quite rightly
24 pointed out by counsel going forward, and we weren't.
25 We had a prioritisation process that we were focusing on

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1 and if we had anything coming in we would have then gone
2 into urgency. If we didn't have that we would have
3 continued at that steady state and it would have taken
4 some period of time.

5 Q. If in May, or in fact before May, Mr Hone or somebody
6 from the police had said "London Bridge is very
7 vulnerable with all the vehicle-as-weapon attacks going
8 on I would like it protected and I would like it
9 protected quickly. I would like the job done properly
10 but I'm happy to have some interim measures if need be,
11 but I really do need this done outside the slow time of
12 a long engineering project"; what would or could then
13 have been done?

14 A. That would have then been the terminology I was using in
15 relation to a gold group. What would then have happened
16 is that the Town Clerk or -- led by Commander Gyford,
17 but depending who the conversation started with would
18 chair that gold group, it would have been a multi-agency
19 gold group which would have included all the relevant
20 partners, all the relevant people in relation to that as
21 to how we can mitigate it.

22 What the solutions were to that I think are very,
23 very limited because the only thing I can think of at
24 that time would have been the National Barrier Asset.
25 Because of the issues in relation to the National

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1 Barrier Asset the City of London Corporation now has
2 a Public Realm Board. That Public Realm Board has now,
3 looking at all these locations I mentioned earlier on,
4 and I think we have target hardened six, put temporary
5 measures which the Corporation has actually purchased
6 itself, that would not cover a bridge what's been
7 purchased. So the bridge is the complicated part --

8 Q. Just let me pause you there. Would TfL have been one of
9 the partners attending such a gold group?

10 A. Yes, they would if it had gone to the gold group stage.
11 At the point in time -- just a clarification -- at the
12 point in time when PC Hone and I were discussing neither
13 of us knew that TfL were the highway authority for the
14 pavement and highway. That may now seem obvious because
15 of what's taken place in relation to London Bridge but
16 at the time I took it to the Corporation, to Peter
17 Lisle, because I, like Matt Hone, thought it was the
18 Corporation's. I now know categorically the highway
19 responsibility for the pavement and the road is that of
20 TfL's. The bridge belongs to the Corporation and
21 there's issues in relation to a partnership approach, so
22 categorically the only way that would have been resolved
23 is through an absolute partnership approach and yes,
24 they would have been invited.

25 Q. So back to my hypothetical: if there had been an urgent

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1 recommendation earlier in 2017 of some form of hostile
2 vehicle mitigation on the bridge, that could or would
3 have gone to a gold group which would have included TfL
4 and everybody would have understood the nature of the
5 partnership required?

6 A. Indeed.

7 Q. If TfL had popped up in that meeting and said: we might
8 have access to some barriers from a private contractor,
9 would that have been considered seriously as an option
10 for a temporary or interim measure on that bridge?

11 A. Every mitigation would have been considered. Once you
12 get into a gold group and you're looking at urgency, you
13 would be looking at all aspects, sir, yes.

14 Q. But at the time that you were having your discussions
15 with Mr Hone, for the reasons you've told us, you didn't
16 understand this to be a call to immediate action?

17 A. Absolutely.

18 Q. Now, can I move on to a different topic, which is
19 an email query following the Westminster Bridge attack
20 which you deal with at pages 5 and 6 of your statement?

21 A. Indeed.

22 Q. Is it right that a query was received from a committee
23 member about safety on bridges on or around
24 24 March 2017, a couple of days after the Westminster
25 attack?

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1 A. There was an email from a member to Carolyn Dwyer, yes.
 2 Q. Did that email first of all get referred to the
 3 Commissioner of the City of London Police, and then on
 4 to you?
 5 A. It did, indeed.
 6 Q. As we've heard from Deputy Chief Constable Gyford, did
 7 she consult you and was a response then given?
 8 A. It was the other way round, sir. The email first went
 9 to the Commissioner, the Commissioner then asked me to
 10 deal with it because I had been involved in the response
 11 on the day of Westminster Bridge. Although I had no
 12 command and no decision-making role in the police
 13 because I had left on secondment, on the day of the
 14 Westminster Bridge attack there was no chief officer in
 15 the City of London. I got contacted by the
 16 Commissioner's staff office and telling me there was
 17 an extraordinary security meeting, SRC(e), which DACSO
 18 chaired, which you have heard about already. I attended
 19 that meeting, came back, Commander Gyford, Deputy Chief
 20 Constable Gyford had now returned back into the City,
 21 she then chaired that extraordinary group, I attended
 22 that meeting with a detective inspector who had attended
 23 the meeting with me, SRC, and they -- because she was on
 24 leave that day, I think, but she certainly came in from
 25 home and had to go back home again and we were going

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1 onto 12-hour shifts, I stayed on all night to cover the
 2 night duty role of commander in the City, handing back
 3 to her at midday -- it wasn't midday, but it was during
 4 the early part of that early morning the following day
 5 handing back --
 6 Q. Can I just cut across the detail of your movements.
 7 A. Sorry.
 8 Q. In brief, did you consult her before responding to this
 9 query?
 10 A. I consulted her twice, once on the Friday afternoon and
 11 the following day on the Saturday prior to sending it.
 12 Q. And then {WS5010/10}, please. We've seen this before so
 13 I won't take it at great length, but you sent a response
 14 to, or drafted a response to the query.
 15 A. I did, indeed. The response was sent, as it says, on
 16 the start of the second paragraph. It was simply sent
 17 at that point to reassure that member coming to work on
 18 Monday morning, not to make any policy decisions.
 19 Q. In summary, was your response that a great deal of
 20 joined-up work was being done against terrorism by the
 21 Corporation and the police but that there was not
 22 a threat to bridges specifically?
 23 A. I didn't say there was not a threat to bridges, I said
 24 the threat from terrorism is in multiple guises, not
 25 just to bridges. At no point did I dismiss bridges, at

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1 no point did I close out of mindset around bridges.
 2 Q. You suggested I think bridges weren't a particular
 3 target of threat more than other places?
 4 A. Yes, in relation to the fact that I was keeping an open
 5 mind, the threat of terrorism in multiple guises, not
 6 just bridges alone, which is the exact words that's on
 7 there, sir.
 8 Q. Thank you.
 9 Can I now ask you about a press report after the
 10 attack, after the London Bridge attack, but City of
 11 London Corporation officials ruled out barriers on
 12 London Bridge shortly before the attack. Are you now
 13 aware that before the attack there had been a request
 14 from a newspaper, The Sun, about whether barriers might
 15 be installed on London Bridge?
 16 A. Before I had absolutely no knowledge of this, I was only
 17 asked about this and made aware of it when the -- your
 18 team actually asked the question to the Corporation.
 19 I can categorically state at no point was I aware of any
 20 conversation with the Corporation ruling out anything in
 21 relation to London Bridge.
 22 Q. At the time, and we'll hear from Mr Hughes about this in
 23 more detail, the answer was that there were no current
 24 plans for installation of barriers, but barriers had not
 25 been ruled out. Is that the answer you would have given

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1 if you had been asked the question before the attack?
 2 A. Sorry, can you state what you just said again, sorry
 3 sir?
 4 Q. The response in simple terms was barriers hadn't been
 5 ruled out but there were no current plans for them?
 6 A. Yes.
 7 Q. Is that the response you would have been given if you
 8 had been asked?
 9 A. Yes, indeed, there were no current plans at this time.
 10 MR HOUGH: Thank you very much. Those are all my questions.
 11 A. Thank you, sir.
 12 Questions by MR PATTERSON QC
 13 MR PATTERSON: Mr Woolford, I ask questions on behalf of the
 14 families of six of those who were killed, including in
 15 particular, Christine Archibald, who was killed on the
 16 bridge.
 17 A. Again, sir, if I can please reiterate my sincere and
 18 heartfelt condolences to the families.
 19 Q. Thank you for that.
 20 Have you read the evidence of witnesses who have
 21 been addressing these topics this week, namely witnesses
 22 D'Orsi, Gyford and Hone?
 23 A. I was here for those, sir, yes.
 24 Q. You were present in the courtroom to hear their
 25 evidence?

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1 A. Yes, sir, yes.
 2 Q. And have you spoken this week to any of those witnesses?
 3 A. This week? Yes, I have, because we've been around here
 4 today, obviously.
 5 Q. Ah. Those who were injured on the bridge on 3 June may
 6 want to know, and certainly the Archibald family want to
 7 know who was responsible for the fact that there were no
 8 barriers on the bridge when Butt and Redouane and Zaghba
 9 launched their murderous attack.
 10 Now, as to whether or not there was a failure and
 11 they should have been installed, the barriers, we shall
 12 come to that in a moment. But in terms of the specific
 13 question of responsibility, who do you, Mr Woolford, say
 14 had responsibility for deciding whether or not physical
 15 protective measures should have been installed?
 16 A. I would say it was a partnership approach, sir.
 17 Q. Including whom?
 18 A. The highway authority, as I now know, is TfL, so TfL are
 19 responsible for putting anything in relation to the
 20 highway, which includes the pavement and the road.
 21 Q. Yes.
 22 A. The Corporation are responsible for the bridge, and
 23 following witnesses after me will give you much detailed
 24 answers in relation to that side of it, but the police
 25 categorically would be there for advice in relation to

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1 that, in a steady state. Because London Bridge is
 2 within the City of London Corporation's footprint and
 3 City of London Police's footprint, it would have been
 4 the CTSA's from the City of London Corporation who would
 5 give relevant advice and in relation to fast-time,
 6 again, that would have been from the City of London
 7 Police.
 8 Q. So the City of London Police?
 9 A. In partnership with the Corporation and TfL.
 10 Q. So those three organisations?
 11 A. So a partnership, sir, yes.
 12 Q. Now, we heard from the witness, Lucy D'Orsi, who told us
 13 that as DACSO, as a member of the Metropolitan Police
 14 and the senior national coordinator for protective
 15 security, she was not responsible for London Bridge,
 16 even though the decision to put them up on 4 June was
 17 made, she told us, by her, and even though the evidence
 18 we will hear from Mr Hughes is that the maintenance, the
 19 ongoing maintenance of these barriers now that they are
 20 in place is the responsibility of the
 21 Metropolitan Police.
 22 So do you agree that as senior national coordinator
 23 for protective security that the DACSO did have
 24 a responsibility in terms of whether there were or were
 25 not barriers on London Bridge?

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1 A. I started my question, sir, I thought you were asking
 2 the question specifically at the beginning in relation
 3 to the City side of it. As far as the national
 4 perspective -- as far as the national perspective is
 5 concerned, unreservedly the standards set in relation to
 6 CT response and protective response sits with DACSO as
 7 she has very clearly articulated.
 8 Cascading down from that goes through to NaCTSO
 9 which is then responsibility for the CTSA's and the
 10 tasking around the CTSA's, so there is an aspect whereby
 11 if there is information or intelligence we don't know
 12 about, I don't know about, the Metropolitan Police can
 13 do something.
 14 Certainly because of the moral reasons which I fully
 15 agree with, the world had changed after a second attack,
 16 the right thing to do at that time was to put it in and
 17 the Metropolitan Police did that decision, I think
 18 they'd been to a Cobra meeting which we -- we, City of
 19 London Corporation, City of London Police would not have
 20 been present at.
 21 Q. But her evidence wasn't just based on moral grounds.
 22 She told us that a relevant factor was whether there
 23 might be a repeat --
 24 A. Indeed, copycat.
 25 Q. -- or copycat attack.

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1 A. Yes.
 2 Q. And you would agree with this, Mr Woolford, if she had
 3 directed that careful consideration be given to whether
 4 or not barriers should go in on the bridge, that would
 5 have been actioned, wouldn't it?
 6 A. What was the question again, sorry, sir?
 7 Q. If DACSO had directed that careful consideration be
 8 given to whether or not barriers should be installed,
 9 that would have happened, wouldn't it?
 10 A. If -- sorry, to the City of London or to --
 11 Q. Yes.
 12 A. If DACSO sends out -- there's the different stages of
 13 advice messages comes out. Everything that comes out of
 14 there is in relation to advice but without a doubt it
 15 would have been actioned. There is no way that if
 16 someone says to you: you need to be doing something, you
 17 wouldn't do it, so yes.
 18 THE CHIEF CORONER: But the question was would serious
 19 consideration be given, not would it be installed. Your
 20 question was --
 21 MR PATTERSON: I'm about to ask my next question.
 22 THE CHIEF CORONER: So would serious consideration be given,
 23 I think the answer is yes.
 24 A. Yes.
 25 MR PATTERSON: Yes.

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1 THE CHIEF CORONER: I am just saying because Mr Woolford
 2 went on to ask the second part which hasn't yet been
 3 asked.
 4 A. I apologise.
 5 THE CHIEF CORONER: So the first stage is -- it's quite
 6 important one breaks this down.
 7 MR PATTERSON: That's right, yes.
 8 THE CHIEF CORONER: Because there is a distinction,
 9 Mr Patterson, between seriously considering, and going
 10 on to the next stage.
 11 MR PATTERSON: Absolutely.
 12 A. Apologies, I'm trying to be too helpful.
 13 THE CHIEF CORONER: No, no.
 14 A. The answer to your first question is: yes, serious
 15 consideration.
 16 MR PATTERSON: Absolutely. And next, as his Lordship
 17 indicates, if there had been a direction, the view had
 18 been reached that they should be installed, again,
 19 that's not something that the City of London Police
 20 would have obstructed in any way, would they?
 21 A. No one would have obstructed.
 22 Q. It would have happened, wouldn't it?
 23 A. It depends how quick -- something would have happened at
 24 some point. The timescales for that I can't answer.
 25 Q. And from your familiarity with the Corporation with whom

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1 you were seconded over these periods, these months
 2 before Westminster, after Westminster, the months
 3 leading up to the attack, and you're still there to this
 4 day, you tell us, from your experience with how they
 5 approached things, you would no doubt agree that they
 6 take protective security very seriously.
 7 A. They do now, yes, very much so.
 8 Q. And at the time.
 9 A. And they have historically, yes.
 10 Q. And at the time. I mean, counter terrorism issues are
 11 very important for the City of London and have been for
 12 decades, haven't they?
 13 A. They have indeed, sir, yes.
 14 Q. Her evidence was that the City of London Police had
 15 responsibility and you told us that you agree that the
 16 City of London Police did have responsibility for
 17 whether or not barriers should be installed; yes?
 18 A. Sorry, ask the question again, sorry, sir?
 19 Q. I'm now moving on to the City of London Police.
 20 A. Yes, yes.
 21 Q. And I think your answer a few minutes ago was: yes, you
 22 agree that the City of London Police, with its counter
 23 terrorism security advisors and the like did have
 24 a responsibility for the decision as to barriers on the
 25 bridge?

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1 A. It depends on what we're talking about. If you're
 2 talking about fast-time, then yes, because that is the
 3 role that they can have in relation to providing that
 4 advice. If it's in relation to a long-term permanent
 5 solution, they can provide the advice, it's a policing
 6 role to advise, it is then down to the owner of that
 7 location to actually then decide what they do, because
 8 the advice is provided, and then it's down to the owner,
 9 in this case it's a partnership approach, it is not
 10 purely and simply one individual body or agency.
 11 Q. I'll come on in due course to the nature of the advice
 12 that would have been given and the issues as to speed or
 13 otherwise.
 14 The evidence yesterday from Deputy Chief Constable
 15 Gyford who chaired the SG, the Security Group, who had
 16 responsibility for protective security measures in the
 17 context of counter terrorism, was that she did not share
 18 any responsibility for the absence of barriers; that she
 19 did not -- she went so far as to say she did not have
 20 any responsibility for the absence of barriers. In
 21 light of what you've just said, it sounds as though you
 22 disagree with that evidence?
 23 A. I don't recollect the Deputy Chief Constable saying that
 24 she had no responsibility.
 25 Q. Transcript yesterday, Day 29, page 54, please

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1 {Day29/54:1-25}. Could we go, please, to halfway down
 2 the page:
 3 "Question: ... your role as commander of operations
 4 and security, do you share responsibility for the
 5 absence of barriers on London Bridge on 3 June, you
 6 personally?
 7 "Answer: No.
 8 "Question: You don't have any responsibility for
 9 the absence of barriers?
 10 "Answer: No."
 11 And then the questions went on from there. But it
 12 sounds, Mr Woolford, as though your evidence is that the
 13 City of London Police did share responsibility for the
 14 decisions as to barriers on the bridge?
 15 A. As I have said, sir, the role of the police is in
 16 relation to an advisory role. In relation to solutions
 17 to that, I would say it is a partnership approach. So,
 18 therefore, as I said, the highway is that of TfL, as
 19 I now know, and the Corporation in relation to the
 20 building, but the people who provide the advice in
 21 relation to that would be through the police and the
 22 CTSAs.
 23 Q. Yes. Exactly. The experts, as you've said in your
 24 statement, are the CTSAs within the City of London
 25 Police.

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1 A. Nationally they are the experts on protective security
2 for providing advice.
3 Q. Yes, and for this particular geographical area,
4 obviously the Matthew Hones of this world, the Sergeant
5 Haddons of this world --
6 A. Absolutely, yes.
7 Q. -- who had commissioned advice in relation to
8 London Bridge, amongst other areas, for example; yes?
9 A. Yes to what, sir, sorry?
10 Q. The Cerastes advice?
11 A. Yes, PC Hone and Superintendent Isaac had tasked out
12 Cerastes, sir.
13 Q. City of London Police were paying external experts who
14 had been used before by CPNI to give advice on, amongst
15 other specific locations, the risks on London Bridge
16 from terrorism?
17 A. They were tasking in relation to looking at how Servator
18 is working and CT tactics are working. The vast
19 majority of that document is all about CT taskings.
20 Q. That's right.
21 A. To do that, PC Hone sent them to three locations in the
22 first document, five locations in the second document,
23 one of which was London Bridge, and the feedback they
24 gave was in relation to how easy or not it was for them
25 to carry out their friendly hostile reconnaissance and

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1 in relation to that, to say this is what the attack
2 methodologies that they could consider so that then the
3 CTSAs could then review that to give the proportionate
4 recommendations.
5 Q. Yes, so their expert opinion included London Bridge,
6 didn't it?
7 A. As one of those locations? Yes.
8 Q. Yes. Now, back in January 2016, Deputy Chief Constable
9 Gyford told the court that officers had begun to be
10 deployed specifically on London Bridge because of
11 vulnerabilities as to that bridge.
12 Now, you have told us that in the past, you had had
13 awareness or dealings with counter terrorism issues and
14 protective security issues at, I think you said
15 a strategic level; is that correct?
16 A. A strategic level in relation to tasking -- sorry, in
17 relation to chairing the Security Group, but also in
18 relation to that quality assuring I would go out and
19 actually assess and do some of those observations, and
20 I have actually personally been out with PC Hone.
21 Q. So you were aware in January 2016 of the beginning of
22 those deployments on London Bridge; is that correct?
23 A. And other bridges and other locations in the City of
24 London, yes. They are called the CT taskings. They
25 were taskings for officers to go and do work.

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1 Q. You will appreciate, Mr Woolford, my questions are about
2 London Bridge: that's the specific site I am interested
3 in. Of course we all recognise there are other sites
4 that came across your radar.
5 A. I do fully understand that, sir, but I think it's very
6 important to put it into perspective that CT taskings
7 covers the whole of the City of London to protect the
8 whole of the City of London and all the work we were
9 doing was about protecting the whole of the City of
10 London in relation to multiple attack methodologies. So
11 I do understand, but I think it is also -- you can't
12 just dismiss and forget everything else that was taking
13 place.
14 Q. No, we're all very conscious of the other areas that --
15 where the public are at risk. So that was
16 in January 2016, and one of the features that she
17 identified in her evidence as to its vulnerability was
18 its iconic nature, and no doubt you would agree with
19 that: that that was a feature that made it attractive to
20 terrorists?
21 A. That it's an iconic location?
22 Q. London Bridge.
23 A. It was an iconic location, yes.
24 Q. Yes. That was my question; do you agree?
25 A. I agree it's iconic, but likewise, I also agree, as I've

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1 tried to say, there are multiple iconic locations around
2 the City of London.
3 Q. That's right. In July of that year, the Nice attack
4 took place in which there was a horrific vehicle attack
5 on the public, something in the region of 80 members of
6 the public --
7 A. 86.
8 Q. -- were killed?
9 A. Yes, indeed, horrific.
10 Q. In October, Lord Harris in his report addressed the
11 preparedness of London for a terrorist attack, and no
12 doubt you would have been aware of that report?
13 A. Are you talking about his recommendations that were
14 published in October?
15 Q. Yes, Lord Harris' report.
16 A. Yes, I am aware of that.
17 Q. And at the time you would have no doubt have been
18 interested to see what the independent review helped you
19 with in terms of London's preparedness?
20 A. That was just before I went off sick, but yes, I was.
21 Q. Yes. And one of the topics that he dealt with was
22 bollards and whether there should be more bollards used
23 to act as hostile vehicle mitigation?
24 A. Yes, it is in there, yes.
25 Q. In December there was the Berlin attack in which

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1 a vehicle was used, causing multiple deaths in
 2 a terrorist attack, you would have been aware of that?
 3 A. I was off sick, but yes, I was fully aware of it.
 4 Q. And in January and February and March of 2017, so just
 5 focusing on that period leading up to the Westminster
 6 attack, you were, when you came back you were attending
 7 some of those Security Group meetings; is that --
 8 A. I think I may have chaired one in that two-week or
 9 three-week period that I was back in and I had attended
 10 some of the others whilst I was then on my secondment,
 11 yes.
 12 Q. And we can go to the minutes if necessary, we can see
 13 occasions when you were listed as present, we can see
 14 occasions where your apologies had been received?
 15 A. Yes.
 16 Q. But you would have seen the minutes, would you, if you
 17 hadn't been in attendance?
 18 A. No, not unless someone said to me there was an action
 19 for me or the Corporation because was no longer in the
 20 police command role and because of absolute clarity of
 21 command, Commander Gyford, and now Deputy Chief
 22 Constable Gyford, was the chair of those meetings and
 23 responsible for those meetings when she was in
 24 attendance or a deputy I would not be linked into those
 25 meetings unless I was able to attend those, or there was

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1 an action or an activity being brought to me and then
 2 I would be verbally briefed, bearing in mind I was
 3 working with CTSA's on a regular basis and I was -- every
 4 six weeks the City of London Corporation has a Security
 5 Board to which Special Branch attend and provide
 6 a threat and risk briefing, and I was in regular
 7 dialogue with Commander Gyford and Chief Superintendent
 8 Paul Barnard.
 9 Q. {WS5031/3}, please. If we could go back a page
 10 {WS5031/2}, this is 5 January, your apologies noted at
 11 the bottom.
 12 A. I was off sick, sir, yes.
 13 Q. NPCC, can you help?
 14 A. National Police Chiefs' Council.
 15 Q. And help us, what does that relate to?
 16 A. It is what used to be called ACPO, Association of Chief
 17 Police Officers, it is a terminology used for senior
 18 police officers. You have the federated ranks, the
 19 superintendent ranks and then the ACPO ranks, now NPCC,
 20 and whoever had taken those minutes decided to write
 21 NPCC, National Police Chiefs Council, instead of Chief
 22 Officer Team.
 23 Q. At {WS5031/3} the meeting addressed issues including
 24 hostile vehicle mitigation and issues that included
 25 bollards and hostile mitigation of vehicles. Are these

