

# OPUS2

Fishmongers' Hall Inquests

Day 10

April 26, 2021

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Monday, 26 April 2021

(10.00 am)

(In the presence of the jury)

JUDGE LUCRAFT: Good morning, everyone. Very nice to see you all.

Mr Hough, I think we're ready for our first witness.

MR HOUGH: Yes, the first witness is Dr Ashley Fegan—Earl.

DR ASHLEY FEGAN—EARL (sworn)

JUDGE LUCRAFT: Good morning, doctor. I'm very happy, if you are happy, that you remove your mask whilst giving evidence.

A. Thank you, sir.

JUDGE LUCRAFT: And very much a matter for you if you would prefer to sit whilst giving evidence or stand, we can do both.

A. I'll stand sir, thank you.

JUDGE LUCRAFT: Thank you.

Questions by MR HOUGH QC

MR HOUGH: Would you please give your full name for the court record?

A. Dr Ashley William Fegan—Earl.

Q. Dr Fegan—Earl, you understand I'm asking you questions first on behalf of the Coroner. You may then receive some questions from other lawyers.

A. Yes, of course.

1

Q. By profession, are you a Home Office registered forensic pathologist?

A. Yes, I am.

Q. In that capacity, did you conduct post mortem examinations on both Saskia Jones and Jack Merritt?

A. I did, yes.

Q. Could you give us your relevant qualifications in summary?

A. Yes. I hold the degrees of Bachelor of Science, Bachelor of Medicine, Bachelor of Surgery, Diploma in Medical Jurisprudence, I'm a fellow of the Royal College of Pathologists, a fellow of the Faculty of Forensic and Legal Medicine of the Royal College of Physicians and a Medical Examiner of the Royal College of Pathologists.

Q. Before carrying out each of the post mortem examinations in this case, had you received a briefing document setting out the background to the attack?

A. Yes, as would be standard in any case of suspicious death, the circumstances as are known at the time are relayed to me, albeit I keep an open mind as to my findings and interpretation.

Q. And you may not know this, but interested persons have received disclosure of that background document.

A. Thank you.

Q. Just to be clear at the outset, you can confirm that

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you'll be dealing today with detailed matters of the medical effects of the various injuries, and so your evidence has the capacity to distress.

A. Regrettably, yes.

Q. And you're aware that we're going to use no photography from the post mortem examinations, but we shall be using stylised images, or body maps, to identify the locations and effects of the injuries?

A. Yes, no photographs whatsoever, just computer-generated graphics that allow us to see the distribution and nature of the injuries present.

Q. May we begin with your post mortem examination on Saskia Jones. Your report is reference {DC5338/1} and it runs to 14 pages.

A. Yes.

Q. But we don't need that on screen. Did you carry out a post mortem examination on the body of Saskia Jones on 1 December 2019?

A. Yes, I did.

Q. May we begin as you conventionally do in reports with the external injury you found, and for that purpose may we bring up, please, the body map {DC6655/3}.

A. Yes, thank you.

Q. Can you identify by reference to the image the external injury you found, its location and its type?

3

A. We see here the lady's front, including her neck, and at the base of the neck, just behind and above the right collarbone — and we always refer to the deceased's right and left — we see an injury. There's a number there. The numbering, all pathologists will give injuries a number. It's not to denote an order in which injuries were sustained, albeit this lady only had one injury, it's simply the way we record injuries for reports.

So you see behind that collarbone a stab wound. So that is an injury caused by an implement with a sharp cutting edge, and by definition, it penetrates deeper into the body than it measures long upon the skin.

We take a number of measurements and look at the features of the wound, and that wound in its maximum dimension from end to end measured 5 cm and that gives us an idea as to the approximate width of the responsible blade at its point of insertion.

I also noted that the ends appeared rather different. I think you can get a slight appreciation of that on the graphic. The upper limit, as you can see it there, the upper end, was more V-shaped, or sharp, whereas the lower end appeared more squared off. What that suggests is the use of a knife with a single sharp cutting edge. The reason for the difference is that

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1 a sharp edge of a blade cuts neatly through the skin and  
2 it leaves a sharp v-shaped defect. If the opposite side  
3 is blunt, then that edge is rather more squared off  
4 because it is torn rather than cut.

5 So from that wound we can assess the use of a knife  
6 with a single cutting edge, the cutting edge towards the  
7 back of the body, so the upper part of the diagram you  
8 see before you, and at its point of insertion, it  
9 measured 5 cm in width from back edge to sharp cutting  
10 edge, so that's the external injury.

11 We then move on to identify what structures it has  
12 passed through, the effects of that, and how they may or  
13 may not have contributed to death.

14 Q. Thank you very much. And you have indicated that was  
15 the only external injury?

16 A. That is the only wound identified following  
17 an examination from head to toe and front to back.

18 Q. Did you carry out a full internal examination in which  
19 you identified the associated structural and organic  
20 damage?

21 A. Yes.

22 Q. May we have {DC6655/6} on the screen, please. Using  
23 this image first, can you identify the internal damage  
24 caused?

25 A. Yes, so this is an internal diagram showing us what lies

5

1 beneath the skin.

2 In this particular diagram you can principally see  
3 the muscles that make up the neck, so the large muscles  
4 coming down from the back of the skull to merge with the  
5 collar bone, you can see the chest muscles there. You  
6 can also see the blue is a blood vessel, a vein, and you  
7 can see just in the armpit some of the nerves, and  
8 superimposed onto that diagram, you see the stab wound,  
9 sitting, as it does, behind the collarbone, so it will  
10 have, there, at that point, passed through the skin, the  
11 fat, and through the muscles at the root of the neck at  
12 that point, and then we need to penetrate and see deeper  
13 where it's gone.

14 Q. {DC6655/7}, please.

15 A. So in this image, the muscles have been removed so we  
16 can now see part of the skeleton, so the collarbone  
17 joining with the breastbone in the centre, and the ribs  
18 below. And we see more of the structures of blood  
19 vessels. You can see that there are many blood vessels  
20 at the base of the neck, and those blood vessels are  
21 essentially coming from the heart to supply the arm. So  
22 they're large and numerous in nature.

23 From my examination, I identified damage to a number  
24 of structures. The subclavian artery and vein were  
25 transected, that is, they were cut through, and those

6

1 are large blood vessels to the arm.

2 Finally, the brachial plexus was cut through. The  
3 brachial plexus is a web of nerves which go to supply  
4 the muscles of the arm.

5 The lung you can see behind the ribs on either side  
6 and in fact the lung actually comes quite high in our  
7 bodies, behind the collarbone, it's actually just behind  
8 there. So having passed through those blood vessels it  
9 passed through the upper lobe of the right lung, the  
10 lung is divided into three lobes on the right-hand side,  
11 and finally, the track ended in the right second  
12 thoracic vertebra, so the second bone within the chest  
13 itself.

14 So to reiterate, we have a wound going through skin,  
15 fat, muscle, subclavian artery and vein and nerves,  
16 through the upper lobe of the right lung, and into the  
17 right side of the second thoracic vertebra.

18 The track itself was shown to pass from the lady's  
19 front to back, from her right to left, and from above  
20 downwards, and the final assessment that we make is the  
21 wound track length, that is the maximum distance between  
22 the skin and the deepest point of penetration, and that  
23 was approximately 10 cm. So the knife had penetrated  
24 10 cm into the body.

25 Q. We can take that image off screen now.

7

1 Dr Fegan—Earl, what would have been the effects in  
2 terms of blood loss and the effects of the penetration  
3 of the lung on the internal part of the body?

4 A. There would be a number of effects, as a consequence of  
5 that injury. Firstly, the chest cavity is normally  
6 an airtight space. The lung sits firm up against the  
7 chest wall and moves in and out as we breathe.

8 If the chest cavity is breached, such as by a stab  
9 wound, air gets in and can cause the lung to collapse  
10 down, that's a condition known as a pneumothorax, and  
11 that compromises the ability to breathe effectively.

12 Secondly, the lung has many blood vessels. It has  
13 many blood vessels because the blood is picking up  
14 oxygen from the lungs to take round the body, so many,  
15 many blood vessels, so you would get bleeding from that  
16 lung. And perhaps more significantly, you would get  
17 extensive bleeding from the blood vessels, the  
18 subclavian artery and vein that have been cut. That  
19 results in the accumulation of blood within the chest  
20 cavity, and I found 750 ml of blood, so that's  
21 three-quarters of a litre. A lady of her size and build  
22 would have approximately 4.5 litres of total circulating  
23 blood volume, so we're getting on for a quarter of blood  
24 volume lost into the chest.

25 So it would be the combination of bleeding from the

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1 blood vessels and the lung, and also the collapse of the  
 2 lung, which would render her into significant  
 3 difficulties .  
 4 Q. Dr Fegan—Earl, is it right that you were provided with  
 5 witness statements of various people who witnessed the  
 6 attack and who assisted with CPR in order to help reach  
 7 conclusions?  
 8 A. Yes.  
 9 Q. May we turn to your conclusions at page 13 of your  
 10 report, and looking in particular at conclusions 3 and  
 11 4, did you reach conclusions as to the injury inflicted  
 12 and its effects?  
 13 A. Yes. My third conclusion effectively rehearses what  
 14 we've already discussed, namely that Saskia Jones had  
 15 suffered a single stab wound to the right—hand side of  
 16 the neck, and that wound had penetrated major nerves and  
 17 blood vessels in the region, before passing fully  
 18 through the right lung and impacting against the side of  
 19 the thoracic spine, so the spine as it passes through  
 20 the chest.  
 21 The injury to both the artery and vein resulted in  
 22 catastrophic haemorrhage, bleeding, both externally and  
 23 internally, and that's where I've referred to the  
 24 three—quarters of a litre of blood, into her chest.  
 25 Q. Looking at conclusion 5, did you reach any conclusions

1 as to the weapon which inflicted this injury, having  
 2 looked, I think, at photographs of knives taken from  
 3 Usman Khan?  
 4 A. Yes. It was plainly a stab wound caused by a knife.  
 5 The appearances suggested a knife with a single sharp  
 6 cutting edge, which at its point of penetration measured  
 7 approximately 5 cm from back edge to sharp cutting edge,  
 8 and which had penetrated some 10 cm from the skin before  
 9 it struck the spine.  
 10 Q. Did you reach any conclusion as to whether the weapons  
 11 taken from Usman Khan were consistent with that injury?  
 12 A. Yes, they were.  
 13 Q. Looking at your conclusion 6, did you also consider how  
 14 the attacker and Saskia Jones would have been positioned  
 15 in relation to each other at the moment of strike?  
 16 A. Yes. In general terms, pathology cannot define the  
 17 precise spatial relationship between a victim and  
 18 an assailant, and the reason that can't be done with  
 19 accuracy is because the human body is capable of  
 20 assuming a great many positions, different positions,  
 21 over a very short space of time, and incidents such as  
 22 this are almost invariably dynamic in nature.  
 23 What we can do as pathologists is be given  
 24 a scenario and state whether, from the pathological  
 25 findings, such a scenario has any merit in terms of

1 consideration. So, for example, one cannot say whether  
 2 the assailant was right or left—handed, whether they  
 3 were to the front or behind the deceased.  
 4 Q. Did you also at your conclusion 7 address the degree of  
 5 force which was likely used, based upon the nature and  
 6 effects of the injury?  
 7 A. The pathological assessment of force is a relatively  
 8 crude tool, but it's based upon consideration of what  
 9 structures have been damaged by the course of the knife,  
 10 and how strong or resistant are those structures to the  
 11 passage of the knife.  
 12 In general terms, the skin is the principal barrier  
 13 to a knife. It's a fairly tough structure and, once  
 14 breached, a knife can move with relative ease through  
 15 structures, although, of course, to penetrate something  
 16 like bone, which is the most resistant structure, would  
 17 require significant force.  
 18 In my view, on a three—point scale of mild, moderate  
 19 and severe, I was of the view that severe force would  
 20 have been employed, but I add that there are other  
 21 factors that may need to be considered, that includes  
 22 how sharp is the responsible weapon, what clothing was  
 23 the individual wearing, what resistance might that  
 24 clothing provide, and of course, coming back to the  
 25 dynamics of such an incident, the relative movements

1 between victim and assailant at the time of coming  
 2 together.  
 3 Q. At your conclusion 10, did you express views as to the  
 4 rate of blood loss, and the expected period of survival?  
 5 A. It is extremely rare for victims of stabbing to collapse  
 6 immediately to the ground. There are a number of  
 7 factors that will affect survival time. The first thing  
 8 to say is that this young lady was completely fit and  
 9 well at the time of this incident, and we glean that  
 10 from the totality of the post mortem examination, so, in  
 11 other words, she had a healthy heart.  
 12 In the situation such as this, the heart beats  
 13 harder and faster to accommodate blood loss, and the  
 14 body also produces adrenaline, the hormone that prepares  
 15 us for action and gives us some degree of resilience.  
 16 So it is not at all surprising if an individual, having  
 17 sustained an injury such as this, is capable of  
 18 purposeful movement, so that can be talking, walking,  
 19 shouting, engaging in interaction with an individual.  
 20 What then happens is that the blood pressure  
 21 progressively drops as blood is lost from the injured  
 22 areas, and there will come a time when the brain is no  
 23 longer supplied with sufficient oxygen to stand, and  
 24 they will collapse and pass into cardiac arrest. How  
 25 long that is, is very difficult to assess, it is

