

# OPUS 2

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London Bridge Inquests

Day 31

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1 Friday, 21 June 2019  
 2 (9.32 am)  
 3 MS SIWAN HAYWARD (continued)  
 4 Questions by MR HOUGH QC (continued)  
 5 A. Good morning, sir.  
 6 MR HOUGH: Good morning, sir.  
 7 A. Good morning, sir.  
 8 Q. Good morning, Ms Hayward.  
 9 A. Good morning.  
 10 Q. Thank you for being here bright and early.  
 11 At the end of yesterday's hearing I had been asking  
 12 you about some communications in April 2017 to Transport  
 13 for London and we'd just been looking at an email on  
 14 26 April to TfL from the police setting up a chain of  
 15 communications about hostile vehicle mitigation; do you  
 16 recall?  
 17 A. Sir, I'm not clear that was from the police. Sir, can  
 18 you just point out which email you are referring to?  
 19 Q. The email we had been referring to was {WS5011/104}, and  
 20 it was an email from London Councils about issues raised  
 21 by the police and about setting up a chain of  
 22 communication with the police, I think.  
 23 A. Yes, but the email was from London Councils.  
 24 Q. I'm going to now ask you about a further email, send  
 25 this time from the Mayor's Office to Transport for

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1 London's Mr Furlong on 24 April 2017.  
 2 A. Yes.  
 3 Q. Can we go to {WS5011/108} of the same document, please.  
 4 Can we see that Sarah Spencer of the Mayor's Office for  
 5 Policing and Crime writes to Mr Furlong of Transport for  
 6 London and says that:  
 7 "At the London CONTEST board on Friday, the Deputy  
 8 Mayor asked that a sub-group of the Board be set up with  
 9 [DAC] D'Orsi's team to discuss bollards and other work  
 10 around street furniture."  
 11 A. Yes, sir.  
 12 Q. And dates are then being canvassed for that meeting.  
 13 A. Yes, sir.  
 14 Q. And then if we look to the top of the page, can we see  
 15 that the meeting was fixed for 25 May 2017?  
 16 A. That's correct, sir.  
 17 Q. And then page 110, please {WS5011/110}, do we see that  
 18 an agenda was produced for the intended meeting?  
 19 A. Yes, sir.  
 20 Q. Including an overview from Superintendent Aldworth on  
 21 threat, current HVM landscape, changes made to the  
 22 landscape following the Westminster attack, and current  
 23 planning and funding arrangements?  
 24 A. Yes, sir.  
 25 Q. And at the end, at item 4, an item for agreement on what

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1 work was required in relation to hostile vehicle  
 2 mitigation?  
 3 A. Yes, sir.  
 4 Q. Now, was that meeting postponed because of the  
 5 Manchester attack that took place a few days before it  
 6 was intended to take place?  
 7 A. Yes, sir.  
 8 Q. Was it then rearranged for Thursday, 1 June 2017?  
 9 A. That is correct, sir.  
 10 Q. If we look at page 114 {WS5011/114}, I think we can see  
 11 a minute of the meeting when it did take place. And if  
 12 we just read down, that's attended by the Mayor's Office  
 13 for Policing and Crime, the Metropolitan Police Service,  
 14 London Councils, City of London Corporation, Transport  
 15 for London and various others, including the OSCT at the  
 16 Home Office?  
 17 A. Yes, sir.  
 18 Q. And the minutes say this, that the chair:  
 19 "... provided context for this meeting convened by  
 20 [the Mayor's Office] to discuss how we could increase  
 21 Hostile Vehicle Mitigation ... coverage across London  
 22 following the Harris Review."  
 23 A. Yes, sir.  
 24 Q. And are you aware that in broad terms the Harris review  
 25 made some recommendations about increasing bollards and

3

1 other protective measures across London?  
 2 A. Yes, sir.  
 3 Q. It goes on:  
 4 "It was also convened to discuss the ongoing work  
 5 taking place across the city to ensure there is a joined  
 6 up response. It was asked that the group consider if  
 7 they see a need for a series of these meetings to be set  
 8 up, to target any specific areas around HVM.  
 9 "The MPS provided the group an update on the threat  
 10 level and the current HVM landscape.  
 11 "The group discussed options available of HVM  
 12 including the disruption of environment tactics which  
 13 can be alternatives to HVM in the pure sense."  
 14 Are those tactics concerning the design of the  
 15 environment which are alternatives to bollards and  
 16 barriers in their most obvious form?  
 17 A. Yes, sir, there's a range of both physical measures  
 18 which blend the streetscape, such as planters and other  
 19 features, but also, as I have stated in my evidence,  
 20 measures such as traffic exclusion and the slowing down  
 21 of traffic through chicanes and other measures can all  
 22 be part of a protective security approach.  
 23 Q. Then there was a discussion of the National Barrier  
 24 Asset and the organisation involved in deploying it, and  
 25 some discussion of the means to deploying the National

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1 Barrier Asset; yes?  
 2 A. Yes, sir.  
 3 Q. Are you aware whether there was any discussion about the  
 4 National Barrier Asset being made more widely available?  
 5 A. I'm not aware of that, sir.  
 6 Q. Then there was a discussion about communicating evidence  
 7 for where best to deploy HVM, and a comment from  
 8 Westminster, that's Westminster local authority?  
 9 A. That's right, sir.  
 10 Q. Thinking that access to the list of sites held by NaCTSO  
 11 would be helpful to justify decisions around where to  
 12 deploy HVM?  
 13 A. Yes.  
 14 Q. And then there's a discussion of short-term options to  
 15 support the HVM effort.  
 16 A. Yes, sir.  
 17 Q. And then over the page, a series of proposals  
 18 {WS5011/115} for a discussion with NaCTSO about sharing  
 19 a list of vulnerable or at-risk sites with local  
 20 authorities?  
 21 A. Yes.  
 22 Q. A proposal for better circulation of information about  
 23 hostile vehicle mitigation. Yes?  
 24 A. Yes, sir.  
 25 Q. A proposal raising the possibility of NaCTSO providing

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1 practical advice about simpler, speedier and less costly  
 2 devices to impede hostile vehicles?  
 3 A. Yes, sir.  
 4 Q. A proposal for longer term consideration of designing  
 5 out crime and terrorism; does that refer to steps taken  
 6 in the design of the built environment against  
 7 terrorism?  
 8 A. Yes, sir.  
 9 Q. And then proposals for information sharing and  
 10 allocation of the best organisation to take on these  
 11 various issues?  
 12 A. Yes, sir.  
 13 Q. So that was the meeting of 1 June 2017.  
 14 Were you present for that meeting yourself?  
 15 A. No, sir, one of my colleagues from Transport for London  
 16 attended.  
 17 Q. Were you briefed about it afterwards?  
 18 A. No, sir.  
 19 Q. Did you speak to your colleague at any point afterwards,  
 20 even after the London Bridge attack about what had  
 21 happened at that meeting?  
 22 A. I spoke to colleagues at MOPAC about this area of  
 23 activity, and as you can see from this minute, the focus  
 24 of this meeting remained on protective security  
 25 measures, including hostile vehicle mitigation at

6

1 vulnerable sites, being crowded places, within the  
 2 existing list of sites determined by the counter  
 3 terrorism policing and NaCTSO.  
 4 Q. So from your discussions afterwards with members of the  
 5 Mayor's Office, you understand that this meeting was  
 6 still very much focused on sites rather than the  
 7 streetscape and assessment of the streetscape?  
 8 A. Yes, sir, that is correct.  
 9 Q. We can take that down now.  
 10 May I ask you some general questions, please.  
 11 A. Yes, sir.  
 12 Q. Suppose Transport for London at a time before June 2017  
 13 had been told by police, for example, by a counter  
 14 terrorism security advisor, that London Bridge was the  
 15 most vulnerable site in the City area to  
 16 a vehicle-as-weapon attack; do you think any action  
 17 would have been taken on the part of TfL?  
 18 A. Categorically yes, sir. Transport for London takes its  
 19 security responsibilities incredibly seriously and we  
 20 protect millions of Londoners every day as they travel  
 21 on the underground and rail network. We also respect  
 22 the expertise and professionalism and the advice of our  
 23 counter terrorism security advisors. If a counter  
 24 terrorism security advisor had said to us that  
 25 London Bridge was the most vulnerable site in the

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1 capital, we would, in collaboration with the Corporation  
 2 of London, have moved quickly to take action to mitigate  
 3 the elements which make that site vulnerable and  
 4 attractive to terrorists.  
 5 Q. I think in fairness the premise of my question was the  
 6 most vulnerable to attack in the area of the City, so  
 7 the Square Mile?  
 8 A. Yes, sir.  
 9 Q. And I should probably qualify that further by saying  
 10 perhaps with one other site equally vulnerable.  
 11 A. Yes, sir.  
 12 Q. If that had been put to you, one of the two most  
 13 vulnerable sites to vehicle-as-weapon attack in the  
 14 Square Mile, do you think action would have been taken?  
 15 A. Yes, sir.  
 16 Q. What action?  
 17 A. As has been set out for my colleagues from the  
 18 Corporation of London, we would have immediately got  
 19 together in a gold group to determine what urgent action  
 20 could be taken and, as Transport for London, we have  
 21 access to a huge range of vehicle restraint barriers,  
 22 crash barriers, street furniture, planters, so we would  
 23 have been able to work on the advice of a counter  
 24 terrorism security advisor about measures that could  
 25 have been put in place to reduce the vulnerability of

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1 that location .

2 Q. So if you had been told at any point before 3 June what

3 we know Police Constable Hone thought, namely that

4 London Bridge was one of two most vulnerable sites in

5 the Square Mile to a vehicle-as-weapon attack, you, TfL,

6 could and would have triggered a gold group meeting?

7 A. With the Corporation of London, yes.

8 Q. And in that gold group meeting are you saying you would

9 have offered up to police and others and proposed the

10 use of your own privately procurable barriers as hostile

11 vehicle mitigation?

12 A. Yes, sir, if the advice was one of urgency and immediate

13 vulnerability, then we would have taken action.

14 Q. Suppose the advice had not been: we have a particular

15 threat that something is going to happen now, but our

16 understanding is that this is one of the most vulnerable

17 sites in the Square Mile to a vehicle-as-weapon attack

18 structurally, would you at that point in that gold

19 group, in that hypothetical gold group, have been

20 saying: we have barriers we can procure, we would be

21 happy to and we think it would be a good idea to put

22 them on as a matter of urgency?

23 A. Yes, sir, we would offer our support to reduce the

24 vulnerability of that location.

25 Q. And if the police had taken you up on that proposal, how

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1 quickly could your private barriers have been put in,

2 roughly speaking?

3 A. Sir, I'm not an expert on highway contractors, however,

4 TfL does have access to a conglomeration of different

5 highway contractors and be able to access a range of

6 different assets, so I'm confident it could have been

7 done relatively quickly.

8 Q. I know it's a difficult question: weeks, days?

9 A. It's -- sir, I apologise, I can't put a timescale on

10 that.

11 Q. But you certainly seem to be suggesting weeks rather

12 than months?

13 A. Yes, certainly.

14 Q. If TfL had been told at any time before June 2017 by

15 a CTSA that permanent HVM to a particular standard ought

16 to be installed on London Bridge, do you think that

17 recommendation would have been accepted?

18 A. Yes, sir.

19 Q. Would there have been any chance that the response might

20 have been "we need to consider cost, we need to consider

21 aesthetic considerations, we need to consider the

22 potential effect on traffic safety issues; we can't

23 simply accept the recommendation without thinking about

24 all those other things"?

25 A. All those factors come into consideration after the

10

1 acceptance of the recommendation. The recommendation of

2 protection is one that trumps other recommendations.

3 Clearly we would want to work on the design, the

4 engineering constraints and, as part of our current

5 approach, which is embedded throughout our Mayor's

6 Transport Strategy, we are seeking to make streets safe,

7 attractive and welcoming, which means we would be

8 looking at a design that would be -- that would not

9 impede accessibility or pedestrian flow. So there would

10 be a number of design considerations that would be part

11 of that, but that would be after the recommendation was

12 accepted.

13 Q. So, to be clear, if there was a recommendation on safety

14 grounds, on public safety grounds, permanent HVM, that

15 wouldn't be trumped by cost or aesthetics --

16 A. No.

17 Q. -- or traffic safety, you would seek to produce a design

18 which met the safety requirements but was also

19 appropriate in terms of cost, aesthetics and traffic

20 safety?

21 A. Yes, sir. Though cost is not the second-most important

22 factor.

23 Q. No, no, understood.

24 If, in response to advice of that kind, TfL had

25 decided to install a permanent system of bollards or

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1 other hostile vehicle mitigation on London Bridge, and

2 assuming ready agreement by the City of London

3 Corporation, are you able to say how quickly that could

4 have happened? Would that have been a matter of months

5 or years?

6 A. As you have heard already, the process for the

7 feasibility, the design, the consent, the consultation,

8 the structural assessment for permanent hostile vehicle

9 mitigation to a standard rated and set by CPNI, given

10 particular engineering limitations that there are on

11 a bridge, that would have taken a number of years.

12 Q. Can I turn to the action which was in fact taken by TfL

13 and others following the attack? As we've heard,

14 temporary barriers were installed on various bridges

15 following the London Bridge attack, prompted by the

16 police?

17 A. Yes, that's correct, sir.

18 Q. Is further work being done on designing permanent

19 installations to replace those temporary barriers?

20 A. Yes, sir. We have led on the determination of the

21 future permanent measures for all the central London

22 bridges which are currently protected with temporary

23 measures. That means we have undertaken a threat and

24 vulnerability risk assessment workshop for each of those

25 bridges, bringing in counter terrorism security experts

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1 and the local authorities and other partners to assess  
 2 and determine the appropriate mitigations as permanent  
 3 features for those bridges.  
 4 Q. Meanwhile, has TfL established an internal working group  
 5 called the Protective Security Oversight Group?  
 6 A. That's right, sir.  
 7 Q. In brief, what are the functions and approach of that  
 8 group?  
 9 A. The purpose of that group is for TfL to proactively  
 10 consider every project and undertaking where we are  
 11 developing the highway, to proactively consider if it  
 12 creates predictable crowding how we can design-in  
 13 measures to counter the threat from terrorism and  
 14 improve the security of people using that space. So  
 15 every single one of our projects will now go through  
 16 that process that's overseen by the Protective Security  
 17 Oversight Group.  
 18 It is also a forum attended by counter terrorism  
 19 security advisors where if they have any locations or  
 20 locations on TfL's highway where they are seeking  
 21 protective security measures, they can bring those to  
 22 that forum for discussion.  
 23 Q. So do I understand it correctly: it has two elements,  
 24 first of all, looking at new TfL projects and  
 25 developments to ensure they take proper account of

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1 protective security?  
 2 A. That's correct, sir.  
 3 Q. Secondly, as a forum for CTSAs to notify TfL of any  
 4 areas they're concerned about?  
 5 A. Exactly, sir.  
 6 Q. But not, as presently constituted, carrying out  
 7 systematic assessments of the GLA roads across the  
 8 capital?  
 9 A. Not at this stage, sir.  
 10 Q. Can I turn to a different topic: pedestrian guardrail  
 11 removal.  
 12 A. Yes, sir.  
 13 Q. Is it right to say that before 2009 there had been  
 14 pedestrian guardrails on both footways of London Bridge?  
 15 A. Yes, sir, that is my understanding.  
 16 Q. And is this right: that from 2007, there was  
 17 an assessment of the use of pedestrian guardrail on  
 18 roads generally?  
 19 A. That's correct, sir.  
 20 Q. If we bring up {WS5045/9}, can we see that TfL produced  
 21 in 2007 a document for assessment of the use of  
 22 guardrails?  
 23 A. That's correct, sir.  
 24 Q. {WS5045/14}, please. Can we see at paragraph 6.1 the  
 25 document indicated that there was a growing consensus

14

1 that there had been overuse of pedestrian guardrails  
 2 over many years?  
 3 A. Yes, sir.  
 4 Q. And that research showed that in some cases, those  
 5 guardrails did not clearly have a positive effect on  
 6 safety?  
 7 A. That's correct, sir.  
 8 Q. Did the document then go on -- and we probably don't  
 9 need the technical detail -- to suggest a procedure for  
 10 assessing those for the removal or, indeed,  
 11 installation, of pedestrian guardrail?  
 12 A. That's correct, sir.  
 13 Q. Was the pedestrian guardrail on London Bridge assessed  
 14 by a private contractor in June 2009?  
 15 A. Yes, sir, that's my understanding.  
 16 Q. If we look at page 59 of the same document, the same  
 17 bundle {WS5045/59}, can we see here a guardrail risk  
 18 assessment form was completed by that private contractor  
 19 following the approach in that guidance document we just  
 20 looked at?  
 21 A. Yes, sir.  
 22 Q. If we go to {WS5045/60}, please, can we see on the  
 23 right-hand side of the page how the pavement looked  
 24 before 2009?  
 25 A. Yes, sir.

15

1 Q. And then {WS5045/64}, please, can you maximise, please,  
 2 the "Summary of important points" on this document in  
 3 the left-hand column. Thank you.  
 4 Can we see after various records of what collisions  
 5 there have been, the contractor said this:  
 6 "Recommend removal of both sections of PGR. PGR  
 7 does not suppress any significant pedestrian desire  
 8 lines -- pedestrians more likely to cross the  
 9 carriageway to the south or north of the bridge where  
 10 there are facilities to attract pedestrians to either  
 11 side of the road. London Bridge has a straight  
 12 alignment so there is very little chance of vehicles  
 13 coming into contact with pedestrians on footway.  
 14 Removal of plain PGR will also improve the aesthetics of  
 15 the bridge."  
 16 A. Yes, sir.  
 17 Q. So the rationale was an assessment that the pedestrian  
 18 guardrail didn't serve a good traffic safety purpose?  
 19 A. That's correct, sir.  
 20 Q. The rationale wasn't that it would be -- that it was --  
 21 that it actually caused traffic safety dangers; it's  
 22 just that it didn't do any good?  
 23 A. The rationale in this specific case was that it doesn't  
 24 cause -- is that it's -- sorry, can you say that again?  
 25 Q. Yes, the rationale appears to be not that pedestrian

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1 guardrail caused traffic casualties , but that it didn't  
 2 do anything to suppress them?  
 3 A. Yes, sir . Though in other locations there has been a --  
 4 there have been fatalities and other serious injuries  
 5 where cyclists have been squashed, for want of a better  
 6 phrase, between large vehicles and pedestrian guardrail,  
 7 and at the time of this decision, the Mayor's Transport  
 8 Strategy had a presumption both to increase the number  
 9 of cyclists and cycling in London and also a presumption  
 10 against the removal of guardrail.  
 11 Q. Against the removal of guardrail?  
 12 A. Sorry, a presumption for the removal of guardrail.  
 13 Q. Was the proposal in respect of London Bridge subject to  
 14 a road safety audit by TfL?  
 15 A. That is correct, sir .  
 16 Q. Page 84, please {WS5045/84}. You can see that that  
 17 audit report was produced with a date of June 2009?  
 18 A. Yes, sir .  
 19 Q. And then {WS5045/87}, please. You can see that the  
 20 purpose of the scheme under consideration was to remove  
 21 pedestrian guardrail at various locations, specifically  
 22 the A3 on London Bridge?  
 23 A. That's correct, sir .  
 24 Q. In brief, was the scheme for removal approved by that  
 25 audit?

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1 A. Yes, it was, sir .  
 2 Q. Were the works for removal completed by March 2010?  
 3 A. To the best of my understanding, sir .  
 4 Q. After the removal of pedestrian guardrail, were the  
 5 effects of that removal on collisions monitored?  
 6 A. Yes, sir , they're monitored for a period three years and  
 7 then a further three years after removal compared to the  
 8 prior three years.  
 9 Q. Page 157, please. Can we see in this table a monitoring  
 10 of collisions in that area?  
 11 A. Yes, sir , and you can see --  
 12 Q. London Bridge - King William Street?  
 13 A. Yes, sir .  
 14 Q. And if we look at the middle section, can we see that  
 15 over the period 2007 to 2009, the figure is 23?  
 16 A. Yes, sir .  
 17 Q. Is that pedestrian fatalities ?  
 18 A. It is not fatalities , sir , but it is serious and other  
 19 injuries .  
 20 Q. So on the stretch of road at London Bridge - King  
 21 William Street in the years 2007 to 2009, 23 fatalities  
 22 or serious injuries ?  
 23 A. Serious -- yes, serious and slight injuries , sir , yes.  
 24 Q. Then in the period from 2010 to 2013, do we see that  
 25 that had fallen to 9?

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1 A. That's right, sir .  
 2 Q. Then in the period from 2015 to 2018, had that fallen  
 3 to 6, not including the London Bridge attack?  
 4 A. That's correct, sir .  
 5 Q. We can take that off screen.  
 6 So the monitoring didn't suggest that the removal of  
 7 pedestrian guardrail had an adverse effect on traffic  
 8 safety; in fact, if anything, the opposite?  
 9 A. That's correct, sir .  
 10 Q. Now, to your knowledge, before the London Bridge attack,  
 11 was consideration ever given by TfL to these points:  
 12 first, there had been a lot of removal of pedestrian  
 13 guardrail in the years from 2007, perhaps for very good  
 14 reasons. Second, that from around 2014 there had been  
 15 a progressive increase in vehicle-as-weapon terrorist  
 16 attacks. And thirdly, that the removal of pedestrian  
 17 guardrail might therefore have left the London  
 18 streetscape unprotected to that sort of attack?  
 19 A. Sir, that's -- the final of those points is not the  
 20 correct assumption. The purpose of pedestrian guardrail  
 21 is to prevent pedestrian incursion into the highway. It  
 22 does not protect pedestrians from vehicles. If  
 23 a vehicle was to hit a guardrail it's very flimsy and  
 24 pliable and it would not provide any security against a  
 25 vehicle onto the pavement.

19

1 Furthermore, in terms of the style of attacks that  
 2 we have seen as countering vehicle -- where vehicles are  
 3 being used as weapons, pedestrian guardrail would  
 4 increase the risks to people on the pavement, and if you  
 5 will let me elaborate here, if I may, and by way of  
 6 illustration if you can imagine pedestrian guardrail  
 7 along the length of London Bridge where at the ends of  
 8 the bridge there are crossing points for pedestrians,  
 9 those crossing points are wide, as are those openings at  
 10 the ends of the bridge. Those crossing points are wide,  
 11 a vehicle would be able to access the bridge through  
 12 those crossing points and then you have a scenario where  
 13 pedestrians are hemmed in between guardrail and the  
 14 parapet of the bridge. So the risk is significantly  
 15 increased to pedestrians if guardrail were to exist on  
 16 the sides of a bridge as a vehicle could, as we have  
 17 seen and been extolled, mown down pedestrians at a time  
 18 when the bridge is very busy.  
 19 So we, categorically, would not look at pedestrian  
 20 guardrail as a pressure to provide protective security.  
 21 It would not fit that purpose; it would increase risk.  
 22 Q. What you're suggesting is if you have a wide pavement,  
 23 wide enough to accommodate a vehicle, having  
 24 a pedestrian guardrail can create a problem --  
 25 A. Yes.

20

1 Q. -- by giving that vehicle a free run down the pavement  
2 with a guardrail keeping pedestrians from getting out of  
3 the way?

4 A. Yes, sir, and not just for a vehicle-as-weapon attack,  
5 but also if you were to imagine a marauding knife attack  
6 or firearms attack on a crowded bridge, again, guardrail  
7 prevents an escape route, so in terms of following the  
8 run, hide, tell, you cannot run off the bridge because  
9 the guardrail would be preventing you, it would cause --  
10 yes, it would significantly increase the risk of  
11 injuries and potentially fatalities.

12 Q. Has there been any thinking over recent years about the  
13 benefits of wider use of bollards across the streetscape  
14 to marry up these concerns about traffic safety --

15 A. Yes.

16 Q. -- that you have described with, for example, cyclists  
17 being trapped, and a general need to target-harden major  
18 streets against vehicle-as-weapon attacks?

19 A. Yes, absolutely, sir, and we're looking at how to blend  
20 protective security measures, whether bollards or  
21 planters, or a whole range of measures into the  
22 streetscape.

23 If I may, sir, there has been suggested in this  
24 courtroom that there is a desire by local authorities  
25 and highway authorities such as ourselves to declutter

21

1 the streets. That was the policy of the previous  
2 mayor's transport strategy. That is no longer the  
3 policy of the current mayor's transport strategy. The  
4 transport strategy that we, as TfL, and London local  
5 authorities are working to, has running throughout it  
6 a theme on healthy streets, which is about creating  
7 streets that are safe and welcoming and accessible, with  
8 places to sit, with places to linger. So there is  
9 an active assumption about making streets places with  
10 much furniture and distraction and opportunity to linger  
11 and enjoy all that London has to offer.

12 I apologise for the length of that, but I think it's  
13 important to make that point.

14 Q. No, that's helpful.

15 A couple of points, finally, for the future. We  
16 have looked at the fact that highway authorities are  
17 under a duty to ensure the maintenance of the roadway  
18 and pavements and that that leads to regular assessments  
19 of pavements for cracks and trip hazards and so on. We  
20 looked at that yesterday.

21 A. Yes, sir.

22 Q. The point has been raised and was raised in the course  
23 of other witnesses' evidence that there might be a value  
24 in a statutory duty to take reasonable steps -- only  
25 reasonable steps -- on highway authorities for

22

1 assessment of the roadway against risks of terrorist  
2 attack. If government or others were to propose such  
3 a duty to take reasonable steps and have a reasonable  
4 system, would you welcome that?

5 A. Sir, clearly that is a decision for government, and as  
6 I have set out, we in Transport for London, as with  
7 other local authorities, are actively using our duty  
8 under section 17 of the Crime and Disorder Act to  
9 consider protective security in all our schemes where we  
10 are developing the highway.

11 There is a second element to this question which, if  
12 a duty is put on local authorities and highway  
13 authorities, that will raise a query about any resources  
14 to support the carrying out of that duty.

15 I only raise that because there is a question around  
16 the principle that currently is adopted within national  
17 security policy, which is that the user pays for  
18 security. For streets, it is challenging to determine  
19 who the user is and how that payment is levied from  
20 them.

21 Clearly within our regulated rail environment, our  
22 underground environment, through the money we raise from  
23 the tickets that you pay for as you travel through  
24 London, we are supporting our security infrastructure  
25 through that. It is more challenging to determine for

23

1 the streetscape if a duty was put onto us how the --  
2 where the funding and resourcing of that would flow.

3 Q. So while there might be a perfectly legitimate  
4 conversation to be had with central government about  
5 whether the resources for that duty should fall on  
6 central government, local highway authorities or  
7 a mixture of the two, subject to that conversation being  
8 had, would you have any objection to the duty as  
9 a matter of principle?

10 A. No objection to the duty, though section 17 of the Crime  
11 and Disorder Act is serving us well.

12 Q. And finally this: you've indicated that up to the  
13 present day, there hasn't been systematic assessment of  
14 GLA roads to look at their vulnerability to potential  
15 attack, not by reference to intelligence, but just by  
16 reference to their physical characteristics, with a view  
17 to helping you understand the need for HVM. Do you  
18 think that sort of systematic assessment might be useful  
19 in the future?

20 A. Sir, yes, it is a significant undertaking, and as  
21 I stated, we can assess aspects of vulnerability,  
22 however, to risk-assess and prioritise as a result we  
23 would require input from counter terrorism policing and  
24 others to determine the threat and threat types and the  
25 likelihood and probability and impact so that we can

24

1 make a comprehensive risk assessment of the road  
 2 network.  
 3 MR HOUGH: Thank you very much. Those are my questions.  
 4 A. Thank you, sir.  
 5 THE CHIEF CORONER: Yes, Mr Adamson.  
 6 Questions by MR ADAMSON  
 7 MR ADAMSON: Good morning, Ms Hayward, my name is  
 8 Dominic Adamson, as you know, I appear on behalf of the  
 9 family of Xavier Thomas and his partner, Christine  
 10 Delcros.  
 11 Can I start by just summarising, if I may, my  
 12 understanding of some of the key themes of your evidence  
 13 so far. First of all, that so far as Transport for  
 14 London is concerned, it didn't have a positive,  
 15 proactive obligation to consider the roads within its  
 16 control to determine whether or not to take counter  
 17 terrorism security measures?  
 18 A. That's correct, sir.  
 19 Q. Second, that you, as an organisation, were not receiving  
 20 advice from counter terrorism security advisors in  
 21 relation to those matters?  
 22 A. Not in relation to our highways in general, to the  
 23 streetscape to our pavements, no.  
 24 Q. And so does it follow from that that so far as Transport  
 25 for London is concerned, it was not actively considering

25

1 counter terrorism security measures on its streetscapes  
 2 and highways prior to June 2017?  
 3 A. No, we are dependent on the input and expertise of the  
 4 security advisors within counter terrorism policing and  
 5 NaCTSO to be able to make that judgment and assessment.  
 6 Q. So if no advice is forthcoming, no action is taken?  
 7 A. That's correct, sir.  
 8 Q. Fourthly, had advice been given that the threat on  
 9 London Bridge was a matter of real concern --  
 10 A. Sorry, real?  
 11 Q. Real concern --  
 12 A. Yes, sir.  
 13 Q. -- that there was a significant risk to pedestrians  
 14 because of the nature and layout of London Bridge, had  
 15 those factors been drawn to Transport for London's  
 16 attention, it would have --  
 17 THE CHIEF CORONER: I'm just going to pause there. There's  
 18 a mobile phone ringing somewhere.  
 19 MR ADAMSON: I could hear the buzzing.  
 20 THE CHIEF CORONER: The reason I mention it is because it's  
 21 not the first time I've heard -- it's unusual, because  
 22 I appreciate we all tend to carry these phones, but it  
 23 can be distracting, certainly for me, so if I can just  
 24 ask if anyone has got their phone on, please make sure  
 25 it is on silent, and if it is that urgent call for that

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1 brief next week, you might want to go and answer it out  
 2 of court.  
 3 MR ADAMSON: I just wanted to check it wasn't me, but it's  
 4 not.  
 5 I'll repeat the question.  
 6 THE CHIEF CORONER: So it was the -- you were on your --  
 7 MR ADAMSON: Yes. Had you been given advice that  
 8 London Bridge constituted a location where there was  
 9 a significant risk to the public because of the nature  
 10 and layout of that area, you would have been keen to  
 11 convene a gold group to consider what needed to be done?  
 12 A. Exactly, sir.  
 13 Q. And finally in relation to my summary of the key themes  
 14 as I understand them, had a decision been taken at that  
 15 gold group that further and better security measures  
 16 were required on London Bridge, that could have been  
 17 executed within a matter of weeks?  
 18 A. Yes, sir.  
 19 Q. So insofar as this court has heard evidence about the  
 20 difficulty and the almost unprecedented nature of  
 21 installing hostile vehicle mitigation measures poses,  
 22 you are actually saying that in fact, things can be done  
 23 very quickly if there is a momentum behind them?  
 24 A. Yes, sir. Things can be done very quickly. Hostile  
 25 vehicle mitigation measures clearly are a specific

27

1 category of features which require specific engineering,  
 2 but yes, absolutely, things can be done quickly.  
 3 Q. Well, to take your point, it might not be the best  
 4 hostile vehicle mitigation that money can buy that can  
 5 be delivered in a short time, but something can be  
 6 delivered in a short time which has a good opportunity  
 7 to be effective to protect pedestrians on the bridge?  
 8 A. Yes, sir.  
 9 Q. Can I call up on screen {WS5014/33}. Now, this is  
 10 a document that we're all familiar with, you would not  
 11 have seen at the time.  
 12 A. No, sir.  
 13 Q. It's Mr Hone's summary of his recommendations in  
 14 relation of the outcome of the Cerastes work that you  
 15 are now no doubt familiar because I know you have been  
 16 sitting in court.  
 17 A. Yes, sir.  
 18 Q. And I put this to a number of other witnesses. It sets  
 19 out, does it not, a compelling argument in favour of  
 20 hostile vehicle mitigation in relation to London Bridge  
 21 and I presume that you would agree with that?  
 22 A. Yes, sir.  
 23 Q. Now, this is the sort of information that, as  
 24 I understand your evidence, TfL was not and still is not  
 25 being provided?