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1 the sorts of issues that you would have been familiar
 2 with from your general attendance at these Security
 3 Group meetings?
 4 A. When they are raised in my presence, yes, but sir,
 5 I know nothing about this, it's the first time I've seen
 6 those and I wouldn't even --
 7 Q. You told us that you wouldn't have received the minutes?
 8 A. No. Well, I didn't say -- I wouldn't have read the
 9 minutes. The reason behind that is when I was on
 10 secondment -- well, a, when I was off sick I wouldn't be
 11 looking at these because I was off for nearly two and
 12 a half months for post-operative recovery, and when
 13 I came back in relation to this, I had two computer
 14 systems I was working off, because the City of London
 15 Police computer and the City of London Corporation
 16 computer don't talk to each other in relation to certain
 17 documents. Because of restricted internal use, that
 18 will never get sent to a Corporation computer and
 19 because I was working on a Corporation in relation to
 20 this company called AECOM in relation to vulnerability,
 21 there was a vast amount of documents, the firewalls in
 22 the police wouldn't, so I was working off two computers
 23 so unless I was told there was a specific issue for me
 24 or for the Corporation I wouldn't be going to those
 25 because I would be focusing on what my priority was at

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1 the time set by the Commissioner and by the Town Clerk
 2 in relation to those four highly vulnerable locations.
 3 Q. Page 4, please, of the same bundle {WS5031/4}. On
 4 19 January before your secondment, you chaired this
 5 meeting?
 6 A. Yes, that's the one I said I was back for about two
 7 weeks, two or three weeks.
 8 Q. And SB officers, is that Special Branch?
 9 A. Special Branch, it is, yes, sir.
 10 Q. And are any of those officers listed as attending, are
 11 any of those Special Branch officers?
 12 A. Yes, they are, sir.
 13 Q. Can you help us with which ones, please?
 14 A. David Service is Special Branch. Let me see. Staff
 15 officer ... yes, just David Service on there.
 16 Q. Over on to the next page, please {WS5031/5} one of the
 17 topics that was addressed on that occasion under the
 18 heading of "Emerging threats" and "Preferred counter
 19 terrorism options" was movable barriers; that's right,
 20 isn't it?
 21 A. That's what it says there, sir, yes, the Centre for
 22 Protection of National Infrastructure set the standards
 23 nationally in relation to protective security measures.
 24 They are always evolving and developing new methods in
 25 relation to it and it's not just about barriers and

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1 bollards. There is about streetscape and street
 2 furniture, having bins, chairs, everything designed to
 3 look like normal stuff but provides that mitigation,
 4 that all comes from that, but yes, without a doubt,
 5 that's what it says.
 6 Q. And at this time, given Nice, given Lord Harris, given
 7 Berlin, did you have concerns with your protective
 8 security hat on, did you have concerns about the risks
 9 to the public from a vehicle attack in London?
 10 A. Yes, we had lots of concerns and I personally had lots
 11 of concerns as well, sir, and for the year before that
 12 in relation to -- I think you had it mentioned this
 13 week, the Anti-Terrorism Traffic Regulation Order,
 14 ATTRO --
 15 Q. Yes.
 16 A. -- we had started concerns in relation to this before
 17 Nice and we were going back before Bataclan. I think if
 18 I remember right there were seven vehicle attacks across
 19 Europe in the four years before 2017. Because of that
 20 emerging threat in relation to that we approached the
 21 Corporation, at that point, the police, Special Branch
 22 did, and there was negotiations that took a year through
 23 the Corporation to get the ATTRO in to get -- enable the
 24 City of London Police and the Corporation to close roads
 25 or streets should it be required in relation to

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1 intelligence or in relation to planning for an event.
 2 So we hadn't been ignoring this: it had been being
 3 worked on for some period of time.
 4 Q. At page 8, please {WS5031/8}. You were absent on this
 5 occasion, it seems, this is 16 March, but at around this
 6 time, from what you've told us, is it your opinion that
 7 the City of London Police was being very proactive in
 8 addressing the threat of vehicle attack?
 9 A. I think the partnership has always been considering it,
 10 sir, yes.
 11 Q. So you wouldn't have been of the view, for example, that
 12 more needed to be done or that there were any causes for
 13 concern, your view was that you were very much on top of
 14 this issue; is that right?
 15 A. No, as I said earlier on, I think, to Mr -- sorry ...
 16 MR PATTERSON: Mr Hough.
 17 A. Mr Hough, apologies, sir, I did know your name by my
 18 brain has gone.
 19 MR PATTERSON: He won't mind, he has thick skin.
 20 A. I do apologise.
 21 I think in my response to Mr Hough I made it very
 22 clear in relation to how the Corporation were starting
 23 to grip priorities around four locations, that
 24 post-Westminster Bridge when I was in the secondment
 25 there we had identified other locations that were

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1 becoming vulnerable, and that we were looking at how we
 2 can mitigate that through the partnership approach and
 3 that was all going to go to the June Security Board.
 4 So we were consciously looking at it, there was more
 5 that could be done, there's always more that could be
 6 done, and we were constantly learning and reflecting
 7 back in relation to that. And likewise anything that
 8 comes out of this Inquest, we will embrace totally as
 9 well in relation to that learning.
 10 Q. Onto the next page, please {WS5031/9}, your apologies
 11 for absence are noted there.
 12 A. Yes, sir.
 13 Q. So you weren't present, but did you learn that concerns
 14 were being raised on that occasion in this Security
 15 Group meeting that you would often chair, by --
 16 A. I used to chair.
 17 Q. I'm so sorry?
 18 A. I used to chair.
 19 Q. Used to chair. Forgive me, I just see the word "Chair"
 20 against your name.
 21 A. Whoever has done these minutes has obviously just cut
 22 and paste and left -- I have not chaired, apart from
 23 that one meeting in 2017, I wouldn't have chaired
 24 anything since before 2016.
 25 Q. All right, but as a former chair of this group that you

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1 were recently attending, did word reach you that
 2 a superintendent, Mr Shaw, was raising concerns, as we
 3 can see here, about counter terrorism work and
 4 protective security issues in relation to terrorist
 5 threats?
 6 A. I know nothing about that, sir. I wasn't at the
 7 meeting, I wasn't aware of it, and at that point I was
 8 seconded into the City of London Corporation so
 9 I wouldn't have been dealing with that.
 10 Q. So your secondment began in mid-February?
 11 A. I think I actually went on secondment at the beginning
 12 of February, Commander Gyford took over in the middle of
 13 -- I think 13, 14 February and David McGinley who had
 14 been the acting commander had continued in when I came
 15 back because I was only there for about two or three
 16 weeks.
 17 Q. And you referred to four specific sites, not including
 18 London Bridge, that you had involvement with, but that
 19 wasn't the -- that wasn't the limit of your role, was
 20 it? I mean it was a wider role than just covering those
 21 four sites; is that correct?
 22 A. The secondment, sir?
 23 Q. Yes.
 24 A. When I first went in on the secondment the absolute
 25 priority that was given to me both by the Commissioner

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1 and the Town Clerk and reporting into Peter Lisley, the
2 Assistant Town Clerk, was to absolutely in my terms
3 grip, but provide direction and clarity in relation to
4 those four highly vulnerable high-risk locations that
5 were subject to multiple counter terrorism security
6 advice reports. That was my number one priority.

7 The second aspect in relation to my secondment was
8 then to review a fifth location that had also had the
9 counter terrorism security advisor reports and had had
10 some work done on it already, and I was to review that
11 to make sure it was up to the standards of those
12 reports.

13 Then in addition to that was then to provide advice
14 in relation to security procedures and gaps in relation
15 to how the Corporation was working. Also in relation to
16 changing the cultural stance of the Corporation to
17 a security culture.

18 Q. Yes. So it wasn't just working on five sites that
19 didn't include London Bridge, did it?

20 A. That was the key priority that I was there for, working
21 directly to Peter Lisley.

22 Q. But you were advising and directing and supporting the
23 Corporation in relation to their general cultural
24 approach to security, weren't you, to protective
25 security?

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1 A. There was an action plan which the same consultant who
2 had done the matrix had created an action plan in
3 relation to how to create a security culture. I was
4 supporting him in relation to delivering that on behalf
5 of the Town Clerk, but my key priority, unreservedly,
6 was to focus on those four locations and then
7 post-Westminster Bridge I then started working on
8 identifying other locations, which is why I asked
9 PC Hone to review the matrix five weeks after
10 Westminster Bridge, because by that point, we had
11 managed to get the structures in place to go in front of
12 the committees for those four high-risk locations.

13 But categorically, those four high-risk locations
14 were my number one priority when I went in there.

15 Q. You worked closely with the Assistant Town Clerk who
16 held a rather important post, a Mr Peter Lisley; is that
17 correct?

18 A. Yes, he was my -- for want of a better description, on
19 secondment he was my line manager, I was reporting into
20 him and then to the Town Clerk.

21 Q. And he worked with the Town Clerk, a Mr Barradell; is
22 that correct?

23 A. That's correct, he's the chief executive, otherwise
24 known as the Town Clerk.

25 Q. And your responsibilities included provided strategic

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1 advice, strategic advice on these sorts of issues to
2 Mr Lisley?

3 A. It was, but the clear role, the first part when I went
4 in there was to grip those four locations.

5 Q. And you were telling Mr Hough, I think, earlier that you
6 would speak to Special Branch, and I think you mentioned
7 a superintendent, was it Barnard?

8 A. Chief Superintendent Barnard was the head of the Crime
9 Directorate, the Special Branch sits within the Crime
10 Directorate. There is a superintendent, chief
11 inspector, inspector and a team underneath him.

12 Q. And so again, that was work that you were doing during
13 your secondment dealing with other places rather than
14 just these five identified locations that you have
15 referred to?

16 A. That was post-Westminster Bridge, for clarification.

17 Q. Yes, but you appreciate I'm focusing on the period of
18 your secondment, and I want to --

19 A. Oh, sorry, I thought you were focusing on when
20 I started. When I started, categorically my role was in
21 relation to those four high-risk vulnerable locations.

22 Q. But it included the strategic role, the strategic advice
23 role?

24 A. It did, but not when I first started because I was
25 focusing on that. It then emerged and developed going

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1 further forward because when I came in there I was asked
2 to grip those four locations because they were so
3 vulnerable, the Corporation had them for such a long
4 time and they needed to be addressed and gripped which
5 is what my focus was. Then running parallel to that,
6 especially after Westminster Bridge, I then started
7 working with other people to look at other locations
8 because at that point we had started to have a structure
9 -- we were able to grip those locations.

10 Q. Now you told Mr Hough that on 21 February, just around
11 the time you had started at the Corporation you were at
12 a presentation relating to the first of the Cerastes
13 reports. Is that correct?

14 A. Oh, sorry, yes, I was invited by PC Hone to address this
15 presentation which CPNI and Cerastes delivered.

16 Q. And you were given a copy of that summary report. We
17 saw an email to that effect?

18 A. Yes, I was given that copy of that report by PC Hone.

19 Q. And you positively welcomed the use of external advisors
20 because I think your words earlier were it wasn't just
21 the police monitoring the police?

22 A. Absolutely, it's a very good initiative.

23 Q. Yes. Things might be missed by the police, experts who
24 are external will approach things with a fresh pair of
25 eyes and they may assist with additional recommendations

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1 or observations; is that correct?
 2 A. In relation to the policing tactics , yes.
 3 Q. And no doubt you wouldn't shut your mind to any useful
 4 advice that they could give you in those sorts of
 5 reports?
 6 A. I never have, sir .
 7 Q. The attack was on 22 March, as we know.
 8 A. The one in Westminster, yes.
 9 Q. The Westminster attack, and then the evidence that we
 10 had from Deputy Chief Constable Gyford, was that
 11 following that attack, temporary barriers, temporary HVM
 12 measures were considered as part of the range of various
 13 options, and that this would be considered at every one
 14 of the SG meetings, the [Security] Group meetings, many
 15 of which you attended. Is that correct: was this
 16 something that was being raised and discussed at these
 17 various meetings?
 18 A. I think she was quite clear in relation to it was
 19 a tactical option that was considered at those meetings.
 20 The decisions at meetings in relation to when they did
 21 or didn't, I was not present at those meetings.
 22 Q. But there were meetings of the Security Group that you
 23 were attending during this period we were looking at?
 24 A. I did attend meetings, yes, and in the meetings that
 25 I attended in relation to London Bridge, that was never

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1 discussed in front of me, but it is always a tactical
 2 option.
 3 Q. Albeit at every meeting her evidence was that temporary
 4 HVM measures were being considered?
 5 A. I think she was quite clear in relation to HVM is
 6 considered as part of the tactical menu of options, in
 7 relation to, I can't remember what the document is, it's
 8 the CT menu options, I think it's called, it very much
 9 is talking about long-term permanent solutions and
 10 that's what was being considered.
 11 Q. Yes, and it will include other things, no doubt, but
 12 that was one of the available options?
 13 A. Long-term permanent solutions, yes, it was being
 14 considered, and that's what I had taken to the
 15 Corporation.
 16 Q. Yes. And you told us about the January meeting where
 17 temporary barriers were discussed, we looked at it a few
 18 minutes ago?
 19 A. That was not in relation to the City, that was in
 20 relation to CPNI. Centre for the Protection of National
 21 Infrastructure, who are constantly evolving and
 22 developing new options. It's such an emerging dynamic
 23 world that once I had taken on the role of strategic
 24 security director, I got the CPNI to come into the City
 25 of London and do a presentation firstly, I think it

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1 was September where they covered a presentation on CCTV,
 2 behavioural detection and guarding, and then in October
 3 they came in and I got them to do a presentation in
 4 relation to hostile vehicle mitigation covering the full
 5 raft from streetscape through to barriers and bollards
 6 and at that meeting it was extended to every single
 7 person who would have an impact in relation to hostile
 8 vehicle mitigation going forward because it's
 9 a constantly evolving world.
 10 Q. Yes. You were aware of the availability of barriers and
 11 different types of barriers and all of these issues were
 12 part of your work, weren't they, protective security
 13 work?
 14 A. When I was on secondment to the Corporation?
 15 Q. Well, you've been familiar with these things, no doubt,
 16 for lengthy periods?
 17 A. The amount of work that is available, or the amount of
 18 options there are in relation to it, yes, for long-term
 19 permanent solutions, without a doubt.
 20 Q. Yes. And you were aware that temporary options were
 21 available?
 22 A. Temporary options are available through the National
 23 Barrier Asset. That world has changed since, which is
 24 why Ian Hughes, who can explain it in relation to the
 25 role he has now, has purchased, and we are about to

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1 purchase more temporary measures.
 2 Q. We will come on in a moment to the measures that were
 3 installed the day after the attack, but can I ask you
 4 about 23 March, please {WS5015/28}. If we look at this
 5 meeting, 23 March, it's an Extraordinary Security Group
 6 meeting of the City of London Police, we can see that it
 7 was being chaired by Deputy Chief Constable, as she now
 8 is, Gyford, and then if we go over the page, please
 9 {WS5015/29}, there are references to London Bridge.
 10 A third of the way down:
 11 "Top five crowded places". As we can see you were
 12 recorded as being absent on that occasion?
 13 A. Yes, I'd been gold all night so I wasn't at the meeting.
 14 Q. Police Constable Hone is mentioned towards the bottom of
 15 the page, an update entry is made in relation to
 16 information and a contribution from Constable Hone.
 17 If we go over, please, onto the next page
 18 {WS5015/30}, references to the propaganda coming from
 19 the terrorists, to the methodology being used in
 20 terrorist attacks, and reference to crowded places and
 21 other issues, including iconic sites in relation to the
 22 City of London Police. London Bridge is mentioned in
 23 the top five list, and then Detective Chief
 24 Superintendent Barnard suggests that you, Commander
 25 Woolford, can provide an update for the City of London

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1 Corporation and can ensure that crowded places is linked
2 in to their Security Board.

3 So is that right: were you acting as an important
4 link between the City of London Police and this Security
5 Group, and what was going on in the aftermath of the
6 Westminster attack and what should be done by the
7 Corporation?

8 A. Obviously, sir, as it says there, I wasn't at that
9 meeting, I think I was actually asleep at the time,
10 having been on all night.

11 In relation to that specific comment where it says
12 Chief Superintendent Barnard to myself, to the
13 Corporation, I did speak to Chief Superintendent Barnard
14 and Commander Gyford, but that was very much in relation
15 to briefing the Town Clerk and the Assistant Town Clerk
16 to the contingency of the ATTRO that they were
17 considering at that time should intelligence come in in
18 relation to any threat or in relation to events that
19 everybody was reviewing at those locations.

20 I was then a link and a conduit between the police
21 and the Corporation, but there was -- I was not the
22 single point of linkage: there were many opportunities
23 for the police to engage with the Corporation, as had
24 been going on for many years.

25 Q. What did you think about London Bridge after the attack

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1 that took place on Westminster Bridge?

2 A. On the day of the Westminster Bridge?

3 Q. Yes. When you learned the shocking news and saw the
4 shocking footage, perhaps within a day or two?

5 A. The horrific attack that took place in
6 Westminster Bridge, absolutely I was aware of that,
7 I was cognisant of that, I had been to the meetings in
8 relation to it.

9 You have already heard DACSO, Lucy D'Orsi, talking
10 in relation to the fact that at that point their mindset
11 was in relation to it was an attack on the seat of
12 government and possibly the police, and en route to it,
13 which was actually horrific, the poor people that were
14 attacked on that bridge. Unreservedly where
15 vehicle-as-a-weapon, what was going through my mind at
16 that point, and I think in relation to many other people
17 and certainly conversations I was having with Special
18 Branch and the CTSAs is anywhere you have pedestrians,
19 anywhere you have crowds, and there is an unprotected
20 run to it is vulnerable to vehicle-as-a-weapon.

21 So I was thinking about all locations at that point,
22 not just London Bridge or any bridge. It was an open
23 mind to all attack methodologies.

24 Q. But you were -- but your thoughts did include
25 London Bridge?

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1 A. Not specifically. My thoughts included any location
2 that had pedestrians and crowds with an unprotected run,
3 and that would include multiple sites.

4 Q. And would it include London Bridge?

5 A. It would now, without a doubt, because that's been
6 flagged up as a specific location.

7 Q. Yes. So from around this time onwards you were alive to
8 the vulnerabilities of the public on London Bridge?

9 A. I don't recollect London Bridge being specifically
10 brought to me until later on. The conversations I had
11 with Chief Superintendent Paul Barnard was very much in
12 relation to two other locations that are on that list,
13 because that's the conversation we were having about
14 this -- we call it grey space, the crowded spaces
15 outside crowded places.

16 I do recollect having a conversation with Commander
17 Gyford, as per the email I sent to reassure that member
18 coming into work, which was very much relating to
19 bridges being included, and at no point did I dismiss
20 bridges out of my mindset, and Commander Gyford's brief
21 to me when I spoke to her was that they were including
22 bridges. I emphasise the word "bridges" in plural
23 because it wasn't just London Bridge.

24 Q. On Friday the 24th there was the Carolyn Dwyer inquiry
25 and expression of concern, was there not?

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1 A. That's just the email that I was just referring to, sir,
2 yes.

3 Q. Yes, asking about safety specifically on bridges.

4 A. That's correct.

5 Q. And she was a non-police committee member of the City of
6 London Corporation, or rather a non-police committee
7 member of the Corporation contacted her. She was
8 a director within the Corporation; is that correct?

9 A. Yes, sir, the author of the email was a non-police
10 committee member but was a member of the City of London
11 Corporation. Carolyn Dwyer is a chief officer that
12 I think I had met once before that (inaudible) time and
13 Carolyn Dwyer was the director of the built environment.
14 But I now know her for the responsibility in relation to
15 built public realm.

16 Q. And as we saw in that email, and we can go to your email
17 if necessary, you spoke about this twice with Detective
18 Chief Constable Gyford as she now is; yes?

19 A. That's correct, I spoke to her on the Friday because the
20 Commissioner had asked me to speak to Carolyn. I went
21 to try and find her, she wasn't around, so I then spoke
22 to Jane again on the Saturday because we wanted to
23 reassure that member coming into work on Monday morning
24 that there was a grip taking place in relation to
25 policing tactics.

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1 Q. And in that email you say specifically that the grip, as
2 you put it, does include bridges?
3 A. Mm, as I just said sir, yes.
4 Q. So it wasn't something that you were closing your mind
5 to. You weren't, for example, as some witnesses might
6 have been suggesting, considering Masood's attack as not
7 focusing on bridges but you were focusing on the threat
8 specifically on bridges?
9 A. I think I'm quite clear where I actually turn round and
10 say the threat is not just to bridges; there's a threat
11 of terrorism in multiple guises.
12 At that point in time, as you have quite rightly
13 pointed out, the various different speeches and the
14 documents and publications that they utilise, they're
15 talking about arson, they're talking about firearms,
16 marauding terrorist attacks, they're talking about
17 vehicles. There's lots of attack methodologies they
18 were talking about at that time. I was very clear in
19 relation to keeping an open mindset in relation to that,
20 not dismissing bridges at all.
21 I've already talked about the threats from
22 vehicle-as-a-weapon, including any location where
23 pedestrian crowds are in an unprotected run, but also
24 thinking about other aspects in relation to it.
25 Q. {WS5010/10}, please. In your message in reply that

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1 should go to this non-police committee member of the
2 Corporation, you were emphasising all the work that was
3 being done, if we look at that bottom paragraph, by the
4 Corporation led by the Town Clerk -- you have told us
5 you were working with the Assistant Town Clerk who
6 worked with the Town Clerk -- "... in supporting and
7 driving a proportionate target hardened approach to the
8 threat of terrorism". And you continued speaking about
9 how you had been seconded to address security matters,
10 that there was protective building work being done,
11 there would be uplift to a security culture across the
12 Corporation, and that was key to this. And that the
13 Corporation was actively focused across preparing for
14 terrorist attacks with exercise and testing, capturing
15 learning -- over the page, please {WS5010/11} --
16 focusing on future threats, proportionate prioritisation
17 work in protecting the City, and so forth.
18 So the point you were making was that there was
19 a huge amount of work being done by you and the police
20 and the Corporation in addressing these sorts of
21 concerns in general?
22 A. As I said further up in the email, it's about a holistic
23 partnership approach: it can't be done by one agency on
24 its own, it is about working together. So without
25 a doubt, yes sir, that's what it says on there.