1 unlikely to be in the order of many minutes but, of  
 2 course, there may be other evidence that may assist you  
 3 in seeing how long it was before she collapsed, having  
 4 sustained that injury .  
 5 Q. Now, bearing in mind, of course, that you're  
 6 a pathologist and not a pre-hospital clinical care  
 7 expert, did you also express a view in that conclusion  
 8 as to the evidence you had received of the treatment  
 9 given to Saskia Jones?  
 10 A. Yes. We need to consider whether any treatment given  
 11 has contributed to death in any way, and the answer to  
 12 that is in no way has it. An incident such as this,  
 13 there may be some benefit from looking at the case  
 14 from different angles, so both from the pathology and  
 15 then from a clinical aspect as to what could be done in  
 16 such a situation, so both look at the problem from  
 17 a different angle, and you will hear from such an expert  
 18 later .  
 19 Q. Did you at the final paragraph of your report give  
 20 a cause of death using the standard notation?  
 21 A. Yes, the cause of death is given as 1a, shock and  
 22 haemorrhage, due to 1b, stab wound to the chest. To  
 23 explain it, the primary cause of death is given under  
 24 part 1, and the a and b, the way to look at it is 1a is  
 25 due to 1b. So in this case shock and haemorrhage is due

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1 to the stab wound to the chest. I should just emphasise  
 2 that the word "shock" here is used in medical  
 3 terminology, meaning that the vital organs were no  
 4 longer being supplied with blood and oxygen, it's not  
 5 emotional shock. Why is that? It's because of the  
 6 haemorrhage, the bleeding, as a consequence of the stab  
 7 wound to the chest.  
 8 Q. You were asked some follow-up questions to your report,  
 9 and you produced an addendum report on 2 October 2020;  
 10 is that right?  
 11 A. Yes.  
 12 Q. Addressing question 2 which you were asked, and which  
 13 you answered on page 3, can you be any more precise than  
 14 you have been so far about the potential survival time  
 15 from an injury such as that which Saskia suffered here?  
 16 A. I reiterate what I have just said: that it would be  
 17 expected that some degree of purposeful activity would  
 18 ensue. I suspect from experience of previous similar  
 19 stab wounds it's unlikely to be more than a number of  
 20 minutes, but of course other evidence may be much more  
 21 accurate in making that assessment.  
 22 Q. Is it right that you defer to the clinical expert, in  
 23 this case, Professor Deakin, as to actual survival time  
 24 and the potential benefits of treatments?  
 25 A. Well, survival time is not necessarily the province of

14

1 a clinical expert. He would be able to comment much  
 2 more on survivability and the timetable for action and  
 3 what could be expected when treatment was given.  
 4 Q. May we please move on to your post mortem examination on  
 5 Jack Merritt.  
 6 A. Yes, thank you.  
 7 Q. And your report {DC5337} we don't need that on screen.  
 8 Did you carry out a post mortem examination on the  
 9 body of Jack Merritt on 1 December 2019?  
 10 A. Yes.  
 11 Q. Once again, you received your briefing document telling  
 12 you about the basic facts of the attack?  
 13 A. Yes, I did.  
 14 Q. As before, did you carry out a full head-to-toe external  
 15 examination?  
 16 A. Yes.  
 17 Q. To identify the external injuries, may we bring up the  
 18 body map, {DC6566/1}, and then on to {DC6656/3} for the  
 19 first of the injuries .  
 20 Did you identify a number of wounds to the left arm?  
 21 A. Yes, I did, and I repeat once again, and it is pertinent  
 22 here, injury 1 is not necessarily the first injury, it's  
 23 simply the order in which I have identified those  
 24 injuries and then recorded them in subsequent reports.  
 25 In this particular figure, we're looking at

15

1 Mr Merritt's back, and the back of his left upper arm,  
 2 where you can see what I have described as a curved  
 3 crescentic slash wound. Now, we have used the term  
 4 "stab wound" before; "slash wound" is defined, in  
 5 contrast, as a wound that's longer on the skin than it  
 6 penetrates deep into the body.  
 7 So the contrast, therefore, is a stab wound occurs  
 8 when the point of the knife is travelling directly  
 9 towards the body; a slash wound occurs when it's passing  
 10 parallel to the body, such as in an arcing motion, and  
 11 the "slash" and "stab" are both terms in common  
 12 parlance.  
 13 So we have a slash wound there that measured  
 14 a maximum of 5.5 cm in length. It cut down just to the  
 15 surface of the muscle of the left upper arm, the triceps  
 16 muscle, and whilst like any wound cutting the skin it  
 17 would bleed, it did not cut major blood vessels so  
 18 ordinarily this is not an individual fatal injury .  
 19 Q. Next page, please {DC6656/4}.  
 20 A. We remain on the left arm, but this time looking at the  
 21 front of the left upper arm over the biceps muscle.  
 22 This is another slash wound measuring 7 cm in maximum  
 23 length, gaping to 3 cm, passing through skin and fat  
 24 which you can see in the diagram there, just down to  
 25 muscle at the base. The same applies: the wound would

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1 bleed, it is not individually fatal because it has not  
2 damaged any major blood vessels.  
3 Q. {DC6656/5} for the next injuries.  
4 A. We move to the back of the left hand, on the little  
5 finger side. I have described this as a "slash" or  
6 "chopping" injury. "Chop" is a term used when a sharp  
7 and sometimes weighted implement is brought down against  
8 the skin. That wound is 5 cm in length, 2 cm in depth,  
9 and it had damaged, and you can see in the middle of  
10 that wound, one of the tendons supplying the little  
11 finger. The wound would bleed, no major blood vessels  
12 were damaged.  
13 Q. Then {DC6656/6}, please.  
14 A. We come now to what you will see are two related  
15 injuries, injuries 4 and 5. Number 4, on the outer part  
16 of the left forearm, you can see a relatively complex  
17 stab wound, measuring 5 cm by 2 cm, with a notch in the  
18 middle. This is a more complex type of stab wound. If  
19 you think of the injury to Saskia Jones, which was  
20 effectively a straight line injury, which was much more  
21 of a pure stab wound in and out; if a knife moves whilst  
22 contacting an individual, you may get a much more  
23 complex appearing wound, and that's why you have that  
24 almost tick-shaped injury there: there has been movement  
25 of knife in wound.

17

1 Q. You said there was an associated injury. I think we can  
2 see that more clearly on the next page, {DC6656/7}.  
3 A. Injury 5 you can see on the other side of the left  
4 forearm. That is a stab wound, 4 cm by 3 cm, and I was  
5 able to demonstrate that they were both linked. So 4  
6 and 5 represent a single pass of a bladed weapon passing  
7 fully through the forearm, in at the outer part of the  
8 forearm, out at the inner part of the forearm.  
9 Undoubtedly an injury such as this would bleed  
10 heavily, although major arteries were not damaged, but  
11 clearly there is a great deal of damage to the muscle  
12 and the numerous blood vessels surrounding.  
13 Q. Did you identify a number of wounds to the right hand,  
14 which I think we can see on {DC6656/9} of the body map?  
15 A. Yes, we have a series of injuries to the right hand.  
16 Number 6, the tip of the little finger had been  
17 amputated with the remaining nail chipped.  
18 Moving on to the ring finger, there was a flapped  
19 cut wound, so what I mean by that is — and you can see  
20 it with the graphic — the knife has caused a flake of  
21 skin, which is hinged towards the knuckle, so it's  
22 passing from fingertip towards the hand, just raising  
23 that flap, with a further similar example on the little  
24 finger side of the right middle finger, so both of those  
25 are similar type injuries.

18

1 Finally, on the little finger side of that hand,  
2 a ragged slash-type wound measuring just over 5 cm,  
3 passing into fat and scoring the bone beneath. So those  
4 are the injuries to Mr Merritt's right hand.  
5 Q. And if we move to {DC6656/10} of the body map, did you  
6 identify a substantial wound on the back of the upper  
7 arm?  
8 A. Yes, this is an extremely extensive injury to the back  
9 of the right upper arm. I've described this as  
10 a massive chopping injury, and it extended, as you can  
11 see in that diagram, fully across the back of the right  
12 upper arm. Its maximum length across the skin was 18 cm  
13 from side to side. It cleaved deeply upwards, inwards,  
14 passing through the skin and fat of the forearm, and  
15 then dividing the triceps muscle, the muscle at the back  
16 of the forearm, and it travelled up to and abutted the  
17 humerus, that's the bone of the upper arm. The depth of  
18 penetration from skin to its deepest point was 17 cm.  
19 A wound such as this would be expected to bleed freely  
20 and copiously.  
21 Q. Moving on to another part of the body and looking at  
22 page 12, please, of the body map, did you identify  
23 a stab wound on the left mid-back area?  
24 A. Yes, on the left mid-back, you can see a stab wound. It  
25 was roughly in line with injury 1, which you'll recall

19

1 was on the back of the left upper arm, and it is  
2 conceivable that the two are connected with a knife  
3 passing across the back of the left upper arm and then  
4 going on to penetrate into the tissues of the back. It  
5 measured up to 7 cm. Once again, there were features  
6 here that allowed for consideration of the number of  
7 sharp cutting edges. The outer part appeared slightly  
8 more V-shaped, the inner part rounded, so a blade with  
9 a single sharp cutting edge.  
10 There was also notching in that injury. You can see  
11 it's, rather than simply a straight line, there's  
12 a gentle curve to it. So, once again, indicative of  
13 dynamic movement of knife in the wound.  
14 It penetrated upward and inward, into the muscles by  
15 the spine, but did not penetrate either the chest or the  
16 abdomen. It would have bled freely. It would not be  
17 expected to have proven individually fatal, because it  
18 had not damaged any major organs in the chest or  
19 abdomen.  
20 Q. Moving next, please, to the catastrophic injury, did you  
21 identify a very serious injury to the chest, which  
22 I think we can see on page 13 of the body map?  
23 A. Yes. This is the fatal injury. On the upper inner  
24 right breast, a stab wound {DC6656/13}, horizontally  
25 located, as you can see. It measured, in maximum

20

1 dimension, 7.2 cm, and I think you can reasonably well  
2 see on the lower and right part of the wound as you look  
3 at it, there is a notch, so, once again, evidence of  
4 movement of the knife within the wound.

5 The outer part, to the left of your diagram, was  
6 sharp -- was squarer, I beg your pardon, compared to  
7 a sharper inner limit, once again suggesting then  
8 a knife with a single sharp cutting edge with the  
9 cutting edge towards the left side of his body.

10 That's the external wound. So we move on to  
11 consider the internal track.

12 Q. Just before we do, you have said a couple of times that  
13 features of wounds were indicative of the knife moving  
14 within the wound. Could that be due to either the  
15 attacker's movement or the victim's movement?

16 A. It could be either, and undoubtedly the key feature to  
17 understanding that is the fact that these incidents are  
18 dynamic. There is movement not only from the assailant,  
19 but also from the victim, so it's not unusual to see  
20 such irregularity and notching to injuries.

21 Q. Moving on to the structural and organic damage  
22 associated with that chest injury, which you have set  
23 out at page 9 of your report, may we have page 14  
24 {DC6656/14} of the body map on screen.

25 A. We approached this in exactly the same way as we did for

1 Ms Jones. This diagram demonstrates the muscles beneath  
2 the skin, and you can see the wound superimposed there,  
3 passing, as it does, through the pectoral muscle on the  
4 right-hand side.

5 Q. {DC6656/15}, please.

6 A. We then move down to the skeleton of the chest cage.  
7 The right fourth rib there is highlighted, and at this  
8 point the injury cleaved both the bony and the  
9 cartilaginous parts of the rib. The ribs themselves are  
10 composed of bone towards the outer part of the chest,  
11 and as they come towards the middle to join the  
12 breastbone, they are softer cartilage, so this injury  
13 had passed through both aspects of that rib.

14 Q. And moving on to {DC6656/16} did you identify damage to  
15 the internal organs as the knife passed through?

16 A. Yes, we see the internal organs here. We can see the  
17 right and the left lungs, the heart centrally. The  
18 diaphragm is shown, that sheet of muscle that separates  
19 the chest organs above from the abdominal organs below,  
20 and immediately beneath the diagram, on the right-hand  
21 side, the red-brown structure is the liver. The knife  
22 track passed through the skin, fat and muscle of the  
23 chest wall, through the right fourth rib. It then  
24 penetrated fully through the middle lobe of the right  
25 lung, passing downward, it went through the diagram, and

1 finally it entered into the liver.

2 An injury such as this would result in the same way  
3 a collapse of the right lung, with bleeding from the  
4 right lung, but in addition you would also get bleeding  
5 from the liver, which itself is a structure with many  
6 blood vessels indeed. That was without doubt the fatal  
7 injury.

8 Q. You have been discussing other injuries and mentioning  
9 that they would not have been independently fatal in the  
10 immediate course of things; is this an injury which  
11 would have been immediately fatal in the immediate  
12 course of things?

13 A. Not necessarily immediately fatal, but it would be  
14 an independently fatal injury, so even if it had been  
15 the only injury, one would not be surprised to see  
16 a fatal outcome.

17 Q. Did you also, continuing with the examination that you  
18 carried out, identify a number of minor abrasions to the  
19 face, which we can see on {DC6656/18} of the body map?

20 A. Yes, we see three areas of blunt force trauma here. So  
21 blunt force trauma is the other large subdivision of  
22 injuries, so injuries caused by impact either from or  
23 against an object with a blunt surface. So that can  
24 include a great many different potential objects, such  
25 as, for example, the ground, the shoe of a foot, an iron

1 bar, and the injuries that arise principally are bruises  
2 and abrasions.

3 We see a cluster of injuries of bruising and  
4 abrasion to the outer part of the right eye, just above  
5 the right eyelid, and in the right eye socket  
6 themselves.

7 It's important to note those injuries were  
8 superficial, by that I mean they were shallow. They,  
9 were not associated with damage to underlying structures  
10 so, for example, no fracture to the cheekbone or the eye  
11 socket, and again, importantly, no evidence of serious  
12 head injury arising, no skull fracture, no bleeding over  
13 the surface of the brain or injury to the brain itself.

14 They are relatively non-specific in nature. They  
15 could arise from a number of different actions, such as,  
16 for example, a fall against the ground at point of  
17 collapse, or indeed, during the course of a dynamic  
18 struggle.