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1 A. Yes, sir.  
 2 Q. And did I also understand from your evidence that  
 3 since June 2017, if we exclude the temporary measures  
 4 which have been put on the eight bridges, no other steps  
 5 have been taken on any of London's streetscapes, to  
 6 implement additional HVM?  
 7 A. Yes, sir, that's correct. To further elaborate, if  
 8 I may, there continues to be recommendations for hostile  
 9 vehicle mitigation and other forms of protective  
 10 security around key sites such as places of worship,  
 11 such as nightclubs, such as entertainment venues and  
 12 sports stadia. We were engaged in early 2018 in some  
 13 discussions with some counter terrorism policing and  
 14 NaCTSO about the vulnerability and attractiveness of  
 15 streets that did not include features -- that did not  
 16 include premises that were attractive features.  
 17 Q. Areas that wouldn't qualify as crowded places?  
 18 A. Exactly, sir, but that discussion ...  
 19 Q. Dried up?  
 20 A. Dried up, yes. So we have not received any advice about  
 21 crowded streets.  
 22 Q. Yes.  
 23 A. And we are the highway authority for the majority of  
 24 high streets in London and we -- they are predictably  
 25 crowded every day.

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1 Q. Yes. So we've heard from other witnesses about the  
 2 importance of prioritisation and how one can't just look  
 3 at London Bridge in isolation; one has to consider the  
 4 broader context. But the sense that I'm getting from  
 5 your evidence is that since those temporary measures  
 6 have been installed on the eight bridges, in fact,  
 7 there's been no other area or location which has been  
 8 identified and action taken which is equivalent to, in  
 9 terms of priority, the bridges?  
 10 A. No, there hasn't, sir, not to the best of -- yes, not to  
 11 the best of my knowledge.  
 12 Q. So on TfL-owned roads?  
 13 A. Yes, sir.  
 14 Q. So this notion of prioritisation, "Well, you can't just  
 15 look at London Bridge", is a red herring, isn't it?  
 16 A. Sir, having reflected on this, I accept it may be the  
 17 case that at a national level there is a prioritisation  
 18 of sites and crowded places and crowded spaces that are  
 19 higher priority and therefore the focus of  
 20 recommendations and advice for protective security, and  
 21 that none of those sites include roads that we are the  
 22 highway authority for. So there may be a prioritised  
 23 list. I am not aware of that.  
 24 Q. So there may be something outside of TfL's roads,  
 25 something beyond TfL's roads --

30

1 A. Yes.  
 2 Q. -- that ticks those boxes as a higher priority?  
 3 A. Yes.  
 4 Q. But TfL is responsible for an enormous number of roads,  
 5 is it not? I don't know what the figure is.  
 6 A. It's a very small number of roads, it's 5% of the road  
 7 network in London, but it is London's major roads. It's  
 8 London's busiest roads, it's the red route, when you go  
 9 outside, any road with a red line is TfL's road. So it  
 10 would be the -- so most major high streets and  
 11 thoroughfares?  
 12 Q. Some of the busiest roads in London?  
 13 A. Yes. Not all the busiest roads. We're not responsible  
 14 for Oxford Street, for example.  
 15 THE CHIEF CORONER: There are some major roads which are  
 16 excluded but in fact, you are right, I mean, when one  
 17 looks around one can see the roads which are likely to  
 18 be the roads that you have jurisdiction over --  
 19 A. Yes.  
 20 THE CHIEF CORONER: -- which are either roads where your  
 21 buses are running, for example, but that excludes Oxford  
 22 Street?  
 23 A. Okay, buses run everywhere.  
 24 THE CHIEF CORONER: They do, but they don't, for example,  
 25 run down residential roads?

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1 A. Some do. We have hopper buses, but this is not ... yes.  
 2 THE CHIEF CORONER: Yes.  
 3 MR ADAMSON: But I think that you accept my point that so  
 4 far as TfL roads are concerned, nothing has been  
 5 identified that was a higher priority than  
 6 London Bridge, to your knowledge?  
 7 A. Yes, sir.  
 8 Q. Can I just, whilst we've got this on screen, am I right  
 9 in thinking that had this information been communicated  
 10 to you in some form, that this is the sort of  
 11 information which would have triggered a red group?  
 12 A. A gold group.  
 13 Q. Sorry.  
 14 A. So this is the kind of information in -- this form would  
 15 have been taken into our organisation and given absolute  
 16 serious consideration about what could be done. A gold  
 17 group is triggered if there is a matter of urgency.  
 18 Q. Yes.  
 19 A. So in how this is communicated to us, the determination  
 20 would be the level of urgency that came with it.  
 21 Q. Well, let me ask you the direct question. Look at the  
 22 words:  
 23 "The location that causes most concern is  
 24 London Bridge... reasons why ..."  
 25 Explained, and then:

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1 "Consideration should be given to installing hostile  
2 vehicle mitigation ..."  
3 Surely this would have resulted in TfL demanding a  
4 gold group?  
5 A. It would have resulted in TfL taking this into our  
6 organisation and considering exactly what we could do  
7 and how we could respond to this, yes.  
8 Q. But you agree with me that a gold group was a likely  
9 consequence of this sort of information being  
10 communicated to you?  
11 A. A senior level meeting, yes.  
12 Q. Yes. Now, just in terms of what might have flowed from  
13 that, and you've already had some questions from  
14 Mr Hough, had those senior meetings happened, had those  
15 discussions with partner organisations taken place, then  
16 there was an opportunity, was there not, to implement  
17 some form of pedestrian protection measures on  
18 London Bridge?  
19 A. Yes, sir.  
20 Q. Yes. And we know that this sort of information was  
21 provided to the City of London Corporation on 8 May 2017  
22 to Mr Woolford.  
23 A. Mm-hm.  
24 Q. And is that the sort of information you would expect the  
25 City of London Corporation to liaise with you in respect

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1 of as well?  
2 A. Yes, sir, as we are the highway authority for  
3 London Bridge.  
4 Q. Yes. So you would expect liaison with the City of  
5 London Police, the City of London Corporation, and your  
6 CTSAs?  
7 A. Yes, sir.  
8 Q. In order for you to be able to ensure that the right  
9 discussions are being had between the right people?  
10 A. Yes, sir.  
11 Q. Can I move on to a different topic now, please. I just  
12 want to focus, if I may, on Transport for London's  
13 obligations. Now, as I understand your evidence, and we  
14 started with this, there is no positive proactive  
15 obligation to consider security measures, counter  
16 terrorism security measures on the highways?  
17 A. Yes, sir.  
18 Q. You are the highway authority and so therefore subject  
19 to the Highways Act; is that right?  
20 A. Yes, sir.  
21 Q. Yes. Now, we've got section 66 of the Highways Act.  
22 I don't know if that can be brought up on screen. Thank  
23 you very much. This is the obligation for footways and  
24 guardrails for publicly maintainable highways, and it  
25 says at subparagraph (1):

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1 "It is the duty of a highway authority to provide in  
2 or by the side of a highway maintainable at the public  
3 expense by them which consists of or comprises a made-up  
4 carriageway, a proper and sufficient footway ..."  
5 Then it goes on to deal with the need to safely  
6 accommodate pedestrians that may alight any footway, and  
7 then subparagraph (2):  
8 "A highway authority may provide and maintain in  
9 a highway maintainable at the public expense by them  
10 which consists of or comprises a carriageway, such  
11 raised paving, pillars, walls, rails or fences as they  
12 think necessary for the purpose of safeguarding persons  
13 using the highway."  
14 A. Yes, sir.  
15 Q. So you have the power to provide protection measures to  
16 the public under section 66 of the Highways Act; is that  
17 right?  
18 A. Yes, sir.  
19 Q. Yes. And if we consider that obligation in the context  
20 of your section 17 of the Crime and Disorder Act  
21 obligation -- I won't pull that up on screen, I'll read  
22 it out to you:  
23 "It shall be the duty of each authority to which  
24 this section applies to exercise its function with due  
25 regard to the likely effect of the exercise of those

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1 functions on, and the need to do all that it reasonably  
2 can to prevent crime and disorder in its area."  
3 A. Yes, sir.  
4 Q. So you've got to exercise your function in a way that  
5 reasonably prevents crime and disorder; yes?  
6 A. Yes, sir.  
7 Q. And you've got this power under section 66 to put in  
8 place security measures effectively?  
9 A. Yes, sir. Though my understanding from speaking with  
10 colleagues who are highways experts, that the purpose  
11 and provisions of the Highway Act is to safeguard  
12 persons using the highway from traffic and trips, slips  
13 and falls, not from acts of violence.  
14 Q. Well, it's to safeguard persons using the highway.  
15 A. Yes, sir.  
16 Q. Yes. And so a pedestrian on a pavement is such  
17 a person, are they not?  
18 A. Yes, sir.  
19 Q. Now, my understanding is you're saying that there is no  
20 guidance in relation to a highway authority's  
21 obligations to proactively consider counter terrorism  
22 security measures?  
23 A. Yes, sir.  
24 Q. Could we have, please, up on screen Ms Nacey's  
25 supplemental statement, please.

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1 THE CHIEF CORONER: {WS5064}.  
 2 MR ADAMSON: {WS5064/5}, thank you very much.  
 3 Now, paragraph 22:  
 4 "Government guidance advises how local highways  
 5 authorities and others involved in the planning,  
 6 construction and maintenance of road infrastructure can  
 7 consider protective security in the public realm,  
 8 including roads. This guidance extended to  
 9 collaborating with the Chartered Institution for  
 10 Highways and Transportation on the production of 'Manual  
 11 for Streets 2' published in 2010, which is appended to  
 12 this statement as Annex 2."  
 13 Now, is that guidance that you are familiar with?  
 14 A. I'm not intimately familiar with it, sir, but I am aware  
 15 of it.  
 16 Q. And have you considered it before giving your evidence  
 17 today?  
 18 A. I have refreshed my memory of it, sir.  
 19 Q. Could we have annex 2 up on screen, please.  
 20 {DC8294/1}, this is the Manual for Streets 2, wider  
 21 application of the principles, if we go down, I think  
 22 it's about four pages {DC8294/4}, and we can see that --  
 23 further on, please. Sorry. Keep going {DC8294/6}, this  
 24 is the ministerial foreword and the Under Secretary of  
 25 State for Transport explains:

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1 "Streets and road make up around three-quarters of  
 2 all public space -- their design, appearance, and the  
 3 way they function have a huge impact on quality of ...  
 4 life."  
 5 And:  
 6 "The Department for Transport is committed to high  
 7 quality design in the public realm and our technical  
 8 advice is evidence of that commitment."  
 9 So it's advice from the government. Can we now  
 10 turn, please, to {DC8294/99}. Now, this is what this  
 11 guidance says about security measures. You will see  
 12 there paragraph 12.7.1:  
 13 "With an evolving criminal and terrorist threat to  
 14 infrastructure and areas where high concentrations of  
 15 the public may gather, certain sites may have anti-ram  
 16 protection measures installed to protect them from  
 17 vehicle-borne attack."  
 18 So the first thing that's identified there is  
 19 vehicle-borne attack, in this guidance?  
 20 A. Yes, sir.  
 21 Q. And:  
 22 "Such countermeasures would typically consist of  
 23 vehicle security barriers such as bollards, planters,  
 24 structural walls or balustrades, appropriate resilient  
 25 landscape architecture, or using structural elements

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1 concealed within common streetscape..."  
 2 So giving a suggestion for a range of protective  
 3 measures that might be utilised; yes?  
 4 A. Yes, sir.  
 5 Q. And then we go on to paragraph 12.7.2, it talks about  
 6 protection reasons:  
 7 "... their position is usually optimised as far from  
 8 the vulnerable site as possible."  
 9 Then they talk about having an effective  
 10 cordon-based schemes, reference to security barriers,  
 11 and then 12.7.3, talking about gaps, technical advice in  
 12 relation to that, and then 12.7.6, if I may:  
 13 "Further information is available in the Home Office  
 14 documents 'Working Together to Protect Crowded Places',  
 15 'Crowded Places: The Planning System and Counter  
 16 Terrorism' and 'Protecting Crowded Places: Design and  
 17 Technical Issues'.  
 18 So this is advice and guidance which is being given  
 19 by the Department for Transport; yes?  
 20 A. Yes, sir.  
 21 Q. About security measures on roads.  
 22 A. Sir, if I draw your attention to paragraph 12.7.2, it is  
 23 clear there that they are talking about the protection  
 24 of vulnerable sites. They are not talking about the  
 25 protection of/or the highway as a highway authority. So

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1 it is consistent with the evidence I've given so far  
 2 that clearly there is technical guidance and a range of  
 3 guidance about supporting highway authorities in the  
 4 protection of vulnerable sites. It's not vulnerable --  
 5 it is not streets.  
 6 Q. It refers, 12.7.1, to streetscapes:  
 7 "... concealed within common streetscape items..."  
 8 A. Yes, so absolutely, and you will see across the capital  
 9 and in many other locations that protective security  
 10 measures and physical measures are concealed within  
 11 common streetscape items, so they are concealed within  
 12 benches, within mapping systems, so absolutely, those  
 13 are common streetscape items of which protective  
 14 security measures can be adapted, concealed within.  
 15 However, this is clearly referring to security measures  
 16 around vulnerable sites. It is not suggesting security  
 17 measures for locations.  
 18 So for protection reasons, their position, meaning  
 19 the position of protective security measures, is usually  
 20 optimised as far from the vulnerable site as possible.  
 21 Q. But what about 12.7.5? It refers to "Anti-terrorist  
 22 Traffic Regulation Orders".  
 23 A. Yes, sir.  
 24 Q. What about 12.7.4, it refers to bus priority and  
 25 environmental concerns. You are picking one word out of

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1 paragraph 12.7.2 and suggesting that that means it's  
 2 only concerning sites, vulnerable sites. That's surely  
 3 not a proper interpretation of this guidance, is it?  
 4 A. Sir, in 12.7.4, it talks about the site is crowded or  
 5 when a secure event is being hosted in town.  
 6 So throughout this, because the situation in 2010  
 7 when I believe this guidance was published, was that we  
 8 were working, as all local authorities were, on the  
 9 protection of vulnerable sites, including the  
 10 implementation of physical security measures, to support  
 11 the protection of those vulnerable sites that met the  
 12 crowded places definition.  
 13 Q. Well, can we go back to {DC8294/83}. Perhaps, I ought  
 14 to have drawn your attention to -- sorry, internally to  
 15 3 of the document, the start of chapter 12, I do  
 16 apologise.  
 17 MR HOUGH: Page 88.  
 18 MR ADAMSON: 88, thank you very much, Mr Hough {DC8294/88}.  
 19 This section is not about vulnerable sites at all; it's  
 20 about street furniture.  
 21 A. Yes, it's about street furniture. And street furniture  
 22 is used in a wide range of the locations.  
 23 Q. In a document called "Manual for Streets"?  
 24 A. Yes, sir, this manual, to the best of my understanding,  
 25 from colleagues who are experts in this area, provides

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1 a range of technical guidance around the management of  
 2 the streetscape and therefore covers a whole range of  
 3 different issues.  
 4 Q. Yes. Yes. Management of the streetscape, you're quite  
 5 right --  
 6 A. Yes.  
 7 Q. -- that's exactly the right term, and management of the  
 8 streetscape includes consideration of counter terrorism  
 9 security measures?  
 10 A. Yes, it does --  
 11 Q. And this guidance --  
 12 A. -- at those sites which have been determined as being  
 13 vulnerable and attractive to terrorists, as it clearly  
 14 states sites in the manual.  
 15 Q. "Street furniture is the collective term for the wide  
 16 range of extraneous items that are placed in  
 17 highways..."  
 18 A. Yes.  
 19 Q. "... most of which is to be found outside the  
 20 carriageway."  
 21 It is not about vulnerable sites?  
 22 A. Yes, sir, this chapter is about street furniture, it is  
 23 not called "protective security measures".  
 24 Q. It can't be right for Transport for London to say "This  
 25 is not our responsibility, this is entirely the

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1 responsibility of other organisations who either didn't  
 2 provide us with the advice". You have a positive duty  
 3 to consider these matters, surely, whether it is under  
 4 section 66 of the Highways Act or section 17 of the  
 5 Crime and Disorder Act, or as a matter of common sense  
 6 in the exercise of your functions, that these are  
 7 precisely the sorts of considerations that you should be  
 8 taking into account when assessing the roads that are  
 9 under your control, are they not?  
 10 A. Sir, absolutely. We take our responsibilities in the  
 11 prevention of crime and disorder and the protection of  
 12 the public seriously. We are dependent on input from  
 13 policing partners when determining security threats and  
 14 risk. Whether that threat is a risk of violent crime,  
 15 of pickpocketing, of a whole range of crime and  
 16 anti-social behaviour which can occur to people when  
 17 using public transport, for example, in the capital.  
 18 So we are dependent on the expertise, the input and  
 19 the advice of others.  
 20 Q. Please don't misunderstand me, my fire is not directed  
 21 solely at you. Obviously if you are not receiving  
 22 advice from CTSAs and other partner organisations about  
 23 the risk that exists, then a responsibility also rests  
 24 there.  
 25 But what I'm putting to you is that there must be

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1 a proactive obligation on your organisation to do more  
 2 than to simply sit back and wait for the advice to come  
 3 in?  
 4 A. And, sir, as I have set out, TfL has reflected exactly  
 5 on that position and is now proactively considering  
 6 protective security measures in every single new project  
 7 that we have in our planning pipeline. So we are being  
 8 proactive in this area.  
 9 Q. Now, you will recall that when both myself and  
 10 Mr Patterson and Mr Hough asked you questions in  
 11 relation to your evidence at the Westminster Bridge  
 12 Inquests, we took you to some of the NaCTSO guidance  
 13 that was issued after Nice and Berlin.  
 14 A. Yes, sir.  
 15 Q. And I don't want to go back to the transcripts of those  
 16 hearings. It's right to say, isn't it, that the thrust  
 17 of your evidence at that Inquest, or those Inquests, was  
 18 that after Nice and Berlin, there was no positive  
 19 inquiry or steps taken to consider bridge security at  
 20 Westminster Bridge?  
 21 A. No, sir.  
 22 Q. And I think it's also right that that in reality  
 23 extended to all London bridges that are under your  
 24 control?  
 25 A. That's correct, sir.

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1 Q. And if we could then roll forward to the  
2 post-Westminster period?  
3 A. Yes, sir.  
4 Q. Is it fair to say that after Westminster, no specific  
5 consideration was given to bridge security by TfL and  
6 the installation of the barriers?  
7 A. Sir, we were concerned about the vulnerability of  
8 bridges and some of our most crowded streets, as has  
9 been evidenced by the fact that there was a board-level  
10 discussion on this and a number of internal discussions.  
11 However, in terms of making a decision to act and  
12 install measures or prioritise places for measures, we  
13 are dependent on the input from counter terrorism  
14 policing and counter terrorism security advisors.  
15 So absolutely we were considering it but we were  
16 dependent on others to determine whether to act.  
17 Q. Okay, you are considering it. You've had meetings. Did  
18 anyone at TfL seek down advice from a CTSA or from the  
19 Metropolitan Police Service or the City of London Police  
20 service saying "What do you think? Do you think we need  
21 to do more about bridges? We're concerned about bridges  
22 because we've had an attack on a bridge, but we're  
23 guided by you". Did anyone have that conversation?  
24 A. Sir, I'm not aware of that conversation. What I am  
25 confident about is that a number of individuals in TfL

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1 were speaking during that time regularly with counter  
2 terrorism policing because we were actively discussing  
3 the protection of the Westminster ceremonial streetscape  
4 which was a focus of activity post-Westminster Bridge.  
5 So opportunities arose for discussion around other  
6 places in those meetings.  
7 Q. So the result is, in fact, no action, no actual steps  
8 taken?  
9 A. That's correct, sir.  
10 Q. And, in fact, after Westminster -- sorry, after  
11 London Bridge, the decision to implement temporary  
12 measures on the bridges was, in fact, taken by NaCTSO?  
13 A. That's correct, sir.  
14 Q. And they arranged and facilitated it?  
15 A. The decision was taken by DACSO. TfL was immediately  
16 supportive of that decision and we mobilised our  
17 contractors and others to support the installation of  
18 measures on the bridges where we are highway authority  
19 and other bridges.  
20 Q. Yes. But at that point, once that's done, it would  
21 appear no other measures elsewhere either?  
22 A. So we are now actively considering measures at a whole  
23 range of locations where we have projects in place.  
24 Q. So given what we've discussed, what, in your view, are  
25 the deficiencies in guidance, or the lack of guidance,

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1 for an organisation such as yours so far as proactive  
2 duties on counter terrorism security measures? Where is  
3 there a shortfall?  
4 A. So, sir, we all recognise that crowded spaces, the  
5 streets which are busy and thronging with people are  
6 attractive sites to the type of threats that we are  
7 facing today in the UK. Determining which of those  
8 crowded spaces should be protected and which remain  
9 unprotected is a decision that should be made at  
10 a national level in consultation and collaboration with  
11 all highway authorities, and that's, to the best of my  
12 knowledge, that determination of the protection of  
13 crowded spaces has not yet been made.  
14 Q. And just so I understand the national context as far as  
15 you are concerned, we've heard your evidence about TfL's  
16 position on whether or not there's guidance which puts  
17 a proactive duty on them to take positive steps to  
18 introduce counter terrorism security measures, are you  
19 aware of any other highway authority that takes  
20 a different view --  
21 A. Sorry, sir?  
22 Q. -- to the view that TfL has about the scope of its  
23 responsibilities?  
24 A. In which regard?  
25 Q. With respect to the positive duty to proactively

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1 consider counter terrorism security measures on its  
2 highways?  
3 A. So I'm aware that both the Corporation of London and  
4 Westminster have taken similar approaches to ourselves  
5 in terms of proactively considering counter terrorism  
6 security measures, physical measures across projects and  
7 highways.  
8 I am not intimately aware with the view of the many  
9 local authorities across the UK.  
10 Q. Yes. But so far as you are aware of the views of  
11 others, you're saying that those other highway  
12 authorities share the same view as you?  
13 A. Those that I'm aware of, they are taking a similar  
14 approach to us. I have heard that that is not  
15 universal. A colleague here was describing going to  
16 Manchester and them not thinking about public realm  
17 protection in the way that we are in London.  
18 Q. So in Manchester --  
19 A. But that's anecdotal, sir.  
20 Q. I see. But anecdotally, you have heard that other  
21 authorities do consider that they have a public realm  
22 responsibility?  
23 A. No, the absolute opposite: the majority of highway  
24 authorities will not be considering protective security  
25 as a core responsibility. Categorically it is not being

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1 perceived by highway authorities as something they  
 2 should do. It is uniquely, I think, TfL, Westminster,  
 3 City, Corporation of London who are now being more  
 4 proactive in this area.  
 5 Q. One final point, and it relates to the removal of the  
 6 pedestrian guardrail, and you were taken to some  
 7 statistics of accidents, and I think these are attached  
 8 to Mr Sterritt's statement. Yes, can we have on the  
 9 screen {WS5054/157}. Now, the point has been made that  
 10 one of the considerations that you have to take account  
 11 of when installing anything on the streetscape is  
 12 whether or not it creates a risk that wasn't there  
 13 before. So if by addressing one risk you actually  
 14 create another?  
 15 A. Yes, sir.  
 16 Q. And so -- and the data that you have been taken to, and  
 17 Mr Hough took you through some of the statistics --  
 18 MR HOUGH: I think it's actually {WS5045/157}.  
 19 MR ADAMSON: Oh sorry, did I give you the wrong reference?  
 20 THE CHIEF CORONER: Whichever number you have given,  
 21 Mr Adamson, we have nothing on our screens.  
 22 MR ADAMSON: Oh right.  
 23 THE CHIEF CORONER: Now we do.  
 24 MR ADAMSON: You will remember Mr Hough took you to this  
 25 document before?

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1 A. Yes, sir.  
 2 Q. And the thrust of Mr Hough's questioning was that prior  
 3 to the pedestrian rail being removed, there appear to  
 4 have been a larger number of pedestrian accidents than  
 5 there were after it was removed?  
 6 A. Yes, sir.  
 7 Q. And of course one does not know the detail of these  
 8 individual incidents, so it's very difficult to make any  
 9 assumptions about it, but one understands the point that  
 10 Mr Hough was making.  
 11 Can I just focus, if I may, on the period  
 12 from June 2017 to July 2018, and I think that's at the  
 13 top.  
 14 Now, do I understand the data correctly that in that  
 15 period there were three incidents on London Bridge?  
 16 A. Yes, sir.  
 17 Q. August, November and December?  
 18 A. Yes, sir.  
 19 Q. None in 2018?  
 20 A. That's correct, sir.  
 21 Q. And so this relates to a period after the implementation  
 22 of the hostile vehicle measures on London Bridge?  
 23 A. Yes, sir.  
 24 Q. And so if one looks at it statistically, it doesn't  
 25 appear that the implementation of the hostile vehicle

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1 mitigation measures has resulted in an increase in the  
 2 risk to pedestrians just going about their business or  
 3 cyclists going about their business in the usual way?  
 4 A. I'm -- sir, yes. Sir, there were two serious injuries  
 5 in November and December of 2017.  
 6 Q. Yes.  
 7 A. Yes.  
 8 Q. So it doesn't look like the HVM that's there is causing  
 9 a problem based on, I admit, a relatively short period  
 10 of time?  
 11 A. No, sir.  
 12 MR ADAMSON: Thank you very much.  
 13 Questions by MS AILES  
 14 MS AILES: Ms Hayward, can I ask you some questions about  
 15 the assessment of risk. You spoke in your evidence  
 16 yesterday, I think, about threat and vulnerability?  
 17 A. Yes, sir -- yes, ma'am, sorry.  
 18 THE CHIEF CORONER: We've had red group, so that's ...  
 19 MS AILES: Yes, absolutely.  
 20 I'm just adding another couple of critical  
 21 questions.  
 22 Am I right about this: your understanding of threat  
 23 is that that's the nature of the terrorist threat so,  
 24 for example, there might be direct intelligence that  
 25 a terrorist was planning an attack in a particular

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1 location, there might be information about what the  
 2 propaganda is telling potential terrorists about, when,  
 3 where and how to launch an attack. There might be  
 4 information about the nature of sites that terrorists  
 5 should consider targeting. There might be expertise on  
 6 what sorts of sites are likely to be particularly  
 7 attractive to terrorists, the sort of hostile mindset  
 8 concept.  
 9 A. Yes, ma'am.  
 10 Q. None of those are within your area of expertise,  
 11 corporately or individually?  
 12 A. No. No.  
 13 Q. I accept that.  
 14 There's then the question of vulnerability. Do  
 15 I understand this right: that's about what the impact of  
 16 an attack would be?  
 17 A. Yes. That's correct.  
 18 Q. So it feeds into the standard questions in risk  
 19 analysis: what's the likelihood of the event occurring,  
 20 what are the consequences if it does?  
 21 A. Yes.  
 22 Q. And you need to consider both questions to get your  
 23 overall assessment of risk?  
 24 A. That's the approach we take, yes.  
 25 Q. And that is how risk matrices work, it is a very

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1 standard health and safety approach.  
 2 A. Yes.  
 3 Q. In terms of what the impact of an attack would be, if  
 4 you look at something like the Cerastes analysis, it's  
 5 talking about questions like open pavements, lack of  
 6 bollards, you've given your own evidence about what the  
 7 impact of guard railings would potentially be.  
 8 A. Yes, ma'am.  
 9 Q. Would you accept that Transport for London does have  
 10 some capacity to address that question?  
 11 A. Yes, ma'am. So in terms of assessing vulnerability and  
 12 impact, we collect data on crowding, on density, on  
 13 footfall. We keep an asset register of our highways, we  
 14 know what physical measures are already in place, so we  
 15 can contribute towards that assessment process in terms  
 16 of determining the likely impact of an attack across  
 17 a range of different threats.  
 18 Q. Right. And you're collating that information  
 19 principally, I take it, because of your wider trips and  
 20 slips and road traffic collision type responsibility?  
 21 A. And a whole range of responsibilities we have, and to --  
 22 Q. And are you now looking at it specifically from the  
 23 perspective of the terrorist threat yourselves?  
 24 A. Yes, we are looking at footfall and density.  
 25 Q. Right. Because one of the reasons that I'm asking you

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1 this question is that if we look, please, at {DC8242/5},  
 2 we see here at the bottom of the page this is from  
 3 an article about a plot at Oxford Street. I appreciate  
 4 you have said that's not in fact one of your roads:  
 5 "Crowded London areas".  
 6 Underlined, at the top, I'm looking at the image on  
 7 the screen:  
 8 "Oxford Street - long road with no bollards or  
 9 barriers preventing a van mounting the pavement.  
 10 "Busiest time is between 11 am-12 pm with Saturday  
 11 being the busiest day. We should either use a ram  
 12 attack or use [something] on the truck to maximise  
 13 death. It is a busy street, it is ideal for an attack.  
 14 It is expected nearly 100 could be killed in the  
 15 attack."  
 16 Now, I appreciate, of course, that that is not the  
 17 language that Transport for London might use if it was  
 18 assessing the vulnerability, but do you accept that  
 19 these sorts of questions about the vulnerability of  
 20 a particular street location are ones that Transport for  
 21 London can assess?  
 22 A. We can, with the input of others, we can certainly  
 23 support that assessment by understanding levels of  
 24 crowding and footfall, so the potential impact of  
 25 an attack, yes.

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1 Q. That feeds in, doesn't it, to the question of the  
 2 urgency with which you might respond to what the police  
 3 give you in terms of the threat input, because if we  
 4 could have up on screen, please, {WS5014/33}, when you  
 5 look at a series of concerns like this from the Cerastes  
 6 report, you are considering there factors including the  
 7 length of the long uninterrupted run, the lack of guard  
 8 force, the lack of hostile vehicle mitigation, the  
 9 predictable crowd density, 2,500 people in an hour  
 10 crossing the bridge. When you take into account all  
 11 those factors on vulnerability, together with any  
 12 indication that you receive from the police, that  
 13 heightens the risk, doesn't it, and it therefore  
 14 heightens the urgency with which you would respond to  
 15 a particular threat?  
 16 A. Yes, it would heighten the risk, yes.  
 17 Q. So in terms of what you would have done had you been  
 18 aware -- and I appreciate that you were very much not  
 19 aware -- of this particular piece of work that was  
 20 commissioned by PC Hone, looking at those particular  
 21 factors in the report, that would have been a factor  
 22 that you would have taken into account in saying "This  
 23 is not a risk mitigation activity that we can put on the  
 24 back-burner, we need to address this swiftly"?  
 25 A. Absolutely. Absolutely.