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1 Q. And on 28 March, {DC8333/1}, please, concerns were also
2 coming in around this time, and public debate was taking
3 place around this time, as to barriers on bridges,
4 wasn't it?
5 A. I wasn't aware of this but I can fully understand that
6 comment, yes.
7 Q. Yes, but if you just pause and cast your mind back,
8 everyone around this time, I suggest, was considering
9 these sorts of issues following Masood's attack.
10 A. I think following Masood's attack everyone was concerned
11 about terrorism full stop in relation to
12 vehicle-as-a-weapon. I think earlier on this week you
13 were talking about Oxford Street and the gentleman who
14 was convicted in this court in relation to planning
15 attacks in relation to Oxford Street, but in his
16 planning details he talked about multiple locations.
17 As I said, we were concerned very much so at that
18 point in time, and understandably in relation to
19 Westminster Bridge there, but categorically
20 vehicle-as-a-weapon anywhere you have pedestrians and
21 crowds with an unprotected run was vulnerable and it was
22 how do we mitigate that working together in partnership,
23 which is very much post-Westminster Bridge, within five
24 weeks of gripping the work I was doing, that was then
25 being reviewed by PC Hone categorically saying we will

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1 work on the right locations but including London Bridge.
2 There were the other locations that I've already
3 said that Chief Superintendent Barnard and I were
4 talking about is how do we get that addressed as
5 a partnership which was going to the June Security
6 Board.
7 So, yes, I can totally sympathise with those views,
8 but it was about we all had those same views but where
9 do you prioritise and where do you protect first?
10 Q. {DC8333/2} London Bridge again was specifically being
11 referred to, pavement safety barriers, the fact that
12 barriers had been removed some time earlier, therefore
13 there wasn't even the deterrent effect of a railing any
14 more on the bridge. No doubt you were aware of that?
15 A. I have no -- no, sir, I've never seen that comment or
16 that article until I've been in this court this week.
17 Q. But you would have been aware at the time that
18 London Bridge had a very wide pavement, just like
19 Westminster Bridge, and there was no protection or
20 anything at all along that lengthy, whatever it is,
21 400-metre long pavement?
22 A. I am aware of that, as are other locations, yes.
23 Q. Yes, and the Dwyer inquiry the day after, forgive me,
24 two days after Masood's attack, had brought bridges to
25 the forefront of your mind, hadn't it?

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1 A. Brought it to the forefront of my mind? The threat from
 2 terrorism and the --
 3 Q. Well, you applied to it and you had two phone calls
 4 about it .
 5 A. -- vehicle-as-weapon aspect absolutely was at the
 6 forefront of all of our minds.
 7 Q. Yes, and the suggestion here is that a barrier should be
 8 put up. And a reminder in this press report focusing on
 9 this part of the debate that more use should have been
 10 made of temporary barriers; do you see that? The
 11 reference to Lord Harris, and you've told us that you
 12 were familiar with Lord Harris' report?
 13 A. I have not seen this press article before until this
 14 week. As far as Lord Harris and talking about barriers,
 15 I've already said yes, I'm aware of that, and that is
 16 the work that we were doing in relation to prioritising
 17 those high-risk four locations and then we were then
 18 going to go on to look at other locations that needed to
 19 be gripped in relation to that. Barriers are one of the
 20 menu of tactical options to protect the public.
 21 Absolutely categorically all police agencies working
 22 together with all the partners were always looking at
 23 how can we protect, what can we do next and it was very
 24 much in relation to you can't -- you've heard the
 25 conversation about you can't protect everything at once,

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1 you have to have a proportionate phased approach, that's
 2 what we were doing and we were then going on to look at
 3 other ones, discussing them at the June board.
 4 MS BARTON: Sir, before a further question is asked,
 5 I'm conscious that people are reading the transcript
 6 from a distance and when the reference is made to
 7 Lord Harris saying "more use of temporary barriers", to
 8 read on, it says "during big events".
 9 A. Yes, "big public events".
 10 MS BARTON: Yes.
 11 THE CHIEF CORONER: I think we've had that bit read before.
 12 MR PATTERSON: We have, yes. We have.
 13 Why didn't you advise that barriers should go in
 14 after the Westminster attack?
 15 A. I was not given any information or intelligence to say
 16 that London Bridge was a specific vulnerability. I was
 17 not given any information or intelligence to turn around
 18 and say that London Bridge should have something put in
 19 post-Westminster Bridge. As I've already said,
 20 everything we were discussing at that time was having
 21 an open mind to all types of attack methodologies. The
 22 Dabiq stuff and Inspire stuff was talking about all
 23 types of different attack methodologies, so it was not
 24 a closed mindset to one, it was having an open mind to
 25 all.

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1 As we know, tragically then next attack took place
 2 in relation to TATP being used at Manchester, so at that
 3 point in time, after Westminster Bridge it was very much
 4 having an open mind around the vulnerabilities of what
 5 our next attacks were going to be.
 6 Q. But you in particular, Mr Woolford, you had familiarity
 7 with protective security issues, you had familiarity
 8 with terrorism issues, you had been a chair of the
 9 Security Group within the City of London Police.
 10 London Bridge was a bridge that you were very familiar
 11 with. You're now liaising with the Corporation. The
 12 Corporation in effect owns the bridge.
 13 All of those factors, and all of your understanding
 14 of what had been going on with the propaganda and the
 15 methodology and now Masood on a similar bridge just
 16 a few bridges along in the city centre, surely it would
 17 have been obvious to you that London Bridge needed to be
 18 physically protected?
 19 A. I'm not sure why one bridge at that point in time would
 20 be obvious to me at that point in time. As I tried to
 21 make very clear, vehicle-as-weapon vulnerability is to
 22 anybody, any pedestrian or any crowd that has an
 23 unprotected run to it is what is vulnerable. I was
 24 focusing on the top four locations that had been brought
 25 to my attention I was gripping on, and I was having

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1 a very open mind about the next bits we can work to.
 2 Within five weeks of Westminster Bridge I've had that
 3 reviewed by PC Hone who categorically states that I am
 4 focusing on the correct locations and then brings
 5 London Bridge in for the first time and that then is
 6 being discussed to go to the June Security Board as were
 7 other locations that I've tried to articulate earlier.
 8 Q. {WS5011/1}, please. We'll hear later today from
 9 a witness for Transport for London, or perhaps tomorrow,
 10 and if we go, please, to {WS5011/14}, around this time,
 11 the public concerns and the public debate was going on
 12 in a number of locations. At the bottom of the page we
 13 can see that on 31 March, a member of the public posted
 14 a question on the issue of the Westminster attack on
 15 a website, a london.gov.uk website, and over on to
 16 {WS5011/15}, please, the question that was being raised
 17 related to London Bridge. "London Bridge in light of
 18 last week's attack":
 19 "I would that the Mayor's office take a look at the
 20 security situation on London Bridge. If terrorists are
 21 now using vehicles to target civilians then,
 22 unfortunately, London Bridge is a prime target. The
 23 pavement walking north-to-south [which is the pavement
 24 along which the attack took place some months later] is
 25 extremely wide to cater for the volume of pedestrians

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1 that use the bridge at peak times. In addition the
2 traffic flow (north-to-south) is usually relatively
3 clear even during rush hour (ie cars/buses/motorbikes
4 etc are not normally queueing but can accelerate
5 unimpeded in this direction). At present there are no
6 barriers at all between the road and the pavement (just
7 a low kerb). At least it would make sense to put
8 regular black metal posts up (as we see along other
9 walkways across the capital)..”

10 Then as we can see, the response that was provided
11 was TfL worked closely with the City of London Police
12 and the Metropolitan Police and so forth.

13 But, just focusing on that point, did you give
14 consideration if not to barriers, to those metal
15 bollards that we see outside this building, for example,
16 every couple of metres, something like that even?

17 A. In relation to that article first and foremost, I've
18 never seen that, wasn't aware of it. I've now just had
19 it read out to me but I know nothing about it, I am
20 afraid, so I can't comment on that particular article.

21 In relation to different types of hostile vehicle
22 mitigation, what I tried to articulate earlier on is
23 very much in relation to yes, we were having an open
24 mind in relation to it. At that particular point, there
25 was no location that was being flagged up as immediate

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1 action being required in relation to that. I was
2 focusing on the locations I was working on where, yes,
3 hostile vehicle mitigation was being considered.

4 In relation to London Bridge, at that particular
5 point in time no, it wasn't being considered because it
6 hadn't been brought up as a specific concern, and
7 vehicle-as-a-weapon, as I've tried to make very clear,
8 can happen anywhere you have pedestrians or crowds and
9 there is an unprotected run and working through that,
10 the mitigation that we were going to be discussing
11 in June was yes, now to London Bridge, because quite
12 rightly PC Hone had brought that concern to me as
13 a long-term permanent solution, so that was going to be
14 discussed, as were other locations in relation to how
15 could we mitigate going forward and yes, that type of
16 method would be one of those that would be considered,
17 but that would be down to the CTSA to advise in relation
18 to it and then down to the engineers, and you'll hear
19 from Ian Hughes after me, I think, who will give you the
20 specifics of how all that would work because that's not
21 in my remit, that's in the engineering world.

22 MR PATTERSON: My Lord, I see the time.

23 THE CHIEF CORONER: Yes, we'll pause there and we'll pick up
24 at 2 o'clock.
25 (1.00 pm)

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1 (The Luncheon Adjournment) time 2.06 pm)

2 THE CHIEF CORONER: Mr Patterson, just before we commence
3 this afternoon, I just wanted to ask about timing
4 because we've got quite a lot to get in today and
5 tomorrow.

6 MR PATTERSON: Yes.

7 THE CHIEF CORONER: I know you have covered probably most of
8 what you need to cover in the questions you've asked,
9 but how much longer do you think you are likely to be
10 with this witness?

11 MR PATTERSON: I told Mr Hough about 30 minutes.

12 THE CHIEF CORONER: Right. And I don't know if anyone else
13 has any -- I am looking at Mr Adamson, I don't know
14 whether he has any ...?

15 MR ADAMSON: I will be no more than 10 minutes.

16 THE CHIEF CORONER: Thank you. And then we'll move on to
17 Mr Hughes.

18 MR HOUGH: I think others than Mr Patterson and Mr Adamson
19 may have a few questions, but I think not many.

20 THE CHIEF CORONER: Yes. And, Mr Hough, I'm going to ask
21 you the same question in relation to Mr Hughes.

22 MR HOUGH: With Mr Hughes, my best estimate, about 25
23 minutes.

24 THE CHIEF CORONER: Right. And so that would take us
25 through until about 3.10, if that's about right, just

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1 before our break.

2 MR HOUGH: It should take us about to the break, yes.

3 THE CHIEF CORONER: And then questions of Mr Hughes.
4 I'm just asking this perhaps because we are going to sit
5 until about 5.00 today, but at least we can make
6 a reasonable start.

7 MR PATTERSON: I think I told Mr Hough about 15 or 20
8 minutes, something of that order.

9 THE CHIEF CORONER: Right, so that should mean, Mr Adamson,
10 that we can make a reasonable start with Siwan Hayward
11 because obviously we have to get through her and another
12 witness tomorrow.

13 MR HOUGH: Yes.

14 THE CHIEF CORONER: Thank you, very good.

15 MR PATTERSON: Mr Woolford, in the period after the
16 Westminster attack did you advise the installation or
17 cause the installation of any barriers or bollards
18 within the jurisdiction of the City of London?

19 A. No, sir.

20 Q. {WS5014/21}, please. Mr Hough asked you about this
21 email in which Matthew Hone, the CTSA, stated that
22 London Bridge should be considered the most vulnerable
23 to low sophisticated attacks using a vehicle, and we
24 looked also at the table that accompanied it; yes?

25 A. Correct, sir.

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1 Q. Now in your role providing direction to the
2 Corporation's Security Board, and given your rank,
3 I think you were temporary commander at the time, did
4 you not think that at that stage you needed to give
5 a direction to install barriers or bollards on
6 London Bridge?
7 A. As I explained earlier, sir, I met PC Hone on 10 or
8 11 May to clarify exactly what was in this email and
9 also in relation to the matrix. At that point I asked
10 him is there any immediate action required from me or
11 the Corporation, to which he turned around and said no,
12 it had been discussed in police meetings and in
13 conversations I had not been party to.
14 The recommendations he was going to give me were in
15 relation to a long-term permanent solution and that is
16 exactly what I immediately took to the Corporation.
17 Q. But a long-term solution wasn't good enough: this is
18 a really urgent need to protect life in light of what he
19 has said about the vulnerability of that bridge to low
20 sophisticated attacks using a vehicle; do you agree?
21 A. The conversation relating to that was mitigated through
22 police tasking, as I think has been quite clearly
23 explained this week, in the same way as in relation to
24 the other works that we were doing, tasking in relation
25 to guards whilst mitigation is taking place.

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1 Q. But the presence -- even if there are officers 24/7
2 standing on the bridge, that will not prevent a vehicle
3 attack, it might even encourage a vehicle attack; would
4 you agree?
5 A. I don't agree, no, sir.
6 Q. Did you cause at this stage, after this email, a single
7 bollard or barrier to be installed within the
8 jurisdiction of the City of London?
9 A. No, sir, as has been explained, there was no information
10 or intelligence to prioritise any immediate deployment.
11 I had discussed it and it was being taken to the
12 Corporation for a long-term permanent solution.
13 Q. Then do I understand your evidence accurately that there
14 was a second meeting with Matthew Hone in relation to
15 the Cerastes report some time in early May, around about
16 10 May?
17 A. No, it's the same meeting, sir. That email was sent on
18 8 May at 9.54 and I met him, I think it was either 10th
19 or 11th, it was certainly before the 11 May Security
20 Board.
21 Q. So two things of significance in early May: the email
22 with the attachment and the Cerastes report, but one
23 meeting with Mr Hone; is that correct?
24 A. Correct, yes, sir.
25 Q. And if we just look at {WS5014/28}, please, in

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1 early May, and it's important to note that you are not
2 a recipient of this email, but in early May, what
3 appears to have been going through the mind of this
4 highly experienced CTSA officer in relation to
5 London Bridge was that it was probably his biggest
6 concern in terms of low sophisticated attack. Do you
7 see that?
8 A. I do see that, yes, sir.
9 Q. And surely that came across when you had the
10 face-to-face meeting with him and the Cerastes report
11 was mentioned and his email about London Bridge being
12 the most vulnerable location was also mentioned.
13 A. No, sir, the conversations -- I'd been working with
14 PC Hone throughout, as I've explained, in relation to
15 the highly vulnerable priority locations I was working
16 on. In the conversation I had with him he had said he
17 had had conversations and there had been meetings which
18 I hadn't been party to and there was no immediate action
19 required from me, he was going to give me long-term
20 permanent solutions which is what I took to the
21 Corporation.
22 Q. But did you not say: Matthew, long-term solutions aren't
23 good enough, we've got a duty to protect life -- you
24 will have been familiar with Article 2 --
25 A. Absolutely, sir.

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1 Q. -- and the responsibilities of the police -- and we have
2 to do what's reasonable given the nature of the threat,
3 given the degree of harm that would be caused, loss of
4 multiple lives and really serious injuries?
5 A. Absolutely, sir, and that's why I asked the question and
6 he categorically said no, it would be discussed in
7 police meetings and in conversations I had not been
8 party to. I was working on a prioritisation list to
9 which he had reviewed, and as you can see on that list
10 he came back saying they were the top priorities that
11 I was focusing on, and that he was going to give me
12 long-term permanent solutions in relation to this and
13 there was no immediate action required from me because
14 of the conversations he had had.
15 Q. He is the constable, you are the temporary commander;
16 did you not feel it appropriate to say to him: that's
17 not good enough, I am afraid, constable, can I, within
18 seven days, please, have your proposals for urgent
19 action?
20 A. I was now seconded into the Corporation, I was
21 categorically not part of that command chain, Commander
22 Gyford, Deputy Chief Constable Gyford was. He had said
23 he had had conversations and had been in meetings to
24 which I wasn't party to and I wasn't going to start
25 second guessing those meetings and those conversations.

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1 Q. Given your link, given your role, your liaison role
 2 between the force and the Corporation dealing with
 3 protective security, my suggestion is that you should
 4 have taken a grip in relation to London Bridge and
 5 caused barriers or bollards to be installed; do you
 6 accept that?
 7 A. No, I don't, sir.
 8 Q. If we just remind ourselves of what you said, you said
 9 that at one stage -- at some stage, you can't say when
 10 precisely before the attack, but at some stage you did
 11 read the Cerastes document?
 12 A. Yes, I have. I can't remember when I read it, but the
 13 meeting conversation did not relate to London Bridge, it
 14 related to the rest of it, where Cerastes was concerned.
 15 Q. {WS5015/15}, please. Towards the bottom of the page in
 16 relation to six hostile actions; do you see that?
 17 A. I do, sir, yes.
 18 Q. In relation to London Bridge, amongst all of the things
 19 that they were flagging up about the vulnerability there
 20 to a ramming attack, was the high casualty numbers; do
 21 you see that?
 22 A. "Six hostile actions were considered, including
 23 London Bridge -- although not as iconic as many other
 24 bridges ..."
 25 Yes, I do see that.

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1 Q. Over to {WS5015/16}, please, in relation to
 2 London Bridge a little below the halfway point, about
 3 two-thirds of the way down, speaking about disrupting
 4 vehicle ramming attacks, there were two recommendations
 5 that were made.
 6 A. Yes.
 7 Q. The second of which was consideration being given to the
 8 placement of vehicle mitigation measures along both
 9 sides of the bridge, and this is clearly physical
 10 installation of measures because it goes on to advise
 11 either hard barriers or smaller structures placed at
 12 regular intervals, which would be consistent with
 13 bollards, wouldn't it?
 14 A. It's one of the options in relation to it.
 15 Categorically, as it says in relation to that, the first
 16 option was in relation to Project Servator deployments
 17 which is what the police were doing and the second one
 18 was in relation to consideration being given.
 19 Consideration was being given in relation to being taken
 20 to the Corporation for a long-term permanent solution as
 21 per the conversation I had with PC Hone.
 22 Q. At page 17, please {WS5015/17}, again, physical barriers
 23 was flagged up, just below the halfway point, against
 24 the words "London Bridge", there's a reference there, as
 25 we can see, to certain times of the day and particular

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1 congestion and then these words:
 2 "The location and layout of the bridge lends itself
 3 to a ramming attack, with no physical barriers in place
 4 to prevent a vehicle from mounting the pavement in
 5 either direction."
 6 Do you see that?
 7 A. I do sir, yes.
 8 Q. And at {WS5015/21}, under the heading of "Physical
 9 Security Measures", about a third of the way down
 10 towards the end of that short paragraph:
 11 "Hostile Vehicle Mitigation measures around several
 12 of the sites had a similar impact on plans for any use
 13 of a vehicle-borne explosive device."
 14 So there in a different context, they were
 15 specifically focusing on the significance of actual
 16 measures around a site; do you agree?
 17 A. Yes, and that's part of the point I was trying to make
 18 out earlier on. In this document there were five
 19 locations and they were talking about attack
 20 methodologies at five different locations, three of
 21 which were the highest risk locations on that matrix
 22 including the most vulnerable of those locations.
 23 In that they contradict the advice being given by
 24 PC Hone and other CTSA's in relation to it which is why
 25 I will always go by the actions and advice of a CTSA

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1 over this document.
 2 Q. And at {WS5015/22}, specifically in relation to
 3 London Bridge, again, under the heading of "Physical
 4 security measures", it was making this additional point
 5 that:
 6 "The absence of physical security measures...
 7 encouraged ... attack plans."
 8 So it is an additional point of positive
 9 encouragement is being caused:
 10 "The absence of barriers separating vehicles from
 11 pedestrians along the length of London Bridge resulted
 12 in vehicle ramming attacks at this location being
 13 considered as viable."
 14 This was all really prophetic, wasn't it, when we
 15 consider what then happened some months after the
 16 report?
 17 A. As I said at the time, when PC Hone brought this to my
 18 attention I asked him the question was there any
 19 immediate action required from me or the Corporation, he
 20 categorically said there had been conversations and
 21 meetings that I had not been party to and no, there
 22 wasn't sentence. The awareness of this is part of many
 23 of the aspects in relation to that document.
 24 Q. So in early May, were you not really worried for the
 25 public at London Bridge?

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1 A. I was worried about the public in multiple locations,
2 sir.

3 Q. Did you not agree that time was clearly of the essence
4 given the rather shocking observations in this report?

5 A. At that point in time, the policing tactics were being
6 utilised, we were not aware, no one -- to my knowledge
7 I don't know anybody at that point in time knew the
8 diversity and the ferocity of attacks that we were about
9 to face at all. But we were doing everything we
10 possibly could in relation to police taskings at that
11 time and we were prioritising in relation to locations
12 for long-term permanent solutions.

13 Q. I can take you to them if necessary, but we're familiar
14 with other documents where around that time,
15 Constable Hone was expressing his concerns and one of
16 them, using capital letters, he writes about highly
17 recommending, dealing with what he had advised, and
18 another he set out in a document advising that
19 consideration should be given to the installation of
20 hostile vehicle mitigation. Surely he was expressing
21 those sorts of things in his dealings with you around
22 that time?

23 A. Not at all, sir, that was not the role I had at the time
24 and he knew that and he was working with me in relation
25 to long-term permanent solutions at priority locations.

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1 Q. Did it not occur to you that other central London
2 bridges did have barriers which protected the public,
3 such as Southwark Bridge?

4 A. Sorry, sir?

5 Q. Did it not occur to you that there were other central
6 London bridges that did have protective barriers, such
7 as Southwark Bridge?

8 A. Not so much in relation to bridges but in relation to
9 anywhere where you have an unprotected run, from
10 pedestrians and crowds being at those locations with
11 an unprotected run is vulnerable to a vehicle attack.
12 Street furniture in those locations is one of those
13 factors. There were many locations that we were
14 considering, as I've tried to explain earlier on, that
15 was all going to the June Security Board, we addressed
16 that in partnership.

17 Q. You were still employed by the City of London Police at
18 this stage; yes?

19 A. Absolutely, sir, that's why I'm accountable for my
20 actions at that time as a public servant, yes.

21 Q. And you were attending the Security Group meetings?

22 A. As and when I could attend those meetings, yes.

23 Q. And you agreed that the City of London Police did have
24 duties to protect the public from the threat of
25 terrorism?

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1 A. Yes, and they were advising advice and we were working
2 on priority locations at that time to mitigate that.

3 Q. If I were to suggest that there was a collective failure
4 by the City of London Police, and that includes you, to
5 urgently cause barriers to be installed, would you
6 accept that?

7 A. I would disagree with you, sir. There was no
8 information or intelligence at that time to deploy
9 urgent action.

10 Q. Now you briefed Mr Lisle of the Corporation about the
11 matrix and about the Cerastes report; is that correct?

12 A. That is correct and also in relation to the crowded
13 spaces outside crowded places that I was talking about
14 earlier, yes, sir.