19 Q. Moving, then, to your conclusions on pages 14 and 15.

20 In order to reach your conclusions, were you again  
21 provided with witness statements of people who had  
22 witnessed the events of the day and some of whom who had  
23 assisted with CPR?

24 A. Yes.

25 Q. Looking at paragraph 3 of your conclusions, did you

1 reach any view about the nature of the assault from the  
2 positioning and nature of the injuries ?

3 A. Yes, it was clear that Mr Merritt had sustained multiple  
4 stab and slash wounds which, in my view, were indicative  
5 of a dynamic assault with significant defensive  
6 posturing, and what I mean by that is, an individual who  
7 is assaulted with a knife, if they are capable of  
8 anticipating a blow, the natural, if not reflex action,  
9 is for that individual to raise the arms to protect the  
10 body. In that way, the arms frequently sustain serious  
11 injury. You'll recall that includes an extremely deep  
12 chopping wound to the back of the right arm, together  
13 with a through—and—through injury to the left upper arm.

14 The smaller injuries on the right hand are fairly  
15 typical of an individual attempting to either defend  
16 themselves or, indeed, trying to gain control of the  
17 knife during an assault, hence they have an array of  
18 injuries across the fingers.

19 Q. Taking your conclusions 4, 5 and 6 together, what were  
20 your conclusions about the effects of the various  
21 injuries in relation to each other and collectively ?

22 A. The fatal injury is that to the right upper chest,  
23 injury 12, which had cut through a rib, passed through  
24 the right lung, diaphragm and liver, the track passing  
25 from above downwards and backwards. It would have led

25

1 to torrential haemorrhage and death, despite all  
2 attempts provided, treatment. This was an independently  
3 fatal injury.

4 The stab wound to the back, injury 11, penetrated  
5 deeply into the muscles of the back but did not damage  
6 significant organs.

7 The remaining injuries were to both arms, included  
8 stab wounds, slash wounds and chopping wounds, with  
9 an extremely deep injury to the back of the right arm,  
10 and that through—and—through injury to the left arm.

11 Even having sustained that ultimately fatal injury,  
12 he would have been capable of purposeful activity. That  
13 is clearly described by witnesses whose statements  
14 I have read. It is confirmed by the fact that my  
15 examination showed that he too was a fit, healthy  
16 individual at the time of this incident, therefore with  
17 some degree of reserve, and he has plainly been engaged  
18 in a highly dynamic interaction. Therefore, one cannot  
19 assume that the chest injury was the last injury; he  
20 would have been capable of moving on, having already  
21 sustained that injury.

22 Q. Can you give any indication of the period of time,  
23 approximately, for which he could have been capable of  
24 purposeful activity following receipt of all the  
25 injuries ?

26

1 A. Again, that's always difficult. It could be several  
2 minutes. One always has to appreciate that there may be  
3 other direct witness evidence which is far, far more  
4 helpful to the jury.

5 Q. Looking, then, at your conclusion 8, did you reach any  
6 view, once again using the relatively subjective scale  
7 of degree of force, about the level of force used to  
8 inflict these various injuries ?

9 A. Yes. When a knife enters the chest, more often than  
10 not, when it contacts the skin, it rolls above or below  
11 the rib and penetrates between the ribs. With  
12 increasing levels of force, rather than that rolling  
13 action, the knife may simply contact and then cleanly  
14 cut through the rib. That, in my view, suggests  
15 a higher tier of force.

16 I also take into account injury 10, the major  
17 chopping wound to the back of the right arm. Given its  
18 extent, which was 18 cm across, but cutting 17 cm deep,  
19 I have no doubt that extreme force was utilised.

20 Q. Once again, did you express a view as to whether the  
21 injuries were consistent with the knives taken from  
22 Usman Khan which you were shown ?

23 A. Yes, in my view they were. From a pathological  
24 perspective, one always wants to take into account the  
25 results of any additional forensic investigation of

27

1 those weapons.

2 Q. Did you again consider whether any error in the  
3 treatment given to Jack Merritt, based on the evidence,  
4 could have caused or contributed to the death ?

5 A. There was no technical error of the treatment provided.

6 Q. What was your ultimate conclusion as to cause of death,  
7 using the standard notation ?

8 A. Once again, 1a, shock and haemorrhage; 1b, stab wound to  
9 the chest.

10 Q. In your addendum report at question 2, you were asked to  
11 elaborate on your conclusion that there was no evidence  
12 of technical error in treatment. Were you able to  
13 elaborate on that conclusion at all ?

14 A. I'm sorry, which question ?

15 Q. I'm now looking at your addendum report, the second  
16 question, which is page 5 of the seven—page report.

17 A. Ah, thank you very much. Yes. I identified no  
18 identifiable error in the treatment provided. One of  
19 the difficulties here was that his chest was opened to  
20 visualise the lungs, but this stab wound had not only  
21 damaged the lungs but had also penetrated deeper into  
22 the liver, so would have required even more extensive  
23 surgery to control.

24 But, once again, I would defer to a clinician with  
25 expertise in pre—hospital care as to the nature and

28

1 extent of treatment that could be provided in  
2 a situation such as this.

3 MR HOUGH: Thank you very much, Dr Fegan—Earl. Those are my  
4 questions. Just to confirm one matter, though. I think  
5 you have told me that you're prepared, indeed very keen,  
6 to help either of the families if they have any  
7 questions with you, either today or later; is that  
8 right?  
9 A. Yes, of course.

10 MR HOUGH: I'll look to see if others have questions.  
11 I see not. Thank you very much, Dr Fegan—Earl.

12 JUDGE LUCRAFT: Dr Fegan—Earl, if I might say so, as always,  
13 extremely clear, very thorough, and very clear  
14 explanation to the jury as to what it is that you  
15 detected. Thank you very much indeed for coming.  
16 A. Thank you, sir.

17 MR HOUGH: Sir, it is, of course, a matter for you whether  
18 we begin the Commodore now and take 15 or 20 minutes of  
19 his evidence, or whether we have our mid—morning break  
20 now.

21 JUDGE LUCRAFT: I think because we're changing topic,  
22 Mr Hough, I think probably the sensible thing is to have  
23 a slightly earlier break, take it there, and we'll sit  
24 again in 15 minutes or so. Thank you.  
25 (In the absence of the jury)

29

1 I'll rise.  
2 (10.59 am)  
3 (A short break)  
4 (11.19 am)  
5 (In the presence of the jury)

6 JUDGE LUCRAFT: Thank you.  
7 COMMODORE TOBY WILLIAMSON (sworn)

8 JUDGE LUCRAFT: Good morning. If you are happy to do so,  
9 please do feel free to remove your mask, and you can  
10 either sit or stand, whichever you would prefer.  
11 Questions by MR HOUGH QC

12 MR HOUGH: Would you please give your name for the court?  
13 A. Toby Williamson.

14 Q. Commodore Williamson, you understand I'm asking you  
15 questions first on behalf of the Coroner, and then you  
16 may have some questions from other lawyers.  
17 You made a witness statement on 13 October 2020, and  
18 you may refer to that as you wish.  
19 Are you now the Clerk of the Fishmongers' Company?  
20 A. I am.

21 Q. Since when have you been with The Fishmongers' Company?  
22 A. Since March 2017.

23 Q. Before you came to The Fishmongers' Company, what was  
24 your career?  
25 A. 34 years in the Royal Navy, specialising in aviation.

30

1 Q. Flying helicopters, I think?  
2 A. Yes.

3 Q. In that capacity, did you rise to a command role and  
4 a role also involved in education at the staff college?  
5 A. Yes, at three different rank levels.

6 Q. Leaving at the rank of Commodore?  
7 A. Yes.

8 Q. A little information about The Fishmongers' Company,  
9 please. Is the company one of the oldest livery  
10 companies of the City of London?  
11 A. Yes.

12 Q. Is this right: that historically, it had the functions  
13 of a guild, governing the sale of fish?  
14 A. Yes.

15 Q. In more modern times, in a sentence or two, what have  
16 its functions been?  
17 A. Well, for seven centuries, exactly that, the standards  
18 and practices in the fishmongering trade, and the  
19 welfare of those who fell on hard times having  
20 previously been in that trade. Effectively, it's the  
21 modern interpretation of that, namely charity on one  
22 side and still fish and fisheries on the other side.

23 Q. We know, of course, that The Fishmongers' Company  
24 operates the rather grand guild hall, the  
25 Fishmongers' Hall, as many livery companies do?

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1 A. Yes.

2 Q. Is it right that the company hosts both its own events  
3 at Fishmongers' Hall and hosts events of other  
4 organisations?  
5 A. Yes.

6 Q. Is it also right that events hosted at Fishmongers' Hall  
7 often involve people of note in public life?  
8 A. Yes.

9 Q. For example, does the company have a link to the royal  
10 family, notably through the Princess Royal?  
11 A. Yes.

12 Q. She, I think, has been a member of the court of the  
13 company since 2012?  
14 A. Yes.

15 Q. And from time to time attends events at  
16 Fishmongers' Hall?  
17 A. Yes.

18 Q. Moving to the organisation of the company, does the  
19 company by way of organisation have at its apex  
20 a general court?  
21 A. Yes.

22 Q. What's the function and composition of that body?  
23 A. It's 34 men and women, generally in the early retired  
24 bracket, but ranging from mid—40s to mid—90s, and they  
25 set the policy and the vision for the company with

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1 a view to perpetuity.  
 2 Q. They serve as a kind of main board would for a limited  
 3 company?  
 4 A. Yes.  
 5 Q. Is there then another body called the Wardens'  
 6 Committee?  
 7 A. Yes.  
 8 Q. What does that do?  
 9 A. It's a subset of the main court of the company of six  
 10 people, who effectively would equate to the main  
 11 operating board in standard high street terms.  
 12 Q. Do the general court and the Wardens' Committee meet  
 13 every month?  
 14 A. Approximately nine times a year.  
 15 Q. Are there then under those general bodies a number of  
 16 committees which are responsible for specific areas?  
 17 A. Yes.  
 18 Q. Do they include areas such as membership, upkeep of the  
 19 hall, and so on?  
 20 A. Yes.  
 21 Q. Alongside these decision-making groups, is there  
 22 an executive team led by you which implements decisions?  
 23 A. Yes. It's a team of four.  
 24 Q. And does that team manage both the charitable side of  
 25 the company and the events management function?

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1 A. In implementation terms, yes.  
 2 Q. Now, you said it's a team of four; who are the members  
 3 of that team?  
 4 A. I have a deputy chief operating officer, who also  
 5 manages the philanthropy side. I have a finance  
 6 director who manages property investment. I have a fish  
 7 and fisheries director who manages one of the major  
 8 trusts.  
 9 Q. Under that team are there a series of other staff  
 10 members responsible for particular areas of work?  
 11 A. Yes.  
 12 Q. Do you, for example, have a head of events?  
 13 A. Yes.  
 14 Q. We have heard that person named, for our purposes, as  
 15 Antonella Santos; is that right?  
 16 A. Yes.  
 17 Q. A head of facilities?  
 18 A. Yes.  
 19 Q. Who was that at the relevant time?  
 20 A. Adam Cresswell.  
 21 Q. Head of security?  
 22 A. Security supervisor, it's not a full head of section  
 23 position, he sets the rosters for the security team.  
 24 Q. And who was that at the relevant time?  
 25 A. Steve Noe.

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1 Q. Is there also a specific Health and Safety Committee?  
 2 A. Yes.  
 3 Q. How regularly does that meet?  
 4 A. As often as need be, but not less than three times  
 5 a year.  
 6 Q. Does that committee take responsibility for ensuring  
 7 compliance?  
 8 A. Yes.  
 9 Q. Moving to responsibilities for health and safety, may we  
 10 please have on screen {DC5031/1}. Is this right, we're  
 11 looking at a health and safety policy for the company  
 12 which is one of the schedules to the staff handbook?  
 13 A. Yes.  
 14 Q. If we look down the page at paragraph 5, can we see that  
 15 the Clerk, that's you, is designated for formal purposes  
 16 as the responsible person for health and safety,  
 17 exercising responsibilities through the head of  
 18 facilities, Mr Cresswell?  
 19 A. Yes.  
 20 Q. Then if we go to {DC5031/2}, please, paragraph 6, can we  
 21 see that there is a description of the work of the  
 22 Health and Safety Committee, and its standing agenda  
 23 items: Updates on legislation and policy; analysis of  
 24 accidents or incidents; review and adjustment of company  
 25 policy, and progress of staff training.