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1 Q. You said yesterday, and you have been asked about it  
 2 today, that you have been asking which of our highways  
 3 across our 580 kilometres of highways, where should we  
 4 be focusing for protection, and that information you say  
 5 is still not forthcoming?  
 6 A. That's correct.  
 7 Q. Is that equally true as far as you know of other highway  
 8 authorities?  
 9 A. I'm not aware of the conversations between counter  
 10 terrorism security advisors and local authorities.  
 11 Q. There have now been mitigation measures introduced on  
 12 London Bridge.  
 13 A. That's correct.  
 14 Q. That changes the vulnerability and therefore the overall  
 15 risk on London Bridge?  
 16 A. Absolutely.  
 17 Q. So if I were to ask you where on the Transport for  
 18 London road network is now most vulnerable to low  
 19 sophisticated attacks using a vehicle --  
 20 MS BARTON: I don't think --  
 21 A. I would not answer that in this court.  
 22 MS AILES: Of course you wouldn't answer the question.  
 23 Would you refuse to answer the question for security  
 24 reasons --  
 25 THE CHIEF CORONER: I wouldn't allow the question to be

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1 asked either .

2 MS AILES: I'm so sorry.

3 THE CHIEF CORONER: I wouldn't suggest it's a proper

4 question to be asked either in the context of this

5 Inquest, because it begs all sorts of potential answers

6 which are not particularly helpful to me, but it's

7 more -- I'm not quite sure what point you are driving

8 at, with respect.

9 MS AILES: What I want to know, sir, is if the witness knows

10 the answer to the question, I don't want to know what it

11 is .

12 THE CHIEF CORONER: Again, I'm not entirely sure how that's

13 going to help me, but ...

14 MR HOUGH: Sir, I don't need to say to the witness, the

15 witness has already answered questions about the degree

16 to which assessments are currently made, but perhaps

17 questions can be asked, if they need to be asked,

18 further on that subject.

19 THE CHIEF CORONER: Yes.

20 MS AILES: Are you currently being provided with information

21 which enables you to prioritise the threat from

22 terrorist activity on the roads for which you are

23 responsible?

24 A. No, we are not.

25 Q. In terms of the input that you need, you are now seeking

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1 to engage with individual counter terrorism security

2 specialists . Those are local to the particular areas?

3 A. So there are, as I believe has been set out in this

4 court, counter terrorism security advisors are broadly

5 attached to local authorities and basic command units

6 for the police in the capital .

7 Q. Yes.

8 A. We have identified a number of them to draw them into

9 TfL and support the work that we are doing, and we also

10 bring in counter terrorism security advisors when we're

11 considering specific projects . So, for example, as part

12 of our Protective Security Oversight Group, at the last

13 meeting the counter terrorism security advisor for the

14 City of London Police came and participated in that

15 meeting, although we were not discussing any projects

16 within the City . So we are corralling them into our

17 ways of working.

18 Q. Could we have on screen, please, the transcript for Day

19 28 at page 65 {Day28/65:1-25}. Ms Hayward, this is part

20 of the evidence of Deputy Assistant Commissioner D'Orsi,

21 DACSO, as she's called . I'm just going to pick it up at

22 the bottom of the page there:

23 "Question: Was any thought given after the attack

24 on Westminster Bridge that bridges might be

25 exceptionally busy at particular times of day with long,

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1 broad, relatively unobstructed pavements, and limited

2 escape routes?"

3 And the answer that is given is :

4 "Answer: So no more so than at other locations that

5 would fit that definition across London. You know,

6 I could transpose that definition to other locations

7 that I'm aware of, so there is always a consideration.

8 "I suppose the difficulty for everybody is there is

9 a need to prioritise where we put our focus in terms of

10 protective security ..."

11 A. Yes, I can see that, ma'am.

12 Q. Now, I think it has already been put to you: it's not

13 a case that you are being given information about

14 priority sites ; you haven't received any such

15 prioritisation for the roads for which you're

16 responsible?

17 A. No, we haven't, ma'am.

18 Q. So would this be right: the input that you need in order

19 to be able to fulfil the duties that you have identified

20 as being ones that you would like Transport for London

21 to fulfil are not just on the local level with local

22 security advisors; you also need input from the

23 Metropolitan Police in its regional counter terror role

24 to identify the people who are going to come in and give

25 you that support?

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1 A. Yes, that's correct.

2 Q. Moving on to a different topic . Could I have

3 {DC7846/9}, please. This is the question you were asked

4 about yesterday to the Mayor's Office . It is referred

5 to in your statement and I think we looked at it as it

6 was set out in your statement, this is from an email

7 chain, so this is a member of the public, Mr Anthony,

8 referring to "London Bridge in light of last week's

9 attack ". He submits this which would have gone in the

10 first instance to the Mayor's Office . He says:

11 "I would like to ask that the Mayor's Office take

12 a look at the security situation on London Bridge.

13 "If terrorists are now using vehicles to target

14 civilians then, unfortunately, London Bridge is a prime

15 target ."

16 And we've heard the rest of that email yesterday.

17 That is then forwarded by somebody called Wendy, we

18 see her name at the foot of the page, this is actually

19 part of the email so we can go back to {DC7846/8} and

20 see that that is being forwarded around various

21 organisations within the Mayor's broad remit, seeking

22 responses, and if we go to {DC7846/3}, please, we get to

23 the point at which it is being sent to Transport for

24 London.

25 A. Yes.

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1 Q. So it's been forwarded there:  
 2 "The below post was forwarded to us by a community  
 3 member who added their comments via the Talk London  
 4 page. We have been advised if we could provide  
 5 [I suspect that means ask] input from a TfL perspective.  
 6 "Are we responsible for the roads/pavements in the  
 7 London Bridge area/would you suggest the City of  
 8 London?"  
 9 At the top of the page we see the reply to that:  
 10 "Just to update you, EOS and Asset Management are  
 11 considering this issue. To clarify, the comment posted  
 12 on the ... forum is about London Bridge, the structure  
 13 itself, and asks us to consider installing barriers to  
 14 prevent a similar security incident. Wendy believes we  
 15 should consider this in principle across London --  
 16 meaning other bridges."  
 17 I think Wendy may not have been somebody who was in  
 18 fact from Transport for London.  
 19 "Appreciate this is urgent but the teams need to  
 20 consider this. I'll be in touch ASAP."  
 21 So is that one of your colleagues from Transport for  
 22 London --  
 23 A. Yes.  
 24 Q. -- suggesting that there are things being considered?  
 25 A. Sorry, so Esther Johnson who works at Transport for

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1 London is further clarifying with Ebbah who also works  
 2 for Transport for London, what the question is seeking.  
 3 Q. So where she says "EOS and Asset Management are  
 4 considering this issue", does that mean that EOS and  
 5 Asset Management are considering the response to the  
 6 community member's question or does it mean that they're  
 7 considering installing barriers on London Bridge to  
 8 prevent a similar security incident?  
 9 A. So I can't -- I'm not clear what Esther's intention was  
 10 when she wrote that, so she could have meant either.  
 11 Q. Were Transport for London considering installing  
 12 barriers to prevent a similar security incident?  
 13 A. So the -- so as I have outlined, in Transport for London  
 14 there was consideration about the vulnerability of  
 15 crowded streets, of bridges, of a whole range of  
 16 locations that we are responsible for. So there was  
 17 consideration of the issue as well as consideration of  
 18 how to respond to this question.  
 19 Q. Yes. So this was the stage at which there were some  
 20 discussions about the vulnerability, but the long and  
 21 the short of it was that no advice was forthcoming from  
 22 the police and nothing was in fact done?  
 23 A. Yes, and as you've seen, all the guidance from NaCTSO  
 24 and others was still very much focused on crowded places  
 25 and temporary events, ceremonial, special events.

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1 Q. Could I have {DC7846/1}, please. This then is the  
 2 approved response which finally went out:  
 3 "TfL works closely with its policing partners in the  
 4 Metropolitan Police Service, British Transport Police  
 5 and City of London Police to continually review the  
 6 security measures in place across its network.  
 7 Recommendations for security measures in crowded places  
 8 in London are generated by specialist officers in the  
 9 MPS, who work closely with the National Counter  
 10 Terrorism Security Office and the Centre for the  
 11 Protection of National Infrastructure."  
 12 Now, we know that London Bridge was not, in fact,  
 13 a crowded place within the technical definition, don't  
 14 we?  
 15 A. That's correct.  
 16 Q. Bearing that in mind, would you agree with me that this  
 17 is a response which might have given the public  
 18 reassurance which was not in fact merited? This is  
 19 an answer to a question about London Bridge and the  
 20 response that comes out of Transport for London is:  
 21 well, we're continually reviewing the security measures  
 22 in crowded places?  
 23 A. So as I've set out, the clear advice and guidance from  
 24 counter terrorism security advisors and counter  
 25 terrorism policing in terms of where security,

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1 protective security effort and measures should be  
 2 focused, was on crowded places.  
 3 Q. I appreciate that, and London Bridge wasn't one, was it?  
 4 A. That's correct.  
 5 Q. So why is what's being done for crowded places relevant  
 6 to a response raising concerns about London Bridge?  
 7 A. Because the question was as steered from -- so on the  
 8 previous page you saw that the question was steered to  
 9 answer more generally across London, and so this  
 10 confirms that the approach across London is determined  
 11 by counter terrorism security advisors. To determine  
 12 what are those places which are most vulnerable and the  
 13 locations that are most vulnerable, and that's what this  
 14 confirms.  
 15 Q. I don't want to be unfair to you because I appreciate  
 16 that you were not yourself involved in this email chain,  
 17 but would you agree with me that this has the appearance  
 18 of something that's being produced to provide  
 19 a reassuring press line rather than representing  
 20 an indication that anything is in fact being done?  
 21 A. So the -- we are -- so, sorry, Transport for London as  
 22 it states, we are reviewing security measures with our  
 23 policing partners, the clear steer where protective  
 24 security should be focused comes from them and the  
 25 places that -- the places and locations which are

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1 considered vulnerable and at risk, are attractive to  
 2 targets, and so it does communicate to the requester  
 3 that there is a set of experts, specialist officers  
 4 within the police and national counter terrorist  
 5 security officers and we respond to their advice.  
 6 Q. It doesn't say, does it, what you have told the court  
 7 now which is that London Bridge is a crowded space and  
 8 these experts aren't working on crowded spaces?  
 9 A. So my -- to further elaborate on that, if I may, my  
 10 understanding is that the -- as we have seen  
 11 from February 2018 in the Home Office, the  
 12 interpretation of crowded places does include crowded  
 13 spaces but there is -- so what I'm confirming is that  
 14 from that change in definition there are still not  
 15 recommendations coming to us to say: these are the  
 16 places where you need to protect.  
 17 Q. Can I just ask you about the Mayor's strategy. Could we  
 18 have, please, {WS5011/26}. Now, Transport for London  
 19 acts under the direction of the Mayor of London's  
 20 office, doesn't it?  
 21 A. Yes, the Mayor is the chair of our board.  
 22 Q. Yes, and if we can zoom in on the right-hand side of the  
 23 screen so we can see proposal 14, we looked at this  
 24 yesterday. Now, it says:  
 25 "The Mayor, through TfL, will work with Government,

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1 the boroughs, law enforcement and security agencies,  
 2 transport providers and other relevant organisations to  
 3 respond to, and counter, current and future terrorist  
 4 threats to London."  
 5 That's the current policy as I understand it?  
 6 A. Correct.  
 7 Q. Current direction. I just want to understand, is this  
 8 right: it really is TfL that takes the lead on this for  
 9 the London Mayor. MOPAC, for example, are not involved  
 10 in these conversations?  
 11 A. So in relation to the transport network, yes, but we are  
 12 not the lead agency for counter terrorism in the  
 13 capital.  
 14 Q. No. But where we look, for example, at hostile vehicle  
 15 mitigation at the foot of that, you're the lead agency  
 16 for that?  
 17 A. Yes, we are. Working with the others that we've already  
 18 set out.  
 19 Q. Working with others, yes, of course.  
 20 Is there a role for a wider oversight by the London  
 21 Mayor than just your specific transport expertise?  
 22 Would there be other parts of the Mayor's Office that  
 23 could be brought in to give a London-wide perspective?  
 24 A. So one of the ways that we fulfil this proposal is that  
 25 we are now an active member of the London CONTEST board

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1 and, as you are fully aware, the CONTEST board is the  
 2 overseeing and coordinating board for all aspects of the  
 3 counter terrorism strategy in the capital. And that's  
 4 hosted by the Mayor's Office, by MOPAC, and DACSO  
 5 attends, and it is chaired by the Deputy Mayor for  
 6 Policing. So there already is better coordination  
 7 across the capital in terms of fulfilling and delivering  
 8 the counter terrorism strategy.

9 Q. Thank you. I will turn to a last topic, if I may. It's  
 10 the question of employment in the London Underground.

11 A. Yes.

12 Q. That's not your role at all.

13 A. No.

14 Q. I know you have been asked to expect these questions and  
 15 I appreciate if there are questions you can't answer, we  
 16 will find some other way of dealing with it.

17 We know that from May 2016 Khuram Butt had  
 18 employment in the London Underground and he was placed  
 19 in a number of underground stations, including  
 20 Westminster, don't we?

21 A. We know that between May and October when his employment  
 22 terminated he worked as a CSA2, which is a customer  
 23 service assistant, at Westminster station and at Canada  
 24 Water station, and he completed a total of 20 shifts  
 25 while working at Transport for London before going off

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1 on sick, and his employment was eventually -- was  
 2 terminated in October.

3 Q. Yes. Transport for London has recognised that the  
 4 London Underground is a potentially attractive target to  
 5 terrorists since the attacks of July 7, hasn't it, if  
 6 not before?

7 A. So the London Underground, as all the rail network in  
 8 Great Britain, is regulated by the Department for  
 9 Transport who issue security instructions to the rail  
 10 network across the whole of the UK. So there is a clear  
 11 set of regulations and expectations for all rail  
 12 operators and infrastructure providers and network  
 13 providers to maintain a very high level of security  
 14 across the rail network, and Transport for London, both  
 15 London Underground, our overground and other rail  
 16 networks are fully compliant with that security  
 17 programme.

18 Q. Yes, and that includes things like a criminal record  
 19 check, an adverse media check, those sorts of measures.

20 A. So the Department for Transport security instructions  
 21 include a suite of measures around personnel security.  
 22 There is a requirement that everyone who works on --  
 23 works in the rail industry undertakes or is checked,  
 24 prior to employment, as part of pre-employment  
 25 screening, consistent with a standard known as the

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1 Baseline Personal Security Standard. The pre-employment  
 2 checks that TfL undertakes go in -- are in excess of the  
 3 Baseline Personal Security Standard that is required for  
 4 people working in the rail industry.  
 5 Q. Is what that means that the rail industry requirement is  
 6 a criminal records check and the adverse media check  
 7 goes beyond that, or are you saying there are other  
 8 checks?  
 9 A. So my understanding, and as you will appreciate, this is  
 10 not my area of expertise, but my understanding is that  
 11 the Baseline Personal Security Standard requires checks  
 12 around entitlement to employment, around nationality,  
 13 around the -- and a basic criminal records check. It  
 14 does not require an adverse media check.  
 15 Q. Right. We've been provided with some information,  
 16 reassuring in its way, to the effect that because  
 17 Khuram Butt was a CS2, he would not, for example, have  
 18 been likely to have had unsupervised access to the  
 19 control room.  
 20 A. Yes, that's correct.  
 21 Q. Are you aware of whether there are any additional  
 22 security checks that CS1s receive that CS2s don't?  
 23 A. No, the customer-facing roles across the rail industry  
 24 are vetted through the basic levels of security vetting,  
 25 and that's true for customer-facing roles across all the

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1 vulnerable sectors, whether that's the entertainment  
 2 industry, whether that's sports stadia. So all similar  
 3 roles have a basic level of checking.  
 4 Q. And in those roles, whether it's a CSA1 or CSA2, those  
 5 customer-facing staff have access to the security plan  
 6 for a relevant station, which tells you about regular  
 7 security checks and the frequency of security  
 8 announcements?  
 9 A. Yes, that's correct.  
 10 Q. And a CSA1 might be conducting those checks  
 11 unaccompanied?  
 12 A. Yes, that's correct.  
 13 Q. They can close the gates to the station?  
 14 A. Yes, they can.  
 15 Q. And a CSA2 might not be unattended in the control room:  
 16 might a CSA1 be?  
 17 A. Yes, yes, they might be. It's -- without getting into  
 18 the depths of this, there are different levels of  
 19 control room, so a control room on a station provides  
 20 CCTV coverage of the platforms and other public areas of  
 21 the station. It is not -- it is not controlling the  
 22 London Underground system, its signalling and its power  
 23 network, so it is a limited control function.  
 24 Q. Now, we know that this man that you were employing was  
 25 the subject of a high priority investigation based on

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1 an aspiration to conduct a UK-based terror attack.  
 2 Could we see on screen, please, {Day25/69:1-25}. This  
 3 is Witness L, who was the witness that gave evidence for  
 4 MI5. He agrees that risks are being taken if terror  
 5 suspects are permitted to hold down jobs in locations  
 6 where the transport infrastructure is, for example,  
 7 vulnerable.  
 8 A. I can see that, yes, ma'am.  
 9 Q. Yes. And he confirms that people can still be terror  
 10 suspects and start working at these sorts of locations  
 11 without him or counter terrorism police being notified  
 12 of it.  
 13 A. Without whom being notified?  
 14 Q. In other words, Transport for London does not share  
 15 a list of all its staff with MI5 or counter terrorism  
 16 police?  
 17 A. No, it doesn't, and to the best of my knowledge, neither  
 18 does any rail operator or any other industry where there  
 19 are, you know -- where there is crowding on a regular  
 20 basis.  
 21 Q. And neither, for sound reasons, do MI5 give you a list  
 22 of the individuals who they have under high priority  
 23 investigation?  
 24 A. No. But can I -- to clarify, it may be helpful for the  
 25 court to understand, we have a dedicated unit within

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1 Transport for London whose purpose is to support the  
 2 police and security services in the prevention and  
 3 detection of crime and the apprehension of offenders.  
 4 They can come to us and seek information on any employee  
 5 or any of our customers and we will disclose data and  
 6 information as long as it is proportionate and we have  
 7 the legal gateway to do so.  
 8 Furthermore, within the rail sector every -- it is  
 9 requirement under the DfT regulations that every rail  
 10 organisation has a nominated security contact who  
 11 provides a point of contact for the Department for  
 12 Transport and the policing and security services, so if  
 13 there was a concern about an individual who was in our  
 14 employment, there would be a mechanism for the security  
 15 services to come in, share that information on  
 16 a confidential basis with a nominated security contact  
 17 and then that nominated security contact would then, as  
 18 guided, trigger action internally.  
 19 Q. Notwithstanding all of that, which was true, I take it,  
 20 in 2016/2017 --  
 21 A. Yes, it was.  
 22 Q. -- you had a man who was the subject of a high-priority  
 23 investigation based on an aspiration to conduct  
 24 a UK-based terrorist attack working in your stations and  
 25 you didn't know that that was the case?

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1 A. Yes, that's correct.  
 2 Q. And for all you know, there could be another such  
 3 individual working there today?  
 4 A. Yes, there could be.  
 5 Q. There's an indication in the statement of Mr Clack,  
 6 which I know you have read, that the Transport for  
 7 London is currently consulting, paragraph 17, on  
 8 proposals to change the arrangements. Will those  
 9 proposals lead to the prevention of a situation where  
 10 someone who is believed to aspire to conduct a UK-based  
 11 terror attack can work in a London underground station  
 12 without Transport for London being aware?  
 13 A. I am not familiar with the details of how those  
 14 proposals change. For the rail network, which has  
 15 already had updated regulations from the Department for  
 16 Transport, there is a requirement that role risk  
 17 assessment is undertaken and looking at both a role in  
 18 terms of its location, so where it is based, and what  
 19 that role has access to in order to counter potentially  
 20 the insider threat.  
 21 Alongside that there is a range of measures that we  
 22 adopt as an organisation which are part of that  
 23 regulatory framework, which is about supporting the  
 24 reporting of suspicious behaviour, so if any of our  
 25 colleagues were to be concerned about the behaviour of

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1 an individual and we put out information on a regular  
 2 basis about the signs to look out for, then there are  
 3 mechanisms in place for that suspicious behaviour to be  
 4 drawn to the attention of the employee manager and for  
 5 action as appropriate to be taken by our organisation.  
 6 MS AILES: Thank you, those are all my questions.  
 7 MR HOUGH: Sir, would now be a convenient time for  
 8 a 10-minute mid-morning break. I'm just aware of the  
 9 transcribers.  
 10 THE CHIEF CORONER: We are certainly going to take a break  
 11 there. Just before we do that, I know Ms Leek has got  
 12 some questions, because I think she was just about to  
 13 get to her feet before you stood up. I just wanted to  
 14 check, because I am conscious about the timing.  
 15 MS LEEK: Sir, I'm going to be five or ten minutes.  
 16 MS BARTON: Similarly, sir.  
 17 MS CANBY: I will be as well, sir.  
 18 MR HORWELL: Similar.  
 19 THE CHIEF CORONER: And yours will be significant, we know  
 20 that.  
 21 MR HORWELL: I can assure you on this particular occasion  
 22 they will be.  
 23 THE CHIEF CORONER: Thank you. We will sit again in  
 24 10 minutes' time.  
 25 (11.26 am)

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1 (A short break)  
 2 (11.41 am)  
 3 THE CHIEF CORONER: Ms Leek.  
 4 Questions by MS LEEK QC  
 5 MS LEEK: Ms Hayward, I think that you on behalf of TfL  
 6 recognise and accept that the security and safety of  
 7 crowded places are the responsibility of owners,  
 8 operators and public authorities?  
 9 A. Yes. Yes.  
 10 Q. And there is a wide range of publicly accessible  
 11 material, as set out in Ms Nacey's statement, which has  
 12 been provided by Her Majesty's Government in order to  
 13 support all of those entities in their consideration of  
 14 protective security.  
 15 A. Yes.  
 16 Q. And that publicly accessible material on the one hand is  
 17 disseminated by NaCTSO, by the Department for Transport,  
 18 and by HMG, and on the other hand, is available through  
 19 CTSA's through the authority of NaCTSO?  
 20 A. Yes, but my understanding is that CTSA's, through the  
 21 authority of NaCTSO, have access to far more information  
 22 about threat and risk and likelihood than is available  
 23 publicly.  
 24 Q. Absolutely. And the definition of "crowded place" that  
 25 we have heard about, and the tiering system, is simply

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1 an attempt at prioritising resources for the provision  
 2 of advice on protective security?  
 3 A. That's my understanding, as we've heard in this court.  
 4 Q. Prioritising locations, prioritising resources?  
 5 A. That's -- that's my understanding, as I've heard here.  
 6 Q. So far as you are concerned, that doesn't mean that you  
 7 cannot engage in dialogue with CTSA's at any stage with  
 8 regard to seeking advice for the purpose of protective  
 9 security?  
 10 A. Yes, we can engage with CTSA's for the purpose of seeking  
 11 advice on protective security, and we do. On the  
 12 question of crowded spaces and where we should  
 13 prioritise our effort and resources and focus potential  
 14 protective security, we have not had -- that's not been  
 15 a fruitful dialogue.  
 16 Q. So far as what is available to you for the purpose of  
 17 protective security, you are aware, are you not, of the  
 18 document "Integrated Security: A Public Realm Design  
 19 Guide for Hostile Vehicle Mitigation" referred to in  
 20 Ms Nacey's first statement?  
 21 A. Yes, I am aware of it.  
 22 Q. And you are aware of a traffic advisory leaflet  
 23 disseminated in April 2011 entitled "Vehicle Security  
 24 Barriers Within the Streetscape"?  
 25 A. Yes, I'm aware of it.

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1 Q. And a traffic advisory leaflet in May 2013, updated  
 2 in October 2017 entitled "Bollards and Pedestrian  
 3 Movement: How Bollard Schemes Affect Pedestrians and  
 4 Planning Advice to Help With Installing Bollards to  
 5 Reduce Vehicle Threats"?

6 A. Yes, and as I believe I gave in my evidence to Mr Hough,  
 7 all that guidance is very useful and valuable to us as  
 8 a highway authority after the decision has been made  
 9 about where needs to be protected.

10 Q. Absolutely. Another document entitled "Influence of  
 11 Bollards on Pedestrian Evacuation: Additional Guidance  
 12 on Using Bollards as a Vehicle Security Barrier"?

13 A. Yes.

14 Q. And as we've already heard, the "Protecting Crowded  
 15 Places: Design and Technical Issues" document, published  
 16 in March 2014?

17 A. Yes, there's a range of technical guidance available.

18 Q. And you also, I think, have accepted that you infer into  
 19 the Crime and Disorder Act section 17, a duty to have  
 20 consideration to dangers from terrorism?

21 A. Yes. That is a position that we now actively take post  
 22 the horrific events that we saw in 2017. So though we  
 23 broadly considered crime and disorder as we carried out  
 24 our functions as Transport for London, we now actively  
 25 consider that in terms of preventing the threat and risk

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1 of terrorist attack.

2 Q. And, indeed, even prior to those attacks, as we've  
 3 heard, within the Highways Act 1980, there is the duty  
 4 of the highway authority to provide a sufficient footway  
 5 as necessary or desirable for the safety or  
 6 accommodation of pedestrians?

7 A. Yes, that's correct.

8 Q. And within section 66 of the Highways Act there is  
 9 a power to maintain -- sorry, to maintain paving,  
 10 pillars, walls, rails or fences as and when necessary  
 11 for the purpose of safeguarding persons using the  
 12 highway. So the combination of those two subsections  
 13 gives you the power to use the guardrails to protect  
 14 pedestrians.

15 A. My understanding is that there is -- no highway  
 16 authority in the UK is interpreting that section of the  
 17 Highways Act around protection from acts of extreme  
 18 violence and terrorism. The interpretation of that  
 19 section is about the safety of people within the highway  
 20 function.

21 Q. And from your perspective, the way in which to assess  
 22 what the terrorist threat is widely across your road  
 23 network in London is through engagement with CTSA's?

24 A. That is my understanding.

25 MS LEEK: Thank you.

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1 THE CHIEF CORONER: Yes.

2 Questions by MS BARTON QC

3 MS BARTON: I ask questions on behalf of City of London  
 4 Police and there's just one or two issues I would like  
 5 to deal with, please.

6 The first one, if we could have up on the screen,  
 7 please, {WS5014/33}, a document you have already been  
 8 shown. This is a document which emanates from the City  
 9 of London Police, from a Sergeant Hone, who prepared his  
 10 highlighted concerns in respect of London Bridge.

11 Now I make it clear that you have already said you  
 12 didn't see this before the attack on London Bridge, did  
 13 you?

14 A. No, we did not.

15 Q. No. And the question that was put to you is that this  
 16 is the sort of information which would be taken into  
 17 your organisation if offered up by a CTSA?

18 A. That's my understanding, yes.

19 Q. And the question that was then put to you is, if you had  
 20 seen that, or a member of your organisation had seen it  
 21 at the time, it would have resulted in a heightened risk  
 22 in respect of London Bridge and a heightened sense of  
 23 urgency, and your answer was, a heightened risk, because  
 24 that document alone doesn't give a sense of urgency,  
 25 does it?

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1 A. No, it doesn't. My reading of this document, and  
 2 appreciating that the first time I've seen this document  
 3 is through this Inquest process, is that the opening  
 4 suggested cause of concern, however, the conclusion is  
 5 that consideration should be given to installing hostile  
 6 vehicle mitigation. That statement, "consideration  
 7 should be given", does not convey a sense of urgency.

8 Q. No. And nor does the final sentence which we're talking  
 9 about, "The HVM should be PAS..." These are particular  
 10 standards, aren't they --

11 A. Yes, they are. Yes.

12 Q. And they're quite high standards?

13 A. They are very particular engineering standards for  
 14 security features in the streetscape.

15 Q. And if one was considering installing those on a bridge,  
 16 there would be engineering consequences?

17 A. It would require a significant undertaking to install  
 18 measures of that nature on a bridge and it would take  
 19 some time to achieve.

20 Q. And so if this document had been brought to you,  
 21 although there are temporary measures that could have  
 22 been put in, this document and the content of it would  
 23 not have had you running to London Bridge putting  
 24 temporary HVM on?

25 A. Not in this form, because although it highlights

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1 concern, it is a concern that we were discussing within  
 2 TfL, the recommendation in this document does not  
 3 suggest urgency.  
 4 Q. And so it would have gone through the usual processes at  
 5 TfL, which would have been to a meeting. You might then  
 6 have invited the CTSA to come and give you some more  
 7 information, and there would then have been  
 8 an inspection of the location?  
 9 A. Yes, that's correct.  
 10 Q. Can I just deal with another issue, please. You said in  
 11 the course of your evidence yesterday, although not in  
 12 your witness statement, and we'll just go to the  
 13 transcript from yesterday, pages 225 and 226  
 14 {Day30/225-226}. At the bottom of 225 Mr Hough put the  
 15 question to you:  
 16 "Question: ... if somebody within a highway  
 17 authority like Transport for London had gone to their  
 18 local CTSA and said 'I want to carry out a systematic  
 19 assessment of these roads for which I'm responsible, can  
 20 you please tell me, just as you would tell me in your  
 21 reports, which are potentially vulnerable to terrorist  
 22 attack', that would be ... feasible ..."  
 23 And you said yes, it would be feasible, but went on  
 24 to say -- let me just look. Further down that page.  
 25 You went on to say:

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1 "Answer: I imagine ...  
 2 And then you gave an answer:  
 3 "Answer: ... the response would have been: it's not  
 4 an issue, our focus is crowded places."  
 5 That's on lines 15 to 17 of the bottom page, 226:  
 6 "Answer: So there is -- or we could have gone and  
 7 asked for counter terrorism secure advice, however,  
 8 I imagine the response would have been: it's not  
 9 an issue, our focus is crowded places."  
 10 A. Yes, that's correct.  
 11 Q. Were you in court when Sergeant Hone gave his evidence?  
 12 A. Yes, I was, ma'am.  
 13 Q. Having seen his passion for the job that he did, is it  
 14 really realistic in your view to say that if he had been  
 15 asked to give a view about potentially vulnerable places  
 16 he would have simply said "our focus is on crowded  
 17 places and not spaces"?  
 18 A. So, ma'am, I was not aware, until the evidence given in  
 19 court, that Sergeant Hone had devised his own criteria  
 20 to determine vulnerability and prioritised locations, so  
 21 that response was informed by my understanding of the  
 22 national approach which I had understood to be adopted  
 23 by counter terrorism security advisors across the  
 24 capital?  
 25 Q. So you accept, having heard PC Hone -- Sergeant Hone,

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1 that it is at least possible, and probably likely, that  
 2 had he been approached, he would have given you his  
 3 views about risk and threat?  
 4 A. And more to the point, if he had approached us, given  
 5 that we are the highway authority for London Bridge, to  
 6 express his views and concerns about the vulnerability  
 7 of London Bridge, we would have responded actively to  
 8 that.  
 9 Q. Can I just test that a little bit, because that's  
 10 an answer that you give a lot: if someone had approached  
 11 us, if someone had brought this to us, if this had been  
 12 brought to our attention. Do you accept, as  
 13 an organisation with joint responsibility, that there is  
 14 also a responsibility on you to ask the questions?  
 15 A. Yes, and that is something we now actively do.  
 16 Q. An answer that you gave earlier, I think yesterday,  
 17 again, in relation to asking the questions, you said: we  
 18 have been asking. Sorry, can we have those pages back  
 19 up, this time {Day30/226-227}, you say, at the bottom of  
 20 226, line 21:  
 21 "Answer: Even to date, so now in 2019, we have --  
 22 no counter terrorism security advisor has come, and we  
 23 have repeatedly asked to say: which of our highways  
 24 across our 580 kilometres or so of highways, where  
 25 should we be focusing for protection?"