15 Q. And when you briefed him you told him that the police
16 would be providing more detailed recommendations in
17 relation to what was in the Cerastes report; is that
18 correct?

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

20 Q. And all of this is in early May, but not a single
21 recommendation was provided before the attack, which as
22 we know was in early June; is that correct?

23 A. Sorry, sir?

24 Q. Not a single recommendation was provided to the
25 Corporation between then, which was early May, and the

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1 day of the attack, which was early June?

2 A. Four weeks later, yes. There were no recommendations
3 made, but during that time period we had also had the
4 horrific attack on Manchester Arena. We were also doing
5 lots of training in relation to guards, in relation to
6 uplift for a critical, but there was lots of stuff
7 taking place there, but no, there was no recommendations
8 that had arrived at that point.

9 Q. And you told Mr Hough that you didn't chase
10 Constable Hone for the recommendations. Did you not
11 feel that given the degree and nature of the risk, that
12 this needed to be gripped urgently?

13 A. As I have said, sir, PC Hone had told me that there had
14 been police meetings and conversations where this had
15 been discussed that I had not been party to, there was
16 no immediate action required from me, he was bringing it
17 to me as a long-term permanent solution and that is what
18 I took to the Corporation whilst we were focusing on our
19 priorities.

20 Q. And as all these weeks went by, did you say: Matthew,
21 who are these officers that are dealing with this?

22 A. The couple of -- what the four weeks that went through
23 in relation -- while we were prioritising everything
24 else, I knew who it -- it was the tasking process and
25 Special Branch, I'm guessing that's who he was talking

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1 to.

2 Q. Right, because the families would like to know who was

3 considering this and who, I would suggest, were failing

4 to deal with it urgently. Can you give us names? Who

5 within Special Branch was actioning this and drafting

6 their recommendations?

7 A. I can totally understand the families' desire for that,

8 sir. I do not know because I was not involved in those

9 conversations and I was not involved in those meetings.

10 Q. Because he gave evidence yesterday that he had

11 distributed copies of the report, not just to you, but

12 also to others, and that they were lifted at one of the

13 Security Group meetings?

14 A. I heard him say that, sir, yes. I actually asked for

15 a copy of the report so I could action what I could

16 within the Corporation and that was before that meeting.

17 I don't know who he gave it to in that meeting, I have

18 no idea.

19 Q. But still you weren't sufficiently troubled about the

20 risks to the public on that bridge?

21 A. Sir, I had asked the question and I had been given the

22 advice that there was no immediate action required from

23 me and it had been discussed in meetings and in

24 conversations that I had not been party to and he was

25 bringing it to me for long-term permanent solutions and

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1 that I was focusing on the priorities that he had been

2 working with me and we continued to do so.

3 Q. When you told Ms Dwyer of the holistic approach being

4 adopted and of how the Corporation was driving through

5 the approach and the uplift in security culture and all

6 of those things, in light of all of that, did you not

7 feel it necessary to advise the Corporation: listen,

8 there's this real problem on London Bridge and it's

9 an ongoing problem and if there's an attack tomorrow,

10 there is absolutely no protection.

11 A. I asked for a review of the priority matrix. He came

12 back and told me categorically the locations that we

13 were focusing on were the priorities. He brought in

14 London Bridge for the first time to me as the sixth

15 place. I asked the specific question and he gave me the

16 very clear answer in relation to it had been discussed

17 in police meetings and conversations I had not been

18 party to and he was bringing it to me for a long-term

19 permanent solution which is what I took to the

20 Corporation.

21 Q. {WS5033/25}, please. A few days before the attack, the

22 press raised concerns again. If we look, please, at

23 this email, I think we've heard earlier that this was

24 The Sun newspaper on 31 May contacting the Corporation

25 asking about the bridge, as we can see at the bottom of

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1 the page:

2 "... I was wondering whether there are any plans

3 afoot to put bollards on the pavement on London Bridge?

4 The pavement is extremely wide there and following the

5 Westminster attack, it does seem to be a weak spot. Can

6 you help at all?"

7 And a journalist called Emily Hall signs that.

8 The City of London Police were consulted before the

9 reply went out. Did none of this reach you, officer?

10 A. I was not involved in any of this, sir. The first

11 I knew about it is when the Coroner's team asked me the

12 question to put in the statement which I made very clear

13 I had no involvement or no knowledge of this.

14 Q. At page 21, please {WS5033/21} we have chains of emails

15 and one of them involves the City of London Police head

16 of media, John Ellul?

17 A. He is part of the media team, yes, he's not the head of

18 it.

19 Q. "Can you raise this Dave Service/Trevor Dyson/Dave

20 Timmins for a CT/Special Branch perspective ...?"

21 Mr Timmins, he was a senior officer in Special

22 Branch, wasn't he?

23 A. He is sir, yes.

24 Q. So specifically it was being flagged up: let's just

25 check with the City of London Police, let's just check

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1 with Special Branch as to what the position is about

2 bollards on London Bridge.

3 Then if we go to {WS5033/20}, please, a City of

4 London officer responds saying that they have asked the

5 Special Branch officers if they wish to add anything

6 "and I've not heard anything back".

7 So Special Branch have been asked if they want to

8 add anything, we heard from Constable Hone that they had

9 been given copies of Cerastes. You said that they were

10 looking into this and recommendations were awaited,

11 having considered those troubling observations in the

12 Cerastes report, and they don't raise any concerns. And

13 then the reply that goes back to the journalist --

14 THE CHIEF CORONER: Well, in fairness, Mr Patterson, this is

15 any response to the journalist's queries, not any

16 response to the Cerastes.

17 MR PATTERSON: That's absolutely right, yes.

18 THE CHIEF CORONER: Just to make that clear, that's what

19 this email chain is seeking, a response to the

20 journalist's query.

21 MR PATTERSON: Yes, and if they wish to add anything and

22 "I've not heard anything back", so therefore "feel free

23 to respond as you see fit", is what the police say to

24 the Corporation, and then consequently on {WS5033/25}

25 the reply goes back to The Sun newspaper on Friday

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1 the 2nd that:
 2 "There are no current plans for the provision of
 3 barriers or bollards to be deployed at London Bridge."
 4 Can you help us, you are a central liaison figure
 5 dealing with protective security, dealing with counter
 6 terrorism, linking the police and the Corporation. Can
 7 you help us with why there are no Special Branch
 8 concerns being raised if consideration has been given to
 9 how they deal with the Cerastes report?
 10 A. I know nothing about those emails, I know nothing about
 11 that conversation, sir, I apologise, I can't help.
 12 Q. A collective failure, I suggest, within the police to
 13 action with the necessary urgency the very real and
 14 ongoing risks flagged by Mr Hone and by Cerastes; would
 15 you agree?
 16 A. No, sir, I spoke to PC Hone personally myself and he
 17 categorically told me it had been discussed in meetings
 18 and in conversations that I had not been party to and
 19 that as far as I was concerned, the Corporation was
 20 bringing to us a long-term permanent solution which
 21 I took to the Corporation as soon as I was told about
 22 it.
 23 Q. Finally this, officer {WS5008/1}. Responsibility within
 24 the Corporation for the bridge involved work from
 25 an individual called Paul Monaghan, who as we can see in

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1 this statement that he helpfully provided, confirmed
 2 that he had responsibility, if you look in the second
 3 paragraph, for the City of London Corporation's five
 4 river crossings, and he deals at paragraph 4 with the
 5 five bridges that are owned by Bridge House Estates, and
 6 that includes London Bridge; do you see that?
 7 A. I do see that, sir, yes.
 8 Q. And at {WS5008/3}, please, he reveals that on Sunday
 9 4 June, if we look halfway down paragraph 9, late in the
 10 evening he went along and he witnessed the installation
 11 commencing on Westminster Bridge, and he speaks about
 12 the speed of the process proceeding and he speaks about
 13 the use of National Barrier Asset and he deals with the
 14 installation by Transport for London and
 15 Metropolitan Police on London Bridge; do you see that at
 16 paragraph 10?
 17 A. I do, sir, yes.
 18 Q. And we've heard that it was all dealt with at
 19 London Bridge within something like six days.
 20 My suggestion, officer, is that you could have
 21 caused that speedy installation of barriers on
 22 London Bridge prior to 3 June; would you accept that?
 23 A. No, sir, because that was not the role I was in. I was
 24 seconded to the City of London Corporation at that time,
 25 I was not in the commander's seat which Commander Jane

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1 Gyford, Deputy Chief Constable Jane Gyford, has already
 2 covered, and I was not party to any of those discussions
 3 or decisions in relation to that.
 4 Q. Would you agree with this, we can deal with the details
 5 later with another witness, Mr Hughes, but neither
 6 Bridge House Estates nor the Corporation of London are
 7 short of money, are they?
 8 A. No, sir, as long as they have a reasoned business case
 9 brought to them with options, threat and risk impact
 10 assessments and recommendations, I have never found them
 11 not supportive of any measures.
 12 Q. You told Mr Hough that there could have been a gold
 13 group, there could have been urgent installation that
 14 would have included things like the rental of barriers;
 15 do you agree that if you had directed that as a matter
 16 of urgency barriers or bollards be installed, the
 17 likelihood is that the Corporation would have done what
 18 they were advised?
 19 A. If I had been given the information intelligence, as
 20 I said earlier on, and the circumstances were different
 21 to what I was faced with, I would have advised the Town
 22 Clerk that he needed to have a gold group or Commander
 23 Gyford, Deputy Chief Constable Gyford, would have called
 24 the gold group and we would have then looked through a
 25 range of options in relation to that.

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1 Q. And suggestions that everything should be parked until
 2 27 June, and thereafter further delays for analysis of
 3 funding and different types of barriers all of
 4 that showed an insufficient degree of urgency, given the
 5 nature of the ongoing risk; would you agree?
 6 A. The conversation that I had with PC Hone was categorical
 7 in relation to long-term permanent solutions, not in
 8 relation to temporary measures. As I said, I was not
 9 party to any of those conversations which Deputy Chief
 10 Constable Gyford explained yesterday.
 11 MR PATTERSON: No more questions.
 12 THE CHIEF CORONER: Thank you.
 13 Questions by MR ADAMSON
 14 MR ADAMSON: Mr Woolford, my name is Dominic Adamson, I ask
 15 you questions on behalf of the family of Xavier Thomas
 16 and his partner Christine Delcros.
 17 A. And if I can again please offer my sincere personal
 18 condolences to the family.
 19 Q. Thank you.
 20 Mr Woolford, I will be brief. Just a couple of
 21 short topics, please.
 22 First of all, culture. If we could have up on
 23 screen, please, {WS5010/2}. Now, at paragraph 5 of your
 24 statement you deal with your secondment to the
 25 Corporation.

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1 A. That's correct, sir, yes.
 2 Q. And you say, and this is the second half of that
 3 paragraph, in connection with the Security Cross-Cutting
 4 Board:
 5 "This Board had been devised to most efficiently
 6 manage the security requirements across various
 7 high-risk sites which had been identified by various
 8 Counter Terrorist Security Advisors (CTSA) reports that
 9 the Corporation had held for some time: none of which
 10 related to London Bridge."
 11 So do I understand from that paragraph that there
 12 were various CTSA reports relating to high-risk sites
 13 which had not been addressed efficiently?
 14 A. That was what was taken to the Town Clerk, it had been
 15 identified that they'd been given to building managers
 16 and it had not been actioned in. That's why Assistant
 17 Town Clerk Peter Lisle from January 2016 put it into
 18 this action plan and I was then sent in in February 2017
 19 to, as I said, grip, but amplify direction and control.
 20 THE CHIEF CORONER: And, as you told us at the beginning of
 21 your evidence, that was really the genesis of your
 22 involvement?
 23 A. Absolutely, sir, that's correct.
 24 MR ADAMSON: But the point is this: that as I understand
 25 what you're saying in that paragraph, CTSA's had been

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1 giving advice?
 2 A. Had given reports, yes.
 3 Q. Yes. And that advice was not being followed or
 4 implemented?
 5 A. One of them had absolutely been implemented and the
 6 others hadn't been implemented, and that's what I was
 7 sent in to address and that's what the Assistant Town
 8 Clerk was addressing.
 9 Q. So when we go to paragraph 6 of your statement:
 10 "In addition, I supported the organisational
 11 cultural change to security ..."
 12 A. Yes.
 13 Q. Do I take it from your evidence that really that
 14 cultural change included ensuring that there was proper
 15 engagement with advice being given by CTSA's?
 16 A. Absolutely. From that day onwards, from once I got
 17 involved in there, there was absolutely engagement with
 18 it, yes.
 19 Q. Yes, but just to press this point --
 20 A. Yes, sir.
 21 Q. -- the reality is that the culture in the City of London
 22 Corporation in terms of its attitude to security was not
 23 as it should have been; do you agree?
 24 A. No, they were addressing stuff at the time but they
 25 hadn't addressed those fully. For example, if you look

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1 at new buildings and planning consents that were taking
 2 place, absolutely they were looking at -- that we had
 3 an architectural liaison officer and the CTSA's giving
 4 advice around mitigations that were taking place in
 5 planning, but those reports had not been addressed and
 6 that's why I was sent in to help grip it.
 7 Q. Your words are "for some time"?
 8 A. That's correct.
 9 Q. Now you don't put a timescale on that?
 10 A. No.
 11 Q. But the impression, the clear impression you're giving
 12 is that it's too long?
 13 A. It absolutely was too long. Peter Lisle started it
 14 from 2016 onwards, and he was gripping it in relation to
 15 that, and that's where they had then set up the
 16 Cross-Cutting Board, they had used a company called
 17 AECOM to recommendations and I was sent in to help
 18 provide clarity and direction.
 19 Q. Yes. You had, prior to this point, been the chair of
 20 the Security Group at the City of London Police?
 21 A. Up until about November 2016, yes.
 22 Q. Yes. And so does it follow that this culture of not
 23 responding to CTSA advice in prompt and efficient time
 24 had been allowed to develop on your watch under your
 25 stewardship of the Security Group?

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1 A. I was unaware that this hadn't been addressed.
 2 Q. How is it that the chair of the Security Group does not
 3 know that CTSA advice in relation to three or four
 4 high-risk sites in the City of London, that those
 5 reports, that advice, was not being followed?
 6 A. Because as you chair those board meetings, you are
 7 reliant on the information being provided to you. I was
 8 not aware of that and as soon as I was aware of it,
 9 I went in there to sort it out with Peter Lisle.
 10 Q. So the CTSA's are at fault for not informing you, is that
 11 right?
 12 A. No, I'm not saying anyone's at fault, sir, I am just
 13 saying I was not --
 14 Q. Well somebody must be at fault if the chair of the
 15 Security Group does not know that three or four
 16 high-risk sites in the City of London are not actually
 17 engaging with the advice that they're receiving?
 18 A. There was -- at no point was that flagged up at all that
 19 they were not being addressed at that point to me.
 20 Q. So you just didn't know --
 21 A. I didn't know.
 22 Q. -- despite your position as the chair of the Security
 23 Group?
 24 A. You chair the Security Group but other people would
 25 chair meetings -- whether it was discussed at any

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1 meetings I haven't been at, I can't comment, sir, but
 2 without a doubt, as soon as we were aware of it, I got
 3 sent in to address it.
 4 Q. Now you said that you went in to, in effect, get a grip
 5 of what was going on; is that right?
 6 A. That's correct, sir, yes, to provide clarity and
 7 direction.
 8 Q. So grip is your word?
 9 A. It is, yes.
 10 Q. The fact that you say somebody needs to get a grip of it
 11 suggests that that was not the position at the time that
 12 you went into that role?
 13 A. There were some parts of it being addressed, there were
 14 other parts that weren't, there was, as I said, the
 15 Corporation brought in a company that had provided a sea
 16 of recommendations and then by working with the CTSA's to
 17 address which of the proportionate mitigations to
 18 address.
 19 Q. Now, just in terms of how the City of London responded
 20 to your arrival, can we turn to paragraph 11 of your
 21 statement, the next page, please. {WS5010/3}, now, just
 22 to give you some context, if we could just look up the
 23 page, I do apologise, here you're discussing the
 24 prioritisation matrix that you have answered questions
 25 about both to Mr Hough and Mr Patterson, and again,

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1 we're still in the realms of the discussion around,
 2 amongst others, the three or four priority sites that
 3 you were brought in to develop and to advance the
 4 security planning in relation to; is that right?
 5 A. Sorry, what was the question, sir?
 6 Q. In relation to the locations on the security of
 7 prioritisation matrix, they include the three or four
 8 sites that you are brought in to specifically deal with;
 9 yes?
 10 A. Yes, sir, they were. I was brought in to address four
 11 of them and review the fifth one which the Corporation
 12 had done a lot of work on in relation to which was
 13 a tier 1 site.
 14 Q. Yes. Can we now look at paragraph 11:
 15 "A further amount of funding was secured
 16 in March 2017 but was still a long way from delivering
 17 the recommendations to mitigate the risks identified
 18 from the CTSA reports."
 19 A. That's correct.
 20 Q. So do I understand this: that a request is made for
 21 money in order to deliver recommendations, and you get
 22 a response along the lines of: well, you're not having
 23 that, you're having a sum which is less than that?
 24 A. There's a project management approach which is called
 25 the Gateways that I was trying to explain earlier on.

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1 In relation to that, you have a gateway 1 and 2 which is
 2 basically the consent from members to start working
 3 around how you are going to address things, bearing in
 4 mind as a chief officer, and Ian will tell you in more
 5 detail than I because he does this all the time,
 6 I believe as a chief officer you have a limit of about
 7 £50,000 that you can do, after that it has to go through
 8 the due diligence process of local government. The
 9 gateway 1 and 2 is the conversation piece, the gateway 3
 10 and 4 is when you have the specific figures in relation
 11 to it. I was not involved in that conversation
 12 initially, I believe it was Assistant Town Clerk and the
 13 Town Clerk who sorted that part out. When we went
 14 through it with the work that was coming out of AECOM
 15 and the recommendations with the CTSA's, we decided that
 16 was not sufficient in relation to it which is why the
 17 work that we were doing that then went in front of the
 18 members, which was the gateway 3/4 process, which was
 19 through the committees -- this says 10 and 22 May,
 20 signed off on 8 June, which then gave the full funding
 21 envelope to allow then the detailed design and
 22 procurement process.
 23 Q. My point was a simple one.
 24 A. Oh, sorry.
 25 Q. Your words: the funding that was allocated was a long

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1 way off what was delivered?
 2 A. Correct.
 3 Q. So in terms of this cultural change that you're there to
 4 oversee, to embed, whatever the right term is, your
 5 arrival still results in a resource allocation a long
 6 way off what was required?
 7 A. That was within the first month of me being there, sir,
 8 so yes. And the cultural change was based around that.
 9 Q. Do you accept the proposition that I'm putting to you?
 10 A. What is the proposition?
 11 Q. Which is that you were still being allocated sums of
 12 money which were well short of what was necessary?
 13 A. At that point there were insufficient funds which was
 14 then addressed at that meeting.
 15 Q. So no cultural change by March?
 16 A. No, there was cultural -- the cultural change part was
 17 in relation to an action plan that had been set up by
 18 the same consultant who did the matrix back in, I don't
 19 know when it started because it was before I was there,
 20 he was employed from January 2016, he created a detailed
 21 action plan which was all based around a -- a document
 22 called Centre for the Protection of National
 23 Infrastructure, CPNI, Passport to Good Security. It is
 24 what all good companies should be doing in relation to
 25 bringing a cultural change and a security culture into

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1 the organisation. That is what the action plan was and
2 that is what was going forward to it and that was taking
3 place. I joined there in February on a secondment and
4 in the March that's when we then said it's insufficient
5 and we went through a series of processes to get the
6 correct funding.

7 Q. Yes. And we see at the end of that paragraph that you
8 got what you describe as final sign-off on 8 June where
9 the funds are effectively made available.

10 A. That's the gateway 4 process that enables the funding
11 envelope to then allow the project managers to then go
12 into the detailed design procurement stage which is the
13 gateway 5 process.

14 Q. So is this the case, then, that it was only after the
15 events of 3 June that the purse strings were released to
16 the extent necessary to deliver the recommendations
17 which had been made in relation to the four high-risk
18 sites?

19 A. No, not at all, sir, as you can see, it had already been
20 agreed at the 10 May meeting and the 22 May meeting,
21 I think it is the final meetings, there is a series of
22 committee meetings that you have to go through, it's the
23 same with every local authority and that's what it is
24 going through.

25 In relation to timescales with this, we have had

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1 a review in relation to this with officers as to how we
2 can expedite that and I believe there is a meeting
3 taking place with members to see if we can expedite the
4 processes and procedures in relation to this, which
5 I think was taking place this week, but I've not been
6 able to be party of it.

7 Q. Next topic, please, can we turn to Mr Monaghan's
8 statement, it's the passage to which Mr Patterson
9 briefly referred. It's paragraphs 9 and 10, {WS5008/3},
10 and paragraph 9, Mr Patterson has made the point that in
11 fact, implementation of barriers was something that
12 could be executed within a little over 24 hours. In
13 fact, it was probably less than 24 hours of the events
14 taking place.

15 And what Mr Monaghan goes on to say is that:

16 "The installation consisted of National Barrier
17 Assets of HVM design applied at the ends with lengths of
18 temporary highway barriers anchored to concrete blocks
19 at either end to provide some protection to the
20 footpath."

21 Now, do I understand what he is saying there is part
22 of what was being installed was National Barrier Asset
23 and other parts were non-National Barrier Asset?

24 A. I wasn't involved in that but my understanding is
25 I thought the whole process had come from the National

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1 Barrier Asset.

2 Q. Okay. Paragraph 10:

3 "As part of the process I reviewed the types of
4 barriers, subsequently installed by
5 TfL/Metropolitan Police on London Bridge. These are
6 predominantly used in major roadworks to protect the
7 operatives and can alternatively be bolted to [other]
8 road construction."

9 And so there doesn't appear to be any magic or any
10 particular difficulty in identifying resource of that
11 nature; would you agree?

12 A. As I said, sir, I was not involved in any of that so
13 I can't really comment, but as far as the process in
14 relation to it, it's been explained by DACSO and also by
15 Deputy Chief Constable Gyford that the problem at that
16 time in relation to the National Barrier Asset, unless
17 it was intelligence-led or an event, and that's the
18 problem they were having at that time. This was then
19 put in post, London Bridge, because the circumstances
20 had tragically changed.

21 Q. But we've heard this time and again that utilising the
22 National Barrier Asset in these circumstances was
23 unprecedented, it wasn't something which was done in
24 ordinary circumstances, but it's not that difficult, is
25 it? What Mr Monaghan is saying is that equipment that

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1 could be used in roadworks to protect operatives was --
2 is being used? So this asset, this sort of protective
3 material could be sourced from any number of locations,
4 surely?