35

1 A. Yes.  
 2 Q. If we then look at paragraph 7, there is a reference to  
 3 The Fishmongers' Company risk assessment, a general risk  
 4 assessment. In a sentence or two, can you tell us what  
 5 that document is and what it's supposed to do?  
 6 A. Sir, can I just be clear on the question. You're asking  
 7 me for individual risk assessment documents or you're  
 8 talking about the risk register in general terms?  
 9 Q. The health and safety policy refers to something called  
 10 The Fishmongers' Company risk assessment. I was just  
 11 going to ask you what that was and what its purpose is.  
 12 A. Okay, so we have a risk register, which looks at the  
 13 strategic operational level of the big things that  
 14 affect the company as a whole, and then we will have  
 15 individual risk assessments for specific events, should  
 16 they be warranted.  
 17 Q. This refers to something, the risk assessment, being  
 18 reviewed annually. Is that the risk register that you  
 19 were referring to that's reviewed annually?  
 20 A. So the risk register is a living document, possibly  
 21 updated as much as monthly. Some things are very long  
 22 term and won't, effectively, change.  
 23 Q. You can take that off screen now.  
 24 May I ask you about physical security measures at  
 25 Fishmongers' Hall. We have heard about a number of the

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1 security measures in physical terms at the hall: the  
 2 door had an automatic lock, the main door had  
 3 an automatic lock function that could be opened with  
 4 a key fob at the side of the door; yes?  
 5 A. Yes.  
 6 Q. And that there was exterior CCTV for the building.  
 7 A. Yes.  
 8 Q. We've also heard that there was a fire alarm. What  
 9 other forms of physical security were there at the  
 10 relevant time, November 2019?  
 11 A. So a very high proportion of events that we put on will  
 12 be closed, so they're not open to the general public or  
 13 advertised in any way at all, so that everyone coming  
 14 through the door is either a member or employee of the  
 15 company, or is known to the client organiser in  
 16 question. That means that you have a very high level of  
 17 visual identification of every person arriving, or what  
 18 I would call one step removed, they may be bringing  
 19 someone that is known to us who is known to them, so  
 20 that, in security terms, is extremely valuable.  
 21 You mentioned CCTV, and also very high level of  
 22 virtual signal, being able to be tracked through the  
 23 wi-fi. Then you've got self-closing, self-locking  
 24 doors, either one set of double doors or, if need be,  
 25 a second set of double doors which could be used as

1 well. Then you've also got two -- normally two trained  
 2 security guards at the front door, including more at the  
 3 back, including more in reception, and those are  
 4 essentially all the standard security procedures in  
 5 play.  
 6 Q. Is it right that there were also panic buttons located  
 7 in various places around the building?  
 8 A. Yes.  
 9 Q. The CCTV, is this right, was upgraded in August 2019, so  
 10 a few months before the attack, with further cameras  
 11 being added?  
 12 A. Yes, the quality of video gets ever better; time for new  
 13 cameras.  
 14 Q. You know, we've heard from the senior investigating  
 15 officer that there weren't interior CCTV cameras from  
 16 which to obtain footage showing the events of the  
 17 attack; were there, in November 2019, any interior CCTV  
 18 cameras within the building?  
 19 A. Not cameras. There's movement sensors. There's not  
 20 cameras.  
 21 Q. Would the movement sensors be operated or monitored  
 22 while the building was in use rather than closed up?  
 23 A. No, they wouldn't.  
 24 Q. Was a positive decision taken not to have interior CCTV  
 25 cameras?

1 A. Not particularly. There is no legislative requirement  
 2 to have them. There's plenty enough, you know, getting  
 3 in and out of the building in itself means you're going  
 4 to be recorded one way or the other. The need to  
 5 monitor movements inside every public room is not  
 6 a requirement. We didn't have them. I can't recall  
 7 making a positive decision one way or the other. That's  
 8 all I can offer.  
 9 Q. Is it right, you can tell me, that the rationale for  
 10 having exterior cameras is to monitor those going in and  
 11 out and risks arising from people trying to gain access  
 12 to the building?  
 13 A. Yes.  
 14 Q. As at the end of November 2019, did the company own any  
 15 knife arches or metal detector equipment?  
 16 A. No.  
 17 Q. To your knowledge, both during your time with the  
 18 company, or anything you heard about events prior to  
 19 that, did the company ever borrow or rent such equipment  
 20 for use at particular events?  
 21 A. No.  
 22 Q. Just to be clear and complete, does that answer also  
 23 apply to knife wands, the sort of wands that we  
 24 sometimes see being used to swipe people down?  
 25 A. It does.

1 Q. Was any consideration ever given before the end of 2019  
 2 to ever purchasing or borrowing or renting any such  
 3 equipment for any events?  
 4 A. No serious consideration. It's always something that  
 5 sits in my mind beforehand. It's one of many layers of  
 6 security you can add, but knife arches and knife wands  
 7 in themselves can also -- you have to think about what  
 8 happens when you find a knife or gun or a bomb when  
 9 you've got it already inside your building, so in  
 10 itself, it's not the magic solution. We didn't consider  
 11 it necessary or necessarily representing what it is we  
 12 stood for as a company where we wanted a degree of  
 13 accessibility to our members and to our client  
 14 organisations as and when they came to the building.  
 15 Q. You have just described a thought process of why one  
 16 might not want to have a knife arch or a knife wand.  
 17 Was that thought process ever articulated in any  
 18 meetings before 2018 such as it might have been minuted?  
 19 A. No.  
 20 Q. Turning to security staff. You told us that there would  
 21 ordinarily be two security staff on the front door of  
 22 the building; is it right that there would ordinarily be  
 23 one at the rear?  
 24 A. Yes.  
 25 Q. Was that the standard level of security staff cover?

1 A. Yes, when there were events going on, but we can always  
 2 draw in further agency staff and have done from time to  
 3 time, as necessary.  
 4 Q. Agency security staff?  
 5 A. Correct, yes.  
 6 Q. How commonplace was it for you to add to the complement  
 7 of security staff for events?  
 8 A. Well, we have four trained security staff of our own, so  
 9 occasionally one may need a fifth, or someone was away  
 10 on holiday or was ill.  
 11 Q. Now, we know that for a period of time, shortly before  
 12 the attack in this case, that Mr Watkins, the security  
 13 staff member on the door, left briefly, and the  
 14 receptionist was letting people in and out for a time.  
 15 That's her evidence. Is that something which should or  
 16 shouldn't have happened?  
 17 A. It does happen from time to time. It's pragmatic.  
 18 I haven't specifically banned it. It's a normal way of  
 19 getting on with things when everything looks calm, is  
 20 calm. At the end of the day, someone still has to open  
 21 the door and close the door, so it's not a question of  
 22 there being an open door for anyone to go in and out,  
 23 it's still controlled, but it's not necessarily done for  
 24 short periods of time by a trained security guard.  
 25 Q. So in the ordinary course of things, there would from

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1 time to time be occasions during an event when the door  
 2 wouldn't be manned by a trained security person, and  
 3 entry and exit would be handled by the receptionist?  
 4 A. Momentarily, mid-way through the event. Never at the  
 5 entry point, at the beginning of an event.  
 6 Q. What training did the security staff have who might be  
 7 on the door?  
 8 A. Security industry standard.  
 9 Q. That's the Security Industry Association, I think?  
 10 A. Yes.  
 11 Q. And can you confirm that those security staff members  
 12 who were working at the hall on the day were up to date  
 13 with their training?  
 14 A. That's my understanding, yes.  
 15 Q. Moving on, then, to the arranging of events. In general  
 16 terms, before we look at the specifics of the  
 17 Learning Together event, in general terms where events  
 18 were booked at the Fishmongers' Hall by outside  
 19 organisations rather than by the company itself, what  
 20 information would the company request from the  
 21 organisers?  
 22 A. Well, nature of the event, the material to be covered.  
 23 It might be a conference, it might be a dinner, it might  
 24 be a lunch, all sorts of — what is it they're trying to  
 25 achieve from the event. Then you've got the issues of

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1 scale, size, domestic requirements, that's it.  
 2 Q. So the type of organisation, the event, so you know  
 3 you're not hosting an organisation with, for example,  
 4 unpalatable views?  
 5 A. Mm—hm.  
 6 Q. Numbers of attendees, catering requirements and so on?  
 7 A. Yes, I might make a judgment on that. It has been the  
 8 case in 2019 that I have turned back events because it  
 9 doesn't fit right with what we can cope or wish to allow  
 10 into the building. One example was Greenpeace,  
 11 in February that year. I didn't have enough information  
 12 in order to be sure that that was what we could cope  
 13 with, given their proactivity in certain areas.  
 14 Q. Was it commonplace to make — to ask the question  
 15 proactively, whether any special security requirements  
 16 existed for an event?  
 17 A. So I work on the basis that the building is always safe  
 18 and secure, the food served is always healthy to eat as  
 19 a standard. Why? Because over the course of the year  
 20 we may have 200 events, they could arrange — they could  
 21 go from 10 people for a small meeting, they could go to  
 22 200 plus for a major banquet, conferences of all  
 23 descriptions.  
 24 So the Learning Together event on the 29th was the  
 25 eighth that week, probably the 20th that month. It's

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1 running on a very familiar template. In aviation terms,  
 2 the aircraft is always safe to fly, irrespective of the  
 3 number of passengers on board.  
 4 Q. But it wasn't standard practice to ask what sort of  
 5 passengers you might be taking?  
 6 A. Well, by nature of knowing who the organisation is, and  
 7 eventually always getting a guest list, you've got  
 8 a very good idea of who they are.  
 9 Q. Now, you said in response to one of my earlier questions  
 10 that specific risk assessments might be carried out and  
 11 documented for particular events. You've just told me  
 12 that there were many events of a social or  
 13 a professional nature in a given week, hosted by various  
 14 organisations. What would make you decide whether to  
 15 carry out a risk assessment for a particular event?  
 16 A. Probably the profile of the attendees.  
 17 Fishmongers' Hall in early 2019, it may have been 2018,  
 18 hosted the Bank of England conference, a serving Prime  
 19 Minister, a previous Prime Minister, a whole host of  
 20 financial luminaries from right across the world. So  
 21 they will come with all their own close protection  
 22 teams, there will be the City of London recce  
 23 beforehand. That's a good example where I will  
 24 personally be very closely on top of how we're going to  
 25 manage that.

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1 As you mentioned, the Princess Royal was in the  
 2 building 20 times in 2017, maybe a dozen times every  
 3 year after that, so you're running on a template which  
 4 has had a lot of exposure to our City of London  
 5 colleagues in the police force and to many other  
 6 different organisations coming through the system. At  
 7 no stage have they ever been uncomfortable with what we  
 8 have needed to do, and I can only think of one occasion  
 9 when the Prince of Wales was coming to the building when  
 10 they did ask for visual bag-searching, but on no other  
 11 occasion was that required of us.

12 Q. Can I just pause you there because we're getting  
 13 a little ahead of ourselves.

14 You've told us that sometimes there would be  
 15 event-specific risk assessments carried out?

16 A. Mm-hm.

17 Q. But I think not for every single event that took place  
 18 at the hall?

19 A. Correct.

20 Q. What would make the decision, what criteria would be  
 21 applied, to decide whether to make a risk assessment for  
 22 a specific event?

23 A. So events internal to the hall, very rare would we have  
 24 an independent, separate, bespoke risk assessment. The  
 25 risk assessment was month on month, the system is

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1 working and we are safe for whoever is coming in the  
 2 building, and therefore it's very rare that I will, for  
 3 an internal conference or banquet, have a piece of paper  
 4 that is documenting one specific event because it's so  
 5 unique and so different from all others that are going  
 6 through during the annual cycle.

7 Q. You were also telling me that some events, for example,  
 8 with the Prime Minister or the Princess Royal, might  
 9 require special measures in terms of security?

10 A. Yes.

11 Q. Would those sometimes include special measures on the  
 12 part of the hall rather than special measures arranged  
 13 by those attending, so the Parliamentary and Diplomatic  
 14 Protection officers coming with the Prime Minister or  
 15 the Princess Royal?

16 A. No.

17 Q. So is it right, then, that the company would not  
 18 consider for any event booked at the hall whether  
 19 special security measures were required?

20 A. Yes.

21 Q. The view was always taken the hall was basically safe  
 22 and if the organisers need special security, they'll  
 23 bring it with themselves.

24 A. I've never known the organisers need to bring additional  
 25 security.

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1 Q. Well, you have told us ---

2 A. Sorry, you're absolutely right, apart from the VVIP  
 3 level.

4 Q. To your knowledge, have organisers ever suggested or  
 5 requested additional security measures at the hall?

6 A. Not to my knowledge.

7 Q. Was it the responsibility of any person at the hall to  
 8 look at a forthcoming event and think whether further  
 9 security was required for that event?

10 A. Well, the buck stops with me. We have a weekly meeting,  
 11 of which everyone who needs to be there will be there,  
 12 so I'm talking about the head of facilities, the head of  
 13 events, the chief operating officer and others, where we  
 14 will be looking at the short, medium and long term  
 15 calendar, what are the events coming through the system,  
 16 and are there any special sort of signature requirements  
 17 for that event. That will be a continuous conversation.  
 18 So there's no lack of awareness of who is coming.

19 Q. You said earlier that sometimes additional security  
 20 staff could be brought in. In what circumstances would  
 21 additional security staff be brought in?

22 A. Probably numbers, probably density of the weekly  
 23 programme when you've got, maybe, three or four midnight  
 24 finishes in a row and you've got, you know, two or three  
 25 big early-morning starts, then you simply need more in

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1 order to keep the rota manageable in --- well, fatigue  
 2 terms, if nothing else.

3 Q. But it was nobody's particular job --- I'm not at the  
 4 moment levelling a criticism, just seeking to find out  
 5 the facts --- it was no one's particular job to look at  
 6 events and identify whether they required an additional  
 7 security presence in terms of numbers of staff?

8 A. The numbers will be geared to the scale of the event  
 9 coming through the door. Obviously there's a difference  
 10 between 20 people or 250 people, and so the security  
 11 supervisor will look at the rotas, he knows the scale of  
 12 the events coming through, can work a week, a month  
 13 ahead, as far ahead as he likes, so occasionally he may  
 14 need additional staff who would often be on the back  
 15 door as opposed to --- so we can bring, if you like, our  
 16 own team onto the front door.

17 Q. Now in response to one of my previous questions, you  
 18 were beginning to say something about bag searches  
 19 before I stopped you. To your knowledge, has the --- did  
 20 the hall at any time before November 2019 put in place  
 21 bag searches for events?