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1 And you say:  
 2 "Answer: Where is at risk? ...  
 3 "That information is not forthcoming because there  
 4 remains a focus on crowded places, not on crowded  
 5 spaces."  
 6 Is that accurate? Just reflect on that, would you,  
 7 a moment? Are you really saying that CTSAs are not  
 8 engaging with TfL now in 2018 and 2019?  
 9 A. So CTSAs, as I outlined in my evidence to one of your  
 10 colleagues, we have gone out and sought CTSAs to work  
 11 with us, and of those CTSAs who are working now more  
 12 closely with us, they have not been forthcoming about  
 13 crowded spaces on our highway network.  
 14 Q. Well, it may not be within your knowledge, but in light  
 15 of the response yesterday, were you aware that back in  
 16 2018, TfL set up a series of threat and vulnerability  
 17 risk assessment workshops?  
 18 A. Yes, I am aware of that.  
 19 Q. And you are aware, are you, that they were, specifically  
 20 the ones I'm aware of, between the Corporation of  
 21 London, TfL and police CTSAs from the City and MPS?  
 22 A. Yes, that's correct. And that's an evidence of how we  
 23 are now proactively bringing people together, including  
 24 counter terrorism security advisors to advise and  
 25 support the risk assessment process for both the bridges

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1 and other projects and schemes that we have planned for  
 2 the highway.  
 3 Q. So it is not right, is it, to say that you are  
 4 repeatedly asking for a focus on protection and  
 5 priorities and it's not forthcoming, because both  
 6 Met Police and City of London Police CTSA's attended  
 7 meetings on 19 July, 25 July, and a date later in July  
 8 which I'm not able to get, where we're considering not  
 9 only crowded places, but specifically crowded spaces.  
 10 A. Yes, but they are coming to us at our invitation to  
 11 discuss crowded spaces that we are now considering. So  
 12 they are -- so this is evidence of how we are now being  
 13 proactive in our consideration of the protection of  
 14 crowded spaces.  
 15 Q. Yes. So it's wrong, isn't it, to say that information  
 16 is not forthcoming because there remains a focus on  
 17 crowded places and not on crowded spaces; that's not  
 18 fair, is it?  
 19 A. Sorry, there's a clear distinction here. So CTSA's are  
 20 not coming to us outwith the process that we have  
 21 established around places we'd like them to consider.  
 22 They're not coming to us and saying: there are also all  
 23 these other locations, these other streets that you  
 24 should be considering.  
 25 Q. You have to set up a meeting of your individuals, you

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1 know when your individuals are available, don't you, to  
 2 discuss threat and vulnerability risk assessments?  
 3 A. I'm sorry, I'm not clear what the question is. Do  
 4 I know the calendars of whom?  
 5 Q. TfL as an organisation are best placed to know when  
 6 individuals who are concerned with threat and  
 7 vulnerability risk assessments are available to engage  
 8 with CTSA's?  
 9 A. I'm just -- I'm really sorry, I cannot understand what  
 10 your question is.  
 11 Q. CTSA's, whether they be from the Metropolitan Police  
 12 Service or from the City of London Police, don't know  
 13 the availability of TfL operatives for meetings, do  
 14 they?  
 15 A. Sorry, so we have within Transport for London a central  
 16 point for the surface side as well as the London  
 17 Underground, crime reduction and operational security  
 18 experts. They are widely known now across the CTSA  
 19 community. They can be phoned, they can be emailed,  
 20 they can be engaged with at any time.  
 21 Q. Indeed, can you say from the evidence that you've  
 22 collated from these Inquests, that the CTSA's from the  
 23 City of London Police and the Metropolitan Police have  
 24 not engaged over these crowded spaces and places with  
 25 TfL, save for these meetings?

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1 A. Oh, so sorry, they are engaged with us at our invitation  
 2 to discuss spaces and highways where we are concerned  
 3 about the potential risk of those places. So they are  
 4 now engaged with us, but at our invitation.  
 5 Q. So I'm clear, it's just simply that you wanted to take  
 6 the credit for inviting them rather than them offering  
 7 up their diaries to you; is that what it comes to?  
 8 A. Ma'am, I am not at this Inquest to take credit for  
 9 actions that we are now considering in terms of the  
 10 protection of people across London. I find that --  
 11 sorry. I find that a very cheap remark. I'm not here  
 12 to take credit, I am outlining that there is  
 13 a distinction between the fact that we are now actively  
 14 considering crowded spaces across our highway, and where  
 15 we have schemes we are actively inviting CTSA's and we  
 16 benefit enormously from their expertise in the  
 17 determination of risk and measures that potentially need  
 18 to be put in place.  
 19 Q. So why does it matter who invites who?  
 20 A. So I was clearly making the distinction between the fact  
 21 that in terms of there being a reappraisal in the light  
 22 of the attacks of 2017 and the other attacks that have  
 23 happened of where needs to be protected, there has not  
 24 been forthcoming a list of streets that need protecting.  
 25 Q. Are you aware that in these meetings there have been

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1 discussions about specific locations and that TfL has  
 2 prepared, I think, a TVRA report, for various locations?  
 3 A. Yes, absolutely, that is the purpose of the meetings:  
 4 the meetings are designed by my team to undertake  
 5 a threat and vulnerability risk assessment of places  
 6 that we are keen to seek input on of the crowded spaces  
 7 on -- on potentially the predictably crowded spaces for  
 8 which we are the highway authority.  
 9 Q. So since these events and through 2018 and 2019, there  
 10 has been engagement between TfL and CTSA's from both the  
 11 City of London Police and the Metropolitan Police about  
 12 crowded spaces and crowded places; is that correct?  
 13 A. Yes, there has.  
 14 Q. And as a result of that engagement, TfL has prepared  
 15 threat and vulnerability risk assessments in respect of  
 16 a number of locations; is that correct?  
 17 A. Yes, that's correct.  
 18 Q. And those locations include crowded spaces as well as  
 19 crowded places?  
 20 A. Yes, it has.  
 21 MS BARTON: Thank you very much.  
 22 THE CHIEF CORONER: Significant questions are coming now,  
 23 apparently.  
 24 Questions by MR HORWELL QC  
 25 MR HORWELL: Madam, perhaps the point has, to some extent,

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1 gone away, but it's not just Police Sergeant Hone; all  
 2 CTSAs are passionate about their jobs and their  
 3 responsibilities .  
 4 A. I'm sure that is the case, sir .  
 5 Q. They want to do their best to protect the public?  
 6 A. As we do in Transport for London, sir .  
 7 Q. As you do, I'm not suggesting otherwise. But the  
 8 evidence that you gave yesterday and that you repeated  
 9 today about the lack of forthcoming approach from CTSAs  
 10 as to assistance as to crowded spaces on your highways,  
 11 that wasn't in your witness statement, was it? We can  
 12 laboriously go through it, but I suggest it wasn't  
 13 there.  
 14 A. No, I talked about the -- a policy gap of which this is  
 15 a clear element of that .  
 16 Q. The only point I'm mentioning about that is that we  
 17 haven't had much time to look into the evidence that you  
 18 gave yesterday, but can I ask you about one matter that  
 19 has come to our attention: that throughout the time that  
 20 matters, 2016 up until this attack in June of 2017,  
 21 there were two Metropolitan Police CTSAs, Ian Bright and  
 22 Stuart Satchell , do their names mean anything to you?  
 23 A. Yes, they do, sir .  
 24 Q. And they had a particularly close working relationship  
 25 with John Strutton of TfL .

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1 A. Yes.  
 2 Q. And what was John Strutton's job or responsibilities  
 3 there?  
 4 A. John Strutton now leads the crime reduction and  
 5 operational security team.  
 6 Prior to that, so prior to October of 2017, he was  
 7 our crime prevention lead .  
 8 Q. Right.  
 9 A. So he supported the organisation in fulfilling its broad  
 10 section 17 duties .  
 11 Q. All that I can put to you is that there was never any  
 12 form of complaint from Mr Strutton to those two CTSAs  
 13 that there was a problem and that you needed advice that  
 14 wasn't forthcoming.  
 15 A. Sir, I'm not sure that is the case .  
 16 Q. You're not sure that is the case? Have there been any  
 17 complaints to the Metropolitan Police Service?  
 18 A. Sir, it is not our approach to complain, it is our  
 19 approach to seek advice, guidance, working together, but  
 20 we have been seeking input in terms of the broader  
 21 streetscape and where we need to be focusing our  
 22 attention, but not in the form of a complaint .  
 23 Q. You see, doing my best to understand what is no doubt  
 24 quite a complex relationship, your evidence is that  
 25 until recently, your complaint -- and it is

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1 a complaint -- is that CTSAs were not forthcoming with  
 2 advice as to security protection for open spaces on your  
 3 highways .  
 4 A. Sir, my understanding of the role of a counter terrorism  
 5 security advisor is to work with a local authority to  
 6 determine the most vulnerable and attractive locations  
 7 for a terrorist attack and potentially other security  
 8 threats, but primarily for a terrorist attack, and then  
 9 to advise on the mitigations that could take place .  
 10 Q. And we've heard how they have to prioritise their work  
 11 and the advice that they give?  
 12 A. Yes, sir .  
 13 Q. But since you have asked, made an active request to  
 14 CTSAs, to assist you as to protective security measures  
 15 for open spaces on your highways, that assistance has  
 16 been forthcoming?  
 17 A. Yes, for the places that we've asked for their input,  
 18 it's been very helpful .  
 19 MR HORWELL: So ever since you have started to ask direct  
 20 questions, the assistance has been made available to  
 21 you?  
 22 A. Yes .  
 23 THE CHIEF CORONER: Yes .  
 24 Questions by MS CANBY  
 25 MS CANBY: Sir, I hope I will be no more than 15 minutes

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1 because I'm aware of Ms Nacey waiting patiently .  
 2 Ms Hayward, I have just four topics, please, on  
 3 behalf of Transport for London. The first of those is  
 4 the legislative duty, and I appreciate you're not  
 5 a lawyer, Ms Hayward .  
 6 A. No .  
 7 Q. But in summary, you've been taken by Mr Adamson, and  
 8 you've been referred back to it by Ms Leek, to  
 9 section 66 of the Highways Act. Section 66(2) of the  
 10 Highways Act gives a highway authority power to provide  
 11 and maintain such barriers, rails or fences as they  
 12 think necessary for the purpose of safeguarding persons  
 13 using the highway, and that's your understanding, isn't  
 14 it?  
 15 A. That's my understanding .  
 16 Q. To that, we have to consider section 17 of the Crime and  
 17 Disorder Act. Section 17 of the Crime and Disorder Act  
 18 provides that it's the duty of each authority, of which  
 19 TfL is one, to exercise its various functions with due  
 20 regard to the likely effect of the exercise of those  
 21 functions on, and the need to do all that it reasonably  
 22 can, to prevent crime and disorder?  
 23 A. Yes, that's correct .  
 24 Q. And your evidence is that prior to June 2017, highways  
 25 authorities, including TfL, were interpreting the

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1 interrelationship between section 66 of the Highways Act  
 2 and section 17 of the Crime and Disorder Act to mean  
 3 that when they were considering whether to provide  
 4 barriers under section 66, then they should consider the  
 5 effect on crime and disorder?  
 6 A. Yes, the function being, yes ...  
 7 Q. The function being the consideration of the provision  
 8 and maintenance of barriers?  
 9 A. Yes.  
 10 Q. But what the interplay between those two sections was  
 11 not leading to was a proactive consideration by highways  
 12 authorities of whether they needed to be providing  
 13 barriers for the purpose of protecting against terrorist  
 14 attack?  
 15 A. Yes, that's correct.  
 16 Q. And you as TfL, and the Corporation of London, and  
 17 Westminster, are now interpreting the interplay between  
 18 those two sections as meaning that you will, in certain  
 19 circumstances, proactively consider the need for  
 20 barriers?  
 21 A. Yes, that's correct, yes.  
 22 Q. But as far as you're aware, no other highway authority  
 23 is.  
 24 A. To the best of my knowledge.  
 25 Q. And that is part of one of the gaps that you are here

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1 anxiously trying to draw to the attention of this court?  
 2 A. Yes, that's correct.  
 3 Q. Can I please then move on to my second topic, which is  
 4 the one of guidance, and Mr Adamson asked you about the  
 5 Manual for Streets.  
 6 A. Yes.  
 7 Q. And Ms Leek asked you about the various traffic advisory  
 8 leaflets and other guidance that's come from central  
 9 government. Can we start, please, with Manual for  
 10 Streets 2, and that's document {DC8294/1}, please,  
 11 first.  
 12 So we can see, Ms Hayward, "Manual for Streets 2:  
 13 Wider Application of the Principles", produced by the  
 14 organisation The Chartered Institution of Highways and  
 15 Transportation.  
 16 Could we move, please, to {DC8294/2}, and we can see  
 17 that it was published in September 2010; is that  
 18 correct, Ms Hayward?  
 19 A. That's correct.  
 20 Q. The steering group included, if we go down on the big  
 21 screen, we can see there it included an individual for  
 22 Transport for London?  
 23 A. Yes, although I do not know that individual.  
 24 Q. No. And it was contributed to also by an individual  
 25 from Transport for London?

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1 A. Yes.  
 2 Q. And if we move to page 6, please, which I think  
 3 Mr Adamson did take you to, this is the ministerial  
 4 foreword from the parliamentary Under Secretary of State  
 5 for Transport, and if we have a look, please, at the  
 6 last paragraph, can you see there that he is commending  
 7 the document to all those involved in designing the  
 8 public realm?  
 9 A. Yes.  
 10 Q. And that:  
 11 "The challenge now is for them to embrace the advice  
 12 and extend the advantages of good design to streets and  
 13 roads outside residential areas."  
 14 A. Yes, I see that.  
 15 Q. And so is it right that highway engineers were using  
 16 this document, which is very well known, and continue to  
 17 use this document, as the manual in relation to the new  
 18 design or change?  
 19 A. Yes, absolutely.  
 20 Q. It's not a manual that is used in terms of  
 21 retrospectively?  
 22 A. Yes, that's correct, yes.  
 23 Q. And so, in fact, this document would have no application  
 24 to London Bridge because there was no design change  
 25 between September 2010 and June 2017?

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1 A. Yes, that's correct, to the best of my knowledge.  
 2 Q. But can we please, just so that we're clear, move  
 3 forward, please, to {DC8294/99} which is the guidance  
 4 that was being given in terms of any new design or  
 5 change to the highway, and this is the section that  
 6 Mr Adamson took you to, 12.7, "Security measures".  
 7 The first point to note, please, Ms Hayward, is that  
 8 under 12.7.1, the particular focus here was in relation  
 9 to protection from vehicle-borne attack.  
 10 A. Yes, I can see that.  
 11 Q. And could you please explain to us the distinction  
 12 between vehicle-borne attack, as you understand it, and  
 13 a vehicle-as-a-weapon attack?  
 14 A. Yes, so my understanding is that vehicle-borne attack is  
 15 particularly used in reference to where explosive  
 16 devices carried by a vehicle and left in close proximity  
 17 to a particularly vulnerable site. So, for example, you  
 18 may recall an incident where a vehicle-borne incendiary  
 19 explosive device was left outside Tiger Tiger nightclub  
 20 in central London. I believe the vehicle was moved by  
 21 parking attendants and therefore never exploded, but it  
 22 is that kind of scenario which those security measures  
 23 are seeking to reduce the risk of.  
 24 Q. Yes. And that would fit very much with the timing of  
 25 this manual, of course, was September 2010 --

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1 A. Yes.  
 2 Q. -- before we had really seen the development of the use  
 3 of the vehicle-as-a-weapon?  
 4 A. That's right, that's correct.  
 5 Q. So if a highway authority were to look at this in terms  
 6 of looking at the design of a new highway or a change to  
 7 a highway, would it be fair that they would be reading  
 8 it, 12.7, in relation to the risk posed by vehicle-borne  
 9 devices and not by the use of vehicle-as-a-weapon?  
 10 A. Yes, and specifically with relation to protection of  
 11 sites where it was determined that vehicle-borne attacks  
 12 were a risk to that site.  
 13 Q. And that is why, as I understand it, you would interpret  
 14 this as applying to buildings?  
 15 A. Exactly.  
 16 Q. Because it's the building that the incendiary on the  
 17 vehicle is usually targeting, it certainly was  
 18 in September 2010?  
 19 A. Yes, that's right.  
 20 Q. Rather than a highway itself?  
 21 A. Yes, that's correct.  
 22 Q. And could we have a look, please, then, at the guidance  
 23 at 12.7.6, so the guidance that it then refers highways  
 24 authorities onto, is the Home Office document Working  
 25 Together to Protect Crowded Places, and we'll have

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1 a look at that in a minute, but it also then says:  
 2 "Protective security advice and a palette of  
 3 appropriately resilient vehicle security barriers or  
 4 structural elements for embedding in the public realm  
 5 are available from specialists at the UK Government's  
 6 Centre ... (CPNI) or via the local police counter  
 7 terrorism security advisor."  
 8 A. Yes.  
 9 Q. So it's highlighting to highway authorities that they  
 10 can obtain further advice from the CPNI or from CTSAs?  
 11 A. Yes, that's right.  
 12 Q. What engagement were you having with the CPNI?  
 13 A. In 2010?  
 14 Q. Well, particularly in relation to the use of  
 15 vehicle-as-a-weapon on the highway?  
 16 A. So we have a very -- now we have a very constructive  
 17 relationship with the CPNI, they are part of our  
 18 Protective Security Oversight Group, and we are working  
 19 with them on the development of a palette of measures to  
 20 provide physical security across the streetscape that  
 21 blends well with a streetscape which you want to feel  
 22 safe and accessible and welcoming to all.  
 23 Q. But as I understand it, the CPNI would not have viewed  
 24 London Bridge as part of the national infrastructure?  
 25 A. No, absolutely. So specifically the transport sector,

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1 meaning the rail sector, is part of national  
 2 infrastructure, and there are a number of key locations  
 3 in London which are highways that are considered  
 4 critical national infrastructure, but they are -- but  
 5 London Bridge is not one of those.  
 6 Q. No. And so although the CPNI would have been able to  
 7 give highways authorities guidance about the standard to  
 8 which hostile vehicle mitigation has to be manufactured,  
 9 for example --  
 10 A. Yes, that's right.  
 11 Q. -- a little bit like the British Standards we get in  
 12 other areas --  
 13 A. Yes, that's right.  
 14 Q. -- it would not be giving you specific advice about how  
 15 to assess and prioritise risk on highways and bridges?  
 16 A. Categorically not. They're a technical authority.  
 17 Q. So then you would have to look to the CTSAs?  
 18 A. That's correct, yes.  
 19 Q. Can we then, please, look at the other document that's  
 20 referred to, one of the other documents that's referred  
 21 to in 12.7.6, that's "Working Together to Protect  
 22 Crowded Places", and that is {DC8293/1}, and we've  
 23 looked at this before, Ms Hayward, I don't think with  
 24 you, but with other witnesses.  
 25 So, in summary, we know that this is the guidance

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1 that was given in March 2010 by central government after  
 2 the consultation that had been conducted by Lord West?  
 3 A. That's correct, yes.  
 4 Q. And can we have a look, please, at {DC8293/13} and in  
 5 particular paragraph 1.15. So this is the paragraph  
 6 that is telling us about the scope of the document, and  
 7 you can see there that in the first sentence it says:  
 8 "This document does not apply to buildings in the  
 9 transport sector [although] there will be occasions  
 10 where crowded places... are integrated with either  
 11 a transport building or hub... the Department for  
 12 Transport can offer advice about specific requirements  
 13 that apply to transport buildings."  
 14 The first point is, Ms Hayward, that the implication  
 15 is that the document applies to buildings?  
 16 A. That's correct.  
 17 Q. And if we then look, please, to paragraph 1.17, which is  
 18 on that page, if we could scroll a little bit up,  
 19 please, thank you. We are given a working definition of  
 20 crowded places, and I accept, and we'll hear later from  
 21 Ms Nacey that there's no legislative definition, so the  
 22 definition has changed over time, but in 2010, in this  
 23 guidance, the working definition, we can see listed  
 24 there, it did not include highways, bridges or streets,  
 25 did it?

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1 A. No, it did not.  
 2 Q. And so, again, if a highways authority was looking for  
 3 guidance about how to risk-assess its highway and  
 4 prioritise measures on its highway, it would not  
 5 automatically think that this guidance was of assistance  
 6 to it?  
 7 A. That's correct.  
 8 Q. Can we please turn to page 16 of this guidance  
 9 {DC8293/16}, and paragraph 2.10 and just to confirm,  
 10 although we've heard this from many others, that here it  
 11 confirms:  
 12 "It is the responsibility of the CTSA's to undertake  
 13 risk assessments of crowded places ..."  
 14 A. Yes, that's correct.  
 15 Q. So that can be taken off the screen, thank you.  
 16 Just more generally in terms of the traffic advisory  
 17 leaflets and guidance that Ms Leek has taken you to and  
 18 we will be hearing more about from Ms Nacey, in summary,  
 19 is it fair to say that it's a range of technical  
 20 guidance?  
 21 A. That is my understanding and interpretation of it, yes.  
 22 Q. As a highway authority, it's helpful for you, once  
 23 a decision has been made, to install the HVM?  
 24 A. Yes, that's correct.  
 25 Q. So it tells you, for example, what standard the HVM

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1 should be manufactured to?  
 2 A. Yes.  
 3 Q. It tells you, for example, how you should look at the  
 4 movement of pedestrians in relation to the placement of  
 5 HVM?  
 6 A. Yes, yes, that's correct.  
 7 Q. But it's not helping you, as a highway authority, to  
 8 give you the factors for risk assessment of every  
 9 kilometre of your highway if, indeed, that is what  
 10 you're supposed to be doing?  
 11 A. Yes, that's the case.  
 12 Q. And it's not giving you advice about how to prioritise  
 13 where you put HVM in?  
 14 A. Yes, that's correct.  
 15 Q. Can I ask you, please, to look at a document that was  
 16 attached to your witness statement, which I don't think  
 17 we've seen yet. That's {WS5011/62}. Can you help us,  
 18 please, Ms Hayward, with this document, because as  
 19 I say, I don't think we've seen it before. It's titled  
 20 "Hostile Vehicle Mitigation: funding", and we can see  
 21 from the very bottom that it was issued by the  
 22 protective security section, at the Office for Security  
 23 and Counter-Terrorism.  
 24 Can you tell us, please, about your understanding of  
 25 this document?

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1 A. Yes, my understanding arises that -- sorry, I'll start  
 2 again.  
 3 This document was produced by OSCT as a result of  
 4 a series of meetings and engagements that happened after  
 5 the tragic events on London Bridge where MOPAC and TfL  
 6 and London Councils and others were coming together to  
 7 try and determine what action to be taken to protect  
 8 crowded spaces, and this was advice forthcoming from  
 9 OSCT.  
 10 Q. And we can see here that there were two real issues that  
 11 people were trying to grapple with after London Bridge.  
 12 The first is, the user pays principle that you can see  
 13 from the top paragraph, and you have outlined that too.  
 14 So essentially the principle being that although it is  
 15 accepted that owners and operators have responsibility  
 16 for protective security, that leads to difficulties for  
 17 a highways authority because if one is to install  
 18 protective security measures, who is the user that ends  
 19 up having to fund them?  
 20 A. Yes, that's correct.  
 21 Q. Is that it in a nutshell?  
 22 A. In a nutshell, yes.  
 23 Q. So that was one of the difficult issues that people were  
 24 trying to grapple with.  
 25 A. Yes.

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1 Q. Is that an issue that remains outstanding?  
 2 A. It does remain outstanding.  
 3 Q. And then another issue that people were trying to  
 4 grapple with is headed under "Crowded Places Strategy  
 5 Review", so it said this:  
 6 "There is an ongoing review of the Government's  
 7 crowded places strategy led by OSCT."  
 8 And I'm sure we'll hear more about that from  
 9 Ms Nacey. But it was including:  
 10 "... consideration of issues such as:  
 11 "The scope of the current programme and whether it  
 12 needs to change in light of the current threat to better  
 13 reflect crowded spaces (such as bridges)."  
 14 So here it appears to be making a distinction  
 15 between crowded places and crowded spaces; is that  
 16 right, Ms Hayward?  
 17 A. Yes, that's right.  
 18 Q. And so therefore there was going to be consideration of  
 19 how protective security advice, guidance and measures  
 20 could be undertaken at such locations, so locations such  
 21 as bridges?  
 22 A. Yes, I can see that, yes.  
 23 Q. And presumably that would also include, would it,  
 24 highways?  
 25 A. Yes, that would. Yes, that would.

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1 Q. Whether or not that was going to be a voluntary or  
 2 a regulated approach, how a partnership working can be  
 3 enabled and what delivery frameworks and resourcing it  
 4 required?  
 5 A. Yes, I can see that.  
 6 Q. Does that really summarise for you the gaps that you  
 7 have identified?  
 8 A. Yes, that's correct.  
 9 Q. And those are the gaps that you say remain outstanding?  
 10 A. Yes, that's correct.  
 11 Q. And so what guidance would you like to see as a highways  
 12 authority?  
 13 A. So it would be extremely helpful to understand of our  
 14 crowded streets and the public highway in general where  
 15 needs to be protected, and how do we protect and where  
 16 don't we protect and what the basis and rationale for  
 17 those decisions are.  
 18 Q. And you don't, as a highways authority, feel that's  
 19 a decision that you can take on your own?  
 20 A. It's certainly not a decision we can take in isolation .  
 21 We would be dependent on the input, advice and expertise  
 22 of counter terrorism specialists .  
 23 Q. And that then brings me on to the third topic, which is  
 24 that of CTSAs, and also the threat and vulnerability  
 25 risk assessment process.

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1 Just so that we're entirely clear, you are not here  
 2 seeking to blame others?  
 3 A. Not at all .  
 4 Q. And you are not here seeking to take credit for steps  
 5 that TfL have now put in place?  
 6 A. Not at all .  
 7 Q. What you're trying to do is assist the court with where  
 8 you see difficulties that are still arising?  
 9 A. Yes, I'm highlighting concerns I have that I think would  
 10 assist in this process.  
 11 Q. And one of those difficulties, from your perspective, as  
 12 somebody who has had great experience now, sadly, in  
 13 dealing with the need for protective security within the  
 14 transport realm, on the surface transport, is that  
 15 although you are engaging proactively on specific  
 16 projects that TfL have identified --  
 17 A. Yes.  
 18 Q. -- and that includes the bridges --  
 19 A. Yes.  
 20 Q. -- where you have set out this threat and vulnerability  
 21 risk assessment process --  
 22 A. That's right .  
 23 Q. -- which you have outlined in your witness statement --  
 24 A. Yes, that's correct.  
 25 Q. -- what is still not happening, as far as you're aware,

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1 is that CTSAs are not risk-assessing each kilometre of  
 2 the highway and coming to you and saying: we've  
 3 identified this highway as being a risk and these are  
 4 the steps you need to take?  
 5 A. Yes, that's correct.  
 6 Q. And that is the distinction that you are trying to draw?  
 7 A. That's correct.  
 8 Q. You're not, as I understand it, here to directly  
 9 criticise the CTSAs in relation to that?  
 10 A. Not at all, not at all, and we have enormous respect for  
 11 their expertise and their professional input.  
 12 Q. And in fact, as I understand it, your explanation for  
 13 that lack of engagement is because, as far as you are  
 14 concerned, you perceive that there is still a focus on  
 15 places and not on highways?  
 16 A. That's correct.  
 17 Q. And finally this, please, Ms Hayward: when you gave your  
 18 evidence to the Westminster Bridge Inquests, your view  
 19 was that in light of TfL's experience of these atrocious  
 20 events, both at Westminster Bridge and London Bridge,  
 21 TfL was now at the forefront of thinking in relation to  
 22 a highway authority's responsibility and protective  
 23 security measures. Does that still remain your view?  
 24 A. I would say that TfL, with some of the other key central  
 25 London local authorities, are really now trying to

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1 grapple with the very issues and concerns that we have  
 2 heard outlined during the course of this Inquest about  
 3 how do we best protect people using our highways.  
 4 MS CANBY: Thank you very much.  
 5 MR HOUGH: Thank you, Ms Hayward. Those are all the  
 6 questions we have for you. Thank you for your evidence.  
 7 A. Thank you.  
 8 THE CHIEF CORONER: Thank you very much.  
 9 A. Thank you, sir .  
 10 MR HOUGH: The next witness is Sarah Nacey.  
 11 MS SARAH NACEY (sworn)  
 12 THE CHIEF CORONER: Good afternoon, please do take a seat  
 13 and make yourself comfortable.  
 14 Mr Hough, just before you even ask your first  
 15 question, I'm conscious of time, so I'm just going to  
 16 ask everyone, including you, please, for a time  
 17 estimate.  
 18 MR HOUGH: My best estimate is an hour and a quarter.  
 19 THE CHIEF CORONER: Thank you.  
 20 MR ADAMSON: 30 minutes.  
 21 MR PATTERSON: About 30 minutes.  
 22 MR HORWELL: Hopefully nothing, sir.  
 23 THE CHIEF CORONER: That will be particularly significant,  
 24 Mr Horwell.  
 25 MR HORWELL: And it will be.

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1 MS CANBY: Possibly 10.  
 2 THE CHIEF CORONER: 10 minutes.  
 3 Ms Leek, I know it's very difficult --  
 4 MS LEEK: Between nothing and half an hour, I would say.  
 5 THE CHIEF CORONER: Yes. I mean, what I am going to  
 6 suggest, Mr Hough, is that we will have a short break  
 7 mid-afternoon to see how we're going, but I am afraid  
 8 I'm going to hold everyone to the estimates they've  
 9 given unless it overshoots, literally by a few minutes,  
 10 because it seems to me that I've got to provide  
 11 sufficient time for Ms Leek to have the opportunity, it  
 12 obviously depends what comes up, there may be very  
 13 little, but I've got to have regard to that and that's  
 14 why I'm sort of asking those questions of you as well.  
 15 Thank you.  
 16 MR HOUGH: Thank you, sir.  
 17 Questions by MR HOUGH QC  
 18 MR HOUGH: Would you please give your full name for the  
 19 court?  
 20 A. Yes, it's Sarah Jane Nacey.  
 21 Q. Ms Nacey, what's your current post?  
 22 A. I am the Deputy Director Protect and Prepare in the  
 23 Office of Security and Counter Terrorism at the  
 24 Home Office.  
 25 Q. Are you here to give evidence on matters of protective

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1 security policy and guidance and also about vehicle hire  
 2 from the perspective of the Home Office and the OSCT?  
 3 A. Yes.  
 4 Q. May I begin with your career: did you join the  
 5 Home Office in 2009?  
 6 A. I did.  
 7 Q. Between then and 2015 I understand that you held various  
 8 roles in national and border security; is that right?  
 9 A. That's correct.  
 10 Q. In July 2015, were you appointed head of the Protective  
 11 Security Section in the Protect and Prepare Unit?  
 12 A. Yes.  
 13 Q. And were you appointed to your present role on, I think,  
 14 1 May 2017?  
 15 A. That's correct.  
 16 Q. So in summary have you been working in protective  
 17 security specifically since 2015?  
 18 A. Yes.  
 19 Q. What are the various aspects of your current job as  
 20 Deputy Director for Protect and Prepare?  
 21 A. So I lead the team that's responsible for the policy and  
 22 strategy for crowded places, specific vulnerable groups  
 23 and high profile individuals, ensuring that the UK has  
 24 the specific capabilities to respond to current and  
 25 future threats, the delivery of the national counter

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1 terrorism exercising programme, the Victims of Terrorism  
 2 Unit and then working with a series of countries  
 3 overseas to strengthen the protective security for  
 4 British tourists.  
 5 Q. Thank you. Now to UK counter terrorist strategy. We  
 6 have heard from others about CONTEST, the UK  
 7 Government's counter terrorism strategy, and DAC D'Orsi  
 8 set out the four strands or pillars: Prevent, Pursue,  
 9 Protect and Prepare.  
 10 A. Yes.  
 11 Q. Is the CONTEST strategy as a whole overseen by the  
 12 National Security Council, chaired by the Prime  
 13 Minister?  
 14 A. Yes.  
 15 Q. Is counter terrorism within the Home Office overseen by  
 16 the director general of the OSCT?  
 17 A. That's correct.  
 18 Q. In a few sentences, can you explain what the role is of  
 19 the OSCT, what it does?  
 20 A. So the main role of OSCT is to coordinate activity  
 21 across government and its partners against the -- around  
 22 the CONTEST strategy.  
 23 Q. What is the purpose and range of the work done by the  
 24 OSCT under the Protect strand?  
 25 A. I'm sorry, do you mean specifically what do we do?