5 A. I have not been involved in any of that, sir, so I can't
6 really comment. You need to be asking the people who
7 are involved in it.

8 Q. And if somebody says: right, we have just got to do
9 this, we have just got to get those barriers on the
10 bridges, it would have been done, wouldn't it?

11 A. There was never that conversation, sir.

12 Q. There should have been that conversation, shouldn't
13 there?

14 A. As I said, when I was involved, like I asked PC Hone
15 that direct question, I was told it had been discussed
16 in police meetings and conversations I had not been
17 party to, so I was not involved in any of those
18 conversations.

19 Q. One final point and it's a related one. On 8 May you
20 receive the email from Mr Hone?

21 A. Correct.

22 Q. On 10 May or 11 May you have your meeting with Mr Hone?

23 A. Correct.

24 Q. At that stage, you were under no illusion that
25 London Bridge represented a serious risk to a marauding

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1 terror attack from a vehicle; do you accept that?
 2 A. As with other locations at that time, as I have made
 3 very clear in relation to vehicle-as-weapon attack, it
 4 can happen at any location where you have got
 5 pedestrians and crowds.
 6 Q. You told this court that that information came as
 7 a surprise to you.
 8 A. Which information?
 9 Q. That London Bridge represented that sort of a risk and
 10 the fact that it now ended up on your matrix.
 11 A. The details of PC Hone's concerns, yes. I was aware
 12 that any location where you have pedestrians or crowds
 13 and there is an unprotected run is vulnerable from
 14 a vehicle-as-a-weapon. I had been working with PC Hone
 15 throughout that time period and I was very surprised
 16 when he put it in like that, and as soon as I had that,
 17 that is why I met him and asked the question.
 18 Q. Yes, so therefore throughout your time on the Security
 19 Group, this real risk had effectively not been
 20 identified and therefore nothing had been done in
 21 relation to it?
 22 A. As I've made very clear, at no point was London Bridge
 23 brought up to me at any point in time as being
 24 vulnerable to that kind of attack and of concern more
 25 than anywhere else at all, and the point that I think

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1 has been made very clear is that the CTSAs at that point
 2 had not flagged it up, PC Hone quite rightly did, and as
 3 soon as he did, I met him and as soon as I met him
 4 I asked that direct question and he made it very clear
 5 to me there had been conversations within the police and
 6 also in relation to meetings that I had not been party
 7 to and that I did not need to take immediate action, he
 8 was bringing it to me as a long-term permanent solution
 9 and if there had been anything different to that we
 10 would have gone into a gold group.
 11 Q. You, with all your experience, with all your
 12 connections, with your feet in both camps, one in the
 13 City of London Corporation, one in the City of London
 14 Police, were ideally placed to say: we have got to do
 15 something about this now.
 16 A. I agree, that's why I asked the question and I got the
 17 answer that I have just given you.
 18 Q. You were ideally placed to get something done about it
 19 then.
 20 A. If there was any information or intelligence or PC Hone
 21 had turned around and said to me that: this needs to be
 22 addressed now, I would have advised in relation to
 23 a gold group meeting, unreservedly. None of those
 24 circumstances were ever given to me at any point in
 25 time, in fact, the opposite, I asked a direct question

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1 to Sergeant Hone and he made it very clear to me that it
 2 had been discussed in police meetings and in
 3 conversations that I had not been party to and he was
 4 bringing it to me as a long-term permanent solution
 5 which is what I took to the Corporation and to
 6 Peter Lisley.
 7 Q. You were a commander, he was a police constable?
 8 A. Yes.
 9 Q. You were very much more senior than him?
 10 A. It's got nothing to do with rank, sir. It's expertise
 11 and knowledge. He is the one with the expertise and
 12 knowledge. That is why they go through all the training
 13 and the accreditation. His voice was listened to all
 14 the time. He was working with me so closely at other
 15 locations. He brought vehicle-as-a-weapon
 16 recommendations to me in relation to another location,
 17 that was taken into the Cross-Cutting Board. It's the
 18 same location that the Cerastes document gave contrary
 19 vulnerability to. I always act and listen on the advice
 20 of a CTSA rather than anyone else.
 21 Q. You had the clout to get things done whereas he did not?
 22 A. He could have happily had the clout to get that done.
 23 He was a very -- you have seen how passionate he is,
 24 he's one of the most professional officers I've ever
 25 worked with, his passion and enthusiasm is second to

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1 none. If he said to me at any point in time there was
 2 immediate action, I would have listened and I would have
 3 advised for a gold group. I respect that man with so
 4 much high degree, I've commended him for his work,
 5 unreservedly we would have gone into a gold group if
 6 I had had that information.
 7 MR ADAMSON: I have no further questions.
 8 THE CHIEF CORONER: Mr Horwell.
 9 Questions by MR HORWELL QC
 10 MR HORWELL: I appear on behalf of the Commissioner of the
 11 Metropolitan Police.
 12 A. Sir.
 13 Q. I've got three or four topics that I want to cover.
 14 They're all short.
 15 A. Thank you.
 16 Q. Your evidence has been very clear, but in view of some
 17 of the questions that you have been asked I just want to
 18 go over some of the quite basic territory that you and
 19 other witnesses have covered this week.
 20 The United Kingdom government strategy in counter
 21 terrorism, as we have heard many times, is known as
 22 CONTEST.
 23 A. It is, sir.
 24 Q. And under CONTEST sit the four Ps and one of those Ps is
 25 Protect.

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1 A. It is, sir.
 2 Q. And the Protect strand is the particular responsibility
 3 of the counter terrorist security advisor, the CTSA.
 4 And, of course, the City of London Police had its own
 5 CTSA, Police Sergeant Hone?
 6 A. It had more than just PC Hone, yes.
 7 Q. And it had more than.
 8 A. Yes.
 9 Q. And you've just spoken as to his professionalism.
 10 A. Very much so.
 11 Q. Upon which you relied.
 12 A. Absolutely.
 13 Q. Now in terms of the Protect strand of CONTEST, the City
 14 of London Police had responsibility for London Bridge.
 15 A. That is correct, from a policing perspective.
 16 Q. Yes. And that of course included hostile vehicle
 17 mitigation.
 18 A. In relation to advising, yes.
 19 Q. And that is obvious from the fact that, as we have seen
 20 on countless occasions, all of Police Sergeant Hone's
 21 relevant emails and meetings are with the City of
 22 London?
 23 A. That is correct.
 24 Q. Now, as for DACSO, you were asked about DACSO some time
 25 ago now, obviously if DACSO had intelligence that

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1 a hostile vehicle attack was being planned on a bridge,
 2 let alone on London Bridge, you would obviously expect
 3 her to pass that intelligence on to you?
 4 A. To the City of London Police, unreservedly, yes.
 5 Q. And that was her responsibility?
 6 A. Yes.
 7 Q. And you have been asked about some press reporting, one
 8 of which was shown to you, and you said you couldn't
 9 remember reading it at the time?
 10 A. Which one was that, sir?
 11 Q. It was in relation to the putting up of barriers after
 12 the Westminster attack.
 13 THE CHIEF CORONER: This is the one from The Sun.
 14 A. Thank you, sir, yes, I hadn't seen that one.
 15 MR HORWELL: Now, press reports have their limitations,
 16 obviously.
 17 A. They're a very good open source though, sir.
 18 Q. And they can be a good source. But in terms of press
 19 reporting, are you aware of some press reporting after
 20 the barriers were put on bridges about the danger they
 21 presented to cyclists?
 22 A. I have been made aware of it since, but not at the time,
 23 sir, no, I wouldn't.
 24 Q. And how cyclists may be crushed against the barriers?
 25 A. I've been made aware of stuff but I wasn't aware of the

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1 articles, no.
 2 Q. And the point that I simply wish to make is that no
 3 remedy is ever straightforward?
 4 A. I would 100 per cent agree with you, sir.
 5 MR HORWELL: Thank you.
 6 Further questions by MR ADAMSON
 7 MR ADAMSON: Sir, I do apologise, Ms Delcros has just asked
 8 me to ask one more question.
 9 THE CHIEF CORONER: Of course.
 10 MR ADAMSON: I do apologise.
 11 Mr Woolford, could I have up on screen, please,
 12 {WS5014/34}. This is an email that we've seen before
 13 and it's dated 24 May in which Mr Hone identifies to
 14 Helen Isaac a matter of high importance. Yes.
 15 Q. Now, you were never informed of this email?
 16 A. I was never informed, I apologise, I know nothing about
 17 it.
 18 Q. Yes. Do you consider that you should have been informed
 19 of this email?
 20 A. Not in the role that I had at that time because the way
 21 I read that email is referring to policing tactics and
 22 I was no longer in that role, I was seconded into the
 23 Corporation, so it would have gone to the deputy chief
 24 constable you heard from yesterday.
 25 Q. But having regard to the common goal of ensuring

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1 a secure environment and that this referred to
 2 recommendations which Mr Hone regarded as being in need
 3 of serious consideration, does it reflect poor
 4 communication that you were not notified of the contents
 5 of this email?
 6 A. I had already spoken to PC Hone and PC Hone had told me
 7 he was going to give me recommendations. I had actioned
 8 that to go to the Corporation for the meeting in June.
 9 This is an internal conversation within the police that
 10 PC Hone or Sergeant Hone -- he is a sergeant -- would
 11 have discussed with his line manager and within the
 12 police. It would not have come to me in the role I had
 13 at that time.
 14 MR ADAMSON: Well, it doesn't sit happily with your stated
 15 need for a holistic partnership approach, does it?
 16 A. I would say that we did have a holistic partnership
 17 approach and it was a very good partnership approach and
 18 it is a very good partnership approach and so much has
 19 taken place since that tragic, horrible day.
 20 THE CHIEF CORONER: Yes.
 21 Questions by MS BARTON QC
 22 MS BARTON: Mr Woolford, I just want to deal with one or two
 23 issues that have already been dealt with but from an
 24 entirely different perspective, if I may. First of all
 25 it was suggested by Mr Patterson in questions to you

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1 that Commander Gyford, now Deputy Chief Constable
2 Gyford, had said there was no responsibility on the part
3 of City of London Police for London Bridge, and he
4 showed you an extract from the transcript where the
5 question was phrased "you personally" have
6 responsibility. Could we look, please, at the
7 transcript {Day29/51:1-25} because it was suggested your
8 view and hers diverge. If you have a look at it, could
9 we just -- we need to go up to page 50 -- no, I'm sorry,
10 there we are. Right, okay:

11 "... a whole host of people [had] responsibility."

12 Can we go to the next page, please {Day29/52:1}, the
13 page before.

14 "Question: And so from your answers it sounds as
15 though there are a whole host of people who had shared
16 responsibility for the absence of barriers, particularly
17 following the Westminster attack?

18 "Answer: Absence of barriers ...

19 "Question: Yes?

20 "Answer: -- or in other areas, because there are
21 different responsibilities with different bodies of
22 people.

23 In terms of the bridges then I would go back to the
24 structure being the Corporation of London concern, and
25 TfL being the Highways Agency, and those conversations

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1 have started with both of those bodies of people. With
2 the police being in their advisory role, as we were, and
3 part of that partnership."

4 So the answer that she gives there is exactly the
5 same approach as you in your evidence, is it not?

6 A. Absolutely, and I would be very surprised if Jane and
7 I had contrary, yes, absolutely. The police role is
8 advisory and it's a partnership role.

9 Q. And whether the Corporation of London or, indeed, any
10 other local authority responds to advice given by CTAs
11 under the national protective security programme,
12 depends entirely upon the views of that local authority
13 and the availability of funding to do it.

14 A. Yes, it's advisory, yes.

15 Q. And another initiative from the City of London Police
16 with which you were directly involved is to facilitate
17 the advisory role in protective security and to have
18 joined-up thinking that you were seconded into the City
19 of London Corporation in 2017?

20 A. Yes.

21 Q. And so in terms of the efforts that were being made to
22 facilitate the protective security relationship between
23 the Corporation of London and City of London Police,
24 that was a specific initiative to facilitate that
25 arrangement?

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1 A. Sorry?

2 Q. So in terms of facilitating protective security
3 arrangements --

4 A. Yes.

5 Q. -- between the City of London and the Corporation of
6 London, a special arrangement, namely you --

7 A. Yes.

8 Q. -- had been put in place to facilitate it?

9 A. Yes.

10 Q. It has been suggested to you that there was a failure to
11 follow, a collective failure to follow the
12 recommendations made by Cerastes. Please could I have
13 on the screen {WS5015/16}. Could we look at, just under
14 halfway down the page, there are two recommendations
15 with bullet points "to disrupt vehicle ramming attacks".

16 The first one is there are two recommendations from
17 Cerastes, the first one:

18 "Project Servator deployments should be focused on
19 detecting suspicious activity in and around specific
20 areas highlighted within the associated ... graphics on
21 London Bridge."

22 I think you sat in the court when DCC Gyford gave
23 her evidence; is that right?

24 A. Yes, I was.

25 Q. And you will recall a bar chart going up?

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1 A. I would.

2 Q. And we know from the bar chart that between the time
3 that Cerastes did their hostile reconnaissance, and the
4 date of the London Bridge attack, there was in fact
5 a 35% uplift in Servator deployments on London Bridge;
6 is that right?

7 A. That is correct, yes.

8 Q. And that's something I think you were aware of from your
9 interactions with Mr Hone?

10 A. Yes, I was, and that is also the recommendation 1 in
11 relation to the two recommendations and that was taking
12 place.

13 Q. So when it is suggested that there is a failure to take
14 up recommendation 1, that would simply be wrong on the
15 facts, wouldn't it?

16 A. It would be, and also the consideration to the second
17 part we were doing as well.

18 Q. Well, I'm just coming to that --

19 A. Apologies.

20 Q. -- because the terms of the recommendation are quite
21 important, aren't they?

22 A. They are.

23 Q. Especially if one is going to suggest that there has
24 been a failure to follow those terms. So the actual
25 term of the recommendation was although a more costly

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1 option -- and I'll set that aside because ultimately
 2 that would be a matter for the Corporation, wouldn't it,
 3 as to whether they could afford a particular --
 4 A. It would be a partnership, the Corporation and TFL
 5 together.
 6 Q. "... consideration should be given to the placement of
 7 vehicle mitigation measures along both sides of
 8 London Bridge."
 9 Consideration was being given, wasn't it?
 10 A. It was.
 11 Q. And looking at that, we can evidence that in real time
 12 because we have already heard from PC -- sergeant now --
 13 Hone, but in particular, so far as the Corporation of
 14 London is concerned, you received the matrix on 8 May on
 15 which PC Hone had put London Bridge as a vulnerable
 16 target?
 17 A. As sixth on the matrix, yes.
 18 Q. And so it's not accurate, is it, to suggest that these
 19 two recommendations were not being followed?
 20 A. I would agree it's not accurate, they were being
 21 followed and they were taken through to the Corporation
 22 for consideration.
 23 Q. You read the Cerastes interim 2 report which refers to
 24 London Bridge at or around the time you received it
 25 in May 2017; is that correct?

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1 A. As I said, I can't remember the exact date. I have read
 2 the document, yes, I can't remember when.
 3 Q. And nowhere in that report is there any recommendation
 4 or suggestion that hostile vehicle mitigation or
 5 barriers should be placed immediately upon the bridge,
 6 is there?
 7 A. Nowhere.
 8 Q. I also want to put London Bridge into context, if I may,
 9 because necessarily in this case, Mr Woolford, we are
 10 focusing upon London Bridge, aren't we?
 11 A. For this Inquest, yes, we are.
 12 Q. Following the events in Europe in 2016, the counter
 13 terrorism security advisors were not focusing on
 14 London Bridge alone, but on a multitude of locations; is
 15 that correct?
 16 A. That is correct.
 17 Q. And although after Westminster Bridge it may be said it
 18 was patently obvious that London Bridge was an imminent
 19 target, in fact we know, don't we, that the next attack
 20 that in fact took place was not upon a bridge, but upon
 21 an open space outside an event.
 22 A. Tragically, yes.
 23 Q. And so the necessary focus on London Bridge for these
 24 Inquests is rather artificial in the context of the
 25 decisions that were being made at the time without the

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1 benefit of hindsight; is that fair?
 2 A. I would agree.
 3 Q. So if we look at what was known at the time, what was
 4 known at the time was that the would-be terrorists had
 5 a multitude of attack options open to them and it would
 6 have been wrong, would it not, to focus upon one method
 7 of attack only?
 8 A. That's exactly the point I've been trying to make all
 9 morning and afternoon.
 10 Q. And that is why we see in the matrix which you asked
 11 PC Hone to put together, or amend, that from the point
 12 of view of the Corporation of London, notwithstanding
 13 the risks on London Bridge, there were other locations
 14 within the City which were more at risk?
 15 A. Correct.
 16 Q. And so looking at the entirety of the counter terrorism
 17 picture at that time and looking at the recommendations
 18 that were in fact made by Cerastes and acted upon, do
 19 you consider that at that time you and the CTSAs, in
 20 particular PC Hone, were identifying to the best of your
 21 ability upon the information you had the most high-risk
 22 areas and prioritising them appropriately?
 23 A. Absolutely, as best as we possibly could.
 24 Q. As it now turns out, of course, tragically, events on
 25 London Bridge on 3 June overtook you before the matrix

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1 had been -- or the intentions of the matrix had been
 2 fully realised.
 3 A. Very tragically, yes.
 4 Q. But it was on the radar and it was being worked on: it
 5 was not being ignored?
 6 A. Absolutely, 100 per cent correct.
 7 MS BARTON: Thank you.
 8 Questions by MS BALLARD
 9 MS BALLARD: When you started your secondment within the
 10 City of London Corporation, as I understand it you have
 11 said that you were aware there were CTSA reports in
 12 relation to five high -- vulnerable sites. Yes?
 13 A. Yes, one had had work on; four were still outstanding.
 14 Q. So one had been actioned in its entirety, four were
 15 outstanding?
 16 A. Yes.
 17 Q. To aid with the implementation, the Corporation had
 18 instructed not one but two further independent experts;
 19 is that right?
 20 A. That is correct, yes.
 21 Q. One of those was Marshall Kent; that is an individual;
 22 is that right?
 23 A. That is an individual who created the matrix.
 24 Q. And the other was a company called AECOM; is that right?
 25 A. That's correct.

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1 Q. That Marshall Kent had created an action plan as well as
2 a matrix to aid the implementation?
3 A. That's correct.
4 Q. The Corporation had set up a board to ensure so far as
5 they could that they were implementing those measures?
6 A. A Cross-Cutting Board, correct.
7 Q. And that you were brought in to aid that process?
8 A. Absolutely correct.
9 Q. So a demonstrable willingness to respond to the
10 recommendations made to them?
11 A. Absolutely correct.
12 Q. And steps taken, is this right, that any sensible
13 organisation would be taking?
14 A. Yes, I agree.
15 Q. As to funding, albeit it has to go through various
16 processes and procedures, and that is because the
17 Corporation is quite unique in that it has members that
18 have to vote on things, whenever you asked for money, it
19 was given; that's right, isn't it?
20 A. Unreservedly, yes, as long as the business case and the
21 risk was there.
22 Q. And furthermore, was there ever any resistance to advice
23 that you offered up?
24 A. Never.
25 MS BALLARD: Thank you.

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1 MR HOUGH: Those are all the questions we have for you,
2 Mr Woolford, thank you very much for coming to give
3 evidence.
4 A. Thank you, and again, please can I reiterate my sincere
5 condolences to the family. I apologise for when you
6 went through.
7 MR HOUGH: Mr Ian Hughes, please.
8 MR IAN HUGHES (sworn)
9 THE CHIEF CORONER: Good afternoon, Mr Hughes. Please do
10 take a seat and make yourself comfortable.
11 Questions by MR HOUGH QC
12 MR HOUGH: Would you please give your full name for the
13 court?
14 A. Ian Hughes.
15 Q. What is your current post, Mr Hughes?
16 A. I'm Assistant Director for Highways and the Department
17 of the Built Environment at the City of London
18 Corporation.
19 Q. Since when have you held that post?
20 A. Just over ten years.
21 Q. You appreciate, I think, that you are giving evidence
22 concerning the responsibilities of the City of London
23 Corporation regarding protective security with specific
24 reference to London Bridge?
25 A. Yes.

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1 Q. You understand that your evidence is on behalf of the
2 Corporation as a body, not only yourself?
3 A. I understand.
4 Q. You made a witness statement on these matters on
5 7 March 2019 and you may refer to that if you wish.
6 A. Thank you.
7 Q. First of all, could you tell us in a sentence or two the
8 general responsibilities of your role?
9 A. My role encompasses highway maintenance and
10 construction. It also deals with parking enforcement,
11 our utility works and oversight of major special events.
12 Q. By way of qualification and training, do you have
13 highway construction qualifications in your background?
14 A. I do, yes.
15 Q. Also risk management and other training relating to
16 major incidents?
17 A. I do, yes.
18 Q. May I come on to the bridges across the Thames. Is
19 London Bridge one of five bridges across the Thames
20 owned by an entity called Bridge House Estates?
21 A. It is.
22 Q. Is the City of London Corporation the trustee of that
23 body?
24 A. Yes, it is.
25 Q. After the original construction of London Bridge, did

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1 a statute make the Corporation responsible for
2 maintaining the bridge and its structure?
3 A. That's correct.
4 Q. But since 2000 has statute made Transport for London the
5 highway authority and traffic authority for a number of
6 roads in the capital, including the roadway crossing
7 London Bridge?
8 A. That's correct.
9 Q. I think Transport for London is also in that role for
10 the roadways crossing Blackfriars and Tower Bridges?
11 A. Yes, it is.
12 Q. Is the position as follows, therefore: Transport for
13 London is responsible for maintaining the surface of
14 the roadway, fixing cracks in paving slabs and the like?
15 A. Yes, that's correct.
16 Q. The City of London Corporation is responsible for the
17 structure of London Bridge, if there were, for example,
18 a problem in the struts of the bridge?
19 A. That's right.
20 Q. At an operational level within the Corporation, are the
21 structural responsibilities addressed by Mr Monaghan,
22 whose statement we saw on the screen earlier this
23 afternoon?
24 A. That's correct.
25 Q. Is he the Assistant Director for Engineering?

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1 A. Yes.
 2 Q. As we understand it, if anyone had wanted to propose
 3 permanent barriers on London Bridge that would have
 4 involved the role of the highway authority, Transport
 5 for London, doing something to the road surface?
 6 A. That's correct.
 7 Q. And also would have involved structural works on the
 8 bridge because of the need for permanent barriers to be
 9 properly secured or founded?
 10 A. It would depend on the design of the barriers, the
 11 measures that were being proposed.
 12 Q. But it might well do?
 13 A. It might well, yes.
 14 Q. So any proposal for permanent barriers would have
 15 required both the City of London Corporation and
 16 Transport for London to be involved?
 17 A. Absolutely.
 18 Q. Would it have involved you having the proposal presented
 19 to you?
 20 A. In terms of the role I currently play with the Public
 21 Realm Security Board, I would be involved in that
 22 context, but in terms of structural approvals, it would
 23 generally be the role of Paul Monaghan.
 24 Q. So it would be a combination of you and Mr Monaghan?
 25 A. That's correct.