22 A. Not as a standard policy.

23 Q. Did it ever do so for particular events?

24 A. The security supervisor reminded me that they did it  
 25 once when the Prince of Wales was coming to the

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1 building, and I believe that was at the request of the  
 2 police.  
 3 Q. Again, in these meetings in which events in the calendar  
 4 would be looked at ahead, was there ever any discussion  
 5 that you can recall before November 2019 about certain  
 6 events perhaps needing a bag search?  
 7 A. No.  
 8 Q. As far as you can recall, was there ever liaison with  
 9 City of London Police about security at any particular  
 10 events being arranged at the hall?  
 11 A. Yes. I can expand if you would like?  
 12 Q. Yes please.  
 13 A. Excellent liaison with the City of London Police, who  
 14 provide us with a first –class service, both  
 15 event–specific, they normally provide the back–up teams  
 16 for the close protection teams, they certainly provide  
 17 the dog–searching teams, they certainly would advise it  
 18 on virtual security requirements, and they're ready at  
 19 every twist and turn to help us should we need to. So  
 20 my head of facilities is absolutely linked in with his  
 21 opposite number should there be a specific requirement  
 22 or should there be a security threat which is common to  
 23 the whole of the City of London, by example the last  
 24 weekend with Extinction Rebellion, we all know about  
 25 that ahead and take the necessary precautions, so good,

1 free–flowing conversations with the City of London  
 2 Police.  
 3 Q. To your knowledge did it ever happen  
 4 before November 2019 that you or any of your colleagues  
 5 would tell the City of London Police that there may be  
 6 a security issue given the type of people attending  
 7 an event or the type of event held at the hall?  
 8 A. Only in the sense that they would always be aware of  
 9 VVIPs coming into the City, so anything that is arriving  
 10 with a police escort or its own close protection, they  
 11 will already be hooked in on that requirement.  
 12 Q. Is it right, then, to summarise so far, that the hall  
 13 had in place these various physical security measures  
 14 with a view to making it generally safe; that you sought  
 15 to host events which you were comfortable with in the  
 16 first place?  
 17 A. Yes.  
 18 Q. But when you weren't dealing with VIPs, you didn't give  
 19 particular consideration to adding extra layers of  
 20 security for events because of their nature and  
 21 attendees?  
 22 A. Yes.  
 23 Q. Moving on to terrorist attack risks and training about  
 24 those. Is it right that your head of facilities and  
 25 your security supervisor undertook terrorist awareness

1 training, terrorism awareness training, in July of 2019?  
 2 A. Yes. I would always, also consider myself with my  
 3 background to have that same level of awareness.  
 4 Q. In terms of the training they had, was that a half–day  
 5 course run at one of the other livery companies?  
 6 A. I believe so, yes.  
 7 Q. Do your staff, in general, also receive briefings on  
 8 emergency responses to terrorist events such as the  
 9 government's "Run, tell, hide" mantra?  
 10 A. Yes, they receive standard training on a regular basis  
 11 of all sorts of emergencies which could be envisaged, of  
 12 which one is the run, hide, tell terrorism mantra.  
 13 Q. So if we look at {DC5034/1}, I think we see here the  
 14 start of some training material used for an event to  
 15 update the casual staff team on health and safety, on  
 16 13 November 2019; is that right?  
 17 A. Yes.  
 18 Q. And we see that that begins with the government's "Run,  
 19 hide, tell" advice?  
 20 A. Yes.  
 21 Q. We can take that off screen now.  
 22 Moving on to health and safety management and  
 23 auditing, is it right that a health and safety audit was  
 24 carried out of the Fishmongers' Company by  
 25 an organisation called BV Associates in December 2018?

1 A. Yes.  
 2 Q. If we can bring that up on screen {DC5022/1}. If we  
 3 look at page 7, first of all {DC5022/7}, the executive  
 4 summary, if we look at the second paragraph of that, do  
 5 we see that the auditors say that the company is working  
 6 towards full health and safety compliance.  
 7 A. Yes.  
 8 Q. And then in the third paragraph that some  
 9 non–compliances had been identified, but most of them  
 10 were procedural rather than substantive?  
 11 A. Yes.  
 12 Q. And if we then go to {DC5024/1}, we see that  
 13 BV Associates prepared a risk assessment form?  
 14 A. Yes.  
 15 Q. Which graded the risks by the likelihood of their  
 16 happening and the consequences of their happening?  
 17 A. Yes.  
 18 Q. And then we see, for example, for building break–in  
 19 risks, there are control measures of security staff,  
 20 pass control, and then over the page, please {DC5024/2},  
 21 additional controls of patrols, logs, CCTV, ID checks  
 22 and so on?  
 23 A. Yes.  
 24 Q. Then further down on that page we can see that violence  
 25 to staff is identified as a risk with a control measure

1 being security staff and additional controls, access  
 2 control, lone worker alarms, patrols, and so on?  
 3 A. Yes.  
 4 Q. And was that, as it were, a business as usual type  
 5 assessment, getting some auditors in to check out on  
 6 your health and safety compliance?  
 7 A. It was business as usual. It's absolutely part of  
 8 modern building management that this is something you do  
 9 regularly and you take external professional advice, if  
 10 you're not entirely confident with what you're already  
 11 doing.  
 12 Q. We can take that off screen now. Is it right that in  
 13 addition in late 2018 you engaged with a consultancy  
 14 called Control Risks to do a specific piece of work?  
 15 A. Yes.  
 16 Q. In a sentence or two, what was that piece of work to do?  
 17 A. So as the company expanded in its activities on the  
 18 charitable front, it was important that its governance  
 19 went with that, so during that period, and  
 20 before November 2019, we were resetting our governance  
 21 handbooks to come up to date with the latest  
 22 legislation. We needed to put a risk register in place.  
 23 This was the document which was best informed in the  
 24 first instance by a professional risk management  
 25 consultancy, and we had other standard quarterly—mention

1 reports so the information including that associated  
 2 with risk was seen by the right people every few months  
 3 so that we knew exactly what we were dealing with. So  
 4 that was just part of standard progression, and it's  
 5 proved very useful.  
 6 Q. Is it right that the Control Risks project looked both  
 7 at amorphous risks like reputational risks, and also  
 8 hard-edged physical risks?  
 9 A. Yes.  
 10 Q. If we can look at the proposal, {DC5004/1}, this is  
 11 a proposal made by Control Risks in September 2018, and  
 12 if we go to page 3 of that document {DC5004/3}, looking  
 13 at the second paragraph, can we see that Control Risks  
 14 had been told that the company was interested to  
 15 understand better the reputational and political threats  
 16 stemming from external and internal factors, including  
 17 the evolution of charity governance and the company's  
 18 profile and behaviours, as you were telling us?  
 19 A. Yes.  
 20 Q. And then did that proposal envisage a staged process  
 21 including, first of all, a risk review by Control Risks,  
 22 a risk assessment, and then feedback leading ultimately  
 23 to a final risk assessment document?  
 24 A. Yes. You can see at the top of the page there, well,  
 25 obviously my name, Jo Allinson, my chief operating

1 officer, and Steve Maile, my finance director. That's  
 2 the key trio at the top.  
 3 Q. Thank you. If we go then to {DC5005/1} I think we see  
 4 a project plan that was developed in November 2018, and  
 5 on {DC5005/4}, we see a diagram which envisages the risk  
 6 review, risk assessment, and then roundtable feedback.  
 7 A. Yes.  
 8 Q. And then next, please, to {DC5007/3}, and we see that  
 9 an initial report with a strategic risk register was  
 10 produced in April 2019.  
 11 A. Yes.  
 12 Q. Then on {DC5007/5} do we see a summary of the top ten  
 13 strategic risks, some of them, as we see, reputational  
 14 or financial. Then risk 6:  
 15 "Terror — lone wolf attack at Fish Hall via  
 16 non-blast attack (vehicle—as-a—weapon or knife attack)  
 17 targeting the property and users."  
 18 And the gross risk was identified as "High". What  
 19 did you understand the high risk rating to mean?  
 20 A. So any risk is a combination of likelihood and  
 21 consequence, and the gross risk indicates what it would  
 22 be judged as, unless you take mitigating measures to  
 23 reduce that to what you would deem to be tolerable and  
 24 as low as reasonably practical, in the language, and  
 25 this was one of, I think it is 12 risks in total that

1 are deemed to be high, gross risks for the company in  
 2 the first instance.  
 3 Q. Then if you go to {DC5007/10}, please, we can see more  
 4 detail for this risk. Do we see that the consultants,  
 5 Control Risks, identified vulnerabilities including  
 6 a lack of documented security procedures for responding  
 7 to a terrorism scenario, and a lack of internal access  
 8 control measures?  
 9 A. Yes.  
 10 Q. What did you understand the reference to lack of  
 11 internal access control measures to mean?  
 12 A. So in the situation when you've got a marauding  
 13 terrorist, you can lock your building down, so you can  
 14 have internal controlled doors. The challenge with  
 15 internal controlled doors is how they sit against fire  
 16 safety legislation, where you actually want them to be  
 17 open and free movement, so that's drawing attention to  
 18 that as a vulnerability specific to this risk.  
 19 Q. You can see also that controls are identified. Those  
 20 are controls, I think, already in place, including  
 21 terrorism awareness training, and viable security at the  
 22 perimeter?  
 23 A. Yes.  
 24 Q. Now, as you told us, the risk rating is a combination of  
 25 likelihood, which is graded as very low, and impact or

1 seriousness of consequence, which is graded as very  
 2 high?  
 3 A. Yes, and it's a true -- it's a true and sad fact to say  
 4 that the likelihood is the lowest in our entire  
 5 register, and the impact is the highest.  
 6 Q. If we move to {DC5007/15}, please, of the document, can  
 7 we see that there is also a further risk identified at  
 8 R17 of a lone wolf terror attack targeting another  
 9 building or location in the area, and impacting on the  
 10 Fishmongers' Hall indirectly?  
 11 A. Yes.  
 12 Q. And, once again, we see the same vulnerabilities and  
 13 controls identified?  
 14 A. Yes, and the Borough Market attack of March 2017  
 15 effectively came into that category. Fishmongers' Hall,  
 16 by the time it's got its double door locking in place,  
 17 is very, very difficult to get into with its thick stone  
 18 walls.  
 19 So it's an awareness of that which, unfortunately,  
 20 was all too common for us in our location.  
 21 Q. Now, you, I think, dealt with Control Risks, as the  
 22 earlier document indicated. Was there at any point  
 23 during any of your discussions with Control Risks that  
 24 they suggested that an attacker may emanate from the  
 25 event? So from an event organised, somebody who had

1 been legitimately let into the building?  
 2 A. No, and that's a key point: the people who came into the  
 3 building on 29 November, every single one of them was  
 4 a member or employee of the company, or was known to  
 5 Learning Together as the organisers. There was no  
 6 indication of anyone walking through the door who would  
 7 have come into this category, so no insider threat, as  
 8 such.  
 9 Q. Did you understand from any of your discussions with  
 10 Control Risks that there was identified such a risk of  
 11 somebody coming in legitimately and starting an attack?  
 12 A. So you will see another risk entered in there, which  
 13 will be the disgruntled employee.  
 14 Q. Yes.  
 15 A. And I believe in the United States of America that's  
 16 an all too common cause of violence. But someone coming  
 17 from within a client organisation's guest list, we  
 18 hadn't considered. You may wish to touch upon the  
 19 Mansion House incident. I can expand on that if you  
 20 want me to.  
 21 Q. Not at the moment, we may get to that later.  
 22 We can take that off screen now, please, and if we  
 23 can then move to {DC5030/9}, I think we can see that on  
 24 11 April 2019, there was a meeting of the Wardens'  
 25 Committee, and if we go over to page 10, please,

1 {DC5030/10}, can we see at item 6 there is discussion  
 2 with you showing extracts from the draft risk register  
 3 of the top ten entries. Was that showing in the  
 4 Wardens' Committee the document prepared by Control  
 5 Risks?  
 6 A. Yes.  
 7 Q. So considered at that meeting, and then I think also  
 8 considered in the Wardens' Committee of July 2019; is  
 9 that right?  
 10 A. Yes, and what you're seeing is the transition to the  
 11 company being run on the basis of management by risk.  
 12 Q. May we have on screen {DC5030/23}, so page 23 of the  
 13 same document. Those, I think, are the minutes for  
 14 the July meeting.  
 15 A. Yes.  
 16 Q. And {DC5030/24}, please. Item 8, paragraph 8, do we see  
 17 that it was agreed that the Control Risks' contract  
 18 would be terminated, recouping the final 15% of the  
 19 budget, without an overarching report, but noting that  
 20 Control Risks, through their interviews and work, had  
 21 confirmed the company's core approach to risk management  
 22 was now on a sound footing?  
 23 A. Yes.  
 24 Q. Were you yourself happy about the Control Risks'  
 25 contract being brought to an end without a final report?

1 A. Yes, absolutely delighted. Myself and Jo Allinson have  
 2 extensive exposure to management by risk all the way  
 3 through our careers. Control Risks had done  
 4 an excellent job in formulating a great deal of that.  
 5 We had what we wanted, which was the product, a risk  
 6 register. It absolutely accorded with what we might  
 7 have expected. It had lined that sort of top 20 or so  
 8 risks very nicely, it was a document that was ready just  
 9 to be matured by us internally and by common agreement  
 10 they were ready to move on and we were ready to take  
 11 action.  
 12 Q. I don't think I need to show it on screen, but was the  
 13 register prepared by Control Risks also considered by  
 14 the Health and Safety Committee?  
 15 A. Yes, certain extracts of it relevant to the Health and  
 16 Safety Committee, yes.  
 17 Q. May we then have on screen {DC5009/1}. Now,  
 18 in September 2019, after Control Risks had produced the  
 19 initial assessment, and that had been considered with  
 20 the company, was a revised version of the risk register  
 21 produced?  
 22 A. Yes, as it has been almost every month since.  
 23 Q. And if we go to {DC5009/6}, we can see that risk 6, R6,  
 24 terror attack inside is still as it is before. The risk  
 25 treatment options, which is the penultimate column on

1 the right, identify some additional training which has  
 2 been secured with the City of London Police, and  
 3 a further option to:  
 4 " ... step—increase visible security presence and  
 5 screening of guests at selected events."  
 6 So, first of all, the training, please. What was  
 7 the training that was envisaged?  
 8 A. So the City of London Police have their own protection  
 9 teams, their own security teams, and from time to time  
 10 they just need a venue to practice those with. Because  
 11 we have such good relations with them, they asked if  
 12 they could use Fishmongers' Hall, we were delighted.  
 13 That was — I'm just checking the date.  
 14 Q. The date of this document is September 2019.  
 15 A. Yes, so they were about to come in, and they did come  
 16 in, from memory, in November 2019, ahead of the 29th,  
 17 used our hall for two scenarios, one was the  
 18 overenthusiastic visitor that hassles a VVIP and you  
 19 can't quite shake them off.  
 20 The second was the renegade chef, who was going to  
 21 do a knife attack on the VVIP, and the test for the  
 22 protection team was how would they respond, hoping it  
 23 would, I think, tasers, rather than weapons, and  
 24 I believe one of our events team actually provided the  
 25 princess for that.