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1 Q. Yes, what does the OSCT do?  
 2 A. So we will lead on certain areas, for example, the  
 3 protection of people and places. We will look at the  
 4 security of crowded places, access to hazardous sites  
 5 and substances, as well as coordinating border and  
 6 aviation security.  
 7 Q. Do you work with public authorities in those various  
 8 functions?  
 9 A. We do.  
 10 Q. Do you also work with private companies?  
 11 A. We do.  
 12 Q. Turning now to oversight of the Protect strand. Within  
 13 the OSCT, is the Protect strand overseen by a director  
 14 who is responsible for Protect, Prepare, for chemical,  
 15 biological, radiological, nuclear and explosives matters  
 16 and for counter terrorism science?  
 17 A. That's right.  
 18 Q. Is it right to say that until 2018, strategy and  
 19 programmes for crowded places specifically were overseen  
 20 by a body we've heard about, the Crowded Places Working  
 21 Group?  
 22 A. That's correct, yes.  
 23 Q. Did that first meet in 2012?  
 24 A. It did.  
 25 Q. Then I think every three to four months after that?

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1 A. Around about that time period, yes.  
 2 Q. Did you chair that group for a time?  
 3 A. I did.  
 4 Q. Was that between 2012 and 2015?  
 5 A. No, that was from when I joined the unit -- sorry, from  
 6 when I took up my current role in April 2016.  
 7 Q. I see, so from 2016 to 2018, or ...?  
 8 A. To 2018 when the group was replaced by a different  
 9 group.  
 10 Q. Thank you.  
 11 Can I turn to the responsibilities of the OSCT and  
 12 other bodies within Protect. You have told us that your  
 13 responsibility extends to the protection of people and  
 14 places, security at crowded places and access to  
 15 hazardous substances. Is your responsibility in  
 16 a policy and strategy-setting role?  
 17 A. With very few exceptions, yes.  
 18 Q. Does CT policing, the network of which we were told by  
 19 DAC D'Orsi, do the practical work of providing  
 20 protective security advice?  
 21 A. It does.  
 22 Q. We've heard about the National Counter Terrorism  
 23 Security Office. Does that body develop guidance and  
 24 accredit CTSAs who then deliver the advice locally?  
 25 A. Yes.

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1 Q. Do those officers, those CTSAs, provide advice about the  
 2 security of crowded places?  
 3 A. Yes.  
 4 Q. Do they also advise on other matters?  
 5 A. They do.  
 6 Q. And do those other matters include, for example,  
 7 hazardous sites, critical national infrastructure sites,  
 8 and other areas?  
 9 A. Yes.  
 10 Q. And then finally, the Centre for the Protection of  
 11 National Infrastructure, what does that do?  
 12 A. CPNI is the technical authority which sets standards for  
 13 physical and personal protective security measures, and  
 14 that is used -- they are used by CTSAs and others in  
 15 their work, but they will also have an engagement focus  
 16 with a wide range of organisations, communities and  
 17 public authorities.  
 18 Q. So CPNI might, for example, set technical standards for  
 19 forms of hostile vehicle mitigation measure?  
 20 A. Yes, and they will also work with organisations that ask  
 21 for their advice and support on that.  
 22 Q. May I now turn to the topic of protective security,  
 23 which you address from page 6 of your first statement.  
 24 A. Yes.  
 25 Q. As we've heard, protective security is a concept not

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1 limited to barriers or even to physical measures; is  
 2 that right?  
 3 A. That's right.  
 4 Q. So at a site, for example, might protective security  
 5 include CCTV and other monitoring systems, security  
 6 patrols and so on?  
 7 A. Yes.  
 8 Q. In the counter terrorism context specifically, might it  
 9 include those people who at Parliament have mirrors  
 10 under cars looking for explosive devices underneath?  
 11 A. Yes.  
 12 Q. So it might include search, screening, as well as  
 13 hostile vehicle mitigation, patrols by people, and so  
 14 on?  
 15 A. Yes, including Operation Servator, for example, which  
 16 the court heard about earlier this week.  
 17 Q. So Operation Servator is, in at least some of its goals,  
 18 a form of protective security?  
 19 A. Absolutely.  
 20 Q. In order to put in place an effective protective  
 21 security regime for a place, is it usually necessary to  
 22 make a security plan?  
 23 A. Yes.  
 24 Q. Will such a plan be based upon a comprehensive  
 25 assessment of the risks and the ways of addressing them?

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1 A. Yes.  
 2 Q. But is it nevertheless sometimes necessary to identify  
 3 a specific risk and take a particular mitigating measure  
 4 either urgently or in slower time outside the context of  
 5 making a plan?  
 6 A. Yes.  
 7 Q. So, as we saw, after the London Bridge attack, nobody  
 8 waited to make a security plan: the instruction was  
 9 given straightaway to put in barriers on certain  
 10 bridges?  
 11 A. That's right, you need to make sure that you are dynamic  
 12 and able to respond to events.  
 13 Q. May I turn, then, to the topic of definitions of crowded  
 14 places and crowded spaces. Let me begin with trying to  
 15 understand why the definition of crowded places matters.  
 16 Is this right: whether or not a place is the subject  
 17 of focused consideration and active advice by CTSAs  
 18 locally may depend on whether it is classified as  
 19 a crowded place and at what tier; is that fair?  
 20 A. Maybe if I could put it in my own words and you can tell  
 21 me if this is what you're asking.  
 22 Q. Please do.  
 23 A. So the strategy has always been to provide publicly  
 24 available advice and support, freely available to  
 25 anybody, space, place, irrespective of sector, and then

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1 for bespoke engagement to be provided through CTSA's in  
 2 a prioritised way.  
 3 Q. Okay. So we have heard over the course of this week  
 4 that the action of a CTSA in going and talking to the  
 5 owner of a place can prompt action in relation to  
 6 hostile vehicle mitigation, and indeed other security  
 7 measures.  
 8 A. That's right.  
 9 Q. But that action of a CTSA going to talk to somebody  
 10 about a place may only take place if the place in  
 11 question is a crowded place and particularly one of  
 12 tier 1 or tier 2.  
 13 A. Not quite. So I think the word "prioritised" is  
 14 important, because that prioritises their efforts but it  
 15 does not exclude CTSA's, as we heard from PS Hone,  
 16 actually, choosing to do other activities, but it  
 17 prioritises the activities that they would undertake.  
 18 Q. Is this fair: the definition of crowded place matters  
 19 because it at the very least increases the chance that  
 20 a place will be the subject of active advice from  
 21 a CTSA?  
 22 A. That's fair, yes.  
 23 Q. So that's the importance of the definition. There  
 24 isn't, as we've heard from others, a statutory  
 25 definition; is that right?

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1 A. That's right.  
 2 Q. There are, however, statutory schemes which require  
 3 security measures to be considered or taken in relation  
 4 to some types of crowded place.  
 5 A. That's right.  
 6 Q. So, for example, in the specific context of sports  
 7 grounds, where we have a heavily regulated regime of the  
 8 Safety of Sports Grounds Act 1975 with its safety  
 9 certificates and all the plans and arrangements that  
 10 they require?  
 11 A. Yes.  
 12 Q. And we have the Civil Contingencies Act requiring  
 13 planning against emergencies?  
 14 A. Yes.  
 15 Q. We've heard from Ms D'Orsi about the developing approach  
 16 to crowded places and perhaps I can just address that  
 17 with you. First of all, could we have on the screen  
 18 {DC8338/1}. Now, this is a document of January 2012,  
 19 "Crowded places: The Planning System and  
 20 Counter-Terrorism".  
 21 A. Yes.  
 22 Q. So January 2012. If we go to {DC8338/5}, please, we can  
 23 see a definition at 1.04 in this public document:  
 24 "A crowded place is a location or environment to  
 25 which members of the public have access that may be

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1 considered potentially liable to terrorist attack by  
 2 virtue of its crowd density. What counts as a crowded  
 3 place is a matter of judgment. Crowded places will be  
 4 found in a wide range of locations including: sports  
 5 stadia, pubs, clubs, bars, shopping centres, high  
 6 streets, visitors attractions, cinemas, theatres and  
 7 commercial centres. Crowded places can also include the  
 8 public realm -- open spaces such as parks and squares.  
 9 A crowded place will not necessarily be crowded at all  
 10 times -- crowd densities may vary during the day or  
 11 night, and may be temporary, as in the case of sporting  
 12 events or open-air festivals."  
 13 Now, Ms Nacey, is that a definition of "crowded  
 14 place" being put out by the government in 2012?  
 15 A. It is, yes.  
 16 Q. If we can then look at your witness statement,  
 17 {WS5022/8}, please. Now, at paragraph 28 you tell us  
 18 that since February 2018, a more formalised definition  
 19 than the one originally produced in 2010 has been used  
 20 within government and by its partners. Now, I haven't  
 21 checked every single word, but the definition you quote  
 22 under paragraph 28 looks pretty close to that one from  
 23 the 2012 document?  
 24 A. Yes.  
 25 Q. So that definition that we saw in the 2012 document, is

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1 it fair to say that that has been the definition  
 2 provided publicly of crowded places really from 2012 to  
 3 the present day?  
 4 A. It is. I think, if I could just go back to what I was  
 5 saying earlier on about the wider definition versus the  
 6 bespoke -- the definition that related to the  
 7 prioritised support of CTSA's. The 2018 definition that  
 8 you see there relates to the work that is being done  
 9 around prioritising CTSA activity now versus this was  
 10 the wider definition.  
 11 Q. Let me take this in stages, shall we --  
 12 A. Sorry.  
 13 Q. -- may we. The definition that we saw in the 2012  
 14 document, is that a definition which is used in arriving  
 15 at the list of crowded places which are then divided by  
 16 priority into tiers?  
 17 A. No.  
 18 Q. Is there a separate definition used for that purpose?  
 19 A. That is -- forgive me, I can't remember the exact  
 20 paragraph in my statement, but that is the process that  
 21 NaCTSO and OSCT went through first in 2008 and then in  
 22 a different model in 2014. That is the way that we  
 23 prioritised CTSA activity.  
 24 Q. We understand, and please correct me if I am wrong, that  
 25 CTSA activity begins with asking whether something is

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1 a crowded place at all and then asking whether it is in  
 2 one of a particular number of tiers with higher levels  
 3 of engagement for the upper tiers; is that right?  
 4 A. That is the majority of their work on crowded places.  
 5 Q. What's the rest?  
 6 A. The rest will be up to their own professional expertise,  
 7 as you saw demonstrated by PS Hone earlier on this week,  
 8 other activities that they may choose to undertake with  
 9 the local authority or other partners that goes outside  
 10 of the prioritised remit.  
 11 Q. So if we exclude for the moment what they may do as  
 12 a matter of discretion --  
 13 A. Yes.  
 14 Q. -- are we right to look at it in this way: first of all,  
 15 NaCTSO, OSCT, CTSA's ask: is this place a crowded place,  
 16 and then if it is, into what tier does it fall?  
 17 A. Yes.  
 18 Q. And that determines the level of engagement?  
 19 A. That's correct.  
 20 Q. Now, for a place to be a crowded place at all -- at  
 21 all -- to get into the first stage of that process --  
 22 A. Yes.  
 23 Q. -- is it necessary for that place to have a particular  
 24 level of crowd density?  
 25 A. Yes.

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1 Q. Do government and police effectively together set the  
 2 threshold of crowd density for something to be a crowded  
 3 place at all?  
 4 A. Yes.  
 5 Q. Is that based on footfall and crowd density?  
 6 A. It is.  
 7 Q. Now, Ms D'Orsi indicated that a place or a space could  
 8 only be a crowded place if it satisfied a crowd density  
 9 standard which is depicted in certain sensitive  
 10 diagrams?  
 11 A. That's correct.  
 12 Q. And if a place doesn't meet that crowd density  
 13 threshold, it can never truly be a crowded place at all?  
 14 A. For consideration by CTSA's?  
 15 Q. Yes.  
 16 A. Yes.  
 17 Q. The reason I ask that question is that Ms D'Orsi  
 18 indicated that at least since 2014 it's possible for  
 19 a place which doesn't meet the relevant crowd density  
 20 threshold to be treated as a crowded place at tier 3  
 21 based on a local decision; is that not quite right?  
 22 A. Forgive me, because I -- as I said, we do the sort of  
 23 policy and strategy, so my understanding is that that  
 24 would be true -- DAC D'Orsi's evidence is true in terms  
 25 of the tier 3 has much wider discretion for CTSA's, but

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1 to be considered as a tier 2 or a tier 1, the site would  
 2 have to meet the crowd density.  
 3 Q. Let me rewind --  
 4 A. Sorry.  
 5 Q. -- because I want to understand this very carefully. Is  
 6 it the case that in order that -- a place can be a tier  
 7 3 crowded place without meeting the crowd density  
 8 requirement?  
 9 A. I believe that is the case, but I would defer to a CTSA.  
 10 Q. Well, it's important we get this right.  
 11 A. I understand that.  
 12 Q. Because what I want to understand is, from all the  
 13 various discussions of these things, whether something  
 14 that does not hit the crowd density requirement can  
 15 never properly be described as a crowded place at all;  
 16 is that right or is that wrong?  
 17 A. Sorry, can I take this in stages?  
 18 Q. Yes.  
 19 A. Anywhere can be a crowded place.  
 20 Q. Within the definition?  
 21 A. Okay, so within the CTSA definition, my understanding is  
 22 that to -- that a certain crowd density must be reached  
 23 in order to be a tier 1 or a tier 2 site. There is much  
 24 greater discretion at a tier 3 level for CTSA's to make  
 25 that choice. That is my understanding.

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1 Q. Okay. So in order to be a crowded place within tier 1  
 2 or tier 2, a place has to reach a certain level of crowd  
 3 density, but within tier 3, it doesn't have to?  
 4 A. That's my understanding.  
 5 Q. Now, appreciating that the precise level of density is  
 6 sensitive, can you answer this question: is it enough  
 7 for a place to satisfy the density test at any time, or  
 8 at certain times of day, or must it satisfy that  
 9 standard with a certain degree of regularity?  
 10 A. I would actually defer to NaCTSO on that one, but my  
 11 understanding is that there has to be a level of  
 12 predictability.  
 13 Q. Now, we've been told that Westminster Bridge and  
 14 London Bridge didn't qualify as crowded places because  
 15 of the level of density. My understanding from what  
 16 you've said so far is that they could be treated as  
 17 tier 3 crowded places locally, even without hitting that  
 18 level of density; is that right?  
 19 A. That's the best of my understanding but, again, I would  
 20 defer to CT policing colleagues.  
 21 Q. Now, considering London Bridge, we've heard from many  
 22 witnesses that pavements might have been very, very  
 23 crowded at rush hour, and in layman's terms, sort of  
 24 shoulder-to-shoulder crowds.  
 25 Are you able to explain in general terms, without

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1 giving anything away as to sensitive details about the  
 2 definition, why that didn't cause it to qualify as  
 3 a crowded place?  
 4 A. I'm not actually, because we did not identify -- OSCT  
 5 did not identify those locations. We agreed the  
 6 framework but that was then promulgated through NaCTSO  
 7 to the individual CTSA's, so we weren't involved in the  
 8 individual decisions, so anything I say, please take in  
 9 that context.  
 10 My understanding is that this was around -- crowd  
 11 density is a gateway to being considered a location and  
 12 on top of that there are then other criteria. Again, my  
 13 understanding is that that -- the bridges did not meet  
 14 the criteria for density, nor did they meet the other  
 15 criteria beyond that, but, again, I would defer to CTSA  
 16 colleagues.  
 17 Q. Now, in the definition that we went through before, it  
 18 is stated that crowded places may include public realm  
 19 spaces such as parks and squares. Could that definition  
 20 encompass a stretch of roadway?  
 21 A. Yes.  
 22 Q. Could it encompass a bridge?  
 23 A. It could.  
 24 Q. Is it the case that London Bridge or Westminster Bridge  
 25 fell outside the consideration of CTSA's for a reason

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1 beyond crowd density, based on how specific,  
 2 geographically specific they were?  
 3 A. I believe the reason they probably would have fallen  
 4 outside of the CTSA engagement was because at that time  
 5 the programme was concentrating on reducing  
 6 vulnerability, and so engaging with a -- I think you  
 7 heard this from Mr Woolford and PS Hone -- engaging with  
 8 an individual to have a plan to reduce the  
 9 vulnerability, I believe that that's probably one of the  
 10 reasons that they were not included.  
 11 Q. So is this right: that each of those bridges could not  
 12 be a tier 1 or tier 2 crowded place for two reasons:  
 13 first of all, because the crowd density levels weren't  
 14 high enough?  
 15 A. Yes.  
 16 Q. Secondly, because by their nature, they didn't permit  
 17 engagement of the CTSA with a person?  
 18 A. And I think thirdly, the other factors that are  
 19 considered alongside crowd density in the matrix that  
 20 CTSA's are applying.  
 21 Q. Are you aware of what any of those factors were which  
 22 caused -- which also, in addition to the other points,  
 23 ruled out Westminster Bridge and London Bridge?  
 24 A. I am afraid we're not able to share those criteria in  
 25 open court because it could reveal other locations.

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1 Q. But to an extent they're irrelevant because the bridges  
 2 wouldn't have been considered because of the crowd  
 3 density and the lack of a person to engage with?  
 4 A. That's my understanding, yes.  
 5 Q. Now, the concern has been raised that the definition is  
 6 too rigid in at least two respects, before we get into  
 7 prioritisation between tiers 1 and 2. First of all,  
 8 that it might not encompass locations which any layman  
 9 would regard as crowded; would you accept that that's  
 10 a legitimate concern?  
 11 A. I do.  
 12 Q. The second point that's been raised about the definition  
 13 is that it might not encompass places such as stretches  
 14 of roadway because of this point about not being able to  
 15 engage with somebody?  
 16 A. I think both of those points could be a fair challenge  
 17 to the definition that was being used in 2014.  
 18 Q. And would you also accept that those may not be academic  
 19 concerns in the context of this case because there is  
 20 some evidence that CTSA's didn't focus on London Bridge  
 21 before PC Hone came on the scene?  
 22 A. I can see that, but I think it's important, the context  
 23 that we heard yesterday from Mr Woolford, I think it  
 24 was, around the prioritisation process was about the  
 25 relative prioritisation of a location compared to others

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1 in the context where there are a wide range of locations  
 2 that could be attractive to terrorists.  
 3 Q. Some questions about the -- further questions about the  
 4 definition.  
 5 THE CHIEF CORONER: Just before we do that, Mr Hough, I have  
 6 just got one eye on the clock.  
 7 MR HOUGH: May I just ask this one question before we break?  
 8 THE CHIEF CORONER: Absolutely.  
 9 MR HOUGH: What is the virtue of identifying a list of  
 10 locations with a particular crowd density before we  
 11 divide them into tiers 1 and 2? Why does density matter  
 12 so much?  
 13 A. Because any location that is crowded will by its very  
 14 nature be attractive to terrorists, and crowd density  
 15 was a way in 2014 of trying to differentiate between  
 16 those areas that would be most attractive because of the  
 17 virtue of their crowd density and crowded places are, by  
 18 their very nature, open compared to other locations that  
 19 might not be as attractive because there wouldn't be as  
 20 many people there to injure or harm.  
 21 MR HOUGH: Thank you very much, I just wanted to get that in  
 22 for fairness and understanding before the break.  
 23 THE CHIEF CORONER: That's fine.  
 24 Ms Nacey, we'll pick up on things at 2.05.  
 25 (1.01 pm)

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1 (The Luncheon Adjournment)  
 2 (2.05 pm)  
 3 MR HOUGH: Good afternoon, Ms Nacey.  
 4 A. Good afternoon.  
 5 Q. Before lunch I had been asking you about the crowded  
 6 places definition, and just looking to the future, is  
 7 that a definition which is under review?  
 8 A. It is, indeed, sir, yes.  
 9 Q. Since when has it been under review?  
 10 A. So I asked -- so, as I mentioned before, I chaired the  
 11 Crowded Places Working Group and in around about,  
 12 I believe it was November 2016, after the attacks that  
 13 we saw in Europe at that time, I asked NaCTSO to  
 14 consider how and if the definition that was prioritising  
 15 CTSA resource was still appropriate given the targeting  
 16 that we had seen of less iconic locations. So it's been  
 17 under review since then, and most recently a new  
 18 definition for CTSA's is, as I believe DAC D'Orsi said,  
 19 being trialled in two locations to understand how we get  
 20 the balance between permanent buildings, spaces,  
 21 et cetera.  
 22 Q. With that in mind can I ask you these questions, flowing  
 23 from some points we were discussing before lunch.  
 24 For the future, would you consider that the present  
 25 density threshold is too high or not fit for purpose if

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1 it doesn't encompass a place like London Bridge?  
 2 A. That work is being taken forward by NaCTSO and so  
 3 I'm not quite clear at the moment quite where that is,  
 4 but I think that is certainly something we would want to  
 5 consider after the evidence we've heard in court this  
 6 week.  
 7 Q. So that aspect of the definition warrants serious review  
 8 given we know that a place that any layman would  
 9 describe as very crowded at predictable times wasn't  
 10 captured?  
 11 A. Yes.  
 12 Q. Secondly, in looking forward and carrying out that  
 13 review, should it be considered that the definition has  
 14 been too rigid in requiring some kind of geographic or  
 15 topographic specificity so that you have to be able to  
 16 engage with somebody?  
 17 A. I think that's right. I think, as I said, there will  
 18 always need to be a blend between permanent locations  
 19 and more -- less clearly defined spaces, but yes,  
 20 I think that's right.  
 21 Q. Because we all understand it may be hard to define  
 22 a stretch of roadway as a site worthy of protective  
 23 security advice as a high priority, however you cast the  
 24 definition, but if you want to engage with somebody  
 25 about a stretch of roadway, there will be a responsible

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1 highway authority?  
 2 A. That's correct, yes.  
 3 Q. So the fact that one can't draw an absolutely clear line  
 4 around a place doesn't prevent there being  
 5 an appropriate point of contact?  
 6 A. Yes.  
 7 Q. Can I move on just for a second from the definition to  
 8 legislative duties?  
 9 A. Yes.  
 10 Q. Now, we've heard that a general duty exists under  
 11 section 17 of the Crime and Disorder Act, for public  
 12 authorities, in simple terms, to take account of  
 13 reducing crime and disorder in the exercise of their  
 14 functions, and so not just duties but also powers.  
 15 A. Yes.  
 16 Q. And is it right that there are also other statutory and  
 17 regulatory duties, for example, under health and safety  
 18 and fire safety legislation, that can produce results  
 19 beneficial for security and counter terrorism purposes?  
 20 A. That's right.  
 21 Q. In general terms, we've also heard that the  
 22 responsibility for somewhere designated as a crowded  
 23 place or some other place regarding protective security  
 24 and counter terrorism measures is that of the owner or  
 25 operator?

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1 A. That's correct.  
 2 Q. And there will, of course, also sometimes be some  
 3 responsibility on public authorities with relevant  
 4 responsibilities?  
 5 A. That's right, yes.  
 6 Q. So we heard debated whether a highway authority might  
 7 have a legal responsibility, setting that to one side,  
 8 there will be responsibilities for, for example, fire  
 9 safety which will have a benefit in counter terrorism  
 10 terms, and which may be a responsibility on a local  
 11 authority rather than the owner?  
 12 A. That's correct.  
 13 Q. In terms of the number of crowded places in the United  
 14 Kingdom, based on the current definition, in your  
 15 witness statement you say simply that there are tens of  
 16 thousands of them.  
 17 A. In the wider generic non-prioritised CTSA's, yes.  
 18 Q. Is that tens of thousands limited to places which  
 19 satisfy the crowd density requirement, or does it  
 20 include all places recognised either nationally or  
 21 locally as crowded places?  
 22 A. Any location where there are a number of people of any  
 23 density will always be attractive to terrorists wanting  
 24 to attack the UK, so the tens of thousands is, put  
 25 bluntly, any place that a terrorist might want to

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1 attack.

2 Q. Now, I'm not asking you for any details that you can't

3 give for reasons of security, but is it fair to say that

4 the cohort of places which fall within the crowd density

5 requirement, satisfy all the other requirements of the

6 prioritised crowded place definition, that cohort is

7 much smaller?

8 A. That's correct, yes.

9 Q. Are you able to say hundreds or thousands?

10 A. I don't have those precise details but I believe they

11 may be in DAC D'Orsi's statement. I'm sorry.

12 Q. May I turn to the protection of crowded places and the

13 measures taken. We heard from DAC D'Orsi that the

14 prioritisation of crowded places has developed over

15 time. Now, the whole concept of a crowded place and the

16 definition designed to identify prioritised crowded

17 places is just a means of identifying a certain number

18 of places which receive priority in the allocation of

19 limited resources; is that right?

20 A. That's correct.

21 Q. Is it right that up until 2014, the model was

22 a vulnerability model which simply placed on a baseline

23 list all places falling within the definition as then

24 set?

25 A. Broadly, yes.

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1 Q. So to get into the baseline list, a place would have to

2 satisfy some of the crowd density and other

3 requirements; is that right?

4 A. That's my understanding. It obviously pre-dates my

5 time, but that's my understanding.

6 Q. And then there was a review by the Crowded Places

7 Working Group, the group you were later to chair?

8 A. Yes.

9 Q. And there was the introduction of an attractiveness

10 model, which remains in use?

11 A. That's correct, yes.

12 Q. And that involves crowded places being prioritised into

13 tiers?

14 A. Yes.

15 Q. And all the places that fit within the definition and

16 satisfy the requirements of crowd density and so on,

17 they will go into either tier 1 or tier 2.

18 A. That's my understanding, yes.

19 Q. And then locally, CTSAs can place sites of interest into

20 tier 3 whether they satisfy any or indeed none of the

21 requirements of the definition?

22 A. That's my understanding, yes.

23 Q. And in broad terms we've been told that tier 1 sites are

24 those symbolic at a national or international level?

25 A. Yes.

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1 Q. Tier 2 sites have what's described as a regional profile

2 above local?

3 A. Yes.

4 Q. And tier 3 sites are sites with only local recognition

5 which have been effectively chosen by the local CTSA?

6 A. Yes. I'm sorry to interrupt you, there are elements of

7 that around other factors which I believe DAC D'Orsi set

8 out, but broadly that's correct.

9 Q. Yes, and that development from the vulnerability model

10 to the attractiveness model was a development in

11 response to concerns that the previous model led to

12 CTSAs giving advice to huge numbers of places, which

13 wasn't proving terribly effective?

14 A. That's right, I believe it was 350 sites that were under

15 the 2010/2011 model, only around 20% had actually

16 received -- had reduced their vulnerability in any way,

17 so we decided at that point that it was necessary to

18 focus efforts so that the country as a whole was safer

19 in crowded places, crowded spaces.

20 Q. Now, who makes the tiering judgment between tier 1 and

21 tier 2 and, indeed, within tier 2, 2(a) and (b)?

22 A. So the overarching system is -- was agreed with Crowded

23 Places Working Group, but the criteria and the decision

24 about identifying sites and placing them into a tier is

25 one for CTSAs.

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1 Q. Do they have guidance from NaCTSO in making those

2 judgments?

3 A. They do.

4 Q. So while the OSCT and the Home Office sets the broad

5 policy guidance for what the tiers are supposed to

6 encompass, the guidance of quite how you allocate places

7 to tiers comes from NaCTSO; yes?

8 A. So NaCTSO are involved -- were involved in developing

9 the criteria and I believe they did that in conjunction

10 with business and CTSA and others, but yes, that's

11 broadly right.

12 Q. And it's the CTSAs informed by the NaCTSO guidance who

13 make those tiering judgments?

14 A. That's correct, yes.

15 Q. If the Home Office or the OSCT, or, rather, the

16 Home Office and the OSCT wanted to introduce different

17 guidance or measures or a different system, presumably

18 it could do so?

19 A. It could but would require national CT policing

20 headquarters to agree that process and be a central part

21 of that process.

22 Q. Because they are the experts?

23 A. Both because they are the experts but also -- and they

24 have the reach. I can't task a CTSA, for example; that

25 would be done through NaCTSO.

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1 Q. Now, we saw on screen before and we can see it again,  
 2 {WS5032/34}, the varying types of engagement which sites  
 3 at different tiers receive, and is it right in broad  
 4 terms, the key advantage of a site being a prioritised  
 5 crowded place, whether at tier 1 or 2, is that it  
 6 receives proactive contact of some kind from the CTSA?  
 7 A. That's correct, yes.  
 8 Q. Other sites may also receive proactive contact, but  
 9 sites which fall into those two tiers are guaranteed to  
 10 get it?  
 11 A. That's my understanding, yes.  
 12 Q. And a site within tier 3 will have access to the wide  
 13 range of advice, materials and tools which the  
 14 government have produced?  
 15 A. Yes.  
 16 Q. But sites on tier 3 may not receive direct engagement  
 17 and certainly will be treated for that purpose at  
 18 a lower priority than tiers 1 and 2?  
 19 A. That's correct.  
 20 Q. And in engaging with sites at tier 3 level, will CTSA's  
 21 be, to an extent, dependent on their other pressures and  
 22 their resources?  
 23 A. I believe that's the case, yes.  
 24 Q. So there may be, putting it bluntly, something of  
 25 a postcode lottery as to whether a tier 3 site receives

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1 visits from its local CTSA?  
 2 A. I don't think I would use the words "postcode lottery",  
 3 but yes, they would differ.  
 4 Q. In giving their advice to sites about protective  
 5 security, do CTSA's have guidance themselves from NaCTSO?  
 6 A. That's my understanding.  
 7 Q. And does that guidance encompass detailed provisions  
 8 about the sort of security measures that might be  
 9 available and appropriate for different types of sites?  
 10 A. It does.  
 11 Q. And that would include hostile vehicle mitigation, would  
 12 it?  
 13 A. Yes.  
 14 Q. After a CTSA has given advice, is it ultimately up to  
 15 the owner or operator to decide whether or not to follow  
 16 that advice?  
 17 A. That's correct.  
 18 Q. But if the owner or operator is a public authority, is  
 19 it sometimes possible for the local police to exert  
 20 influence through local channels as in London, for  
 21 example, we saw the Mayor's Office communicating with  
 22 local authorities, and so on?  
 23 A. Yes, I would actually expect that at any level if there  
 24 was a need to increase engagement for ministers, senior  
 25 officials to support the police in their engagement with

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1 that organisation.  
 2 Q. As regards the guidance available to owners of sites  
 3 which aren't crowded places in tiers 1 and 2, the  
 4 prioritised crowded places, does that include, as well  
 5 as online advice and guidance documents, a series of  
 6 documents about planning, about technical requirements  
 7 and technical standards for things like hostile vehicle  
 8 mitigation?  
 9 A. Yes. So, just maybe some context. So it would be  
 10 NaCTSO, a police organisation that design, deliver,  
 11 produce and disseminate that advice to the public.  
 12 Other organisations, for example, CPNI that you've heard  
 13 about, they would, again, design and disseminate that  
 14 information, and that's the primary delivery mechanism  
 15 for advice and support.  
 16 Q. Is there in addition to the guidance that we've heard  
 17 about, guidance set at a higher security classification  
 18 for mitigating vehicle attacks?  
 19 A. Yes, and that guidance takes both the form of verbal  
 20 briefings as well as written briefings.  
 21 Q. Just to be clear about Westminster Bridge and  
 22 London Bridge, neither of those was a prioritised  
 23 crowded place, but we gather from DCC Gyford's evidence  
 24 that London Bridge was a focus of some direct engagement  
 25 by the City of London Police in the months leading up to

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1 the attack.  
 2 A. That's my understanding from the evidence I've heard  
 3 this week, yes.  
 4 Q. As regards Borough Market, DAC D'Orsi referred to that  
 5 as being a tier 3(b) crowded place, so one of those  
 6 places which didn't fit within the definition but was  
 7 the subject of local, proactive engagement?  
 8 A. Yes.  
 9 Q. Can we now turn to the terrorist threat before and after  
 10 the Westminster Bridge attack, which you deal with from  
 11 page 14 of your statement, your first statement.  
 12 A. Thank you.  
 13 Q. In the run-up to the attack on Westminster Bridge  
 14 in March 2017 is it right that the UK was facing  
 15 a persistent terrorist threat involving a wide range of  
 16 methodologies?  
 17 A. That's correct, yes.  
 18 Q. Is it also right that there had been multiple terrorist  
 19 publications and propaganda items encouraging  
 20 vehicle-as-weapon attacks?  
 21 A. That's also correct, yes.  
 22 Q. We saw the Nice attack of July 2016 and the Berlin  
 23 attack of December 2016 which demonstrated the potential  
 24 lethal effectiveness of that method?  
 25 A. We did.