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1 Q. Can I now turn to counter terrorist responsibilities
 2 that you had before the 2017 attacks. Before the
 3 Westminster Bridge attack took place in March 2017 how,
 4 in brief terms, would you characterise your involvement
 5 in counter terrorist work?
 6 A. I have a number of responsibilities within the context
 7 of my role, so working with the City Police to maintain
 8 the integrity of the Ring of Steel, which are the entry
 9 points into the Square Mile established after the IRA
 10 attacks. I would also have been involved in the
 11 construction of hostile vehicle mitigation measures and
 12 to the public realm changes in general in relation to
 13 major building development activities.
 14 I was also involved in, as I mentioned earlier, the
 15 authorisation of major special events, which became
 16 an increasing area of interest in terms of protective
 17 security in relation to hostile vehicle mitigation and
 18 the use of the Anti-Terrorism Traffic Regulation Order,
 19 and also I have a responsibility within our department
 20 around the response to emergency incidents from
 21 a highways team perspective.
 22 Q. Taking a few of those separately, you would have
 23 a responsibility in relation to constructing permanent
 24 hostile vehicle mitigation measures for building
 25 developments; is that correct?

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1 A. That's correct. I have a team of engineers who are
 2 highly experienced in working with the security industry
 3 and suppliers to look at the design of hostile vehicle
 4 mitigation measures of various formats, and working with
 5 them to design them to enable them to be integrated into
 6 the public realm.
 7 Q. You also have told us that you would have some
 8 responsibility for HVM for major events as well?
 9 A. In terms of facilitating their use at major events, yes.
 10 Q. Now, we have heard that counter terrorism security
 11 advisors and other police figures might liaise with
 12 authorities which were responsible for structures and
 13 give advice on protective measures; are you aware of
 14 that?
 15 A. That's correct, yes.
 16 Q. And do you sometimes in the roles you've described have
 17 dealings with CTSAs?
 18 A. CTSAs, also architectural liaison officers in relation
 19 to protective security for buildings, and also security
 20 coordinators for special events.
 21 Q. Are you aware of the police, the City of London Police,
 22 having any dealings with the Corporation about
 23 protective measures on bridges, including London Bridge,
 24 in the period before March 2017?
 25 A. No, I'm not.

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1 Q. If there had been any such engagement, would you have
 2 been aware of it?
 3 A. I would have been aware of it if it had been related to
 4 the bridges for which TfL aren't the highway authority,
 5 of which that would be -- in the City that would be
 6 Southwark and Millennium.
 7 Q. If there had been advice from CTSAs requiring the
 8 installation of hostile vehicle mitigation, that would
 9 presumably have brought you in even if it related to
 10 bridges for which the Corporation was not the highway
 11 authority for the reasons you've given?
 12 A. Yes, in terms of the role that I now occupy in terms of
 13 our public realm Security Group, yes, that's correct.
 14 Q. So can we take it there was no suggestion of permanent
 15 HVM measures on London Bridge prior to the 2017 attacks?
 16 A. I'm certainly not aware of any.
 17 Q. Before March 2017, are you aware of there having been
 18 any national guidance concerning protective security
 19 measures on roadways over bridges?
 20 A. No.
 21 Q. Before March 2017 were you aware of any intelligence or
 22 any assessment about threats or risks to bridges?
 23 A. Nothing had been brought to me, no.
 24 Q. Between 22 March 2017 and 3 June 2017, so in the period
 25 between the Westminster and London Bridge attacks, were

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1 you aware of any changes in that position, any new
2 intelligence ?
3 A. No, I wasn't aware of any changes in that position and,
4 having conferred with my colleague, Paul Monaghan,
5 neither was he.
6 Q. Can I move on to what happened after the London Bridge
7 attack. After the attack, were steps taken within the
8 Corporation to carry out a security review across
9 a number of sites?
10 A. This was, sorry, after the?
11 Q. After the London Bridge attack?
12 A. After the London Bridge attack. Yes, there was a review
13 of governance around how we were working with the City
14 Police and our other partners around protective security
15 and that led to a review of the way in which my
16 department was working with those partners. And then
17 that has led to, over a period of time, a review of
18 a number of additional locations.
19 Q. Who is now responsible for looking at and ultimately
20 implementing permanent hostile vehicle mitigation on
21 London Bridge?
22 A. On London Bridge the -- because the hostile vehicle
23 mitigation will take the form of street furniture, the
24 expectation is that it's a -- there will be a TfL-led
25 responsibility, but as mentioned previously, it's

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1 a collective responsibility because of the other
2 elements that are involved, so it will still involve the
3 Corporation of London.
4 Q. Who at the Corporation is dealing with that?
5 A. Because the lead would be on a structural side it will
6 still be sat with Paul Monaghan but it would be the
7 Department of the Built Environment.
8 Q. If there had been a proposal for hostile vehicle
9 mitigation measures to be installed as a permanent
10 measure on London Bridge before 3 June 2017, and that
11 had been brought to you in the role that you have
12 described, what would your reaction to that have been?
13 A. My reaction would have been to take that to TfL in the
14 context of our -- the respective roles and
15 responsibilities, and seek to bring the parties together
16 to understand what the risks were that we were trying to
17 mitigate, because any progression on design of such
18 measures would have to take into account the nature of
19 the risk that was being mitigated.
20 Q. If you were persuaded that the risk was urgent, a public
21 safety risk because London Bridge was assessed by
22 experts to be particularly vulnerable to terrorist
23 attacks with vehicles, do you consider that you, with
24 your Corporation hat on, would be supportive of such
25 a proposal?

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1 A. We would have been supportive, yes.
2 Q. Can I ask you about a pedestrian guardrail on
3 London Bridge, and I'll deal with this briefly because
4 the TfL witness will be able to deal with it at greater
5 length. Is this right: that in the past the pedestrian
6 guardrail was generally installed for pedestrians'
7 safety in a traffic context rather than anything to do
8 with terrorism?
9 A. That's correct.
10 Q. Over the last decade, or about a decade ago, was there
11 a change of thinking in which guidance questioned the
12 value of a pedestrian guardrail and suggested it might
13 be counter-productive in terms of traffic protection?
14 A. That's correct. So about ten years ago there was
15 a change in thinking from the highway authorities
16 generally following studies of collision data, the
17 reasons for accidents and severity of accidents, and
18 what that led us to believe is that the number and
19 frequency and severity of those attacks can increase
20 when guard railing is used because pedestrians still try
21 and cross roads, they can then be caught on the wrong
22 side of a guard railing and that creates collisions,
23 and, in addition, with the increase of cycling in the
24 last ten years, where there's a potential for squeezing
25 cyclists between HGVs and guard railings, that creates

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1 quite significant injuries and collisions.
2 So where the position now is, and this is common
3 practice across most local authorities, is to
4 risk-assess guard railing. Guard railing that is still
5 in place now will generally be risk-assessed that there
6 is still a significant benefit in those specific
7 locations, but it's now installed by exception rather
8 than as a general rule.
9 Q. We'll hear from TfL that such risk assessments were
10 carried out in 2009 and 2010, that led the pedestrian
11 guardrail to be removed from both footways of
12 London Bridge.
13 Is it fair to say that in the City area, on roads
14 for which you were the highway authority, you would be
15 doing the same thing over the same period?
16 A. That's correct, we were doing the same work around ten
17 years ago, so the guard railing that remains in the City
18 has been risk assessed as providing a significant
19 benefit to outweigh the potential disbenefits.
20 Q. Has any consideration been given to this point: over the
21 last few years, the last five years or so, there has
22 been an increase in vehicle-as-weapon attacks by
23 terrorists. Has the increased prevalence of those
24 attacks been factored into these reviews and risk
25 assessments of pedestrian guardrail and its removal?

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1 A. I think it's fair to say that the vast majority of
 2 removal of guard railing happened before the last five
 3 years, so I know that our removal was around ten years
 4 ago, and that coincides with the kind of timescale that
 5 TfL have in their statement, so it hasn't been factored
 6 in the removal because that happened already.
 7 Also it is fair to say that there is a visual aspect
 8 to guard railing that is understandably there to help
 9 give the impression that there is a piece of street
 10 furniture that might protect the public, but as well the
 11 guidance around the use of guard railing always
 12 reiterates that it isn't designed to withstand direct
 13 vehicle impact, so its benefit is limited.
 14 Q. But nevertheless, is anyone at the moment within the
 15 City, for the roads where it is the highway authority,
 16 looking at areas from which the guardrail has been
 17 removed, and considering reinstalling it as a protection
 18 against terrorist attack?
 19 A. I think for reasons of confidentiality I wouldn't like
 20 to say too much, but we are looking at additional
 21 locations, that may include such places.
 22 Q. Thank you.
 23 Press reports of June 2017. You are, I think, aware
 24 that after the attack there were articles in the press
 25 saying that Corporation officials had ruled out security

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1 barriers on the bridge?
 2 A. Yes.
 3 Q. Is this right: that there was a press inquiry on the
 4 subject in late May 2017?
 5 A. That's correct.
 6 Q. If we look at {DC7071/2} this is the media officer
 7 passing on the inquiry which we saw earlier:
 8 "... a media query on whether there are any plans
 9 afoot to put bollards on the pavement on London Bridge
 10 as the pavement is extremely wide there and whether we
 11 might consider this a weak spot following the
 12 Westminster attack."
 13 And that's sent on 31 May; do you see that?
 14 A. Yes.
 15 Q. The previous page, {DC7071/1}, please, do you see that
 16 is forwarded to you with an email saying:
 17 "I am not aware of any plans ..."
 18 But copying you in. And you say:
 19 "Nothing from me."
 20 A. That is correct.
 21 Q. And then Mr Monaghan at the top of the email chain says:
 22 "There are no current proposals for the provision of
 23 barriers or bollards to London Bridge to which the City
 24 are aware and I have not seen any proposals from TfL as
 25 Highway Authority.

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1 "I am not aware of any review following the incident
 2 on Westminster Bridge or any requirements for further
 3 consideration."
 4 A. That is correct. As we are the operational department,
 5 so the department that would be responsible for the
 6 practical delivery of things like hostile vehicle
 7 mitigation or equally, changes to the bridge if the
 8 bridge structure needed to be changed. The question
 9 came to us in that context and Paul was responding in
 10 the context that he would have been approached should
 11 there have been any requests to consider it in the
 12 partnership arrangements that are described earlier, and
 13 also my colleague who was the key liaison point with
 14 Transport for London also spoke to TfL's sponsor for
 15 works along that corridor to question whether they were
 16 aware of any plans in their world.
 17 So those two replies were combined together for that
 18 response, which was to say we weren't aware of any
 19 plans, not to say we were ruling them out.
 20 MR HOUGH: Thank you very much, those are all my questions.
 21 Questions by MR PATTERSON QC
 22 MR PATTERSON: Mr Hughes, I ask questions on behalf of the
 23 families of six of those who were killed in the attack,
 24 including the family of Christine Archibald, who was
 25 killed on the bridge.

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1 The bridge is owned by Bridge House Estates; is that
 2 correct?
 3 A. That's correct.
 4 Q. And is that a charitable trust?
 5 A. It is.
 6 Q. And is the Corporation the trustee of Bridge House
 7 Estates?
 8 A. That's correct.
 9 Q. You told us that the 1967 London Bridge Act provides
 10 that the Corporation has responsibility for maintaining
 11 the structure of the bridge. When the barriers were put
 12 up within a day or two of the attack on 3 June, we've
 13 heard that they were put up by the Metropolitan Police;
 14 is that correct?
 15 A. That's correct.
 16 Q. And on that occasion, was the funding provided by the
 17 Metropolitan Police?
 18 A. I'm not sure. I believe that's the case, but it wasn't
 19 Transport for London and it wasn't the City of London.
 20 Q. And you deal with this at paragraph 8 of your statement,
 21 that the maintenance of the barriers is the
 22 responsibility of the Metropolitan Police; is that
 23 correct?
 24 A. That's still the case at the moment as I understand it,
 25 yes sir.

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1 Q. Do you yourself work within the City of London area?
 2 A. Yes.
 3 Q. Your offices are within the Square Mile?
 4 A. That's correct.
 5 Q. Do you yourself ever walk across the bridge?
 6 A. On occasion, sir, yes.
 7 Q. No doubt you shared the shock that all Londoners felt
 8 when they learned of the attack on Westminster Bridge on
 9 22 March?
 10 A. Absolutely, yes, sir.
 11 Q. And no doubt it went through your mind with your
 12 highways responsibilities and your involvement in
 13 hostile vehicle mitigation issues, that that wide open
 14 pavement on Westminster Bridge bore similarities to the
 15 wide open pavement on London Bridge, the Corporation's
 16 bridge?
 17 A. I think if I recall my mindset at the time, my concern
 18 was around central London generally, drawing a parallel
 19 from the number of people that were in the area of
 20 Westminster Bridge and Parliament Square, and how
 21 that -- those circumstances are replicated not just in
 22 Westminster or the City, but in any number of parts of
 23 central London.
 24 Q. You had seen that Masood had targeted and killed members
 25 of the public on the pavement of Westminster Bridge;

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1 yes?
 2 A. Yes.
 3 Q. Did it go through your mind that the public were
 4 vulnerable on London Bridge?
 5 A. As I said, I felt it was -- there was a potential threat
 6 to Londoners and visitors, tourists generally, across
 7 a whole raft of locations that were popular and busy
 8 anywhere through central London.
 9 Q. And did those various locations include London Bridge?
 10 A. They would have included a whole raft of locations,
 11 potentially including bridges, squares, public places
 12 generally.
 13 Q. And those bridges, would that have included
 14 London Bridge?
 15 A. It may well have done.
 16 Q. Just pause and think about it. Did it occur to you that
 17 London Bridge bore similarities to Westminster Bridge?
 18 A. There were a raft of locations that would have had
 19 similarities to Westminster Bridge.
 20 Q. Yes, I've got that point, I'm simply asking whether --
 21 A. Yes.
 22 THE CHIEF CORONER: But I think in fairness -- Mr Patterson,
 23 just a moment. I think in fairness to the witness
 24 you're asking him effectively to give you his impression
 25 of what he felt in the aftermath of Westminster.

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1 MR PATTERSON: I'm not; I'm asking whether London Bridge
 2 came to his mind.
 3 THE CHIEF CORONER: I know that's how you're now putting it,
 4 but you asked him what his impression was in the
 5 aftermath and he answered that question, which is why
 6 I think he has answered in the way that he has. But
 7 I think you are now turning your focus very much onto
 8 what he thought of London Bridge as opposed to what his
 9 impression was in the immediate aftermath of
 10 Westminster.
 11 MR PATTERSON: Yes.
 12 May I ask again, please, did London Bridge come to
 13 your mind?
 14 A. Not specifically, I don't believe so.
 15 Q. Did it not occur to you that on Westminster Bridge there
 16 had been no street furniture to impede the attack?
 17 A. I wasn't conscious of that being a point within the
 18 attack and not being privy to the police analysis of the
 19 reasons behind that attack, that wasn't something I was
 20 considering in the immediate aftermath of the
 21 Westminster attack.
 22 Q. Did it occur to you that when you saw the footage on --
 23 did you see the footage that was on the television
 24 screens?
 25 A. I'm not sure that I did.

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1 Q. Did you not think you had better to do a risk assessment
 2 in relation to London Bridge?
 3 A. In terms of my role at the time, that wasn't
 4 a responsibility that was within my remit.
 5 Q. Did the Corporation install any bollards or barriers,
 6 whether temporary or permanent, in the weeks that
 7 followed Westminster Bridge?
 8 A. What was within my remit was around special events. We
 9 had quite a considerable series of discussions in
 10 relation to additional protective security around
 11 special events and I do recall that within the period
 12 immediately afterwards, there were some considerable
 13 discussions about protecting the London Marathon, which
 14 would be in April, I can't say whether those measures or
 15 those discussions resulted in measures in the Square
 16 Mile but I know that measures were added to protect the
 17 London Marathon as a result of that.
 18 Q. Can you identify any location where bollards or barriers
 19 were installed?
 20 A. Here, now, no, I can't.
 21 Q. We heard -- I don't know if you were in court earlier
 22 for the evidence of Mr Woolford, and that inquiry that
 23 came in within days of the Westminster attack from
 24 Ms Dwyer, who was a non-police committee member of the
 25 Corporation; do you know Ms Dwyer?

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1 A. Carolyn Dwyer is my director, my chief officer .
 2 Q. And so were you aware of the concerns that she passed
 3 through to Mr Woolford?
 4 A. I can't recall whether I was at the time, but I have
 5 been made aware of them since.
 6 Q. Were you aware that there was a public press debate
 7 about whether barriers needed to be installed on other
 8 London bridges?
 9 A. I was aware of the press inquiry that came in and I was
 10 aware that there were other questions being asked.
 11 Q. Yes. Within days of the Westminster attack, we've seen
 12 a report on the BBC News. We've seen that there were
 13 questions being raised on websites hosted by Transport
 14 for London, we've seen the press inquiry that you were
 15 telling Mr Hough about. You must have been aware,
 16 surely, prior to 3 June that there were questions being
 17 raised in a public debate as to the need for barriers on
 18 bridges?
 19 A. I was certainly aware that there were questions being
 20 asked about the need for protecting the public in what
 21 are colloquially called crowded spaces and busy areas of
 22 central London. I can't recall whether I was aware that
 23 there were requests and questions being asked about
 24 bridges.
 25 Q. So in all this period with your involvement in hostile

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1 vehicle issues and highway issues, did you never have
 2 any worries for the public on London Bridge?
 3 A. As I said, I was concerned about the public in general
 4 for central London and the Square Mile in relation to
 5 both myself as an individual and for the roles and
 6 responsibilities that I was in charge of. That's the
 7 reason for the extensive discussion in relation to
 8 special events which was being raised with us by the
 9 appropriate officers within the City Police. They were
 10 raising with us those concerns around how better to
 11 protect the public but they weren't raising with us
 12 questions about how better to protect the bridges.
 13 Q. Did you have any dealings with the Assistant Clerk,
 14 Peter Lisley?
 15 A. The Assistant Town Clerk, yes, I did.
 16 Q. Were you aware that on 8 May he was informed that
 17 London Bridge should be considered the most vulnerable
 18 to low sophisticated attacks using a vehicle?
 19 A. No.
 20 Q. When did you learn that he had been notified in those
 21 terms about vulnerabilities on London Bridge?
 22 A. It would have been after the London Bridge attack in the
 23 context of the review of locations and for the revised
 24 remit that I was given after the London Bridge attack.
 25 Q. Were you surprised that that had been brought to his

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1 attention but that it had never reached you?
 2 A. Given my remit before the London Bridge attack, no.
 3 Q. And did you learn that despite receiving that
 4 information three or four weeks before the attack, that
 5 all that was done by the Corporation was to put it on to
 6 an agenda for a meeting towards the end of June, nearly
 7 two months after the information had been received?
 8 A. The position was, and I think still is, that we rely on
 9 the City Police to help us prioritise and determine the
 10 pace at which we are able to respond and wish to respond
 11 to their advice.
 12 So now I can absolutely say that if the City Police
 13 through the CTSAs bring to us information that they say
 14 requires us to undertake urgent action, we will respond
 15 to that in the context of that request. If they did not
 16 request it to be an urgent response and for long-term
 17 measures, then we would progress it with a long-term
 18 time framework.
 19 Q. If the Corporation had been advised by a senior
 20 Metropolitan Police figure, or a senior City of London
 21 Police figure involved in protective security and
 22 counter terrorism issues, there was an urgent need to
 23 put up physical measures on the bridge, whether
 24 temporary or permanent, whether bollards or barriers, if
 25 that recommendation had come in the Corporation would

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1 have actioned it, wouldn't it?
 2 A. We would have worked with our partners to see how we
 3 could action it, yes. That would have obviously
 4 included Transport for London in that discussion.
 5 Q. And if it was made plain that the risk or threat was of
 6 loss of life or very serious injury, multiple
 7 casualties, that it was an attractive target for
 8 terrorists because there was no escape and because there
 9 was no street furniture, and that the propaganda and the
 10 methodology highlighted it as being a potential target,
 11 if that information had reached the Corporation and they
 12 were advised to act as a matter of urgency, you would
 13 have done so, wouldn't you?
 14 A. If matters had been put in that context and in that way
 15 and if the item had been around responding urgently,
 16 I think as Mr Woolford said earlier, the organisation
 17 would have looked to call a gold group to decide how to
 18 progress with dealing with that issue that had been
 19 raised, those risks that had been raised, and decide the
 20 best way forward, that gold group including the key
 21 partners, Transport for London, and the police advice
 22 that was being given towards us.
 23 Q. The wealth of the Bridge House Estates and the wealth of
 24 the Corporation was such that money wouldn't have been
 25 a problem if there was a real danger to the public on

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1 your bridge?
 2 A. I would say that the security measures that I've been
 3 involved in delivering since the London Bridge attack
 4 have been funded through the City Corporation and money
 5 has been found available to make that happen. That is
 6 not to say that as a public body we cannot discount the
 7 fact that there are limitations to that, both in terms
 8 of the Bridge House Estates charity and the City
 9 Corporation, but so far money has been found where it's
 10 been absolutely necessary to mitigate that risk.
 11 Q. And we only have to walk through the Square Mile to see,
 12 street after street, bollards in place all over the
 13 place; that's right, isn't it?
 14 A. There are a number of bollards that are historic and
 15 new, but it remains a balance between the needs of road
 16 safety, the needs of accessibility, as well as trying to
 17 find the best, proportionate way to mitigate risk to the
 18 public for pedestrians.
 19 Q. Banks and finance houses and commercial firms often we
 20 see bollards outside their premises within the Square
 21 Mile, don't we?
 22 A. On occasions, yes.
 23 Q. And the Corporation regards protection of the public in
 24 just as much a way as protection of commercial
 25 businesses; would you agree?

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1 A. I would say that there are different concerns and
 2 different considerations. I think in terms of the way
 3 in which the protective security has been applied
 4 through the advice of the architectural liaison
 5 officers, that's a route that has facilitated security
 6 measures around places of national infrastructure and
 7 key financial institutions, but often those needs
 8 overlap with protecting the public and crowded spaces.
 9 So quite often those measures have actually served two
 10 purposes, of both protecting the public and those
 11 institutions.
 12 Q. And finally this, Mr Hughes: we've been provided with
 13 information from the principal solicitor of the
 14 Corporation, a woman called Vicki Wells, some of which
 15 has been copied to you; are you familiar with
 16 Vicki Wells, a solicitor?
 17 A. I am, yes.
 18 Q. And taking it briefly, are there disagreements that
 19 continue as to who should pay for the permanent barriers
 20 that it is anticipated might be needed on London Bridge?
 21 A. The payment of the permanent barriers or finding of
 22 funding for it is a matter for discussion still, that's
 23 because at the moment the process to work through risk
 24 assessments and designs for measures across all of the
 25 bridges is still a work in progress.