1 So that was specific to them, they weren't checking  
 2 us out, but the head of facilities and the events team,  
 3 you know, watched and learn and listen. It's very  
 4 difficult to know where the cut—off comes between a  
 5 protection team having the lead because something has  
 6 gone badly wrong, or whether the whole team have the  
 7 lead because actually it's a non—violent protest and  
 8 it's something that we continue to take the lead on.  
 9 Q. So that's the training, we'll come back a little later  
 10 to that event.  
 11 A. Mm—hm.  
 12 Q. Could you explain the reference to an option to  
 13 step—increase visible security presence and the  
 14 screening of guests at selected events?  
 15 A. So that relates directly back to the Mansion House  
 16 incident of July 2019. Would you like me to expand on  
 17 that?  
 18 Q. If you can do so relatively briefly?  
 19 A. Okay. So the Mansion House had a big dinner. In my  
 20 understanding, a group of environmental protesters  
 21 breached the security of the building. They had  
 22 an insider employee who opened a fire exit and allowed  
 23 them to come in. The dinner had the Chancellor of the  
 24 Exchequer as the main speaker. He was giving his  
 25 speech, at which point they barged into the room, all of

1 this being filmed, and the first guest who stood up to  
 2 try and prevent access to where the Chancellor of the  
 3 Exchequer was speaking, he's immediately into that  
 4 dilemma: is he dealing with someone with a knife, gun or  
 5 a bomb, or is he merely dealing with someone who is  
 6 a protester.  
 7 And the stand off point — so, the learning points  
 8 were how did they get access, and secondly, what do you  
 9 do in that scenario. This led to a discussion in the  
 10 Wardens' meeting of July, the first possible  
 11 opportunity, and then subsequently to this entry. It's  
 12 in italics and in that colour because it's registered  
 13 here as: do we need to make that step—change, would it  
 14 have coped with the scenario that Mansion House were  
 15 presented with on that day, or you can put as much  
 16 security as you like on the front door, but if they come  
 17 in through the back door you've still got the problem.  
 18 Q. What was meant by screening of guests? What, in  
 19 physical terms, would be screening of guests?  
 20 A. Well, again, can you do a further level of background  
 21 checks against people who are invited or — well, of  
 22 course these people weren't invited, they came anyway.  
 23 What else is it you could possibly do, given the  
 24 resources of, you know, event management organisation to  
 25 screen the type of person coming through your front

1 door.  
 2 Q. At that stage was consideration being given to asking  
 3 routine questions of event organisers about those who  
 4 would be attending?  
 5 A. Yes. Yes, it was.  
 6 Q. Had a decision on that possibility been taken  
 7 before November 2019?  
 8 A. No, hence it's in italics and in amber.  
 9 Q. And if we move, please, to the final version of the risk  
 10 register before the attack, {DC5012/6}. Do we see that  
 11 risk 6, a breach of security risk with a terror attack  
 12 inside the building is documented in exactly the same  
 13 terms as in the September version?  
 14 A. Yes.  
 15 Q. And then if we can move, please, to risk 17 {DC5012/9},  
 16 which I think is about three pages along, page 9,  
 17 I think. Sorry, it's — there's your malign employee.  
 18 A. Yes.  
 19 Q. If we can move on through the pages, please, until we  
 20 get to risk 17 {DC5012/13}. There we go. We can see  
 21 that for this risk, the risk of an outside terror attack  
 22 impacting on the hall indirectly, a risk treatment  
 23 option has been added:  
 24 "Always hold an event specific review of building  
 25 security."

1 What was meant by that?  
 2 A. So, if you know you've got a demonstration coming  
 3 through the City of London, like Extinction Rebellion,  
 4 which can overwhelm a lot of resources very quickly,  
 5 then as soon as you are aware of that, you want  
 6 an event—specific what do we need to do in order to  
 7 ensure our property is safe.  
 8 Q. That's talking about reviews of outside demos and the  
 9 like?  
 10 A. Yes.  
 11 Q. We can take that off screen. I think that version of  
 12 the register was considered at a risk and audit  
 13 committee meeting on 13 November 2019; is that right?  
 14 A. Yes. Of which, if I may, just above risk 6, there is  
 15 risk 5, dealing with allergen management. More people  
 16 die of allergen mis—mismanagement than they do of  
 17 terrorism. That was a dominant theme for a lot of that  
 18 year, just following straight out of incidents that  
 19 happened in, you know, you see them in the national  
 20 media all the time, just to make sure we'd absolutely  
 21 got that closed down and understood and well captured,  
 22 if you like, as a whole team.  
 23 Q. Yes, you are looking at a whole panoply of risks here?  
 24 A. Yes.  
 25 Q. Can we have on screen {DC5011/3}. There are the minutes

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1 of the Risk and Audit Committee with you in attendance,  
 2 13 November 2019. If we go to {DC5011/4}, do we see  
 3 from the minutes that there's a discussion of a series  
 4 of the risks, but not a specific discussion of either  
 5 risk 6 or risk 17, and control measures required for  
 6 those?  
 7 A. Yes. So during the annual cycle I would hope that all  
 8 of them would get covered, but at this meeting those are  
 9 the ones that were discussed, yes.  
 10 Q. We can take that off screen now.  
 11 You were telling us a short time ago that the hall  
 12 was used in the weeks before the attack as a training  
 13 event for City of London Police, or in association with  
 14 City of London Police. According to our records, that  
 15 took place right at the end of October 2019,  
 16 23 October 2019. Was that witnessed by some of your  
 17 team to look at the two scenarios and see how they  
 18 unfolded?  
 19 A. Yes, so, just to repeat, it was a City of London Police  
 20 training scenario, it was their objectives, for their  
 21 purposes, but it was every opportunity for us to witness  
 22 and learn anything from that so that we could take those  
 23 lessons forward.  
 24 Q. If we could put on screen {DC6334/1}. Do we see here  
 25 the scenario briefing involving a VIP attending

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1 Fishmongers' Hall, and down the page, please, the  
 2 exercise involves reconnaissance of the venue, and then  
 3 at the bottom of the page under "Role Player Briefing",  
 4 we have the persistence handshaker at the bottom of the  
 5 page, and then over the page {DC6334/2}, we see the  
 6 chef, or disgruntled chef approaching with a knife,  
 7 I think it was a rubber knife?  
 8 A. Yes.  
 9 Q. Now, from this document we can see that as you have  
 10 said, this event was primarily to train City of London  
 11 police officers. Did you use it at all for training of  
 12 your staff?  
 13 A. No. Our staff are not police officers, they don't have  
 14 the authority, they don't have the weapons to do  
 15 anything other than what it is in accordance with the  
 16 Security Industry Association standard — they have  
 17 strict limits like anyone does on the front door, so  
 18 nothing more than that.  
 19 Q. If that's the case, why was this training exercise  
 20 a control measure for risk 6 in your document?  
 21 A. Well, merely in the sense one has got a common sense of  
 22 understanding, the City of London Police are familiar in  
 23 broad terms with procedures on our front door, I should  
 24 think they're pretty similar to many other front doors  
 25 across buildings in London, and you know, if they

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1 think: well, actually you could stop the problem in the  
 2 first instance by having a different standard operating  
 3 procedure on your front door, then we would be all ears  
 4 to listen to that. There has to be a small amount of  
 5 mutual value in witnessing each other's procedures so  
 6 that you just know what's going on.  
 7 Q. Reading the risk register document, and the control  
 8 measure identified, one might instinctively have  
 9 thought, as a reader, that the control measure security  
 10 "training arranged" or "training arranged with the City  
 11 of London Police" was referring to training for the  
 12 benefit of your staff?  
 13 A. That's a fair comment. I wouldn't want to mislead in  
 14 that way. That's a perfectly fair comment.  
 15 Q. And the training that was in fact arranged didn't have  
 16 that, certainly, as its primary purpose?  
 17 A. Correct.  
 18 Q. We can take that document off screen now.  
 19 Moving on, then, to the arrangements for the  
 20 Learning Together event in November 2019, is it right  
 21 that one of the Fishmongers' Company's charitable causes  
 22 for some time has been prisoner rehabilitation?  
 23 A. Yes.  
 24 Q. Is it also right, by way of introduction, that from late  
 25 2018, the company was introduced to Learning Together

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1 by, I think, a member of its court?  
 2 A. Yes.  
 3 Q. We've heard from the Learning Together witnesses that  
 4 the start of the relationship involved Learning Together  
 5 applying for grants, and that two grants were, in fact,  
 6 approved?  
 7 A. Yes.  
 8 Q. We don't need to go through your grant application  
 9 process, unless others wish to, but in general terms, is  
 10 it right to say that those grant application processes  
 11 put your grants officer, Amy Spolton, and other members  
 12 of staff in touch with Learning Together?  
 13 A. Yes.  
 14 Q. In that regard, we have heard that Ms Spolton and other  
 15 individuals connected with the company attended some  
 16 Learning Together events?  
 17 A. Yes.  
 18 Q. Did you yourself hear anything from them, from  
 19 Ms Spolton or others who attended such events, about  
 20 Learning Together, its work, and the kind of people they  
 21 were helping?  
 22 A. Yes, I can expand if you would like me to?  
 23 Q. Yes, please.  
 24 A. So I think there are two events, one in March 2019 in  
 25 Cambridge and then a second one in July 2019 up at

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1 Whitemoor.  
 2 Q. It was June 2019.  
 3 A. June 2019. Which was attended by a couple of members of  
 4 our staff. Very kind invitations from  
 5 Learning Together. We had, or were in the process of,  
 6 giving them grant money, so a good chance to go out and  
 7 see how that's being spent. That, of course, is in the  
 8 context of there were many, many other charities that we  
 9 also give to, also in the prisoner rehabilitation  
 10 sector, so this was a perfectly normal process.  
 11 I'm quite sure they will have sent me an email or  
 12 mentioned something in the passageway when I saw them  
 13 the following week as to how was that external visit.  
 14 Unusual in this case because actually it was beyond  
 15 London, so you know, I went up to Cambridge last night,  
 16 or something like that, and it seemed very successful,  
 17 it seemed like the cause was very worthwhile, and so  
 18 I got the sense of: well, that's fantastic, I'm glad  
 19 that's started well.  
 20 Q. Now, the jury have heard that in the course of emails  
 21 between Dr Ludlow of Learning Together and Ms Spolton,  
 22 in July 2019, Ms Spolton was asked about potential  
 23 venues for a Learning Together event in November, and  
 24 she held out the possibility of the hall being used.  
 25 A. Yes.

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1 Q. And if we put on screen {DC5049/7}, please, can we see  
 2 that Ms Spolton forwarded on to your deputy,  
 3 Ms Allinson, an email suggesting a possible  
 4 Learning Together event at the hall in November 2019?  
 5 A. Yes.  
 6 Q. And do we see from that email, from the second  
 7 paragraph, that Ms Spolton at that stage didn't know the  
 8 exact nature of the conference?  
 9 A. Yes.  
 10 Q. And then {DC5049/20} of the same file, please. Can we  
 11 see that on 1 August, Ms Santos, the head of events,  
 12 says that the date of 29 November is fine for an event,  
 13 but more details are required about the requirements,  
 14 timings, numbers and so on?  
 15 A. Yes.  
 16 Q. Then page 31, please. 21 August 2019, can we see that  
 17 Dr Ludlow of Learning Together gives details of the  
 18 event, and by way of background says that it will  
 19 involve bringing together alumni to build a sense of  
 20 national community through a series of workshops, and  
 21 then an early evening drinks reception?  
 22 A. Yes.  
 23 Q. {DC5049/35}, please. Do we see that on  
 24 27 August 2019 — sorry, bottom of the page, please —  
 25 Ms Spolton says that she has spoken to Joanna Allinson

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1 and Antonella Santos, and that the hall can't be  
 2 provided for an event ending after 4.00 pm?  
 3 A. Yes.  
 4 Q. Something else is on. Then if we go up the page,  
 5 Dr Ludlow says that's fine, but can they book the hall  
 6 from lunchtime until 4.00 pm on the 29th?  
 7 A. Yes.  
 8 Q. And then page 77, please {DC5049/77}, we see a few days  
 9 later Amy Ludlow gives further details of the programme  
 10 indicating the timetable and something about who is  
 11 going to be speaking, including at 3.15, a panel  
 12 involving Baroness Lola Young and two Learning Together  
 13 students.  
 14 A. Yes.  
 15 Q. Then can we go, please, to {DC5050/23}, we see that on  
 16 9 September 2019, Ms Spolton submits a formal proposal  
 17 for the company to support the event by hosting it free  
 18 of charge?  
 19 A. Yes.  
 20 Q. And is it right that the Warden gave approval for that  
 21 proposal?  
 22 A. Yes.  
 23 Q. We can look at the document if —  
 24 A. No, no, absolutely right, it did.  
 25 Q. Then {DC5050/52}, please, we can see that Ms Spolton, if