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1 Q. But it was one of a number of methods which were being  
2 used by terrorists over that time in plots including  
3 disrupted plots?  
4 A. That's correct.  
5 Q. Over that period, from late 2016 into early 2017, you've  
6 told us that the crowded places definition was under  
7 review. Was consideration being given over that period  
8 to the entire prioritisation model and the means of  
9 giving advice and guidance because of the emerging and  
10 developing threats?  
11 A. Yes, so that work was started by NaCTSO in November 2016  
12 and they brought a paper to the Crowded Places Working  
13 Group in April 2017 which set out a proposal about how  
14 we would take forward the redesign of that process.  
15 In parallel, you heard from DACSO some of the steps  
16 that the police were taking to respond to the immediate  
17 events that had been seen and encouraging people to take  
18 steps to keep themselves safe.  
19 Q. Now, from your perspective in the OSCT, before the  
20 London Bridge attack, we are now moving on beyond  
21 Westminster Bridge, were bridges considered to be  
22 a specific target for terrorist attack?  
23 A. No, they weren't, sir.  
24 Q. We understand that no systematic review of bridges was  
25 being carried out by police or others with a counter

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1 terrorism perspective; is that correct from your  
2 understanding?  
3 A. That's correct from my understanding, yes.  
4 Q. Setting aside bridges for the moment, in the aftermath  
5 of the Westminster Bridge attack, were long stretches of  
6 uninterrupted pavement in iconic locations and without  
7 much street furniture, were they regarded as  
8 particularly vulnerable?  
9 A. I think anywhere was being considered particularly  
10 vulnerable, given that we'd seen attacks happening in  
11 many places of many attack methodologies.  
12 Q. Given the series of vehicle-as-weapon attacks, and there  
13 were a number during 2016 and 2017, including Nice and  
14 Berlin and Westminster and Stockholm, but not only  
15 those, given all those attacks, was particular concern  
16 being given to the vulnerability of major streets and  
17 squares accessible to vehicles?  
18 A. I believe, as DAC D'Orsi set out, that the focus at that  
19 time from CT policing was around major events and mass  
20 gatherings because the Nice attack had been about  
21 a Bastille Day celebration and the Berlin market was  
22 obviously an attack on a Christmas market, so that was  
23 the focus of the police's time and resource.  
24 Q. To your knowledge, did that focus change with the  
25 attacks in Westminster and Stockholm which weren't on

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1 major events?  
2 A. I know that from a policing perspective, the policing  
3 activity changed as DAC D'Orsi set out earlier on this  
4 week. From an OSCT perspective, we knew that work was  
5 underway to change the wider system, but the changing of  
6 operations would be an issue that the police would deal  
7 with to respond to the threat that they were seeing at  
8 the time rather than anything wider.  
9 Q. Could you detect within the OSCT any need for policy  
10 direction to the police with whom you were presumably  
11 dealing regularly?  
12 A. So that would very much be for CT policing. They are  
13 the best place to determine the threats that they are  
14 seeing and the best courses of action to mitigate that.  
15 So from an OSCT perspective, from my perspective, we  
16 knew that the wider system was in the process of being  
17 changed, but trusted operational partners to respond in  
18 the way that they best saw fit, having the expertise.  
19 Q. After the London Bridge attack, was there, on the  
20 following morning, a Cobra meeting chaired by the Prime  
21 Minister?  
22 A. There was.  
23 Q. Was it that meeting that asked the Security Review  
24 Committee, chaired by DAC D'Orsi, to take appropriate  
25 protective security measures?

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1 A. They did, they tasked DAC D'Orsi to do that, yes.  
2 Q. We've heard that flowing directly from that SRC meeting  
3 was the decision to install HVM on eight bridges in  
4 London, initially temporary HVM?  
5 A. Yes. Sorry, can I just go back for a second, I think it  
6 is important: Cobra didn't task DAC D'Orsi to put the  
7 measures on the bridge, they tasked DAC D'Orsi or the  
8 Security Review Committee to consider what steps should  
9 be taken, just for clarity.  
10 Q. I hope I tried to make that clear.  
11 A. I wasn't sure I had.  
12 Q. The Cobra decision was simply to ask the SRC to look at  
13 the appropriate measures?  
14 A. That's correct.  
15 Q. And then it was DAC D'Orsi and her colleagues who made  
16 the decision then to install temporary HVM on bridges?  
17 A. That's right.  
18 Q. What further activity was taken by central government  
19 and the OSCT in the immediate aftermath, and you may be  
20 assisted by paragraph 61 of your statement.  
21 A. Thank you. So there was a meeting that different  
22 government departments met together on 5 June to start  
23 discussing how we could support the myriad of activity  
24 that was taking place in CT policing, including  
25 supporting what we then learnt was the introduction of

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1 hostile vehicle mitigation on the bridges, as well as  
 2 considering the wider activity that was underway across  
 3 government because the Prime Minister had announced  
 4 a review of the CONTEST strategy.  
 5 Q. Now, we know that the National Barrier Asset was used to  
 6 provide the matériel for the HVM. We've also heard that  
 7 before the attack there were criteria for the police to  
 8 call on NBA material, and that it could only be called  
 9 upon for major events or if there was intelligence of  
 10 a specific threat; is that correct from your  
 11 understanding?  
 12 A. That is, but the Home Office does not and has never had  
 13 a role in identifying the requirements for the National  
 14 Barrier Asset in terms of its tasking or the criteria  
 15 and the definition of how it is used.  
 16 Q. No, we understand that that is a function of  
 17 an agreement between, I think, Sussex Police and other  
 18 policing authorities.  
 19 A. That's my understanding.  
 20 Q. But before the attack, as you understood it, could  
 21 highway authorities install temporary HVM measures  
 22 procured privately?  
 23 A. Yes.  
 24 Q. Would there be any objection to that being done on the  
 25 part of the Home Office?

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1 A. None that I can think of, no.  
 2 Q. Looking at your paragraph 66, more generally, what  
 3 further work has been done in the period following the  
 4 London Bridge attack to improve the assessment of risks  
 5 and the installation of HVM?  
 6 A. So there was quite a lot of work taking place across  
 7 government at that time around CONTEST writ large, but  
 8 we weren't just focusing on hostile vehicle mitigation.  
 9 As you asked me earlier on today, protective security  
 10 can take many forms, and so we were thinking across all  
 11 of those forms at what we could do for protective  
 12 security in the UK.  
 13 Q. May I now ask you about some ongoing protective security  
 14 work. At the national level, we've heard about the ACT  
 15 programme, a major public engagement project, continuing  
 16 guidance from the CPNI, and of course, at the local  
 17 level, work by CTSAs?  
 18 A. That's correct.  
 19 Q. Looking at your paragraph 72, are further steps also  
 20 underway, first of all, considering a form of  
 21 legislation to mandate consideration of protective  
 22 security?  
 23 A. Yes, that's a piece of work that my team has been  
 24 leading to consider if, and if so how, we need to think  
 25 about how legislation could be better and more simply

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1 used for protective security.  
 2 Q. Would there, for example, be a potential value in having  
 3 a legislative duty on highway authorities to maintain  
 4 protective security equivalent to their duty to maintain  
 5 the roadway?  
 6 A. All legislation is being considered in terms of the  
 7 options so that regulations relating to highways  
 8 authorities is on the table as much as any other piece  
 9 of legislation.  
 10 Q. Recognising that you'll probably give me the same answer  
 11 to the next question, might another consideration be  
 12 an occupier's duty to introduce protective security  
 13 measures comparable to that under the Occupiers'  
 14 Liability Acts, but pared of some of the restrictions  
 15 that otherwise apply under those acts?  
 16 A. So I'm not personally familiar with the Occupiers' Act,  
 17 but it's not been something that we've looked at to  
 18 date, but as I've said, nothing is off the table and  
 19 that is certainly something we could look at.  
 20 Q. The only reason I raise it is that DAC D'Orsi made the  
 21 point that private companies may have a duty to have put  
 22 in place general health and safety measures but don't  
 23 have a specific duty by virtue of their occupation of  
 24 a site to consider protective security; is that an area  
 25 where work is being done?

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1 A. At the moment, ministers have asked us to explore how we  
 2 can use the existing legislation rather than new  
 3 legislation, so if that is existing legislation then  
 4 that is absolutely something that we can look to  
 5 explore.  
 6 Q. Is consideration also being given to the use of the  
 7 private sector for advice and guidance?  
 8 A. Yes. The security minister announced, I believe it was  
 9 earlier this year, £10 million that we've been working  
 10 with in conjunction with Pool Re around how we can  
 11 better provide advice and support to businesses in the  
 12 private sector.  
 13 Q. You say also in your witness statement that  
 14 consideration is being given to using other funding  
 15 sources such as insurance. How might that work in  
 16 practice?  
 17 A. So one of the projects that has been established for a  
 18 while is the loss mitigation credit process whereby  
 19 companies that undertake steps consistent with generic  
 20 advice that has been provided by CTSAs, so not directly  
 21 to them but more broadly, will receive a discount on  
 22 their terrorism reinsurance, if they take it out, and so  
 23 how can we use that scheme and maybe others like it to  
 24 incentivise protective security.  
 25 Q. Thank you. May I now turn to a different topic, which

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1 is vehicle hire. The Inquests team, as I think you  
 2 know, asked the government to address the question of  
 3 what work has been done to deal with the problem of  
 4 hired vehicles being used as weapons, something we saw  
 5 at Nice, Westminster Bridge, London Bridge and again, at  
 6 Finsbury Park later in June 2017.  
 7 A. Yes.  
 8 Q. Is this right: that the work on this area is being done  
 9 by the Department for Transport, but you have consulted  
 10 the relevant individual there in order to help us?  
 11 A. That's correct, yes.  
 12 Q. Is it right to say that the Department for Transport  
 13 regulates vehicle safety, road safety and the licensing  
 14 of drivers and vehicles but doesn't otherwise regulate  
 15 the hire industry?  
 16 A. That's correct.  
 17 Q. Looking at your paragraph 80, on 3 March 2017, so before  
 18 the Westminster attack, was a workshop hosted by the  
 19 Department for Transport in light of the attacks in Nice  
 20 and Berlin?  
 21 A. It was.  
 22 Q. What did that workshop consider and seek to achieve?  
 23 A. That workshop was primarily around vehicle-as-a-weapon  
 24 as opposed to vehicle hire but looked at the wide range  
 25 of activity that was taking place across government but

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1 also its operational partners to explore what thinking  
 2 was out there and how we could maybe bring that together  
 3 and what additional activity we could undertake.  
 4 Q. After the Westminster Bridge attack did ministers in the  
 5 Department for Transport agree a set of priorities for  
 6 work countering vehicle-as-weapon attacks?  
 7 A. They did.  
 8 Q. In broad terms, what were those priorities?  
 9 A. It was around providing advice and support to primarily  
 10 the haulage industry, as well as promoting and exploring  
 11 opportunities internationally and working with  
 12 technology about how that could be used to mitigate the  
 13 threat.  
 14 Q. So still not a focus on vehicle hire as such?  
 15 A. Exactly.  
 16 Q. But is this right, in fairness: that in a number of  
 17 vehicle-as-weapon attacks, the vehicles have been  
 18 obtained by either means, either stolen or bought?  
 19 A. Exactly as Witness L described last week, yes.  
 20 Q. After the London Bridge and Finsbury Park attacks, were  
 21 the Home Office and the Department for Transport tasked  
 22 again with looking at the issue of vehicle-as-weapon but  
 23 specifically in the context of hiring of vehicles?  
 24 A. Yes, I wouldn't say tasked again; we were tasked to do  
 25 that for the first time.

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1 Q. But a new focus on hiring?  
 2 A. A new focus on hiring, yes.  
 3 Q. Was consideration given to using something called  
 4 a share code service?  
 5 A. It was.  
 6 Q. Can you explain that to us, please?  
 7 A. A share code service is when you want to, for reasons,  
 8 essentially, of hiring a vehicle pass any details around  
 9 driving restrictions or penalty notifications to the  
 10 hire car company, so you go onto the gov.uk website, you  
 11 type in your details, they give you a code, and when you  
 12 go and hire the vehicle, they ask for your code and you  
 13 provide it to them and that allows them to see if you've  
 14 got any points on your licence, et cetera.  
 15 Q. So that's a service which allows hire companies access  
 16 to some information about a person with a view to  
 17 refusing hire to certain sorts of people?  
 18 A. That's my understanding, yes.  
 19 Q. Has consideration been given to using that in a counter  
 20 terrorism context?  
 21 A. It would require changes to primary legislation, as  
 22 I understand it, so it's not something that we are  
 23 currently, or the Department for Transport is currently  
 24 looking to progress, but are open to doing so.  
 25 Q. Can I ask you next about the Rental Vehicle Security

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1 Scheme. Is that a scheme which was under development  
 2 throughout 2018 and launched at the end of 2018?  
 3 A. That's correct.  
 4 Q. How does that scheme work?  
 5 A. It's a scheme that's been developed with industry  
 6 whereby industries sign up to -- vehicle hire car  
 7 companies or companies sign up to a ten-point plan, and  
 8 those ten points cover a wide range of issues.  
 9 Q. If we look at {WS5022/29}, please.  
 10 If you could speak into the microphone, please.  
 11 A. Oh, I'm sorry.  
 12 Q. Somebody has to interpret what you are saying.  
 13 A. Sorry.  
 14 Q. I think you had just said that the Rental Vehicle  
 15 Security Scheme involved members of the vehicle rental  
 16 industry signing up to a ten-point code?  
 17 A. I did.  
 18 Q. And if we look on this page, we can see the response on  
 19 the part of the government to the Prevention of Future  
 20 Deaths Report from the Westminster Bridge Inquest; is  
 21 that right?  
 22 A. That's right, yes.  
 23 Q. And can we see towards the bottom of the page, some of  
 24 the key aspects of the ten-point code of practice?  
 25 A. That's right, yes.

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1 Q. So ensuring licence verification checks are undertaken  
2 when handing vehicles over to customers; yes?  
3 A. Yes.  
4 Q. Sharing data and information appropriately with law  
5 enforcement agencies?  
6 A. Yes.  
7 Q. Appointing a recognised security contact within the  
8 business?  
9 A. Yes.  
10 Q. Training staff to identify and report suspicious  
11 behaviour?  
12 A. Yes.  
13 Q. And only accepting electronic payment for all or part of  
14 the rental transaction, not cash.  
15 A. Yes.  
16 Q. So that's the scheme that has been introduced to assist .  
17 Can I ask you about the position in some other  
18 jurisdictions? {DC8310/1}, please. This is a note  
19 which has been provided helpfully by Hertz which tells  
20 us that in Spain, legislation has been in force for some  
21 years requiring hire companies to provide information to  
22 the police in respect of any person renting a vehicle .  
23 And then:  
24 "In Italy the position is less developed.  
25 Legislation ... has been enacted [requiring] hire

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1 companies to provide data relating to all vehicle  
2 rentals ... [that] is not yet in force."  
3 Then in fairness, if we can also look at {DC8341/1}.  
4 The point in relation to Spain is qualified by saying  
5 that the law relates to accommodation establishments but  
6 there's a further order concerning the provision of  
7 information by hire companies which requires the  
8 information to be provided within 24 hours of the  
9 vehicle being hired.  
10 Then in Italy, it is said that the legislation is in  
11 force but the requirement will only take effect once a  
12 further non-regulatory decree has been issued.  
13 So the position appears to be this: that in Spain  
14 there is a requirement for information to be provided to  
15 the authorities within 24 hours of the vehicle being  
16 hired, and in Italy, there is legislation which has yet  
17 to be given force, which would require the provision of  
18 information to the government.  
19 Do you consider there is a case for similar  
20 legislation in this country?  
21 A. I don't think that's an easy answer. I think what we  
22 have to put first is what would be most beneficial to  
23 law enforcement colleagues and, as I believe the court  
24 heard from Witness L last week, as I understand what is  
25 written here, that we were not aware of this and I don't

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1 believe police colleagues were -- "we", the Department  
2 for Transport. This looks like it could be somebody  
3 having to sift through the various rental vehicles that  
4 have been asked for and, as L said, he did not think  
5 that that would be proportionate in the UK with the  
6 15 million annual rentals .  
7 So I think it's about a careful balance of  
8 understanding what would be most helpful for law  
9 enforcement first, and that has been the Department for  
10 Transport's position .  
11 Q. Can I suggest this, and you can tell me if it's feasible  
12 or entirely beyond the pale: suppose one required the  
13 provision of information for all these many, many hires,  
14 and then had the names automatically cross-checked by  
15 an IT system against subjects of interest with an alert  
16 being sent to the relevant MI5 operational team if it  
17 transpired that a subject of interest of an active  
18 investigation, which were a limited number of people,  
19 was trying to hire a car at that moment.  
20 Now, appreciating that that would bring up many  
21 perfectly legitimate hirings, wouldn't that be of some  
22 value to the operational teams, and feasible?  
23 A. I think I'd refer back to Witness L's statement last  
24 week about it is technically possible, but very  
25 difficult, and shouldn't be underestimated, and it would

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1 need to be proportionate, and at this time I think, if  
2 I remember L's evidence correctly, he didn't think it  
3 was proportionate.  
4 So at the moment, from MI5's evidence, I would say  
5 that that wouldn't be something that we would be looking  
6 to pursue, but it isn't off the table and that's  
7 something that we are working towards to see how we do  
8 that and if we can develop a proportionate way of doing  
9 that .  
10 Q. So you would consider that sort of option but ultimately  
11 take advice from experts in MI5 about what was  
12 proportionate in terms of measure against threat?  
13 A. MI5 and other law enforcement partners, yes.  
14 MR HOUGH: Thank you very much, those are all my questions.  
15 THE CHIEF CORONER: Thank you, and I think, Mr Hough, I've  
16 not been timing it exactly, but I'm fairly confident  
17 that's an hour and a quarter, so that's very impressive.  
18 Everyone else will, I'm sure, follow .  
19 There's a challenge, Mr Adamson.  
20 Questions by MR ADAMSON  
21 MR ADAMSON: Ms Nacey, as you know, I act on behalf of the  
22 parents of Xavier Thomas and his partner, Christine  
23 Delcros .  
24 I want to start, if I may, by pulling up on the  
25 screen a document which we have seen a lot of,

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1 {WS5014/33}. Now this, as you know, is Police Constable  
 2 Hone's recommendation for consideration of hostile  
 3 vehicle mitigation in relation to London Bridge, and do  
 4 you share the view expressed by others that it's  
 5 a potent argument in favour of the installation of  
 6 hostile vehicle mitigation?  
 7 A. I agree, particularly in light of what happened it is.  
 8 Q. Yes. But this was a document prepared before what  
 9 happened. And the document concerned starts with:  
 10 "The location that causes [me] most concern is  
 11 London Bridge."  
 12 Now, we know that London Bridge did not satisfy the  
 13 criteria for being a crowded place.  
 14 A. Yes.  
 15 Q. Having regard to what you can see on this page, does it  
 16 concern you that the definition of crowded place did not  
 17 encompass a location such as this?  
 18 A. I can totally understand that and agree, but I think it  
 19 is -- and that is the work that we put in train at the  
 20 end of 2016, but I think it is worth repeating some of  
 21 the context that various people have provided in  
 22 evidence before me about London Bridge in comparison to  
 23 many other locations that were as, if not more iconic,  
 24 as, if not busier than London Bridge, and so how you set  
 25 that in context is a difficult challenge and one that

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1 I understand is not easy, but that is the context  
 2 I think it's important to have in mind.  
 3 Q. My question was, does it concern you that this location,  
 4 having regard to the factors that are identified within  
 5 it, was not caught by the definition of "Crowded place"?  
 6 A. Yes, but I think there are many other locations that  
 7 would also be in that category, and we have to  
 8 prioritise the resources to those areas that are most  
 9 vulnerable and most attractive and when set against  
 10 a backdrop that anywhere could be attacked at any time.  
 11 Q. What is the Home Office's position on the identity of  
 12 the organisation which was responsible for the absence  
 13 of barriers on London Bridge?  
 14 A. I agree with the evidence that's already been given that  
 15 it's a shared responsibility between City of London  
 16 Corporation and Transport for London.  
 17 Q. And the City of London Police?  
 18 A. The City of London Police would have provided advice and  
 19 support. It's a partnership, I think as the court has  
 20 heard many times, it's a partnership, but in the idea  
 21 that owners and operators are responsible, as  
 22 I understand it from the evidence that we've heard, it  
 23 would be the City of London Corporation and the highways  
 24 authority, having due regard to the advice that was  
 25 given to them.

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1 Q. And if they don't get the advice positively to put it  
 2 on?  
 3 A. I think that's where there's a balance. There is a wide  
 4 range of advice that is free and publicly available.  
 5 I can understand the desire to have bespoke advice and  
 6 support, but there is wider advice and guidance out  
 7 there.  
 8 Q. Mr Hough took you to some of the documentation setting  
 9 out definitions of crowded places. I'm going to very  
 10 briefly return to some of those, if I may.  
 11 Can we start, though, with a document which I think  
 12 is the earliest in time so far as definitions are  
 13 concerned, {DC8293/1}. Now this is the March 2010  
 14 Working Together to Protect Crowded Places?  
 15 A. Yes.  
 16 Q. And at {DC8293/11} of that document, section 1.02:  
 17 "Crowded places are locations frequented by the  
 18 public, which are judged to be possible terrorist  
 19 targets by virtue of their crowd density."  
 20 A. Yes.  
 21 Q. So a short definition focused on crowd density. If one  
 22 goes forward in that, page {DC8293/16}, paragraph 2.10:  
 23 "It is the responsibility of the CTSA's to undertake  
 24 risk assessments of crowded places ..."  
 25 So do I understand your position to be that in

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1 relation to this document, the onus was on the CTSA to  
 2 identify the crowded place?  
 3 A. My understanding of the full document is the onus was on  
 4 the CTSA's with local authorities and other partners to  
 5 provide risk assessments.  
 6 Q. But if the local authorities don't know the crowd  
 7 density requirements in order to be a crowded place,  
 8 then presumably it falls on the CTSA's?  
 9 A. Crowd density, I don't believe -- I don't believe crowd  
 10 density was a criteria back in 2010. That was the  
 11 introduction of the 2014 model, if I'm remembering that  
 12 correctly.  
 13 Q. Well, I thought the 2014 model was to do with tiering.  
 14 A. The crowd density comes into the tiering.  
 15 Q. Okay --  
 16 A. I might be wrong, because --  
 17 Q. I want to focus on the definition of crowded places for  
 18 the moment.  
 19 A. Yes.  
 20 Q. I will come to tiering in due course.  
 21 A. Of course.  
 22 Q. I will be corrected if I'm wrong because I am sure that  
 23 there are others who know this better than I do, but my  
 24 understanding is that this definition at page 11 of that  
 25 document is one that -- the section at 1.02:

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1 "Crowded places are locations frequented by the  
2 public, which are judged to be possible terrorist  
3 targets by virtue of their crowd density."

4 So it seems to be focusing on crowd density as to  
5 whether or not you are or are not a crowded place in  
6 this document; yes?

7 A. Yes, I would agree with that.

8 Q. The next document in time that I am going to take you to  
9 is {DC8338/1}. Now, this was the document to which  
10 Mr Hough referred you. Can we go, please, to  
11 {DC8338/5}. Now here we have an expanded definition:

12 "A crowded place is a location or environment to  
13 which members of the public have access that may be  
14 considered potentially liable to terrorist attack by  
15 virtue of its crowd density. What counts as a crowded  
16 place is a matter of judgment."

17 Now, pausing there for a moment, was it in reality  
18 a matter of judgment as to whether or not it's a crowded  
19 place, given that you either met the crowd density  
20 criteria or you didn't?

21 A. I am afraid I'd have to go back and refresh my memory  
22 because much of this pre-dates my time, so I would want  
23 to go back and just double-check that crowd density  
24 wasn't a criteria here, but I agree with you that it is  
25 a broad definition whereby any place at any time could

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1 be a crowded place.

2 Q. "Crowded places will be found in a wide range of  
3 locations including: sports stadia, pubs, clubs, bars,  
4 shopping centres, high streets, visitors attractions,  
5 cinemas, theatres and commercial centres. Crowded  
6 places can also include the public realm ..."

7 So again, this seems to be a broader definition than  
8 the earlier one we were looking at, or perhaps it just  
9 provides more information about the range of possible  
10 places --

11 A. Yes.

12 Q. -- that could be crowded places.

13 A. Yes.

14 Q. Now, can we then turn to your statement, {WS5022/8}.  
15 Now, there you say:

16 "Since February 2018, a more formalised definition  
17 has been used within Government and by its partners."

18 And then you set out what that is. Like Mr Hough,  
19 I'm not going to go through it word-by-word, but the  
20 substance of what is in that paragraph is not obviously  
21 materially different to the definition in the 2012  
22 document; do you agree?

23 A. I do agree.

24 Q. Yes. So as at February 2018, which is eight months  
25 after London Bridge, 11 months after Westminster Bridge,

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1 the definition hasn't really changed at all; do you  
2 agree?

3 A. I agree. I think what's important is the intervening  
4 period whereby the activity of CTAs was narrowed down  
5 as a result of the lack of progress being made to  
6 actually reduce the vulnerability of crowded  
7 places/crowded spaces.

8 Q. Yes, but --

9 A. Sorry.

10 Q. -- I think that work related to the tiering, did it not?

11 A. It does relate to the tiering.

12 Q. Yes. I'm just focusing for the moment on the  
13 definition. The definition between 2012 and February  
14 2018 hasn't materially changed; do you agree?

15 A. I do agree.

16 Q. Yes. Then we have the next paragraph, paragraph 29, in  
17 which we are told this:

18 "The Home Office has found it useful to shorten the  
19 above definition in order to articulate clearly what is  
20 within its scope, as follows."

21 And we've got:

22 "'Crowded places encompass a number of different  
23 public locations:'"

24 Over the page, please {WS5022/9}.

25 "'Permanent buildings which are open to the public.

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1 "'Temporary events...

2 "'Crowded spaces..."

3 And we are told that crowded spaces form a subset of  
4 crowded places. Help me, because I may have  
5 misunderstood, what is the source of that definition?

6 A. That definition is the work that is now being undertaken  
7 by CT policing and the Home Office to brigade its work  
8 writ large around crowded places or crowded spaces, so  
9 that is a definition that has been arrived at with CT  
10 policing and the Home Office.

11 Q. But is this in a guidance document?

12 A. No, this is our internal working definition between the  
13 relevant organisations and is being used to inform the  
14 wider piece of work that I mentioned earlier to Mr Hough  
15 around -- that is currently being trialled in two CTSA  
16 locations.

17 Q. One of the observations I make about this new definition  
18 is that it's shorter, which is --

19 A. Good.

20 Q. -- often helpful, but it separates out different  
21 categories of areas that might be crowded places, and it  
22 specifically identifies crowded spaces as a possibility.

23 But this isn't currently in any guidance, as

24 I understand what you're telling me.

25 A. That's correct, yes.

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1 Q. So does it follow that even now this is not being  
2 applied by counter terrorism security advisors in order  
3 to determine whether something is or is not a crowded  
4 place?

5 A. So I don't think that's quite right. So I think first  
6 of all I agree with you that we need to do more to make  
7 this clear, I think that's very clear from the evidence  
8 that we've heard this week.

9 I am confident through the engagement that we have  
10 with NaCTSO, through DAC D'Orsi's team and their  
11 engagement CTASAs that they are understanding that this  
12 is what we are working towards and that we are waiting  
13 to have due regard to the recommendations of this  
14 Inquest and others, but that they are now -- CTASAs are  
15 now working in all of those areas, to varying or  
16 different degrees, because they will need to take regard  
17 to permanent buildings, et cetera, but this is what we  
18 are working towards, I believe that is a shared  
19 understanding between CT policing and the Home Office.

20 Q. So even now we don't have finalised guidance on what is  
21 and is not a crowded place, and this is a review that  
22 started in November 2016?

23 A. So it started in November 2016 and I believe, but  
24 DAC D'Orsi would be better placed to answer this, that  
25 that was put on pause as the volume of the attacks that

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1 we saw in 2017, CTASAs and others, were quite rightly  
2 focused on the immediate response and priorities. That  
3 has been picked up subsequent to that, to the events we  
4 saw in 2017, rather.

5 Q. Yes.

6 A. I think that there is a wide amount of advice and  
7 guidance that is out there to all of the sectors whether  
8 they were identified in the very first iteration back in  
9 2008, or those, the sections there that are on the  
10 screen of (a), (b) and (c). There is a wide range --  
11 a wide range of public advice and guidance that is out  
12 there through NaCTSO and others to support owners,  
13 operators and public authorities in considering  
14 protective security for those locations.

15 Q. And you've accepted from Mr -- in questions from  
16 Mr Hough that there is legitimate criticism of the  
17 definition being applied between 2012 and 2018 as being  
18 too rigid?

19 A. Sorry, yes. I was just reminding myself of something.  
20 So I think that is true in hindsight but I think at the  
21 time with the threat that we were facing, it was right,  
22 but I can absolutely see with the low complexity attacks  
23 that we've seen that it is too rigid now for the threats  
24 that we faced.

25 Q. We know it's too rigid in hindsight because we heard

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1 evidence from a now deputy chief constable that she, in  
2 meetings, this is Commander Gyford as she then was, was  
3 raising concerns about the rigidity of the definition?

4 A. And I understand. I'd raised them -- I'd raised  
5 previously whether it was still valid in  
6 the November 2016 myself, but with the threat picture  
7 that we were seeing between 2014 and 2016, a range of  
8 attack methodologies, including complex attack plots  
9 that we saw and various attacks between that time,  
10 I think it was the best way at that time to deal with  
11 the events and the threats that we were facing. Given  
12 the events of 2016 was it still right and workable and  
13 the best process? No, I don't think it was, and that's  
14 what we've been changing.

15 Q. Yes. Because we see evidence of that rigidity and the  
16 almost inevitable inconsistency of the application of  
17 the guidance through Police Constable Hone's evidence.  
18 Could we have up on screen, please, {Day29/197:1-25}.