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1 I think it's fair to say that because the temporary
 2 mitigation measures that have been provided by the
 3 Metropolitan Police have substantially mitigated the
 4 risks, that there is time to make some considered
 5 decisions about that. Very much it depends on actually
 6 the legal authority and the powers to deliver those
 7 schemes. The key starting point though is still,
 8 I believe, Transport for London looking at designs for
 9 what is fit for purpose, not just in terms of providing
 10 protection for the public from vehicle-as-a-weapon, but
 11 the latest review of risks will also consider wider
 12 things more than just vehicle-as-weapon and
 13 opportunities around improving safety on the bridge
 14 generally beyond counter terrorism.
 15 Q. Has the Corporation been considering the options as to
 16 whether to do nothing or to take a lead or to allow
 17 others to take the lead?
 18 A. Yes.
 19 Q. And have they been considering the fact that they may be
 20 open to criticism if they don't take decisive action?
 21 A. Absolutely.
 22 MR PATTERSON: Thank you. I have no more questions.
 23 Questions by MS BARTON QC
 24 MS BARTON: I ask questions on behalf of City of London
 25 Police and I just want to ask one or two issues, please.

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1 In terms of your thought processes in the immediate
 2 aftermath of the Westminster attack, what you said is
 3 that you recognised the threat to a whole raft of
 4 locations.
 5 A. That's correct.
 6 Q. And that was applying your experience as somebody who
 7 understands the risks of the built environment and the
 8 public streetscape?
 9 A. Yes, at the time more as an individual and
 10 a professional highway engineer rather than somebody
 11 with that direct responsibility at the time, yes.
 12 Q. And you said "We rely on the City of London Police to
 13 help us prioritise."
 14 A. That's correct.
 15 Q. Because it's a sad fact, isn't it, that when one target
 16 hardens a particular location, it pushes the risk
 17 elsewhere?
 18 A. That's certainly the potential, yes.
 19 Q. And so it's very important, isn't it, to analyse as
 20 scientifically as one can, what the various risks are at
 21 various locations?
 22 A. That's correct, and that's what we've sought to do in
 23 the public realm security programme that we've
 24 instituted since the dreadful attacks of 2017, is tried
 25 to take a more rounded approach to consider how best to

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1 protect different locations in different ways that's not
 2 one-size-fits-all.
 3 Q. And in fact you were already doing that within the
 4 Corporation of London with the assistance of City of
 5 London Police in the early part of 2017, weren't you?
 6 A. That's correct.
 7 Q. Because in May of 2017, you had put together with the
 8 assistance of City of London a matrix of at-risk sites
 9 which required work?
 10 A. That's correct. It wasn't with me at the time but
 11 that's as I understand it now, yes.
 12 Q. But it was a piece of work that was ongoing?
 13 A. Correct, yes.
 14 Q. Yes. And so as I put to another witness, we necessarily
 15 are concentrating on London Bridge, but there is a much
 16 bigger risk picture around London as a whole and the
 17 City of London in particular.
 18 A. That's correct.
 19 Q. And that is why, isn't it, if there is specific
 20 intelligence, it helps focus risk in a particular place?
 21 A. That's been my experience since 2017 that our
 22 consideration of locations for improved security
 23 protection does involve an element of understanding
 24 intelligence that's going behind it that we aren't privy
 25 to but are brought into the process by the City police.

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1 Q. So in the absence of that intelligence, one has to apply
 2 other factors to assess the relative priorities at
 3 various times?
 4 A. That's correct.
 5 MS BARTON: Thank you.
 6 Questions by MS CANBY
 7 MS CANBY: Mr Hughes, my name is Fiona Canby and I'm asking
 8 questions on behalf of Transport for London.
 9 I know that you are here today to give evidence
 10 about the duties of an owner of the bridge, but one of
 11 your other hats is as a highways authority and it is in
 12 that regard that I wanted to ask some questions please,
 13 Mr Hughes.
 14 Do you agree that the interpretation of a highway
 15 authority's responsibility for safety to date has been
 16 one which has been concentrating on reducing the risk of
 17 collision and accidents such as trips, slips and falls?
 18 A. That's correct, yes.
 19 Q. And the interpretation to date has not included keeping
 20 pedestrians safe and secure from the risk of terrorism?
 21 A. That's my understanding of it, yes.
 22 Q. Is it also your understanding that there's no
 23 requirement deriving from national guidance or police
 24 intelligence for local highway authorities to provide
 25 security protection measures to public bridges?

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1 A. That's my understanding, yes.
 2 Q. And I think in your witness statement, you also
 3 confirmed that it was your understanding that there was
 4 no duty making highway authorities responsible for the
 5 security of the public in the public realm generally?
 6 A. That's my understanding. I believe that there are -- we
 7 have to have due care to -- and have regard to these
 8 matters but there isn't a requirement for highway
 9 authorities to systematically review their highways with
 10 this in mind.
 11 Q. No. And when you're referring to due regard, I think
 12 you have in mind there section 17 of the Crime and
 13 Disorder Act; is that correct?
 14 A. I do, yes.
 15 Q. But that's limited to when an authority is exercising
 16 its functions?
 17 A. That's correct, yes.
 18 Q. So as far as you were aware, before 3 June 2017,
 19 highways authorities were not systematically risk
 20 assessing every mile of their highway to assess the risk
 21 that was posed by terrorist attack?
 22 A. Yes, that's my understanding. Certainly that was the
 23 case with the City.
 24 Q. That was the case for the City and we'll hear, probably
 25 later today or tomorrow, that that was also the case for

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1 Transport for London.
 2 That remained the case, did it, Mr Hughes, even
 3 after the attacks in Nice and Berlin?
 4 A. That's right.
 5 Q. Can I move on, now, please, to a different topic, and
 6 it's one of an urgent recommendation. Now, I appreciate
 7 the evidence that we've seen from PC Hone and
 8 I appreciate that your evidence is that the Corporation
 9 was never given an urgent recommendation before 3 June
 10 in relation to installing HVM on London Bridge, but can
 11 we put ourselves, please, in the hypothetical scenario,
 12 where you had been given an urgent recommendation by the
 13 police to consider installing HVM, and I think your
 14 response in relation to that hypothetical was there
 15 would have been a gold meeting and you would have been
 16 engaging with your relevant partners, one of them being,
 17 of course, Transport for London?
 18 A. That's correct.
 19 Q. And when you were engaging with Transport for London, is
 20 it correct, Mr Hughes, that your options would not have
 21 been limited in terms of barriers to the National
 22 Barrier Asset?
 23 A. I think in terms of the deployment of the National
 24 Barrier Asset, that still has to come from a police
 25 force rather than -- it has to come through a police

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1 force rather than a local authority. In terms of a gold
 2 instruction to find a way to make an area better
 3 protected or to deliver some kind of security, we would
 4 have looked to our supply chain of contractors to see
 5 whether we were in a position to provide similar kinds
 6 of materials that were readily available, perhaps, put
 7 it that way, to the National Barrier Asset.
 8 Q. And to be clear, that wouldn't be the PAS-rated that
 9 we've seen referred to in PS Hone's recommendations, but
 10 it would nevertheless have been a barrier that was
 11 possibly available to you had you been in that
 12 hypothetical scenario?
 13 A. Yes, that's correct. I think it's fair to say that the
 14 equipment available that is rated to the standard of
 15 CPNI does take considerable time for a local authority,
 16 a highway authority, to source. If it was the request
 17 to facilitate the installation of something of a lesser
 18 standard, then that something could have been looked at
 19 as an interim measure.
 20 MS CANBY: Thank you very much, Mr Hughes.
 21 MR HOUGH: Those are all the questions we have for you,
 22 thank you very much, Mr Hughes.
 23 Sir, would that be a convenient time for our break?
 24 THE CHIEF CORONER: Yes, thank you very much, Mr Hughes, for
 25 coming.

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1 What we will do, Mr Hough, is we will break there
 2 and resume again at 4.10 pm.
 3 (3.55 pm)
 4 (A short break)
 5 (4.12 pm)
 6 MR HOUGH: Sir, the next witness is Siwan Hayward.
 7 MS SIWAN HAYWARD (affirmed)
 8 THE CHIEF CORONER: Good afternoon. Please do take a seat
 9 and make yourself comfortable. I'm sorry we're not
 10 going to be able to finish your evidence today but we
 11 will make a start, and if you can come back tomorrow.
 12 I hope that doesn't inconvenience you too much.
 13 Mr Hough.
 14 Questions by MR HOUGH QC
 15 MR HOUGH: Would you please give your full name for the
 16 court?
 17 A. Yes, I am Siwan Lloyd Hayward.
 18 Q. Ms Hayward, what is your current post?
 19 A. I'm the Director of Compliance, Policing and On-Street
 20 Services for Transport for London.
 21 Q. Since when did you take up that post?
 22 A. I took up that position in September of 2018.
 23 Q. Since when did you start working for TfL?
 24 A. I started working at TfL in 2007.
 25 Q. Do you appreciate you're here to give evidence about

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1 TfL's role in relation to protective security of
 2 roadways and specifically that concerning London Bridge?
 3 A. Yes, I am, sir. And please, before we go any further,
 4 can I on behalf of Transport for London offer my
 5 sincerest condolences and our heartfelt sympathy for the
 6 pain that you have suffered and the loss that you and so
 7 many others suffered as a result of this horrific and
 8 atrocious attack on London Bridge and Borough Market.
 9 Q. Thank you.
 10 Ms Hayward, in a few sentences, what
 11 responsibilities does your present role comprise?
 12 A. I have a broad range of responsibilities at Transport
 13 for London. They include overseeing TfL's significant
 14 investment in the British Transport Police, Metropolitan
 15 Police and the City of London Police to
 16 prevent crime and anti-social behaviour on London's
 17 public transport and support the safety and security of
 18 every journey in the capital.
 19 Q. In practical terms, how do you do that?
 20 A. I have a range of teams working to me which includes
 21 operational officers delivering fare evasion and
 22 enforcement of rules and regulations on the road
 23 network, we also invest £150 million in the three
 24 policing agencies in the capital and we work closely
 25 with them in terms of understanding intelligence, risks

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1 and responding both in terms of what we can do as
 2 a transport authority but also prioritising the action
 3 those policing partners take to prevent the risk of
 4 harm, crime and anti-social behaviour.
 5 Q. Is this right: you will be dealing with matters which
 6 predate your taking overall responsibility for
 7 operational security?
 8 A. Yes, to be clear, in October 2017, so before I became
 9 director, I set up and led a new team within Transport
 10 for London very much in light of the horrific attacks
 11 that we have seen, and the changing threat from
 12 terrorism, to take a proactive role in providing crime
 13 reduction and operational security advice to our surface
 14 operations, and that includes our highways.
 15 Q. Thank you. May I deal with some legislative and
 16 regulatory background, which is covered in the first
 17 witness statement of your colleague, Mr Sterritt. You
 18 may refer to that if you wish.
 19 We can address this briefly: we've heard that
 20 Transport for London was created in 2000; is that right?
 21 A. Yes.
 22 Q. Is it also right that among its other responsibilities,
 23 TfL was made highway and traffic authority for those
 24 roads which were designated as Greater London Authority
 25 roads?

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1 A. Yes, that is correct, sir .
 2 Q. And they form, I think, a minority of the roadways in
 3 London by length?
 4 A. Yes, it 's about 5% of the road network, sir .
 5 Q. Is it right to say in general terms that a highway
 6 authority has the duty to maintain the highway and has
 7 certain powers and duties to maintain and improve
 8 highways?
 9 A. Yes, that is correct, sir .
 10 Q. Is it right to say that a traffic authority has
 11 functions and powers to regulate traffic on the road and
 12 duties to facilitate the speedy movement of traffic?
 13 A. Yes, that 's correct, sir .
 14 Q. As we've heard from others, does a body like TfL have no
 15 specific statutory duty about preventing or mitigating
 16 terrorist attack?
 17 A. Sir, we do not have a specific statutory duty, but
 18 alongside all local authorities we have a general
 19 consideration arising from section 17 of the Crime and
 20 Disorder Act to give due regard when carrying out our
 21 functions to take reasonable measures to prevent crime
 22 and disorder.
 23 Q. Terrorism falls within crime and disorder for that
 24 purpose, does it?
 25 A. Broadly, yes.

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1 Q. Historically has TfL engaged in regular and systematic
 2 assessment of the highways for which it 's the highway
 3 authority to assess risk from terrorism?
 4 A. No.
 5 Q. Have other highway authorities, to your knowledge, done
 6 that in the past?
 7 A. No. To the best of my knowledge, no highway authority
 8 in the UK is systematically assessing the risk of
 9 terrorism to their highways.
 10 Q. Now, we'll come on to what should be done later, but
 11 just to finish laying the ground, the road over
 12 London Bridge is the A3; is that right?
 13 A. That 's correct, sir .
 14 Q. And if we look at {WS5012/18}, please, can we see a map
 15 of the area of London Bridge with, marked red, those
 16 roads which are GLA roads, so roads for which TfL is
 17 highway and traffic authority?
 18 A. Yes, that 's correct, sir .
 19 Q. So on those roads, TfL is responsible for maintaining
 20 the surface of the road and the footways?
 21 A. Yes.
 22 Q. As we've heard, the City of London Corporation as the
 23 trustee for the body which owns the structure of
 24 London Bridge is responsible for the maintenance of that
 25 structure?

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1 A. That 's correct, sir .
 2 Q. That 's your understanding.
 3 Before making any changes to the road layout on
 4 a bridge such as London Bridge, would TfL consult the
 5 Corporation as owner of the structure before making
 6 changes to the layout?
 7 A. Yes, we would consult the Corporation of London as
 8 owners and we would seek their consent as the technical
 9 authority for the structure of the bridge. So we would
 10 need their agreement to any proposal that may change or
 11 impact on the structure of the bridge.
 12 Q. So, putting it very simply, if you wanted to anchor
 13 a bollard or some other form of protective security
 14 measure in the fabric of the bridge, you would need to
 15 consult with and get the consent of the owner of the
 16 structure?
 17 A. Yes, that 's correct.
 18 Q. Turning to protective security, we've heard that
 19 protective security includes the range of measures to
 20 protect areas from terrorism and other threats which may
 21 include physical barriers but also other types of
 22 systems and, indeed, the use of people?
 23 A. Yes, sir .
 24 Q. Is there any specific set of regulatory requirements for
 25 protective security on the road network, any bible for

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1 those?
 2 A. So not on the road network.
 3 Q. There is, however, I think, on the rail network?
 4 A. Yes, the -- given the particular threat to rail, to
 5 public transport and, as you will be well aware TfL has
 6 suffered a number of terrorist attacks on our
 7 underground network and on our bus network, because of
 8 that risk, under national guidance there is this very
 9 thorough and comprehensive set of regulatory
 10 requirements governing the rail network and the London
 11 Underground network.
 12 Q. We've heard that NaCTSO, the national body, supports
 13 a network of nearly 200 counter terrorism and security
 14 advisors who are locally based and provide guidance to
 15 local authorities, businesses and individuals, including
 16 about protective security; are you aware of that
 17 network?
 18 A. Yes, absolutely, sir .
 19 Q. At the time of the London Bridge attack in June 2017,
 20 was there any CTSA who was dedicated to engaging with
 21 TfL?
 22 A. No, sir, there was no CTSA dedicated to engaging with
 23 us.
 24 Q. But did CSAAs nevertheless sometimes have dealings with
 25 TfL and give advice to TfL?

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1 A. Yes, we had a number of engagements with counter
2 terrorism security advisors, specifically around special
3 events on the highway and protection of events where
4 there will be people, the public, gathering in the
5 highway and also around some specific projects that we
6 were engaged with on our -- which includes our road
7 network.

8 So there were numerous lines of engagement between
9 counter terrorism security advisors who are the experts
10 in understanding protective security and the threats
11 that we are facing and ourselves.

12 Q. In terms of policy direction, may we look at
13 {WS5011/24}. Now, can we see here part of the Mayor of
14 London's Transport Strategy for 2010, which was in place
15 at the time of the London Bridge attack?

16 A. Yes, sir. This is the transport strategy of the
17 previous Mayor of London. By the time of the
18 London Bridge attack in 2017 there had been a change of
19 mayor, and we were working to the policy directions set
20 by the new Mayor of London, which was confirmed in his
21 transport strategy that came out later that year.

22 Q. Can we look at the policy that the -- the strategy which
23 was in place in 2017 and then we'll look at the one
24 which you say represented your policy direction in 2017.

25 So the 2010 strategy said this, proposal 82:

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1 "The Mayor, through TfL, and working with the London
2 Boroughs, police and other emergency services and
3 stakeholders will seek to reduce the likelihood and
4 impact of potential terrorist attacks on the transport
5 system."

6 Was that the proposal forming part of the strategy
7 set in 2010?

8 A. Yes, and the clear focus of that proposal is on the
9 transport system, meaning our public transport system,
10 the rail and the underground network especially.

11 Q. Moving, then, to {WS5011/26} of the same document, and
12 if we can maximise proposal 14, which is over on the
13 right-hand side of the page, can we see that this
14 proposal in the March 2018 version of the strategy says
15 this:

16 "The Mayor, through TfL, will work with Government,
17 the boroughs, law enforcement and security agencies,
18 transport providers and other relevant organisations to
19 respond to, and counter, current and future terrorist
20 threats to London. Together, these organisations will
21 develop an approach to protecting public spaces in
22 identified sites across London that is proportionate to
23 the risk. This could include removing traffic from some
24 public spaces and, where appropriate, the use of hostile
25 vehicle mitigation in a way that supports the Healthy

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1 Streets approach and maintains the character and appeal
2 of public places."

3 A. Yes, and that is an absolute statement of our current
4 policy.

5 Q. And was that the policy that was current in 2017, albeit
6 that it hadn't been yet in a published strategy?

7 A. This proposal specifically was formulated after the 2017
8 attacks to reflect the real and enduring risk to public
9 spaces and particularly crowded spaces, alongside the
10 significant risk that remains to public transport.

11 Q. We can take that down now.

12 Before October 2017, was there any team within
13 Transport for London which would have responsibility for
14 looking at hostile vehicle mitigation on GLA roads?

15 A. There was a team within Transport for London which
16 primarily worked on resilience, which is post-event --
17 sorry, dealing with the impact of events, but also had
18 an active role in terms of hostile vehicle mitigation
19 and other forms of protection around special events that
20 occurred on the public highway.

21 Q. If I had asked a member of that team before October 2017
22 whether it was their responsibility to look at permanent
23 forms of hostile mitigation, what would they have said,
24 do you think?

25 A. They would have said: no, the responsibility for

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1 protective security and advising on permanent forms of
2 hostile vehicle mitigation would sit with counter
3 terrorism security advisors and counter terrorism
4 policing who lead on that, and then they would liaise
5 with us for particular sites or buildings or visitor
6 attractions which have been deemed as requiring
7 protective security. They liaised with us as a highway
8 authority in terms of placing bollards or other measures
9 on our streets, and that would then come into the teams
10 who deal with our highways and our overall
11 responsibilities in terms of highways.

12 Q. So the CTSAs in giving their advice for bollards on
13 a road or roadway to protect against terrorism would be
14 dealing with the highways teams rather than this team
15 which dealt with resilience in the aftermath of major
16 events?