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1 we look at the bottom of the page, please, Ms Spolton  
 2 receives by way of copy, I think, an invitation to the  
 3 Learning Together event.  
 4 {DC5050/53}, please. Can we see that the email  
 5 refers to the event involving many alumni and a panel  
 6 discussion with some of those alumni?  
 7 A. Yes.  
 8 Q. Now we can take that off screen.  
 9 Before the event of 29 November 2019, did you know  
 10 in general terms that it was going to be happening?  
 11 A. Yes.  
 12 Q. To your knowledge, did Learning Together inform the  
 13 Fishmongers' Company that the event would be attended by  
 14 some Learning Together students who had been inmates in  
 15 prison? So people that had been inmates but had been  
 16 released?  
 17 A. So this is where the language starts to take effect .  
 18 Individually , I have never been in a prison in my life .  
 19 I've got a layman's awareness that you probably start  
 20 with high security and it might have the letter A  
 21 against it , and you work your way down through the  
 22 system to an open prison and eventually you rehabilitate  
 23 in society .  
 24 But when one is talking about alumni, and I think  
 25 I mentioned in my statement that if you're dealing with

1 The Clink Charity, they talk about graduates, and these  
 2 are recognised academic terms of people who have come  
 3 through a system, are recognised to those charities ,  
 4 have gone through an educational learning programme and  
 5 have come out the other end, or will do shortly .  
 6 The challenge is when you translate that into risk  
 7 management terms, it perhaps gets too soft, and I didn't  
 8 appreciate, I don't think any of my team appreciated  
 9 that "alumni" was referring directly to ex-offenders,  
 10 and certainly not current — people currently serving in  
 11 custody .  
 12 Q. Now, you, no doubt, know a little of what Dr Ludlow and  
 13 Dr Armstrong told the court last week, namely that they  
 14 had people like Amy Ludlow — sorry, Amy Spolton,  
 15 rather, attending their events, and knowing very well  
 16 that their students included university-based students  
 17 and prison-based students, and their point, made with  
 18 some vim and vigour, was that anyone reading  
 19 an invitation of the kind we've looked at would  
 20 understand "alumni" to mean including prison-based  
 21 alumni if they had been at Learning Together events. Do  
 22 you have any response to that in particular ?  
 23 A. If they had been at Learning Together events, yes. The  
 24 attendance at a Cambridge-based one, outside of a prison  
 25 setting, well, fantastic, I imagine those sort of things

1 happen all the time, people do come out of prison and do  
 2 rehabilitate and they do attend things all of the time  
 3 in their lives .  
 4 Regarding going to a prison and doing it in a prison  
 5 setting, the fact that two people from  
 6 Fishmongers' Company went and joined in there almost  
 7 reinforces, to me, the fact that it's obviously safe,  
 8 it's done normally, that's the way things happen, and so  
 9 that the feedback that it was a very successful event  
 10 and they enjoyed being there is not surprising at all .  
 11 But that, of course, was in a prison setting with  
 12 all of the security that goes with being in a prison  
 13 setting. That doesn't read across to me as being  
 14 therefore an automatic: those who are in a prison  
 15 setting would necessarily be exactly the same ones who  
 16 would be in an open venue like Fishmongers' Hall.  
 17 Q. If you had been told before the event that some such  
 18 people would be attending, so people who had been in  
 19 prison but had been released into the community, would  
 20 you have been surprised?  
 21 A. No. I'm perfectly aware that Learning Together did  
 22 difficult work with people who have difficult  
 23 backgrounds, and were doing it tremendously well. So  
 24 the fact that there may have been people who had  
 25 previously had an offending history attending the event

1 in itself , with no other supporting descriptions,  
 2 wouldn't have surprised me.  
 3 Q. Would it have surprised you to be told that some of  
 4 those attending the event had been in prison for serious  
 5 offences, such as serious violent offences?  
 6 A. Yes. Yes, but not in itself a showstopper. People of  
 7 that nature did attend, serious, violent convictions.  
 8 They were on a route, well down a route of  
 9 rehabilitation , but I hadn't got any understanding of  
 10 the detail of how long or what they did or, you know,  
 11 sort of taking a personal view as to whether this type  
 12 of offence or that type of offence was more or less  
 13 difficult to handle. I just don't have that background  
 14 knowledge.  
 15 Q. Now, you've suggested in the last couple of answers that  
 16 you wouldn't have been surprised to hear that  
 17 ex-offenders, released offenders, would be attending,  
 18 but you would have been surprised to hear that  
 19 ex-offenders with serious violent crimes in their  
 20 history would be attending. Why would you be surprised  
 21 that certain categories of offender would be attending,  
 22 given that educational programmes are open to prisoners  
 23 across the board?  
 24 A. So in a sense the category of offence is a — it's  
 25 a static risk factor, it's something that happens in the

1 past.  
2 Where people have got on their rehabilitation story  
3 is a variable, and they could be 20 years ago and  
4 completely, you know, in society now and doing, you  
5 know — productive in every way. So that, you know, it  
6 doesn't surprise me at all.

7 If you had said that they stepped out of prison  
8 yesterday with this sort of offence, then I would be  
9 surprised, thinking: gosh, wow, does it happen that  
10 quickly? Is that the right thing to be doing?

11 So it's the time issue that would have surprised me,  
12 or ... yes.

13 Q. To your knowledge, were any questions ever asked of the  
14 organisers of Learning Together and this event about the  
15 types of people attending, given that you wouldn't have  
16 been surprised that they included released offenders?

17 A. No. It was an event in the community, following  
18 a template that, in my understanding, had been used  
19 before in a similar setting, and we were dealing with  
20 an award-winning charity that was, I believe, highly  
21 recognised for the great work it was doing, and it had  
22 alumni, or graduates, of their programme engaged with  
23 that as a small proportion of their overall audience,  
24 which also had, you know, experts, practitioners, deeply  
25 experienced people from all of the legal, police,

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1 probation services, all present. That, to me,  
2 collectively gives an authority that they know what  
3 they're doing, and this is safe and, you know,  
4 satisfactory, or a proven template, and that's  
5 essentially the impression I took.

6 Q. Did you or any of your colleagues know or expect that  
7 the event would be attended by serving prisoners on day  
8 release, a small number of them?

9 A. No.

10 Q. Is that something that would have surprised you?

11 A. Well, with hindsight, yes. I think I mentioned in my  
12 statement that in my layman's interpretation, that when  
13 someone is out on licence, that I equated it to someone  
14 who has a licence to serve alcohol, someone who has  
15 a licence to drive a car; namely there may be  
16 restrictions on the type of car or the engine size, or  
17 the hours in which they can serve alcohol, but they are  
18 doing something which has been authorised by a statutory  
19 authority of some description. They are doing something  
20 on licence.

21 So if someone is attending in that capacity,  
22 whatever the restrictions are, I have no idea, whatever  
23 the checks and balances are, I have no idea, but I think  
24 as a layman I would, and continue to rely, on the  
25 appropriate authority to make sure those judgments are

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1 correct and appropriate.

2 Q. So if in one of the meetings before the  
3 Fishmongers' Hall event, you had been told by one of  
4 your colleagues that they had an event coming up, which  
5 was going to be attended by a certain number of released  
6 ex-offenders, would you have imposed any special  
7 requirements or added any special measures for security?

8 A. Probably not. Charities right across the country have  
9 a number of ex-offenders working for them. We saw last  
10 week some spectacularly good examples of people who have  
11 reintegrated into society, have found employment, who  
12 are doing good things. We've found others who are  
13 finding that transition slightly more difficult, and my  
14 goodness they were brave. So there were many, many  
15 examples that merely because a charity is choosing to  
16 bring together a small proportion of them into  
17 a building, doesn't in itself, you know, without any  
18 further amplifying information, mean that it's  
19 a showstopper, you can't do it, you know, full stop, end  
20 of conversation. These are difficult areas to get  
21 engaged in and I applaud all of those who try, who do  
22 it, but there's no reason why one cannot host those, but  
23 obviously the degree of information needs to be  
24 satisfactory to ensure it's done in a safe and  
25 appropriate way.

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1 Q. Do you think you would have asked questions if you had  
2 been told that much, that there would be ex-offenders  
3 attending, for example, questions about types of  
4 offences and numbers of people who are ex-offenders,  
5 anything like that?

6 A. Yes. Yes, absolutely. And if we had asked more  
7 proactively, the answer would have been: it's a low-risk  
8 event, based on the information that was known by  
9 Learning Together as the client charity.

10 Q. So if Learning Together had told you the reality, that  
11 it was being attended by a number of ex-offenders with  
12 offences of serious violence, and in one case terrorism,  
13 in their past, that wouldn't have caused you to take any  
14 further steps?

15 A. If I may, your question is prefixed with the hindsight  
16 word "if". But we didn't. We didn't have that  
17 information.

18 Q. What I'm trying to understand is that if that  
19 information, that basic information about the event, had  
20 been communicated to you, would you have done anything  
21 differently at the time? Not with the benefit of all  
22 the review and research work you've done since then?

23 A. So if it was offered to us as a low-risk event on  
24 a template that had been used before in a community  
25 setting, with graduates known to them on recovery

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1 programmes, moving forwards in society, to be combined  
 2 with experts and practitioners who know way more than  
 3 any of us would have done, I would have said: that's  
 4 okay, we're — I mean, if they want more security, we'll  
 5 put more security on, but they've never used more  
 6 security before, so we've got what we've got and that  
 7 would have been okay.  
 8 Q. In summary terms, Dr Ludlow and Dr Armstrong told us  
 9 that they relied on The Fishmongers' Company to  
 10 an extent to have proper security in place, appropriate  
 11 for the event, and you're telling us that without asking  
 12 detailed questions about the event, you effectively  
 13 relied upon them to tell you if the event was anything  
 14 other than low risk. Would you accept that with two  
 15 organisations taking those views, there is a risk of —  
 16 risks or concerns slipping through the crack between the  
 17 two?  
 18 A. I agree.  
 19 Q. And just to finish this topic, during any of the  
 20 discussions prior to this event, was there any  
 21 discussion of any added security measures for the event?  
 22 A. No.  
 23 Q. Turning to the security which was in place for the  
 24 event, we have heard that the security staff on the day  
 25 were the usual three in number: two available at the

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1 front door, one at the back door. That's right, isn't  
 2 it?  
 3 A. Yes.  
 4 Q. As your answers have indicated already, no form of bag  
 5 search or personal search and no metal detectors?  
 6 A. That's correct.  
 7 Q. Was any specific risk assessment carried out of this  
 8 event?  
 9 A. No.  
 10 Q. And, again, you've told us the reasons for that.  
 11 Were any special briefings to staff given about this  
 12 event?  
 13 A. No. Also a previous answer, 10 days before, two weeks  
 14 before, all staff, including all casual staff, had  
 15 a routine update on emergency scenarios for any event.  
 16 Q. Moving, then, to events after the day of the attack, and  
 17 the internal review that was carried out, is it right to  
 18 say in general terms that there has been an extensive  
 19 amount of review work done by the company in the  
 20 aftermath of this attack?  
 21 A. Yes.  
 22 Q. If we can put on screen {DC5056/1}. Can we see that the  
 23 Wardens' Committee met on 12 December 2019, with you in  
 24 attendance, and if we go down to item 3, we can see the  
 25 attack was discussed and you were giving a verbal update

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1 to staff about the impacts of those tragic events?  
 2 A. Yes.  
 3 Q. You obviously had a whole host of responsibilities after  
 4 that event, including, for example, the welfare of the  
 5 many staff caught up in it?  
 6 A. Yes.  
 7 Q. Do we see that at point (b), among all the other work,  
 8 an internal review had been commissioned by someone  
 9 called Andrew Wallace?  
 10 A. Yes.  
 11 Q. Who was and is he?  
 12 A. So he's our fourth director in charge of fish and  
 13 fisheries. He's based in Scotland, so he was the most  
 14 independent, had not been present in the hall that day.  
 15 Q. Had you yourself been present in the hall that day?  
 16 A. Yes, until about 11 o'clock that morning.  
 17 Q. You weren't, though, present at the time of the attack,  
 18 which is why I haven't asked you about it.  
 19 A. Correct.  
 20 Q. If we go over to {DC5056/2} of these minutes, can we see  
 21 that item 4 involved a risk review of risk 6 in the  
 22 register, and you noted that the events of 29 November  
 23 corresponded to risk 6, a lone wolf attack, a risk, as  
 24 we've seen, with a very low likelihood but a very high  
 25 impact.