19 That's not the page I'm after.

20 THE CHIEF CORONER: That is Day 29, page 197.

21 MR ADAMSON: {Day29/198:1-25}.

22 "Question: You spoke about the crowded places list,  
23 and I don't want to get into that, other than this: you  
24 said that we know there is this Home Office list, we've  
25 been told that neither Westminster Bridge nor

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1 London Bridge, even after Westminster, London Bridge  
2 wasn't on the list at all --

3 "Answer: No.

4 "Question: -- at any tier, and I made a note that  
5 at one stage you said that the CTSA, so the experts like  
6 you, wouldn't be applying their mind to London Bridge  
7 because it wasn't on the crowded places list.

8 "Answer: It didn't -- as I put in my statement, it  
9 didn't work as a PSIA site, which is the crowded places  
10 workstream from NaCTSO, it doesn't work because it's not  
11 as simple as crowds in locations."

12 So the point that I understand PC Hone was making  
13 was that CTASAs like him were going to be looking at the  
14 guidance on what is and isn't a crowded place, and if it  
15 didn't occur to them that it fit the definition, that  
16 area wouldn't be given consideration at all.

17 THE CHIEF CORONER: Potentially.

18 A. Potentially.

19 MR ADAMSON: Potentially.

20 A. Potentially, yes.

21 Q. But we know as a matter of fact that that is so because  
22 London Bridge, before PS Hone, was not considered as  
23 such?

24 A. Along with many other locations that would be as equally  
25 vulnerable.

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1 Q. And we know that Westminster was not considered as such?  
 2 A. Yes.  
 3 Q. And I suggest that that is an obvious flaw in the  
 4 definition of crowded places that areas like that  
 5 effectively slip through the net.  
 6 A. And I think, as I've said in my evidence, sir, that is  
 7 one of the things that we have recognised, both the  
 8 Home Office and CT policing, and are looking to rectify  
 9 and are actively now trialling how we blend the public  
 10 spaces work, the events work and the permanent fixed  
 11 buildings work across a range of protective security.  
 12 Q. And the requirement that there be a point of contact for  
 13 a geographical location is also, I would suggest to you,  
 14 inevitably going to have resulted in places not being  
 15 identified and, quite possibility, for very bad reason.  
 16 A. I think that was a fixture of the type of threat and  
 17 type of targeting that we were seeing prior to the lower  
 18 sophisticated, less iconic locations that we saw in  
 19 2016. I think it was right at the time, but it's  
 20 clearly not working for the type of attack methodologies  
 21 that we saw during the course of 2016.  
 22 Q. And at what time do you say it was right, just so  
 23 I'm clear?  
 24 A. I think at the time that the process was developed in  
 25 2014 when we were seeing complex attack threats to

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1 places like shopping centres, the Westgate shopping  
 2 centre comes to mind, the Bataclan attacks, and others,  
 3 there was a targeted approach to buildings and permanent  
 4 structures, whether they be events or buildings, and so  
 5 I think at that time the decision was understandable  
 6 given that the previous approach in 2008 had not seen  
 7 a reduction across a wide range of locations that had  
 8 been identified.  
 9 Q. You changed the approach, as I understand it, to  
 10 introduce tiers?  
 11 A. Yes.  
 12 Q. But, correct me if I am wrong, the tiering process was  
 13 designed to allocate resource amongst crowded places?  
 14 A. Yes.  
 15 Q. It was not designed to change the definition of what is  
 16 a crowded place?  
 17 A. I think it was about focusing resource in the most  
 18 attractive places, and so the bespoke CTSA advice, it  
 19 was agreed that it would focus on a narrower cohort of  
 20 places, and that there would be a differentiation  
 21 between the type of advice, depending on the various  
 22 tiers.  
 23 Q. But you were not changing the definition of crowded  
 24 place when you were designing the approach to tiering;  
 25 is that correct?

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1 A. Yes, because there is a wide range of advice and support  
 2 to crowded places writ large.  
 3 Q. So after 2014, when we see the emergence of low  
 4 sophisticated attacks --  
 5 A. Yes.  
 6 Q. -- which was a change to the nature of the threat --  
 7 A. Yes.  
 8 Q. -- the definition of what was a crowded place was not  
 9 amended.  
 10 A. That is the work that is currently happening. Sorry.  
 11 Q. My question was, it was not amended as a matter of fact;  
 12 is that correct?  
 13 A. That is correct, yes.  
 14 Q. And so does it come to this: that actually, there was no  
 15 change in the way in which you consider whether or not  
 16 somewhere is a crowded place and worthy of attention  
 17 from a counter terrorism perspective despite the change  
 18 in threat?  
 19 A. I'm sorry, could you repeat that question? I'm sorry.  
 20 THE CHIEF CORONER: I'm just going to suggest you hang  
 21 on for a moment so -- I suspect it's a battery change  
 22 issue. (Pause).  
 23 MR ADAMSON: Between 2014 and 2017, when we see the nature  
 24 of the threat change --  
 25 A. Yes.

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1 Q. -- which it might be said demanded a different approach  
 2 in terms of your assessment of how you address that  
 3 threat, you were rigidly still applying the existing  
 4 Crowded Places Model.  
 5 A. We were considering, as we did in 2016, how that process  
 6 would change, and I think that's important that is --  
 7 that we are clear about the timescales for that. So  
 8 when the tiering system was introduced in 2014, that  
 9 took over eight months to introduce and change. It's  
 10 a fundamental change to the way that people do business.  
 11 Tragically that process was in train when the events  
 12 of 2016 happened, but the thinking had already started,  
 13 but yes, it was the same in 2017 that it was in 2014.  
 14 Q. And so the position that existed from 2014 was that you  
 15 might have a place which met the definition of a crowded  
 16 place, which would then be tiered, depending on the  
 17 nature of the site?  
 18 A. Yes.  
 19 Q. But you might have a place which was not a crowded  
 20 place, but was still treated as a crowded place, but  
 21 could only ever be given tier 3 status?  
 22 A. Yes, that's my understanding.  
 23 Q. Why?  
 24 A. That was the way of prioritising resource given that  
 25 an attack can happen at any place, at any time, and

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1 would have devastating effects , and I don't  
2 underestimate that.

3 So this was a way of managing specialist resource to  
4 those areas that were believed to be most attractive to  
5 terrorists to target and conduct an attack using a range  
6 of attack methodologies.

7 Q. But we've seen from the diagram, and I don't want to go  
8 to it , inevitably tier 3 sites get input than tier 2 and  
9 tier 1?

10 A. Yes.

11 Q. But there may be a compelling reason why a tier 3 site  
12 demands a greater input?

13 A. And the decision about whether a site was in a tier 2 or  
14 in a tier 3 was up to the individual CTSA's, and my  
15 understanding, but I wasn't administering the scheme,  
16 NaCTSO and the CTSA's were running the scheme, was that  
17 there was discretion and ability for a conversation  
18 about where in that scoring system a site sat , and if ,  
19 using their advice and their knowledge, their  
20 experience, police feel that there is a specific threat  
21 or something warrants more attention, I have seen  
22 multiple cases in my career that police have gone that  
23 step further , irrespective of the national guidelines .  
24 They are just a guideline .

25 Q. What 2014 changes did not do, however, is result in

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1 reconsideration of whether there might be places which  
2 were not presently identified as crowded places, but  
3 which nevertheless required further and greater  
4 attention .

5 A. That's right , but I think --

6 Q. It was only focused on those sites which already fell  
7 within the definition?

8 A. That is true, but I think that that was probably right  
9 given the threat and the targeting of places in 2014.

10 Q. But not right for a threat based on low sophisticated  
11 marauding vehicle attacks?

12 A. Not right for that threat that we saw evolve in 2016,  
13 no.

14 Q. So does it come to this : that the approach that was  
15 being adopted at the time was not right for the times?

16 A. I think that it could be improved for the times.  
17 I think that there will always need to be a degree of  
18 prioritisation . It's a question of are the right things  
19 being prioritised and that's what was being considered  
20 at the end of 2016.

21 Q. I'm pressed for time, so I'm going to have to be quick.

22 A. Sorry, yes.

23 Q. Can we please call up on screen {WS5011/28}. This is  
24 guidance issued by NaCTSO in the aftermath of the  
25 Westminster attack.

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1 A. It is .

2 Q. Yes. I'm not going to go to it , but we've seen the  
3 Westminster Bridge Inquests, and I know that you have  
4 looked at the transcripts in relation to that period,  
5 there were similar documents issued after Berlin and  
6 Nice?

7 A. Yes.

8 Q. Do you agree with me that this document doesn't suggest  
9 any need for a change in approach in terms of the way in  
10 which organisations assessed their security risk?

11 A. I think it's repeating the advice and guidance that was  
12 already out there that we were at severe, but it doesn't  
13 specify any specific things they should do.

14 Q. And we've seen similar documents with Nice and Berlin,  
15 they carry a similar message, but there is no advice  
16 being issued by NaCTSO "We are dealing with a different  
17 type of threat now"?

18 A. That's something that you would have to have asked DAC  
19 D'Orsi, I am afraid. We wouldn't be providing that  
20 advice from the Home Office.

21 Q. Next point. Statutory duties , we've heard about  
22 section 17 of the Crime and Disorder Act , we've heard  
23 about section 66 of the Highways Act. We've heard the  
24 approach that TfL has been taking in relation to those  
25 two statutory duties and we've heard that their approach

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1 is consistent with the Westminster City Council  
2 approach?

3 A. Yes.

4 Q. We've also heard from Ms Hayward that as far as she's  
5 concerned they are pretty much alone in adopting the  
6 approach that they are taking to the interrelationship  
7 between those two statutory provisions?

8 A. So I'm aware of local authorities elsewhere in the  
9 country who have been thinking about public spaces and  
10 who have been engaging with CPNI and others about the  
11 steps they could take around hostile vehicle mitigation .

12 Q. Who is right , as far as the Home Office is concerned?

13 A. The Home Office's view is that everybody has  
14 a responsibility to keep the public safe and the owners  
15 and operators, public authorities , highways authorities  
16 and others, should be taking steps.

17 Q. And has that been communicated to all such authorities?

18 A. Yes, both in planning guidance and in every single  
19 public statement that the Home Office puts out. We are  
20 clear that it is owners' and operators' responsibilities  
21 and public authorities' responsibilities .

22 Q. Finally , if I may, can I have up on screen {WS5011/62}.

23 Now, this is a document which Ms Canby referred us to  
24 earlier through Ms Hayward. This is a document relating  
25 to hostile vehicle mitigation funding.

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1 A. Yes.  
 2 Q. That there is no --  
 3 THE CHIEF CORONER: Can I just ask one question to help me.  
 4 This document, I think everyone says, is undated.  
 5 A. I can confirm the date.  
 6 THE CHIEF CORONER: Oh, that's my question. There we go.  
 7 A. I'm sorry. It was written by my team.  
 8 THE CHIEF CORONER: Yes.  
 9 A. So it was provided following the first London CONTEST  
 10 HVM meeting, which was on 1 June. It was commissioned  
 11 from that meeting. It was released, I believe it was  
 12 around about 8 or 9 June, it was after the attack.  
 13 MR ADAMSON: I believe it was 8 June.  
 14 A. I'm sorry.  
 15 Q. That's my understanding, but I can't remember where I --  
 16 A. It's about that time.  
 17 THE CHIEF CORONER: Thank you.  
 18 MR ADAMSON: There's no central government funding for HVM?  
 19 A. Bar the National Barrier Asset, that's correct.  
 20 Q. That remains the position?  
 21 A. It does, sir, yes.  
 22 Q. The Intelligence and Security Committee conducted  
 23 a review in relation to what needs to happen after the  
 24 2017 attacks?  
 25 A. Yes.

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1 Q. And one of the observations made during the course of  
 2 that inquiry was that sometimes it's very difficult to  
 3 know who is responsible for paying for what?  
 4 A. Yes.  
 5 Q. Does that reflect your view?  
 6 A. That reflects my understanding of the situation, yes.  
 7 Q. Is the position not crying out for clarity as to where  
 8 responsibility needs to lie for funding of measures of  
 9 this nature?  
 10 A. I think that will flow from the legislation work that we  
 11 already have in hand. I think quite often the  
 12 responsibility will go with the funding. Those two  
 13 things are, I think, connected, but at its very starting  
 14 position the Home Office's view is that owners and  
 15 operators, you should come together to agree that, we  
 16 have seen that work in many locations.  
 17 Q. We've heard about "holistic partnership", but there is  
 18 a real risk with holistic partnership where money is  
 19 concerned, is there not, that everybody is happy to be  
 20 a partner as long as somebody else is footing the bill?  
 21 A. That can sometimes be the case, yes.  
 22 MR ADAMSON: Yes. Thank you very much.  
 23 Questions by MR PATTERSON QC  
 24 MR PATTERSON: I'm conscious that the clock watch is already  
 25 ticking so I won't waste any time.

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1 A. I will try and be short with my answers.  
 2 THE CHIEF CORONER: I will put my hands up to taking at  
 3 least two minutes of Mr Adamson's time just to get the  
 4 date of that document.  
 5 MR PATTERSON: I hopefully will have extra time if  
 6 necessary.  
 7 As you know, I think, Ms Nacey, I ask questions on  
 8 behalf of the families of six of those who were killed.  
 9 A. Indeed.  
 10 Q. Including Christine Archibald, who was killed on the  
 11 bridge, and I will be coming to vehicle rental issues in  
 12 a minute.  
 13 Just on that topic, we all agree that protective  
 14 security is really important, don't we, in protecting  
 15 the public?  
 16 A. We do.  
 17 Q. And we all agree that particularly in perhaps the last  
 18 ten years, the approach within this country to this  
 19 issue has developed organically over time, addressing  
 20 the threats and the risks as they have developed?  
 21 A. Yes, I think that's fair.  
 22 Q. And we've seen the benefits in the area of sensitive  
 23 government activity, namely MI5, of having  
 24 an independent external figure, namely David  
 25 Anderson QC, now Lord Anderson, the independent reviewer

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1 of legislation, assisting by applying their mind to the  
 2 work of, in that case, MI5 and legislation.  
 3 Similarly in this area of protective security, isn't  
 4 there a powerful argument for an external mind,  
 5 a judicial mind, or a figure such as Lord Anderson, to  
 6 focus on this whole area and consider the model and the  
 7 criteria and the overall arrangements to help the  
 8 Home Office and the various organisations to get it  
 9 right?  
 10 A. I think that's an interesting thought. I don't think  
 11 it's one that we have previously considered, but it's  
 12 certainly something that we can take away and think  
 13 about.  
 14 Q. And, secondly, again, with the annual reviews of  
 15 Lord Anderson, of the MI5 work, such as, for example,  
 16 following the Westminster attack and the London Bridge  
 17 attack and the reports that he did, all of which fed  
 18 into the learning and the performance of MI5, so too  
 19 couldn't there be annual reviews to see how the  
 20 application of the criteria is working? Are there areas  
 21 where things are being missed? Are there vulnerable  
 22 locations which aren't on the list? Why is  
 23 Borough Market not on the list? Why are these bridges  
 24 not on the list? Are there dangers that flow?  
 25 A. I think it's an interesting concept. I think there are

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1 maybe a couple of things that we would have to think  
 2 very carefully about in that CTSA activity is only one  
 3 aspect of protective security and there are a range of  
 4 other activities, whether that be through CT security  
 5 advisors, through general advice and guidance, and  
 6 I would be cautious about relying completely on the  
 7 physical protective security measures such as hostile  
 8 vehicle mitigation alone to be the only measure of  
 9 whether what we were doing -- what collectively was  
 10 happening was right or wrong.

11 So I think it's an interesting idea, I think it  
 12 would be certainly one that CT policing would have to  
 13 subscribe to as well --

14 Q. Of course.

15 A. -- and how we fit that together. So I can't say yes  
 16 straightaway, but I think it's something that we would  
 17 certainly go away and have a think about whether that's  
 18 something we want to explore further and of course  
 19 ministers will have their views as well.

20 THE CHIEF CORONER: I think, Mr Patterson, there were the  
 21 two strands to your suggestion.

22 A. Yes.

23 THE CHIEF CORONER: One was the, if I can put it this way,  
 24 the David Anderson approach generally.

25 MR PATTERSON: Yes.

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1 THE CHIEF CORONER: We know that he looked at Westminster,  
 2 London Bridge, and Manchester, as an independent  
 3 assessment did a review of the response to that.

4 MR PATTERSON: Exactly.

5 THE CHIEF CORONER: And then your second stream is really is  
 6 there scope, whatever that scope might be, for, as it  
 7 were, an ongoing annual review thereafter of protective  
 8 security generally?

9 MR PATTERSON: Absolutely, a fresh pair of eyes from an  
 10 experienced, obviously DV-cleared figure, to help.

11 A. Yes, I think the first part of the sort of  
 12 backward-looking what went wrong, if something did go  
 13 wrong, is -- I would suggest myself personally that the  
 14 forward-looking would be more beneficial and looking  
 15 ahead rather than a retrospective, if that is something  
 16 that ministers would be comfortable with rather than  
 17 a retrospective look.

18 MR PATTERSON: Yes, and of course this Inquest has been and  
 19 continues to be having a retrospective look but yes, we  
 20 could have a fresh approach from such a figure saying:  
 21 can we revisit this model and see if it is now  
 22 appropriately structured. We're all grateful to hear  
 23 that the Home Office is looking at it now, but two minds  
 24 are better than one and if there is an appropriate  
 25 person who could help, I would have thought the Home

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1 Secretary would welcome that.

2 A. I can't speak for the Home Secretary, but I -- and nor  
 3 would I want to, but I think there's been a lot of work  
 4 happened by CTSA's and NaCTSO in thinking ahead and  
 5 looking forward about how the whole system, whether that  
 6 be for events, whether that be for grey spaces that you  
 7 heard about, public spaces, et cetera, that's something  
 8 that certainly a lot of people are putting their minds  
 9 to at the moment.

10 Q. Rental issues. As a public authority, a government  
 11 department of course has responsibilities under the  
 12 Human Rights Act; yes?

13 A. Yes.

14 Q. In particular, the Home Office and the Department for  
 15 Transport to act compatibly with Article 2 and the duty  
 16 to protect life; yes?

17 A. Yes.

18 Q. We had evidence in the Westminster Bridge inquest from  
 19 Dr Fegan-Earl about the horrific injuries that were  
 20 caused when that vehicle was used as a weapon: four  
 21 members of the public killed, and something like over 40  
 22 members of the public seriously injured in the attack on  
 23 the bridge, and you appreciate, I think, the problem of  
 24 vehicle attacks and how frequently rentals play a part  
 25 in terrorists getting their hands on vehicles; yes?

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1 A. I think that's something that we've seen more frequently  
 2 in 2017 onwards, but I see that they are used, yes.

3 Q. And you appreciate that vehicle attacks are often  
 4 followed up by a second stage of the terrorist attack,  
 5 the knife stage. So the Lee Rigby attack, Masood on  
 6 Westminster Bridge, Butt and the others on  
 7 London Bridge, on other occasions there has been that  
 8 two-stage nature of these horrific attacks?

9 A. I've seen that, yes.

10 Q. Can we just look, please, at a list of terror attacks  
 11 that involved vehicles. {DC8342/1}.

12 I think, Ms Nacey, you have been provided with this  
 13 list.

14 A. I saw it very briefly this morning, yes.

15 Q. And I don't want to take up too much time because the  
 16 contents speak for themselves, do they not? This is  
 17 a list of significant terrorist attacks involving  
 18 vehicles, it begins in 2006 in the United States --

19 A. Yes.

20 Q. -- with a rental vehicle used to target young students.  
 21 As we get into more recent years of course we have the  
 22 propaganda that's come out of Isis, we have the fatwa  
 23 from Adnani encouraging attacks in the West. We have  
 24 Nice, as we can see in July 2016, 86 members of the  
 25 public killed, and over 400 seriously injured when that

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1 rental vehicle was used; yes?  
 2 A. Yes.  
 3 Q. And so you told Mr Hough that after the Nice attacks and  
 4 the Berlin attack, so before Westminster, that in terms  
 5 of what actually had been done to address the rental  
 6 issue, as I can tell from your statement, Ms Nacey,  
 7 little of substance had been done to make it more  
 8 difficult for would-be terrorists to rent vehicles; is  
 9 that right?  
 10 A. I think, to be fair, before 22 March and the atrocity  
 11 that we saw on Westminster Bridge, the rental SUV was  
 12 the only "normal" car. The attacks that we have seen  
 13 more recently have been around heavy goods vehicles and  
 14 DAC D'Orsi's statement sets out the work that CT  
 15 policing and others were doing specifically around that  
 16 and, as I believe we heard earlier on this week, they  
 17 came to the conclusion that actually getting hold of  
 18 a vehicle, any vehicle, can happen in multiple ways, and  
 19 so the focus at that point was around protecting --  
 20 preventing people acquiring the vehicle sort of by  
 21 truck-stop advice and working with the HGV companies.  
 22 Q. I'm looking at your statement where you deal with this  
 23 period, it's taking stock, it's discussing and  
 24 developing, it's considering further, it's exploring  
 25 a role, but was there anything of substance that was

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1 introduced that would make it more difficult for  
 2 would-be terrorists to rent a vehicle? I haven't been  
 3 able to identify anything from my research.  
 4 A. No, there wasn't, because as Witness L explained, the  
 5 wide range of ways that subjects of interest and others  
 6 can acquire vehicles. A hire car was not something that  
 7 was specifically identified as a particular area of  
 8 concern above and beyond those other ways that you can  
 9 acquire a vehicle.  
 10 Q. Then after Berlin we have Masood on Westminster Bridge.  
 11 Even though his name was held by MI5 as a former  
 12 terrorist suspect he was able to go into Enterprise  
 13 rentals and rent not a lorry, not a van, but  
 14 a four-wheel drive car and he was able to use it and, as  
 15 we know, the horrific result of that to all of those  
 16 people on Westminster Bridge.  
 17 Now, at that Inquest we were told that at that  
 18 stage, there had been no obstacles to his seeking to  
 19 rent that vehicle. So other than confirming that you  
 20 are who you are, confirming that you have the ability to  
 21 pay, confirming that you've got a driving licence, other  
 22 than those three things, no checks of any kind were  
 23 being carried out at the time that Masood tried to get  
 24 that vehicle?  
 25 A. That's my understanding. I wasn't involved in the

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1 details of that, but that's my understanding.  
 2 Q. And then after that and the months that followed between  
 3 the Westminster attack and the London Bridge attack,  
 4 despite those deaths and those 40-odd serious  
 5 casualties, again, we can't identify a single obstacle  
 6 of any substance that was at that stage introduced by  
 7 either the Home Office or the Department for Transport.  
 8 Is that right?  
 9 A. That is right, sir. Just going back to Witness L's  
 10 evidence, that's because a hire car was not something  
 11 that was seen to be any more attractive than any other  
 12 way of acquiring a vehicle to conduct a terrorist  
 13 attack.  
 14 Q. But Nice, a rental vehicle, Masood, Westminster,  
 15 a rental vehicle; was the Home Secretary, was the  
 16 Secretary of State for Transport, were they applying  
 17 their minds to this issue of rentals?  
 18 A. I can't speak for either of those Secretary of State's  
 19 minds, those officials. We were tasked following the  
 20 London Bridge attack. The thought process at that time  
 21 was how can we work with CPNI and others to develop more  
 22 and different hostile vehicle mitigation, how can the  
 23 Department for Transport colleagues work around vehicle  
 24 technology to immobilise vehicles, identify suspicious  
 25 behaviours being -- you know, suspicious driving

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1 behaviours. The focus at that time was not on rental  
 2 vehicle. That is the work that took place following the  
 3 London Bridge attack and Borough Market.  
 4 Q. Why was it not considered, because Masood's name was  
 5 held on the databases of MI5 as a closed SOI, subject of  
 6 interest. There was a missed opportunity. Why was it  
 7 not looked at following Westminster; can you help?  
 8 A. I can only share what I know and that is the evidence of  
 9 Witness L last week around the technical challenges and  
 10 not to underestimate the difficulty around sharing data  
 11 as well as the fact that there are many millions of  
 12 transactions in the UK around rental vehicles and that  
 13 this was not the only way that we were seeing  
 14 subjects -- that agencies were seeing subjects of  
 15 interest acquire vehicles. They were being stolen, they  
 16 were using their own cars, they were being hijacked. We  
 17 hadn't seen a pattern, a significant pattern, that made  
 18 rental vehicle hire -- hiring a rental vehicle any more  
 19 identifiable that somebody was conducting a terrorist  
 20 attack.  
 21 Q. But there were available techniques, were there not:  
 22 a procedure whereby MI5 or the counter terrorism police  
 23 are notified of the names of applicants and, as Mr Hough  
 24 suggested, if one of those names happens to be Masood or  
 25 Butt, a name will flash up on the screen and then the

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1 officers can investigate : oh, that's interesting, is it  
 2 innocent or is it nefarious. Something like that could  
 3 have been introduced, surely.  
 4 A. I think Witness L was quite clear last week that we  
 5 shouldn't underestimate the technical challenges of  
 6 creating such a system. That is the thing that we are  
 7 looking at but, as Witness L said, not to underestimate  
 8 the technical challenges of that being possible.  
 9 Q. But it wasn't even tried at that stage, was it?  
 10 A. We were not considering rental vehicle as any more  
 11 likely than any other way of a terrorist acquiring a  
 12 vehicle at that time, no.  
 13 Q. Or as Mr Hough said, use this code or flag system  
 14 whereby in the other direction, at the vehicle rental  
 15 end, a flag appears on the computer to indicate: oh,  
 16 a phone call has to be made to the police, or something  
 17 of that sort, or the DVLA?  
 18 A. You're right. Nothing in that area was considered.  
 19 I think that's quite an interesting challenge in terms  
 20 of you would either be sharing large amounts of very  
 21 sensitive data with large amounts of people to suggest  
 22 that somebody was suspicious in some way, shape or form,  
 23 and then being clear with the person at the other end of  
 24 the company: this is possibly someone who is quite  
 25 dangerous that you would be trying to engage with.

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1 I think that has all sorts of different challenges in  
 2 different directions.  
 3 Q. Of course, you wouldn't want it to flash up on the  
 4 screen of the employee in Enterprise rentals "MI5  
 5 suspect", but a flag, simple as that, requiring a phone  
 6 call or a query. Something like that could be devised,  
 7 could it not?  
 8 A. I defer to MI5, law enforcement agencies about whether  
 9 they thought that that was necessary or proportionate.  
 10 Q. So some months after Westminster with nothing of  
 11 substance having changed, Butt was able to use his  
 12 telephone to (a) rent the van, the 2.5-tonne van, even  
 13 though he was a terror suspect whose details were held  
 14 on the databases of both MI5 and the police as a live  
 15 suspect?  
 16 A. Yes, as you heard from Witness L in his evidence last  
 17 week, the various implications of that and choices that  
 18 were or were not made.  
 19 Q. Anti-terror hotline reports had come in on him, various  
 20 strands of intelligence had come in on him, he had been  
 21 on a national TV programme called the Jihadis Next Door  
 22 and yet he was able to get his hands on the van and  
 23 the 7.5-tonne lorry?  
 24 A. Again, I don't mean to be repetitious, but Witness L  
 25 gave evidence last week, I am not a member of MI5 or law

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1 enforcement. I can't provide you with anything more.  
 2 Q. Would you agree if I suggested that there had been  
 3 a failure after Westminster and before London Bridge to  
 4 properly address this risk?  
 5 A. I wouldn't agree with you, no.  
 6 Q. The risk to life was there and it was allowed to  
 7 continue. It was already a situation where we had seen  
 8 people who had been suspects on the databases renting  
 9 vehicles, and here was another occasion where a suspect  
 10 on a database was able to rent a vehicle and no steps  
 11 had been taken to address that ongoing availability.  
 12 A. As I've said before, you have heard evidence that there  
 13 are many ways that subjects of interest and those who  
 14 are intent on committing terrorist acts can acquire  
 15 a vehicle.  
 16 Q. Would you agree that if such a procedure had been put in  
 17 place it is possible that his two bookings would have  
 18 been detected or prevented?  
 19 A. I think that's a really big hypothetical. There are  
 20 very many steps to that that I'm not sure that I could  
 21 get there. Possibly, but there are many steps in that  
 22 that I would not have knowledge of.  
 23 Q. And then after London Bridge, as you told Mr Hough,  
 24 there was again use of a rental vehicle in the Finsbury  
 25 Park attack down at the bottom of the page; do you see

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1 that?  
 2 A. I do.  
 3 Q. Over onto the next page {DC8342/2}, Barcelona, 13 were  
 4 killed with a rental van, one of three vans hired.  
 5 Canada in September of 2017, a rental vehicle was used,  
 6 New York, a rental vehicle, a note left claiming that it  
 7 was an attack in the name of Isis.  
 8 So in the months that followed in late 2017, still  
 9 nothing of substance was introduced to address this  
 10 ongoing availability of vehicles to suspects; would you  
 11 agree?  
 12 A. No, I think at that point we were working with the -- or  
 13 the Department for Transport were working very hard with  
 14 various trade industry bodies to develop the Rental  
 15 Vehicle Security Scheme, so I think we were looking at  
 16 how we could provide a deterrent effect and work to  
 17 raise security standards in the rental vehicle security.  
 18 Q. At {DC1872A} --  
 19 THE CHIEF CORONER: Just on that document, Mr Patterson,  
 20 quite a lot of those attacks are overseas and obviously  
 21 the ability of the Home Office here or the Department  
 22 for Transport to deal with vehicle rentals overseas  
 23 would be --  
 24 MR PATTERSON: Oh, no one is suggesting for one moment  
 25 that --

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1 THE CHIEF CORONER: No, but as I say, it is just whether  
 2 these attacks taking place there would trigger a thought  
 3 in the mind here, that's the only point I'm raising.  
 4 I can see you've got a point about the ones which occur  
 5 proximate to London Bridge and Borough Market. As  
 6 I say, I'm just slightly concerned that we've gone  
 7 rather on to other ones which are later but  
 8 predominantly, I think other than one in August which is  
 9 not a rental vehicle, they are overseas.

10 MR PATTERSON: Yes, this document simply addresses the use  
 11 by terrorists of vehicles.

12 THE CHIEF CORONER: Absolutely, but I'm just conscious that  
 13 the witness here at the moment is dealing with the other  
 14 part of your question which is about flagging here,  
 15 would it have led to this being prevented or spotted.

16 MR PATTERSON: Yes. The point I would make on that is  
 17 obviously people take inspiration, don't they, from what  
 18 they read about other terrorists doing elsewhere in the  
 19 world, so the Barcelona terrorist attack and the Nice  
 20 terror attack no doubt will have sadly inspired others,  
 21 I would suggest.

22 On the screen, please, if we could have {DC1872A/1}.  
 23 Ms Nacey -- let's try {WS1872A/1}.

24 Ms Nacey, we have documentation from the rental  
 25 agencies and from Hertz and if we go, please, to

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1 {WS1872A/82}, in September 2017, there was a meeting  
 2 involving representatives of the car hire industry, and  
 3 at the bottom of the page it was reported at this  
 4 meeting in these minutes that there had been an update  
 5 on discussions with government about next steps for the  
 6 rental sector, given the number of incidents involving  
 7 rental vehicles and the press coverage it was reported  
 8 that the government needed to be seen to be doing  
 9 something, but there was no appetite to legislate.

10 Just pausing there, can you help us with that. Is  
 11 that right? Was it the view within government that they  
 12 needed to be seen to be doing something?

13 A. Sir, I can't comment on those minutes because I wasn't  
 14 at that meeting, nor was anyone from the Department for  
 15 Transport or Home Office. That is certainly not the  
 16 position that we were taking within either the  
 17 Home Office or the Department for Transport at that  
 18 time.