17 A. Yes, that's right.

18 Q. Since October 2017, has there been a new team in place
19 and a new approach?

20 A. Yes. I have led the creation of a new team, which is
21 called a crime reduction and operational security team.
22 We are a single point of contact for all counter
23 terrorism and security advice and advice from our
24 colleagues in the police and security services around
25 the threat from terrorism, and we are also now

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1 proactively considering how we can reduce the
 2 vulnerability of particularly crowded spaces across our
 3 highways.
 4 Q. Can I turn to protective security before the
 5 London Bridge attack, and first of all, before the
 6 Westminster Bridge attack of March 2017. To your
 7 knowledge did TfL receive any advice or guidance from
 8 the Metropolitan Police Service, from the City of London
 9 Police, or from any other security agencies recommending
 10 protective security measures on London Bridge?
 11 A. We received no advice.
 12 Q. Did it receive any advice or guidance, to your
 13 knowledge, concerning terrorist threats or risks to
 14 London Bridge or to bridges as bridges?
 15 A. We received no advice or guidance about a threat to
 16 bridges in general, to London Bridge specifically, or to
 17 any of our crowded streets.
 18 Q. After the Westminster Bridge attack, did TfL receive any
 19 guidance that bridges, or particular bridges, or,
 20 indeed, particular roadways, were at risk of a vehicle
 21 attack and required protective security for that reason?
 22 A. We received no advice or guidance or recommendation from
 23 any counter terrorism security advisors or anyone in
 24 counter terrorism policing about the -- about the risk
 25 and the need to protect and mitigate the risk to any of

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1 our streets or any of our bridges or any of our
 2 highways.
 3 Q. Now, we've heard that the Metropolitan Police and the
 4 City of London Police did not have specific intelligence
 5 about threats to bridges and, rightly or wrongly, didn't
 6 regard bridges specifically to be under threat. Is that
 7 your understanding now to be the position before the
 8 London Bridge attack?
 9 A. Sorry, can you say that again?
 10 Q. Yes. We understand now that before the London Bridge
 11 attack, the Metropolitan Police and the City of London
 12 Police didn't have specific intelligence about threats
 13 to bridges and didn't regard bridges as particularly
 14 under threat. That's what we understand now.
 15 A. Yes, sir, however, we understand also that PC Hone, as
 16 a counter terrorism security advisor in the City, had
 17 identified London Bridge as a vulnerable location,
 18 however, that information was never communicated to TfL.
 19 Q. Absolutely. But do you -- is it your understanding now,
 20 from all the work you have done, that the police did not
 21 regard, before June 2017, bridges as being particularly
 22 under threat?
 23 A. Yes, sir.
 24 Q. You haven't seen anything in your dealings with them to
 25 suggest that they had any perception of a threat to

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1 bridges before June 2017, whether that view was right or
 2 wrong?
 3 A. Yes, sir.
 4 Q. Can I look at the guidance that was promulgated. First
 5 of all, {WS5011/28}. After the Westminster Bridge
 6 attack did NaCTSO, the National Counter Terrorism
 7 Security Office, publish some guidance publicly
 8 referring to the attack?
 9 A. Yes, and -- yes.
 10 Q. And do we see that in the second paragraph the guidance
 11 states:
 12 "The attack incorporated multiple methodologies --
 13 as such no one security element will wholly mitigate
 14 such attacks. We understand that people responsible for
 15 building security have differing priorities, some being
 16 responsible for large iconic sites and others for small
 17 businesses, but the message remains the same --
 18 effective security and effective communities defeat
 19 terrorism."
 20 Is that guidance which came through to TfL?
 21 A. Yes, sir, this guidance was received by TfL. You will
 22 see that it focuses on building security and, as you
 23 will have heard, during this Inquest, the focus from
 24 counter terrorism security advisors remained on crowded
 25 places, so specific locations, buildings, places which

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1 they saw as the priority for protection and being
 2 vulnerable to attack. So the focus is very much on
 3 buildings and on places, not on streets, highways, as we
 4 know them.
 5 Q. {WS5011/32}, please, of the same document. The
 6 following day, 24 March, was further guidance provided
 7 by government, entitled "Recognising the terrorist
 8 threat"?
 9 A. Yes, this is general guidance for the public and the
 10 staff and staff working with responsibility for
 11 security. It is not guidance to highway authorities or
 12 to public authorities responsible for the streets.
 13 Q. But nevertheless, did it come through to TfL?
 14 A. Yes, to the best of my knowledge, yes.
 15 Q. And it covers a wide range of methods of attack, but at
 16 number 9 of the contents we see "Hostile vehicle
 17 mitigation", and if we go, then, please, to {WS5011/47},
 18 can we see that the guidance referred to hostile vehicle
 19 mitigation and vehicle security barriers, and described
 20 hostile vehicle mitigation as using:
 21 "... a blend of traffic calming measures to
 22 potentially slow down hostile vehicles and vehicle
 23 security barriers to stop those hostile vehicles
 24 progressing further."
 25 And did the guidance go on to describe a range of

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1 types of barriers, bollards, gates and so on which could
 2 form part of an HVM system?
 3 A. Yes.
 4 Q. Now, there was nothing in that guidance, I think,
 5 specific to bridges.
 6 A. No.
 7 Q. Nothing about systematic assessment of roadways for
 8 barriers?
 9 A. That's correct, sir.
 10 Q. But a reminder of the potential value of barriers and
 11 bollards to mitigate against vehicle attacks?
 12 A. Yes, that's correct, sir.
 13 Q. And that reminder came through to TfL, as you've told
 14 us?
 15 A. Yes, that's correct, sir.
 16 Q. We can take that off screen now.
 17 In early to mid-2017, so before the London Bridge
 18 attack, was there any national guidance about the extent
 19 of a highway authority's responsibilities in connection
 20 with protective security and hostile vehicle mitigation?
 21 A. So not -- there is not national guidance on
 22 responsibilities in terms of defining risk against both
 23 looking at threat and vulnerability and therefore
 24 prioritising. There is broad guidance around the
 25 planning system and crowded places. There's a range,

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1 there's a broad range of technical guidance which is
 2 much more akin to when the decision has been made for
 3 a place to be protected, how hostile vehicle mitigation
 4 or other measures can be blended into the streetscape
 5 and to support the functions of a highway authority and
 6 the multiple functions of a road.
 7 So it's much more technical guidance on when the
 8 decision been made to implement, not where to implement.
 9 Q. So no set of national guidance at the time saying: this
 10 is how you assess your roadways, your public spaces, to
 11 determine what needs barriers and other hostile vehicle
 12 mitigation?
 13 A. Yes, that's correct, sir.
 14 Q. You have told us that there were general duties under
 15 the Crime and Disorder Act to take account of the need
 16 to reduce crime, including terrorism, in performing
 17 public functions. Is that the closest we come to
 18 a duty -- a legal duty governing protective security on
 19 roadways?
 20 A. Yes, sir.
 21 Q. For many years there have been duties to maintain the
 22 pavement in a safe state; is that right?
 23 A. That's right.
 24 Q. And is the effect of those duties that any highway
 25 authority, at least anyone that doesn't want to get sued

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1 constantly, will carry out regular assessments of each
 2 stretch of pavement to identify necessary works?
 3 A. Yes, sir.
 4 Q. Effectively mini risk assessments?
 5 A. Mini risk assessments against the risks of trips, slips
 6 and falls and other collisions.
 7 If I may elaborate, sir, to undertake a risk
 8 assessment for a highway against the threat of terrorism
 9 requires both an assessment of the risk and assessment
 10 of the vulnerability. To assess the risk is dependent
 11 on the knowledge and the expertise of counter terrorism
 12 security advisors and the many expert counter terrorism
 13 security advisors that you have heard during the course
 14 of this Inquest. That is knowledge, information and
 15 expertise that a highway authority does not have access
 16 to. So to risk assess against the threat of terrorism
 17 and take appropriate measures, we are dependent on
 18 a threat assessment from counter terrorism security
 19 advisors blended with an assessment of vulnerabilities
 20 to determine risk.
 21 Q. Would there be any difficulty, though, in having a duty
 22 for a highway authority to carry out proper assessments
 23 of risks from terrorism to roadways for which it's
 24 responsible, taking account of the guidance it has had
 25 from the police and others?

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1 A. So we are currently, as Transport for London,
 2 proactively using the section 17 responsibilities that
 3 we have to now look at every new scheme that we have
 4 across the roadways in London where there is predictable
 5 crowding going to occur and we're using our section 17
 6 duty to bring in counter terrorism security advisors and
 7 a range of expertise to undertake a threat and
 8 vulnerability risk assessment of those spaces and
 9 locations and highways and determine what, if any,
 10 mitigation measures need to be put in place. That is
 11 something that we are actively now doing at Transport
 12 for London within the existing legislative framework.
 13 Q. You are there talking about the work you and your
 14 colleagues are doing now.
 15 A. Yes.
 16 Q. What would you say if it was suggested that highway
 17 authorities like TfL should have been carrying out
 18 systematic assessments of such risks before the
 19 London Bridge attack because of their general statutory
 20 duty under the Crime and Disorder Act, or simply as
 21 a matter of good governance and common humanity?
 22 A. To undertake a systematic assessment would require
 23 an understanding and insight into the threat and
 24 intelligence picture and vulnerabilities, and you've
 25 heard repeatedly as part of this Inquest, that the

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1 purpose of counter terrorism security advisors, counter
 2 terrorism policing and OSCCT within Home Office is to
 3 bring together the knowledge, the expertise, to appraise
 4 what that -- to appraise that threat and be able to
 5 support that risk assessment process. They provide the
 6 expertise and insight into protective security.
 7 Highways authorities could not do that in isolation. We
 8 are dependent on our partners within counter terrorism
 9 security advisors and wider counter terrorism policing
 10 and the Home Office to provide that input to be able to
 11 then support recommendations and take and implement
 12 measures that reduce vulnerabilities.

13 Q. But if somebody within a highway authority like
 14 Transport for London had gone to their local CTSA and
 15 said "I want to carry out a systematic assessment of
 16 these roads for which I'm responsible, can you please
 17 tell me, just as you would tell me in your reports,
 18 which are potentially vulnerable to terrorist attack",
 19 that would be something that would be feasible for the
 20 highway authority to do, isn't it?

21 A. It would be feasible for the approach to be made and, as
 22 Transport for London, particularly in the periods --
 23 particularly during 2017, we were seeking advice and
 24 input, however, the focus from counter terrorism
 25 security advisors remained on crowded places, and

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1 I think you've heard during the course of the evidence
 2 given over many days is that there was no
 3 assessment/appraisal of crowded spaces, of highways.
 4 The focus very much remained on crowded places, which
 5 are very clearly defined and, as you have heard,
 6 London Bridge, which is a very busy thoroughfare, fell
 7 outside that definition of crowded places.

8 There was also a focus on events and temporary
 9 events that took place on the highway, which meant that
 10 we had regular contact with counter terrorism security
 11 advisors, and then thirdly, there was also specifically
 12 some focus around heavy goods vehicles and some of the
 13 threat methodologies that we'd seen in more recent
 14 years.

15 So there is -- or we could have gone and asked for
 16 counter terrorism security advice, however, I imagine
 17 the response would have been: it's not an issue, our
 18 focus is crowded places.

19 Q. You imagine that, but one doesn't know until one asks,
 20 does one?

21 A. Even to date, so now in 2019, we have -- no counter
 22 terrorism security advisor has come, and we have
 23 repeatedly asked to say: which of our highways across
 24 our 580 kilometres or so of highways, where should we be
 25 focusing for protection? So where do we need to

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1 consider measures? Where is at risk? Where should we
 2 be prioritising?

3 That information is not forthcoming because there
 4 remains a focus on crowded places, not on crowded
 5 spaces.

6 Q. So even now you can't engage with somebody and identify
 7 a public authority to tell you which of your roadways
 8 might justify a particular consideration for hostile
 9 vehicle mitigation, say?

10 A. No, not in general. What we have been actively doing is
 11 bringing counter terrorism security advisors into
 12 a process that we have designed of a threat and
 13 vulnerability risk assessment based on a DfT model, to
 14 get their input when we are looking at places where we
 15 have schemes in preparation, so Old Street, Highbury
 16 Corner, and a number of other locations across streets
 17 and public realm schemes across London. So we have
 18 brought them into that process, but there has not been
 19 a consideration across all high streets and busy crowded
 20 places, crowded spaces, across the capital where needs
 21 to be mitigated.

22 Q. I will return to that at the end, if I may. Can we turn
 23 now to some events after the Westminster Bridge attack,
 24 and bring up {WS5011/66}, please. Now, on 23 March, the
 25 day after the attack, did certain board members of TfL

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1 raise some issues for discussion at the next meeting of
 2 the Safety, Sustainability and Human Resources Panel?

3 A. Yes.

4 Q. And can we see from the email at the bottom of this page
 5 that they ask a series of questions about how:
 6 "... we [TfL] (and MPS) evaluate risks at any
 7 location?
 8 "How many exposed locations do we think there are?
 9 "How do we (and MPS) prioritise action?
 10 "What measures can be taken?
 11 "How much would/will they cost?
 12 "Is the government making funding available?
 13 "What plans are in hand?"

14 A. Yes, sir.

15 Q. So those were the questions that were raised. After
 16 those questions had been raised, can we see that another
 17 member at the top of the page agreed that the risk
 18 process needed to be brought to that panel?

19 A. Yes, sir.

20 Q. Thereafter, was a briefing given to the TfL board called
 21 a resilience and security briefing?

22 A. Yes, sir.

23 Q. Was that on 24 May 2017?

24 A. Yes, sir.

25 Q. We can see the title page of that, page 68, please

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1 {WS5011/68}. Were you involved in parts of that
 2 presentation?
 3 A. Yes, I was, sir .
 4 Q. Can we look at slide 81, please, or page 81 {WS5011/81}.
 5 Can we see that the slide recognised a series of
 6 terrorism risks, including, top left, light blue,
 7 "Vehicle-as-weapon"?
 8 A. Yes, sir, and this reflected obviously concern that we
 9 had across TfL about our highways and the fact that we
 10 are the highway authority for some of the busiest high
 11 streets in the capital and the concern about those
 12 potential methods of attack creating risks .
 13 Q. And then {WS5011/85}, please, can we see that the slide
 14 pack quoted those questions raised by the board members
 15 that we looked at in the email before?
 16 A. Yes, sir .
 17 Q. And can we see that the text of the slide then said:
 18 "TfL supports the security services in their
 19 anti-terrorism roles to prevent such tragic incidents
 20 occurring in our city . Our streetscape design guidance
 21 provides options for 'designing out' crime (including
 22 terrorism), and we will continue to work closely with
 23 our partner agencies to determine the most appropriate
 24 measures for individual locations based on risk and
 25 proportionality (including enhanced Hostile Vehicle

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1 Mitigation ... measures)."
 2 A. Yes, sir .
 3 Q. And in the course of the briefing was an explanation
 4 given about the role of CTSA's in giving advice?
 5 A. Yes, to the best of my knowledge, yes.
 6 Q. And was anything said in the course of that briefing
 7 about whether advice had been received about threats to
 8 bridges or highways rather than buildings?
 9 A. My recall, sir, is that the discussion focused on the
 10 fact that counter terrorism security advisors use
 11 a range of different information to appraise risk and
 12 that the advice that we were getting at that time was
 13 the focus remained on protection of crowded places and
 14 special events.
 15 Q. So although you describe it as being a relationship of
 16 partners, and designing out risks of terrorism, you were
 17 in effect reactive at that time to the advice of CTSA's,
 18 entirely reactive?
 19 A. At that time, yes.
 20 Q. Now, we can take that off the screen now.
 21 Over the period after the Westminster Bridge attack,
 22 was the issue of security on bridges to your knowledge
 23 raised in some public forums?
 24 A. Yes, it was, sir .
 25 Q. We've looked at this already today with another witness.

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1 Can we have on screen {WS5011/15}, please. Can we see
 2 from your statement that a question was raised on
 3 a web-based public forum identifying London Bridge as
 4 a prime target for terrorist attack?
 5 A. Yes, sir .
 6 Q. And identifying the pavement as being very wide with
 7 a large volume of pedestrians crossing at peak times?
 8 A. Yes, sir .
 9 Q. And relatively clear traffic flow suggesting perhaps
 10 that a vehicle could be used as a weapon with relative
 11 ease?
 12 A. Yes, sir .
 13 Q. And then finally noting that there are no barriers
 14 between the road and the pavement, just a low kerb, and
 15 suggesting putting up black metal posts or barriers?
 16 A. Yes, I can see that, sir .
 17 Q. And can we see that came to TfL's attention and received
 18 a response from TfL?
 19 A. Yes, that's right, sir .
 20 Q. "TfL works closely with its policing partners in [the
 21 various forces] to continually review the security
 22 measures in place across its network. Recommendations
 23 for security measures in crowded places in London are
 24 generated by specialist officers in the MPS..."
 25 And then the answer goes on to say that those

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1 recommendations are based on the application of
 2 a complex system of risk factors .
 3 A. Yes. Yes, sir .
 4 Q. So was that effectively saying in general terms "We rely
 5 on CTSA's and we follow their advice"?
 6 A. Yes, sir .
 7 Q. Did it occur to anyone at TfL, to your knowledge, to
 8 look at the particular risks on London Bridge
 9 proactively in light of that question that had been
 10 asked?
 11 A. So in terms of looking -- we were concerned about
 12 London Bridge, as we were concerned about a number of
 13 our crowded high streets . What we had seen on
 14 Westminster Bridge was a particular attack methodology
 15 and, but also there had been an HGV attack into
 16 a pedestrian area in Stockholm within ten days or so of
 17 the Westminster Bridge attack. So we were seeing
 18 vehicles being used as a weapon, as a horrific weapon.
 19 So we were very concerned about the vulnerability of
 20 our very crowded and densely crowded high streets, but
 21 the clear position from the counter terrorism security
 22 advisors at that time was the focus remained on crowded
 23 places. So we were concerned about the vulnerability ,
 24 but there was no advice or guidance or recommendations
 25 that we should be taking any steps to protect our

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1 streets and our crowded spaces.

2 Q. To your knowledge did anyone in TfL at this time, with

3 all these horrific attacks taking place, make the point:

4 even if the CTAs aren't advising us about roadways and

5 open spaces, we need to start doing some assessments of

6 roadways and open spaces because of our own duties under

7 the Crime and Disorder Act, under the Human Rights Act,

8 our responsibility to protect life using our powers as

9 a highway authority?

10 A. So we were very concerned about the vulnerability of

11 London's streets. However, to undertake that risk

12 assessment process we could not do that without the

13 input of the specialist knowledge and expertise that

14 sits with the counter terrorism security advisors.

15 So to actually go from being concerned to, as you

16 suggest, actively assessing the risk, we would have had

17 to have had the input of counter terrorism security

18 advisors to achieve that.

19 Q. May we move on to late April 2017, {WS5011/104}, can we

20 see from the email at the bottom of the page that the

21 police raised questions about bollards and barriers at

22 a London CONTEST or counter terrorism board?

23 A. Yes, sir.

24 Q. And does this email, sent to TfL, say that:

25 "... local authorities were politely challenged ...

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1 in relation to their role in reducing the vulnerability

2 of crowded places. Senior MPS officers (Lucy D'Orsi and

3 Mark Rowley) were particularly concerned about the need

4 for bollards to protect against a maliciously driven

5 vehicle and the risk posed by modern street design which

6 minimises street furniture.

7 "The MPS are concentrating on the top 10 crowded

8 places across London, but were looking to localities to

9 focus on the next 50 [and] it was left with [the Mayor's

10 Office for Policing and Crime] to convene a meeting of

11 key stakeholders to look at ways of taking this forward

12 and improving safety."

13 A. Yes, sir, and as you have highlighted, the focus was on

14 the top ten crowded places, moving on to the top 50

15 crowded places, and to the absolute best of my

16 knowledge, no street or bridge or highway featured in

17 those lists.

18 THE CHIEF CORONER: And I think you mentioned earlier on in

19 an answer to Mr Hough about the Stockholm attack.

20 A. Mm.

21 THE CHIEF CORONER: That, I think, was on 7 April, so this

22 is a meeting that's taking place a couple of weeks after

23 that, by the look of things.

24 MR HOUGH: Yes. And the Stockholm attack, as I understand

25 it, was an attack with a heavy vehicle on a crowded

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1 shopping street culminating in the vehicle being crashed

2 into a department store.

3 A. Yes, onto a pedestrianised street, so a street with no

4 vehicle access. Yes.

5 Q. And then later that day, 26 April, was that inquiry

6 forwarded on to you?

7 A. Yes, it was.

8 Q. And then, on to the previous page, {WS5011/103}, please,

9 can you see your response was this:

10 "Very timely as this is a [live] issue in

11 Surface ..."

12 That's a part of TfL at the moment?

13 A. Yes, the bits that aren't underground.

14 Q. "... and the 'conflict' between the recommendations for

15 hostile vehicle mitigation and our wider interests in

16 creating safe, amenable and accessible streets. TfL are

17 proposing to review the Streetscape Design Guidance to

18 set standards and expectations and we are seeking

19 potential alternative to invasive barriers to HVM, alert

20 to the fact that the nature of the threat is

21 changing ..."

22 And you identify yourself as the right person to

23 lead on liaison with the Mayor's office.

24 A. Yes, sir, and just to elaborate on that, you'll notice

25 that I talk there about a conflict between

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1 recommendations by HVM and our wider interests, and

2 I put "conflict" in inverted commas in this internal

3 correspondence. That was referring to a very specific

4 location where a popular visitor's attraction in London

5 where there is queueing to enter the visitor attraction,

6 where a security consultant had advised that as part of

7 protecting that queue from the risk of

8 vehicles-as-a-weapon and from other threats that the --

9 on the highway, on TfL's highway that a metal -- well,

10 like a 7-foot high metal fencing was placed down the

11 pavement to protect the queue with a gate at one end,

12 and clearly the placing of a metal fence of that nature,

13 dividing the pavement, restricted the access of the

14 pavement to people in wheelchairs, with mobility

15 difficulties, so we had been working with colleagues in

16 TfL with that particular venue to look at finding

17 alternative ways to provide hostile vehicle mitigation

18 but also maintain all our other duties and

19 responsibilities as a highway authority under the

20 Disability Act, under the Equality Act and the Mayor's

21 Transport Strategy.

22 Q. What did you think the police were asking TfL to do by

23 that email?

24 A. From this?

25 Q. From the email that had been sent and forwarded on to

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1 you?
 2 A. So they were asking that for the top 10 crowded places,
 3 moving on to the top 50, where those places were on the
 4 TfL highway, that we would play our role in supporting
 5 the installation of appropriate physical measures to
 6 mitigate against the threats, and we have worked with a
 7 whole range of different business premises and business
 8 attractions and crowded places to support their efforts
 9 to protect their premises while also, you know, keeping
 10 the highway safe and maintaining the highway.
 11 So it's specifically in relation to those places
 12 that have been prioritised where they are putting
 13 measures on the highway, and it is for us to support
 14 that, which we have consistently.
 15 Q. Just the final question of today: did you or anyone else
 16 in TfL, to your knowledge, do anything specific in
 17 response to this email?
 18 A. Well, I offered myself to be the point of contact.
 19 I'm not aware that anyone did anything else.
 20 Q. You're not aware that anybody took you up as point of
 21 contact and actually had any further discussions with
 22 you?
 23 A. Not to this email, no.
 24 MR HOUGH: Thank you very much.
 25 Sir, would that be a convenient moment?

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1 THE CHIEF CORONER: It would. We'll sit again tomorrow
 2 morning at 10 o'clock.
 3 MR HOUGH: Sir, just to raise a question about the timing.
 4 THE CHIEF CORONER: Yes.
 5 MR HOUGH: I anticipate that I will be about another 20 or
 6 25 minutes with Ms Hayward.
 7 THE CHIEF CORONER: Yes.
 8 MR HOUGH: I don't know how long others are likely to be.
 9 I only ask because it may militate in favour of
 10 an earlier start.
 11 THE CHIEF CORONER: Yes.
 12 Mr Adamson, by you standing up, I'm assuming you're
 13 probably going to take the lead on this topic.
 14 MR ADAMSON: I haven't discussed it, but it's quite possible
 15 that I might be going first tomorrow morning. I would
 16 have thought half an hour or so.
 17 MS AILES: I certainly wouldn't anticipate being any longer
 18 than that, I would like to think I could halve it.
 19 MR HOUGH: Then we have Ms Nacey, with whom I would
 20 expect --
 21 THE CHIEF CORONER: I'm just going to check whether anyone
 22 else will have any significant questions.
 23 MR HORWELL: Not significant, no.
 24 THE CHIEF CORONER: I hope the questions are significant,
 25 but whether they will take a significant period of time,

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1 Mr Horwell.
 2 MR HORWELL: I am always focused on time.
 3 THE CHIEF CORONER: Yes.
 4 MS BARTON: Sir, I am in a similar position to Mr Horwell.
 5 At the moment I don't anticipate any, but there may be
 6 five minutes.
 7 MS LEEK: We may also have a few questions, sir.
 8 MR HOUGH: Ms Leek in particular needs to have time with
 9 Ms Nacey at the end.
 10 THE CHIEF CORONER: I was just thinking about how long you
 11 think you will be with Ms Nacey?
 12 MR HOUGH: I would anticipate that I will be about an hour
 13 and a quarter or so with Ms Nacey.
 14 THE CHIEF CORONER: Yes. What I'm going to suggest before
 15 I ask anyone any estimate for time, is I'm going to
 16 suggest we start at 9.30 because if, in fact, we finish
 17 before 5 o'clock tomorrow, I don't suppose anyone is
 18 going to be disappointed, it being a Friday, and at
 19 least that way if we have started earlier, if we finish,
 20 courts in this building tend to finish about 4.00 or
 21 4.15 or even 4.30, we've done more than our fair share
 22 of hours, but I think that is the sensible precaution.
 23 Is that all right with you if we start at 9.30?
 24 A. It is, of course.
 25 THE CHIEF CORONER: Thank you very much. 9.30.

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1 (5.04 pm)
 2 (The court adjourned until 9.30 am on
 3 Friday, 21 June 2019)
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