19 Q. But why not appetite for legislation if necessary?

20 A. Sir, as I think I say in my statement, that has not been  
 21 ruled out at all. That is something that DfT, the  
 22 Department for Transport, are keeping under review, and  
 23 if needed, and if there is a proportionate requirement  
 24 to do so by law enforcement agencies, we'll explore  
 25 legislating if necessary.

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1 Q. Moving on to the top of the next page, it was noted that  
 2 there was to be a meeting with the department on  
 3 2 October.

4 Further down it was suggested, about halfway down  
 5 that page, please, Ms Nacey, if you pick it up,  
 6 a reference to the Department for Transport looking at  
 7 access via the banking system to show when a rental  
 8 transaction was booked and that would allow the police  
 9 to check against their watch list. So the very  
 10 procedure that I was suggesting was being posited at  
 11 that stage as early as September 2017; do you see that?

12 A. I do see that, yes.

13 Q. So that's what the business end were offering or  
 14 suggesting according to these minutes, yet here we are  
 15 nearly two years later and that still hasn't been  
 16 considered; is that right?

17 A. So, as I think we explained at the beginning, I don't  
 18 lead on this, the Department for Transport lead on this  
 19 sector, so I don't have intimate knowledge of this.

20 Q. I see. Of course.

21 A. But my understanding is there were a wide variety of  
 22 options that were initially put on the table that were  
 23 then worked through both by the Department for  
 24 Transport, law enforcement colleagues and members of the  
 25 industry, and various things at times might have been

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1 more attractive or less attractive when the  
 2 practicalities came in. I don't know if that was one of  
 3 those examples. That might be a reason.

4 Q. And at {WS1872A/84}, please, when we get to October,  
 5 this is a note of a meeting with the department and the  
 6 Home Office, so with your department.

7 A. Yes.

8 Q. And the proposal there, if we look towards the bottom of  
 9 the page, what was being proposed at that stage was  
 10 a mandatory scheme, so what later was introduced you  
 11 told us earlier in terms of the rental vehicle scheme,  
 12 it was originally being proposed to be mandatory, as we  
 13 can see; do you see that?

14 A. I do see that, yes.

15 Q. Over onto the next page {WS1872A/85}, the next steps  
 16 were there would be advice given to ministers.

17 A. Yes.

18 Q. Then if we go, please, to page 89 {WS1872A/89}, notes of  
 19 a meeting at the offices of the Department for  
 20 Transport. Your department also present, we can see?

21 A. Yes.

22 Q. And representatives of the industry, and it's now  
 23 announced that the Secretary of State, would that be  
 24 Mr Grayling?

25 A. I believe it would have been at the time, yes.

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1 Q. Had opted to pursue a voluntary registration scheme, but  
 2 that it was noted this should be confidential and that  
 3 the proposal should not be discussed in public or in the  
 4 press. Why should it be kept confidential that it was  
 5 to be merely voluntary rather than mandatory?  
 6 A. So I'm assuming because at this -- I can't account for  
 7 that because by this point the scheme was -- had already  
 8 been launched. It is clear on the website where it was  
 9 launched that it is voluntary, so I can't account for  
 10 that. I don't know.  
 11 Q. And you'll agree that a mandatory system would have much  
 12 greater teeth than a voluntary system?  
 13 A. I think that depends on how successful the voluntary  
 14 scheme is.  
 15 Q. True.  
 16 A. And a voluntary scheme was much quicker and more easily  
 17 deliverable, I think if we had gone down a mandatory  
 18 stream straightaway then nothing would have been done  
 19 yet because it takes some time to deliver that through  
 20 legislation.  
 21 Q. So have they all signed up to it or have any of the  
 22 rental companies declined to sign up to it?  
 23 A. A very significant proportion of the market has signed  
 24 up to the scheme and DfT, Department for Transport, are  
 25 keeping in mind the need if they need to mandate the

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1 scheme in future, that has not been taken off the table.  
 2 Q. How many have declined to sign up for the scheme?  
 3 A. I believe it's actually the other way around. You  
 4 choose to sign up to the scheme rather than being asked,  
 5 so I don't think anyone has declined to sign up to the  
 6 scheme.  
 7 Q. So is every business in the scheme?  
 8 A. No, not every business; a significant proportion.  
 9 Q. So how many are not in the scheme?  
 10 A. I believe it's -- there's 80% market share is covered by  
 11 the scheme.  
 12 Q. So 20% of businesses are not in the scheme?  
 13 A. That's my understanding. 20% of the market --  
 14 THE CHIEF CORONER: 20% of the market share, I think.  
 15 A. It's not -- market share, yes.  
 16 MR PATTERSON: Market share, absolutely. And the ISC, what  
 17 was the ISC's concern about the scheme?  
 18 A. The ISC had concerns about its voluntary nature.  
 19 Q. Right.  
 20 A. I would stress that that was before the scheme had been  
 21 launched. They have no -- we have not gone back to the  
 22 ISC with the details of the scheme and its coverage,  
 23 et cetera.  
 24 Q. Butt, of course, didn't rent face-to-face, he rented  
 25 over the phone, didn't he?

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1 A. That's my understanding.  
 2 Q. So this scheme, which has suggestions or recommendations  
 3 like looking out for suspicious demeanour and aspects  
 4 such as that, of course, they would have limited effect,  
 5 wouldn't they, if it's a telephone booking or an online  
 6 booking like Khuram Butt's?  
 7 A. They would.  
 8 Q. What percentage of bookings are made over the telephone  
 9 or online?  
 10 A. I don't know.  
 11 Q. Is it the majority of bookings?  
 12 A. I really don't know.  
 13 Q. Witness L said that as to the technicalities of the  
 14 proposal that that would be possible, and even if  
 15 legislation were necessary is that something that could  
 16 be looked into by the government if it's felt that it  
 17 would assist to protect the public?  
 18 A. I think Witness L said it was possible but the technical  
 19 difficulties shouldn't be underestimated.  
 20 Q. Yes. But we shouldn't adopt a defeatist approach, would  
 21 you agree?  
 22 A. No, no, not at all, but I think they are quite  
 23 significant things that we need to work through and as  
 24 Witness L said about the proportionality perspective as  
 25 well, I think both those things need to be taken into

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1 account but, as I say in my statement, that is not  
 2 something that -- we have not ruled out legislation, if  
 3 that is what is required and that is what is asked for  
 4 by law enforcement and other partners, that is something  
 5 that the Department for Transport will consider.  
 6 Q. But you do recognise that to this day, there are no  
 7 obstacles in place to a would-be terrorist just as there  
 8 were none in place when both Masood and Butt rented  
 9 their vehicles?  
 10 A. I think it depends on the definition of obstacle.  
 11 Q. Of substance?  
 12 A. I think standards have been raised in the industry and  
 13 I think that there is a deterrent effect that the RVSS  
 14 is having.  
 15 MR PATTERSON: I've no more questions, thank you.  
 16 MS LEEK: Might this be a good time for a short break?  
 17 THE CHIEF CORONER: I was just waiting, Ms Leek, to see  
 18 whether there was anyone else who wanted to ask any  
 19 short questions. Assuming no one else does, what  
 20 I'm going to suggest is we take a 10-minute break and  
 21 then we will come back for any further questions there  
 22 may be.  
 23 (3.55 pm)  
 24 (A short break)  
 25 (4.07 pm)

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## Questions by MS LEEK QC

1 MS LEEK: Ms Nacey you answered a question earlier this  
 2 afternoon by saying:  
 3 "I think anywhere was considered particularly  
 4 vulnerable".  
 5 It is a fact, is it not, that there are finite  
 6 resources to be deployed in the fight against terrorism?  
 7 A. Yes, that's correct.  
 8 Q. And delivery of those resources must be considered and  
 9 it must be proportionate?  
 10 A. That's correct.  
 11 Q. And when considering proportionality we have to consider  
 12 also the intrusion into people's lives?  
 13 A. Indeed.  
 14 Q. And into the way in which they go about their daily  
 15 business?  
 16 A. That's right.  
 17 Q. We have to be realistic about the nature of the threat?  
 18 A. Yes.  
 19 Q. And we have to be realistic about the way in which you  
 20 prioritise those resources?  
 21 A. That's right.  
 22 Q. And the key to much of what you have been asked today is  
 23 around the issue of prioritisation?  
 24 A. Yes.  
 25

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1 Q. And in that context, do we have to look at and  
 2 understand how the crowded places model fits into the  
 3 Protect strand of CONTEST?  
 4 A. That's right.  
 5 Q. And we have to remember that CONTEST is the UK's overall  
 6 counter terrorism strategy?  
 7 A. Yes.  
 8 Q. And that sets out how the UK government will reduce the  
 9 risk to the UK of terrorism?  
 10 A. Yes.  
 11 Q. It is divided into four strands. We've heard that.  
 12 A. Yes.  
 13 Q. But we cannot view any one of those four strands in  
 14 isolation?  
 15 A. No, we can't.  
 16 Q. Just as we cannot look at any particular location in  
 17 isolation?  
 18 A. That's right.  
 19 Q. We cannot look at any one particular location and say:  
 20 this presents a real risk of a terrorist attack  
 21 therefore we will focus on this particular location?  
 22 A. That's correct.  
 23 Q. Because this particular location will always be one of  
 24 a very, very large number, sadly, of locations which are  
 25 vulnerable to attacks by terrorism?

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1 A. That is unfortunately right.  
 2 Q. And they will be vulnerable to attacks by vehicles as  
 3 weapons?  
 4 A. Yes.  
 5 Q. By vehicle-borne IEDs?  
 6 A. Yes.  
 7 Q. By suicide attacks?  
 8 A. Yes.  
 9 Q. By knife attacks?  
 10 A. Sadly, yes.  
 11 Q. By chemical attacks?  
 12 A. Yes.  
 13 Q. So is it unrealistic simply to focus in on one location  
 14 and say: we have to throw all of our resources at that  
 15 location because it is at risk of attack?  
 16 A. Sadly that's correct.  
 17 Q. And we have to put this in the context of the way in  
 18 which the understanding of the modes of attack has  
 19 evolved significantly over the last ten years?  
 20 A. That's right.  
 21 Q. Now, OSCT leads on developing, coordinating and  
 22 implementing CONTEST?  
 23 A. It does.  
 24 Q. With significant contributions from others?  
 25 A. Yes.

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1 Q. But it is the part of government that is responsible for  
 2 overseeing cross-government and cross-departmental work  
 3 under those four strands?  
 4 A. It is.  
 5 Q. And the Protect strand within that seeks to reduce  
 6 vulnerability by a number of methods?  
 7 A. Yes.  
 8 Q. Which sometimes work on their own, and they sometimes  
 9 work together.  
 10 A. That's right.  
 11 Q. By reducing access to the material needed for the  
 12 attack?  
 13 A. Yes.  
 14 Q. Knives, guns, explosives, vehicles, and so on.  
 15 A. Yes.  
 16 Q. By reporting suspicious transactions?  
 17 A. Yes.  
 18 Q. By detecting those who are intent on causing damage?  
 19 A. Yes.  
 20 Q. By protecting public spaces, transport and  
 21 infrastructure?  
 22 A. Yes.  
 23 Q. Using border powers?  
 24 A. Yes.  
 25 Q. And deploying partnerships for public and private

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1 sectors?  
 2 A. That's correct.  
 3 Q. The Home Office has a high level strategic function?  
 4 A. Yes, that's right.  
 5 Q. And there are so many strands to the Protect -- simply  
 6 to the Protect strand that the Home Office has to have  
 7 a high-level strategic function?  
 8 A. Yes.  
 9 Q. So one can't simply say to you, for example: did you  
 10 know whether a particular street, building or location  
 11 was on a particular priority list?  
 12 A. I wouldn't be able to answer that question.  
 13 Q. That would be unrealistic?  
 14 A. Yes.  
 15 Q. So we have to look at how responsibility for the  
 16 delivery of advice for the benefit of preventing against  
 17 terrorism, is divided between the Home Office and the  
 18 police?  
 19 A. Yes.  
 20 Q. And we've heard that the police, through CT policing,  
 21 working alongside NaCTSO, have an operational function  
 22 for the delivery of that counter terrorism prevention  
 23 advice?  
 24 A. Yes.  
 25 Q. But we start from the principle that the provision of

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1 protective security is the responsibility of owners and  
 2 operators?  
 3 A. That is the starting principle.  
 4 Q. So the question then is, how do police deliver that  
 5 protective security advice to the owners and operators  
 6 of crowded places, and let's include in that public  
 7 spaces throughout the UK, not just in London, but  
 8 throughout the UK?  
 9 A. That's exactly right.  
 10 Q. Elements of NaCTSO, as I understand it, are embedded in  
 11 and work in collaboration with CPNI?  
 12 A. They are together, yes.  
 13 Q. In the development and the provision -- they work  
 14 together in the development and provision of protective  
 15 security advice?  
 16 A. Yes.  
 17 Q. NaCTSO has a website that local authorities and the  
 18 owners of public spaces should be aware of?  
 19 A. It's via gov.uk, yes.  
 20 Q. That provides regular protective security advice updated  
 21 on a regular basis?  
 22 A. That's correct.  
 23 Q. There are government and NaCTSO media campaigns for the  
 24 provision of that advice?  
 25 A. Yes.

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1 Q. Lucy D'Orsi described NaCTSO in her statement as  
 2 follows, and tell me if you agree with this:  
 3 "... the police's public-facing body responsible for  
 4 taking the amalgamated knowledge from the above  
 5 organisations [CT policing, et cetera] and turning it  
 6 into operational guidance. NaCTSO also oversees the  
 7 accreditation and tasking of the CTSA network."  
 8 A. Do I agree with that?  
 9 Q. Do you agree with that definition?  
 10 A. I do. That is my understanding of NaCTSO, yes.  
 11 Q. And is it right to remind ourselves that the police have  
 12 total operational independence from the Home Office?  
 13 A. They do.  
 14 Q. And as you said earlier, you cannot direct them in  
 15 relation to certain aspects of their policing work?  
 16 A. No, we work in partnership but I can't make them do  
 17 anything.  
 18 Q. So in summary, OSCT's role is to set the policy and  
 19 strategy, which is to provide through the police advice  
 20 and guidance to owners, operators and public authorities  
 21 responsible for crowded locations?  
 22 A. That's correct.  
 23 Q. And is that system deliberately dynamic so that the  
 24 police are able to respond to emerging threats and the  
 25 needs of those with whom they engage?

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1 A. Yes.  
 2 Q. And is the definition of those to whom that advice is  
 3 provided necessarily broad?  
 4 A. Yes.  
 5 Q. Let's turn to crowded places and crowded spaces. We  
 6 have heard that there is no legislative definition of  
 7 what those terms mean, but it cannot be the position,  
 8 can it, that CTSA's somehow have to approach every single  
 9 owner, occupier and public authority in relation to  
 10 every single stretch of roadway, every single shop,  
 11 every single building which may become crowded at some  
 12 particular time?  
 13 A. I think that would be unrealistic unfortunately.  
 14 Q. So what has to be done is that there has to be in some  
 15 way a prioritisation of the police resources with regard  
 16 to the provision of advice to those organisations?  
 17 A. There does.  
 18 Q. And has the way in which that prioritisation is given  
 19 evolved over the last 12 years or so in order to deal  
 20 with the emerging and changing threats?  
 21 A. It has evolved, yes.  
 22 Q. So we've heard that there was a report by Lord West with  
 23 a wide definition of crowded places, and was there  
 24 a point in 2010/2012 where CTSA's were providing  
 25 protective security advice to hundreds, if not thousands

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1 of sites , and they themselves were trying to prioritise  
 2 in terms of risk?  
 3 A. Yes.  
 4 Q. Was it then found in 2012 that as a result of the way in  
 5 which that prioritisation was taking place, that large  
 6 numbers of sites had not had their vulnerability  
 7 sufficiently reduced?  
 8 A. Yes. I believe that only 20% had reduced their  
 9 vulnerability .  
 10 Q. Only 20% had reduced their vulnerability?  
 11 A. I believe that's right, yes.  
 12 Q. So the provision of advice was considered not to have  
 13 been as well deployed then as it might have been; is  
 14 that right?  
 15 A. I think that's a fair summary.  
 16 Q. Did the Protect sub-board then establish the Crowded  
 17 Places Working Group to oversee improvements to the  
 18 crowded places programme?  
 19 A. It did.  
 20 Q. And did the Crowded Places Working Group include what  
 21 was then known as ACPO TAM, that was the Association of  
 22 Chief Police Officers (Terrorism and Allied Matters)?  
 23 A. Yes.  
 24 Q. NaCTSO?  
 25 A. Yes.

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1 Q. OSCT?  
 2 A. That's my understanding.  
 3 Q. Input from JTAC?  
 4 A. Yes.  
 5 Q. Input from CPNI?  
 6 A. Yes.  
 7 Q. And the Department for Transport.  
 8 A. Amongst other departments from around Whitehall, yes.  
 9 Q. So all of those organisations were involved in the  
 10 Crowded Places Working Group that was then set up?  
 11 A. That's my understanding.  
 12 Q. And did the chair of the CPWG then commission NaCTSO to  
 13 lead a review to identify the best way of prioritising  
 14 locations?  
 15 A. Yes.  
 16 Q. And a workstream was then led to develop methodology by  
 17 which to prioritise locations?  
 18 A. That's correct.  
 19 Q. With input from CPNI, from CTSA representatives, from  
 20 business stakeholders, amongst others?  
 21 A. Yes, that's right.  
 22 Q. And was the review wide-ranging?  
 23 A. Yes.  
 24 Q. And did it take into account empirical data which showed  
 25 that at that stage, only 20% of the sites on the list at

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1 that stage had reduced vulnerability?  
 2 A. It did.  
 3 Q. And were the conclusions of that review that new  
 4 criteria were to be applied in order to assist with  
 5 prioritisation of sites for advice?  
 6 A. It did, yes.  
 7 Q. And was that applied in the crowded places delivery  
 8 model of 2014?  
 9 A. That's correct.  
 10 Q. So that model had input from NaCTSO with expert advice,  
 11 the various organisations that we have heard, and was  
 12 signed off by the Crowded Places Working Group?  
 13 A. And then the Protect sub-board, yes.  
 14 Q. And then the Protect sub-board, you beat me to it .  
 15 Was the priority focus then on tiered sites based on  
 16 their importance and their attractiveness at a national  
 17 or a regional level?  
 18 A. Yes.  
 19 Q. That did not preclude, though, did it, advice from being  
 20 given, provided to other sites that were considered  
 21 potentially to be at risk from terrorism?  
 22 A. That's exactly right.  
 23 Q. Was there also a generic approach to all other sites ,  
 24 making better use of publication and online tools?  
 25 A. Yes.

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1 Q. At that stage, was there any known threat at all of  
 2 vehicle-as-weapon attacks?  
 3 A. Sorry, do you mean in 2014?  
 4 Q. In 2014.  
 5 A. Not as vehicle attacks are being talked about in this  
 6 context, no.  
 7 Q. And was the aim of that new model the consistent  
 8 delivery of proportionate advice?  
 9 A. Yes.  
 10 Q. So was it ever the case that if you weren't on the list ,  
 11 you didn't get advice?  
 12 A. Not as far as I'm aware, no.  
 13 Q. Was this effectively and simply a prioritisation  
 14 gateway?  
 15 A. Absolutely.  
 16 Q. It was not a gateway to protection or advice?  
 17 A. No.  
 18 Q. It was simply there to help CTSA's prioritise their  
 19 advice?  
 20 A. Yes.  
 21 Q. And so far as you are aware, was that direction and  
 22 training given to CTSA's through NaCTSO?  
 23 A. To the best of my understanding, that's right .  
 24 Q. And CTSA's were tasked with identifying sites in their  
 25 region which fell within the criteria?

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1 A. Yes.  
 2 Q. The OSCT was then involved, as I understand it, in a  
 3 moderation exercise with NaCTSO, the experts.  
 4 A. Yes.  
 5 Q. With regard to the tiering of sites, particularly tiers  
 6 1 and 2, identified by CTSA's.  
 7 A. Yes.  
 8 Q. And decisions about whether to include sites in tiers 1  
 9 and 2 was determined by NaCTSO with the input from OSCT,  
 10 having been identified by CTSA's in the first instance?  
 11 A. That's my understanding of the process, yes.  
 12 Q. But with regard to tier 3, sites that they felt ought to  
 13 be included, particularly on a regional level, could be  
 14 identified and included?  
 15 A. To the best of my understanding, that's correct.  
 16 Q. And did PC Hone demonstrate in practice that CTSA's at  
 17 a local level can take their own steps, and do take  
 18 their own steps, whether on their own or with expert  
 19 advice, to identify those sites which caused them  
 20 concern?  
 21 A. Yes, I think PS Hone acted exactly how I hope every CTSA  
 22 would act.  
 23 Q. The gold standard?  
 24 A. In my view, yes.  
 25 Q. Now, the 2014 approach, as I understand it, was based on

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1 a wide range of attack methodologies being seen at the  
 2 time.  
 3 A. That's correct.  
 4 Q. But one has to be careful not to see it through the lens  
 5 of today.  
 6 A. That is true.  
 7 Q. And at that time, were the most likely threats seen from  
 8 what were known as marauding terrorist attack and mass  
 9 spectacular attacks?  
 10 A. Yes.  
 11 Q. Now, from 2016 onwards did we then start to see lower  
 12 sophistication attacks around Europe and a change from  
 13 directed to inspired attacks?  
 14 A. That's exactly what we saw.  
 15 Q. And your personal involvement at that stage I think was  
 16 to ask NaCTSO to consider the crowded places matrix?  
 17 A. That's right.  
 18 Q. And you asked them to consider if this was still the  
 19 right approach given the vulnerability of less iconic  
 20 locations?  
 21 A. Yes.  
 22 Q. Not just from vehicles?  
 23 A. No, from a range of attack methodologies.  
 24 Q. We are still looking, are we not, at the full range of  
 25 attack methodologies; we have simply added to that range

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1 a different type of emerging threat; is that right?  
 2 A. Sadly, yes, terrorists will innovate their attack  
 3 methodologies.  
 4 Q. And is that why they are continuing to consider and  
 5 continuing to develop the way in which sites, locations,  
 6 spaces, are prioritised so that the police know how best  
 7 to deploy their resources?  
 8 A. That's right.  
 9 Q. But has it been consistent across the years that  
 10 business owners, local authorities, owners and occupiers  
 11 are responsible still for the implementation of  
 12 protective security measures?  
 13 A. That has always been the position.  
 14 Q. Coming to selection of sites. Do we have to emphasise  
 15 the real difficulty of striking a balance between  
 16 a surveillance and barrier society and, as we said  
 17 earlier, going about our daily business?  
 18 A. Yes.  
 19 Q. And do we have organisations on both sides feeding into  
 20 the Home Office and feeding into all of the legal cases  
 21 that we are aware of about where that balance lies?  
 22 A. Yes.  
 23 Q. We have organisations saying that there is too much  
 24 surveillance, there is too much regulation, there is too  
 25 much provision of data?

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1 A. Yes.  
 2 Q. And there is law enforcement on the other side that is  
 3 trying to use various of those aspects in order to  
 4 protect people?  
 5 A. That's correct.  
 6 Q. But there is a balance to be had there and there is  
 7 a balance to be had with regard to the use of resources?  
 8 A. That's right.  
 9 Q. And do we have to acknowledge that due to their very  
 10 nature, crowded places and crowded spaces will always  
 11 have a level of vulnerability?  
 12 A. I am afraid that's always going to be the case.  
 13 Q. And if we ring-fence and wrap in cotton wool one  
 14 particular location, is that risk going to move  
 15 elsewhere?  
 16 A. I think displacement is increasingly a consideration.  
 17 Q. We heard evidence yesterday from Richard Woolford of the  
 18 City of London Corporation.  
 19 A. Yes.  
 20 Q. And we heard about his interaction with the City of  
 21 London Police CTSA.  
 22 A. Yes.  
 23 Q. Is this type of interaction at a very local level with  
 24 the benefit of local knowledge and local expertise how  
 25 the CPWG envisages this devolved process working?

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1 A. From everything that I heard from Mr Woolford I thought  
 2 it was exactly what I would expect and hope to see.  
 3 Q. May I just come on briefly to vehicle hire. You  
 4 mentioned the evidence given by Witness L.  
 5 A. Yes.  
 6 Q. Witness L said this:  
 7 "I don't think it is proportionate for MI5 to be  
 8 made aware every time a subject of interest hires  
 9 a vehicle."  
 10 A. Yes.  
 11 Q. It is obvious, is it not, that if one provides  
 12 organisations with lists of subjects of interest, there  
 13 is a real problem with the likelihood of subjects of  
 14 interest being made aware that they are, indeed,  
 15 subjects of interest?  
 16 A. I think that's highly likely, yes.  
 17 Q. And yet again, is it a very difficult balance, having  
 18 regard to the fact that there are 15 million car rentals  
 19 per annum, as I understand it, in this country?  
 20 A. That's right, that's my understanding.  
 21 Q. But there are also purchasers of cars?  
 22 A. Yes.  
 23 Q. Cars may be stolen?  
 24 A. Yes.  
 25 Q. Cars may be borrowed?

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1 A. Yes.  
 2 Q. Individuals may work for companies and use company cars?  
 3 A. Yes.  
 4 Q. Individuals may work for delivery organisations and use  
 5 delivery organisation vans?  
 6 A. Yes.  
 7 Q. So, again, given that law enforcement agencies have not  
 8 put to the Home Office, as yet, as we understand it,  
 9 a proportionate business case for legislating to  
 10 restrict the hire of vehicles, that that is not  
 11 necessarily at the top of your list of priorities?  
 12 A. The Department for Transport and the Home Office would  
 13 absolutely consider it if it's received.  
 14 Q. Notwithstanding that, together with business partners,  
 15 the Department for Transport has implemented a Rental  
 16 Vehicle Security Scheme?  
 17 A. Yes.  
 18 Q. With, as we have heard, a 10-point code?  
 19 A. Yes.  
 20 Q. That there is a 12 to 18-month monitoring process in  
 21 relation to the success of that?  
 22 A. That's correct.  
 23 Q. With a view to considering whether that should be put on  
 24 a mandatory footing?  
 25 A. That's right.

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1 Q. And with regard to the provision or the implementation  
 2 of legislation to mandate the implementation of  
 3 protective security, I think you've said that the  
 4 Home Office is currently conducting a review of the  
 5 legislation which is in force with a view to determining  
 6 whether further legislation is needed?  
 7 A. Yes, so that is both if future legislation is needed and  
 8 how we can use existing legislation to make it more  
 9 clear and more simple.  
 10 Q. And finally, the words that everybody is waiting for at  
 11 4.30 on a Friday afternoon, may I deal with a matter  
 12 that was raised by Mr Patterson, which was the  
 13 suggestion of an independent reviewer in relation to  
 14 protective security capabilities?  
 15 A. Mm-hm, yes.  
 16 Q. Is it right that Lord Harris conducted a review of  
 17 London's preparedness for a terrorist attack?  
 18 A. He did.  
 19 Q. And that there was a further review one year on setting  
 20 out what had changed a year after his review?  
 21 A. Yes, a one-year progress review.  
 22 Q. A one-year progress review. And is there also  
 23 a National Capability Assurance Team, which is a unit  
 24 within NaCTSO, responsible for providing assurance to  
 25 senior -- the senior national coordinator of Protect and

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1 Prepare, that Protect and Prepare -- sorry, Prevent and  
 2 Protect capabilities are effective?  
 3 A. Yes, so that's Lucy D'Orsi, that team reports into Lucy  
 4 D'Orsi on exactly that point.  
 5 Q. And as you said in your statement at section 9, there is  
 6 also a national security capability review -- I'll take  
 7 you to paragraph 9 of your statement.  
 8 A. Yes.  
 9 Q. You said this:  
 10 "In 2018, the National Security Capability Review,  
 11 (NSCR) report, found CONTEST to be a well organised and  
 12 comprehensive response to terrorism, with strengths in  
 13 terms of powers, resources, reach and resilience."  
 14 A. That is true.  
 15 Q. And did that deal with all four strands of the CONTEST  
 16 strategy?  
 17 A. It did, and I would just add that that CONTEST has gone  
 18 through considerable review processes since the 2017  
 19 attack.  
 20 MS LEEK: Thank you.  
 21 A. May I just say something very quickly to the families?  
 22 THE CHIEF CORONER: Yes.  
 23 A. I'm incredibly sorry, both personally, on behalf of my  
 24 team, the Home Office and OSCT, for what you have  
 25 experienced. You will always be at the front of our

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1 minds in the work that we do.  
 2 THE CHIEF CORONER: Thank you.  
 3 MR HOUGH: Ms Nacey, thank you very much for your evidence.  
 4 Sir, may I also thank all of my colleagues for  
 5 helping us complete these important witnesses over the  
 6 last couple of days, with proper questions being covered  
 7 in proper detail.  
 8 Sir, we have our final evidence on Monday and  
 9 Tuesday of next week.  
 10 THE CHIEF CORONER: Yes.  
 11 MR HOUGH: We hope, we anticipate finishing probably  
 12 a little early on Tuesday. There will then be  
 13 submissions --  
 14 THE CHIEF CORONER: "A little early" means probably before  
 15 5 o'clock.  
 16 MR HOUGH: I hope very much before 5 o'clock, but those are,  
 17 perhaps, famous last words.  
 18 On Wednesday there will be oral closing submissions  
 19 and on Thursday and Friday, I understand your  
 20 conclusions and summing-up.  
 21 THE CHIEF CORONER: Yes, if we work to that timetable,  
 22 I suspect, Mr Hough, that I will take all of both of  
 23 those days, and I am afraid they might be quite long  
 24 days too. There's obviously quite a lot of material  
 25 that we have covered and certainly Mr Patterson,

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1 I'm looking at you simply because I addressed you on  
 2 this point last time.  
 3 MR PATTERSON: Yes.  
 4 THE CHIEF CORONER: When it comes to my summary of the  
 5 evidence that I've listened to, I obviously won't repeat  
 6 everything that I've heard, but with the Westminster  
 7 attack I was very conscious that actually it's helpful  
 8 for me to set out in some detail what I've heard and how  
 9 it fits in with other pieces of evidence.  
 10 MR PATTERSON: Yes, it was, and I'm sure it will do.  
 11 THE CHIEF CORONER: But it's just a warning, in a sense, to  
 12 the families through you, and I know Mr Adamson will  
 13 take this on board too, that it's not going to be  
 14 a short process for me to do that.  
 15 But I am making plans, I'm saying this for the  
 16 benefit, really, because I know you both have people you  
 17 represent who are listening to what's being said through  
 18 an interpreter. My plan, just to make their task a bit  
 19 easier, is to provide a written copy of what I'm going  
 20 to say. I will probably do so in small, bite-sized  
 21 chunks, simply so there isn't the temptation to read  
 22 ahead --  
 23 MR PATTERSON: Of course.  
 24 THE CHIEF CORONER: -- and see that which hasn't been heard  
 25 by other people. That's all that I'm conscious about.

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1 MR PATTERSON: Yes.  
 2 THE CHIEF CORONER: But I hope that that will be of benefit.  
 3 I've been remarkably impressed by the interpreter  
 4 keeping up with the speed of delivery, acronym overload,  
 5 all sorts of problems, but I hope, at least, that will  
 6 be a benefit at the end of next week.  
 7 MR PATTERSON: Yes. We're pleased that she has outstripped  
 8 the batteries on her device.  
 9 THE CHIEF CORONER: Very well, thank you very much,  
 10 Ms Nacey.  
 11 MR HOUGH: 10 o'clock on Monday.  
 12 THE CHIEF CORONER: 10 o'clock on Monday.  
 13 (4.40 pm)  
 14 (The court adjourned until 10.00 am on  
 15 Monday, 24 June 2019)

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