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1 A. Sorry, I can't quite see — what am I looking at?  
 2 Q. It's paragraph 6(a) under "Item 4".  
 3 A. Yes, sorry, yes.  
 4 Q. So you were drawing an analogy between the events of the  
 5 attack and risk 6 in the strategic risk register?  
 6 A. Mm—hm.  
 7 Q. Then if we go down to paragraph 8, please, on the same  
 8 page, can we see that the issues to be focused upon  
 9 involved, first of all, physical security measures?  
 10 A. Yes.  
 11 Q. And then {DC5056/3}, considering the nature of  
 12 activities within the hall, and an agreement that the  
 13 company should always retain the power of veto on  
 14 certain events?  
 15 A. Yes.  
 16 Q. "... based on the robust assessment of any and all risks  
 17 that hosting such an event could have on the Company"?  
 18 A. Yes.  
 19 Q. Does this discussion suggest that the event brought  
 20 starkly to light both the need to look again at physical  
 21 security and the need to look at risk assessment of  
 22 particular events?  
 23 A. Yes. We're a learning organisation. It's axiomatic  
 24 that one is going to draw as much as possible from this  
 25 sort of experience in order to put in place whatever is

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1 the sensible level of physical and other, you know,  
 2 processes, procedures, protective measures going  
 3 forwards, absolutely, and to share those are all other  
 4 similar organisations, of which there are many, that are  
 5 looking to us immediately as to how did that affect  
 6 them, what have they done about it, and therefore what  
 7 should all of us as a broad community in London and  
 8 beyond, how do you deal with risk 6, unannounced  
 9 violence of a terrible nature?  
 10 Q. The immediate learning points that were drawn or areas  
 11 for further learning were identified, were first of all,  
 12 physical security at the hall, and secondly, risk  
 13 assessment of particular events, even before Mr Wallace  
 14 started his work?  
 15 A. Yes.  
 16 Q. And then {DC5064/1}, please, do we see here a lessons  
 17 learned report, which I think was prepared by  
 18 Mr Wallace; is that right?  
 19 A. Yes.  
 20 Q. {DC5064/5}, please. Do we see the first major  
 21 recommendation is of an event standard operating  
 22 procedure for risk management? Can you summarise in  
 23 a sentence or two or three what that recommendation  
 24 involved?  
 25 A. So the two principal things that have come out of all of

1 our learning: one is a much firmer contract with any  
 2 charity or commercial client coming through the door, so  
 3 that the understanding of many things, but most  
 4 specifically here the audience, the nature of what is  
 5 required, is understood at the outset, and sometimes  
 6 this might be 9–12 months ahead, when they're first  
 7 looking at using Fishmongers' Hall.  
 8 To reaffirm that again at the 10–day point, which is  
 9 when you're starting to allocate actual manpower or  
 10 physical requirements for something that is in the short  
 11 term, and the third time, on the day of event, so that  
 12 everyone is really clear as to who it is who is coming  
 13 through the door, and what are the checks and balances  
 14 required to cope with that.  
 15 So all of that is now tightened up in contract  
 16 terms, it's a more proactive, lean-forward, go out and  
 17 find what it is that you need to know, rather than let  
 18 it be given to you in a benign or passive way. That's  
 19 the contract.  
 20 On the other side, whilst not related directly to  
 21 29/11, but nonetheless a sensible move forward is the  
 22 placing of what I've described as the duty manager role,  
 23 which will be familiar to anyone in the hotel or  
 24 restaurant business, where you've got a single person  
 25 who is definitively the one who is going to manage

1 an event and therefore needs to know exactly what it is  
 2 they're being asked to do, and here in risk terms,  
 3 therefore, the client coming through the door, and  
 4 therefore all the subsets of that, ranging from security  
 5 and facilities and catering staff and all the rest of  
 6 it, they know because the duty manager has told them  
 7 precisely what it is they're handling.  
 8 Now, those two were both perfectly satisfactory at  
 9 the time, but they could have been better, we've made  
 10 them better and those are the two principal learning  
 11 points that we took away.  
 12 Q. If you go to {DC5064/6} of the Wallace report, you can  
 13 see, I think, a draft of the standard operating  
 14 procedure, and we can see that events are divided into  
 15 categories. If we look down to the fourth row, category  
 16 C is philanthropic events with unknown guests, and the  
 17 response is that security is to be appropriate for the  
 18 event, with a bag search and scanning options  
 19 potentially available?  
 20 A. Yes.  
 21 Q. Then if we go down to the last row, high risk events,  
 22 category D, involving known high risk individuals and  
 23 convicted offenders, a presumption against holding such  
 24 events at the hall.  
 25 A. Yes. In the category C ones above, you see guests

1 unknown to the company. Of course, in an open venue,  
 2 a restaurant, St Paul's Cathedral, Tower of London,  
 3 wherever, you never know who is coming through, so we're  
 4 already in a fairly safe category because more often  
 5 than not we know who is coming through the door.  
 6 Tragically we didn't know enough on 29 November.  
 7 Q. Now, if this procedure and your dedicated risk manager  
 8 procedure had been in place before 29 November 2019, is  
 9 it right that, first of all, that person would have had  
 10 the responsibility for finding out about the event with  
 11 a view to putting in place any appropriate additional  
 12 security, and that there would have been a presumption  
 13 against hosting it in the first place?  
 14 A. Not necessarily, because the guests were all known. As  
 15 I said before, every single person in the building that  
 16 day was let in through the door because they were known  
 17 to the host, Learning Together, so it would have been  
 18 somewhere around category B, and that's the difficulty;  
 19 that this was a proven template from an award-winning  
 20 charity that had done it before, that had alumni, so  
 21 people known to them, graduates of their programme  
 22 coming through the system.  
 23 What we didn't know was Usman Khan. We didn't know  
 24 he was a terrorist. He was presented on an attendee  
 25 list in alphabetical order by forename, on page 2, I can

1 visualise it now. We didn't know him from anyone else  
 2 who was attending there, just a name on the list. But  
 3 he was known to others but not known to  
 4 Fishmongers' Hall, and that's the shortfall .  
 5 If we had asked more than we had asked already, it  
 6 would have come back as it's a low-risk event. That was  
 7 the perception of Learning Together, and that was their  
 8 understanding, and of all other attendees present who  
 9 knew Usman Khan, or knew of his background, or knew of  
 10 the prison setting in which he had been in, or knew of  
 11 the normal escort-type regulations that would have been  
 12 appropriate, all of that was uncited to us, was known by  
 13 others. Regrettably it didn't allow us, therefore, to  
 14 make any additional precautions or take any, you know,  
 15 sort of further advice as to whether that was  
 16 an appropriate event to handle at all, in which case it  
 17 would have gone from about category B straight down to  
 18 risk D. We cannot do that in our location.  
 19 Q. Just this question before we break for lunch, and I will  
 20 finish not long after lunch with you, but if this  
 21 standard operating procedure had been in place, in order  
 22 to operate it properly, it would be essential to ask  
 23 about the kinds of people attending, including whether  
 24 they involved high risk individuals and convicted  
 25 offenders; yes?

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1 A. Well, we have got more than one email in  
 2 approximately August and approximately October, asking  
 3 for the audience: what is the audience that is coming to  
 4 us on this day. Not just the scale on the numbers, but  
 5 what is the audience.  
 6 We didn't have the level of detail that we now all  
 7 have coming back; we had an alphabetical list of names.  
 8 Q. I appreciate that, but that wasn't quite the question  
 9 I asked.  
 10 If you had this procedure in place, one of the  
 11 categories was -- is a category for high risk  
 12 individuals and convicted offenders.  
 13 A. Yes.  
 14 Q. If in future you have a request to host an organisation  
 15 by a prison rehabilitation and education programme and  
 16 you want to operate this procedure properly, you would  
 17 have to ask, wouldn't you: do you have convicted  
 18 offenders and other high risk individuals attending?  
 19 A. High risk individuals, absolutely, but someone who is  
 20 previously convicted doesn't make them high risk for  
 21 life, and so that is a static factor which now needs to  
 22 be relooked at.  
 23 But if they are high risk, they are genuinely high  
 24 risk -- and Usman Khan comes at no higher risk -- then  
 25 obviously we can't do it, but it doesn't mean that every

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1 other person who has ever been to prison is high risk,  
 2 because that's how all prisoner rehabilitation charities  
 3 work.  
 4 Q. So once again it's relying on Learning Together who told  
 5 us last week that they have no experience of risk  
 6 management?  
 7 A. It absolutely relies on a higher degree, higher fidelity  
 8 of information than we had available to us on that day.  
 9 MR HOUGH: Thank you very much.  
 10 Sir, would that be a convenient time for the break?  
 11 JUDGE LUCRAFT: It would. We'll break there, Commodore, and  
 12 we'll come back at 2 o'clock. Thank you very much.  
 13 (In the absence of the jury)  
 14 I'll rise.  
 15 (1.01 pm)  
 16 (The short adjournment)  
 17 (2.00 pm)  
 18 JUDGE LUCRAFT: Yes.  
 19 MR HOUGH: Commodore Williamson, before lunch we were  
 20 looking at Mr Wallace's lessons learned report. I would  
 21 like to return to that for some more questions.  
 22 {DC5064/7}, we had been looking at page 6, but  
 23 perhaps now we could look at page 7. Do we see there  
 24 that after the part of the standard operating procedure  
 25 dealing with categories of offence, we now see

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1 a structured plan for a series of events to be taken, or  
 2 steps to be taken, in advance of an event.  
 3 A. Yes.  
 4 Q. Providing for initial contact between the events team  
 5 and the client, oversight by a single individual, as you  
 6 identified, then pre-event risk categorisation, applying  
 7 the tool on the previous page.  
 8 A. Yes.  
 9 Q. With a discussion to take place with you, or I think  
 10 that's Ms Allinson, if there are any doubts.  
 11 Then going down the page, please, a step of booking,  
 12 and a further step of a contract with risk assessment in  
 13 relation to the guest list.  
 14 A. Yes. It codifies actions that were taking place before,  
 15 but not in a format which was as obvious as is stated  
 16 here.  
 17 Q. To be clear, is one value or benefit of documenting it  
 18 in this way that you ensure that the steps are thought  
 19 through and taken in a structured way?  
 20 A. Yes.  
 21 Q. Then page 9, please {DC5064/9}, as well as the  
 22 recommendation for the standard operating procedure for  
 23 risk management, do we see towards the bottom of this  
 24 page, recommendations for physical and virtual building  
 25 and event security measures?

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- 1 A. Yes.
- 2 Q. If we look from {DC5064/10}, we can see a whole series  
3 of recommendations made, including if we go down the  
4 page, item 5. The potential for random bag searches  
5 taking place.
- 6 A. Yes.
- 7 Q. Was that a recommendation for random bag searches at any  
8 and all events, or just certain types of events?
- 9 A. Certain types of events, some which may be a committee  
10 meeting of 20 people, everyone is known very well to the  
11 company, not required, but not those where you have got  
12 contracts in place with external charities or commercial  
13 clients, then yes.
- 14 Q. Then over to {DC5064/11}, please. Item 13, please,  
15 under "Building security", can we see recommendations  
16 for changes to CCTV at items 12 and 13, and item 13,  
17 extending coverage of CCTV throughout the interior of  
18 the building?
- 19 A. Yes.
- 20 Q. And is it right that there are also, as well as these  
21 various recommendations for physical security measures,  
22 some recommendations about matters of policy and  
23 governance?
- 24 A. Yes.
- 25 Q. We can take that off screen now. Is it right that

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- 1 in March of last year, the company purchased  
2 a walk-through metal detector?
- 3 A. Yes.
- 4 Q. We can put that on screen, {DC5073/1}. If we can rotate  
5 it. That's the item, is it?
- 6 A. Yes, it arrived the week that the country went into  
7 lock-down, so it hasn't been used for big-scale events  
8 since.
- 9 Q. Is the intention that will be used for events generally,  
10 or only for certain types of events with particular risk  
11 classifications?
- 12 A. Well, we would retain the right to use it for any event,  
13 and of course in our future invitations, it would be  
14 specified that that, and visual ID, would be expected of  
15 any guest at any time. Whether we choose to employ it  
16 may be restricted to those of the nature just described,  
17 higher risk category events.
- 18 Q. So events with larger numbers of people where you can't  
19 vouch for every attendee?
- 20 A. Larger, or higher risk, which are not always the same  
21 thing.
- 22 Q. We can take that image down now.  
23 As of now, and of course bearing in mind that the  
24 country has been in lock-down for much of the last year,  
25 to what extent have the recommendations in the

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- 1 Wallace Report been implemented?
- 2 A. To a very high extent. The challenge with all of these  
3 things is dealing with what I call the needle in the  
4 haystack. When you've got the needle in your hand, you  
5 can see very easily where the point of danger is and you  
6 can handle the problem with the greatest possible care.  
7 When you've got the needle in the haystack, you're  
8 always looking to not just, if you like, fight  
9 yesterday's problem, but all the problems that you've  
10 got going forwards, never quite knowing where that next  
11 risk will materialise itself.
- 12 I mentioned allergen management as one issue, but  
13 look at Covid itself, and that also as a risk—to—life  
14 issue, how also do you handle that going forwards, and  
15 of course, how any organisation handles it will be  
16 a moving feast depending on, you know, this month, next  
17 month, next year and so on, so it's very important we  
18 stay alive to all risks, all situations, and this is one  
19 of them and, of course, one which has commanded the  
20 closest attention.
- 21 Q. Have you brought in the standard operating procedure  
22 involving classification of events in the way we saw  
23 described in the document?
- 24 A. So we've not only brought it in, we have shared our  
25 contract template, and our duty manager risk job role

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- 1 description with all our colleagues, ranging from  
2 Lambeth Palace to Tower of London, St Paul's Cathedral,  
3 the other livery companies, right across the piece.  
4 They can take or leave, but that's what we've done,  
5 informed by the very sharp experiences of 29 November.
- 6 Q. And do you now go through the staged process that we saw  
7 on the document just now when taking on a new event with  
8 the various stages of enquiry and risk assessment, not  
9 necessarily a long document in risk assessment, but risk  
10 assessment of the event which we saw described on that  
11 page??
- 12 A. Yes.
- 13 Q. You now, as a result, also have a specific option to  
14 consider of implementing bag searches for events?
- 15 A. We have that option, yes.
- 16 Q. Whereas you told us that was something that had never  
17 been done before November 2019, except perhaps when  
18 required for very unusual events by the police?
- 19 A. Yes.
- 20 Q. And you have a metal detector which you retain the right  
21 to use based on your view, your independent view of the  
22 risk of an event?
- 23 A. Yes.
- 24 Q. If an event with the profile of the Learning Together  
25 one on 29 November 2019 were to be proposed in the

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1 future, so with the same profile of guests, and you had  
2 been told about that profile of guests, do you think  
3 that Fishmongers' Hall would agree to host it?  
4 A. It couldn't. It couldn't possibly. The specific issue  
5 is you've got someone who is only recently released from  
6 a category A prison with a terrorist background. We  
7 couldn't provide the security arrangements for that sort  
8 of individual.

9 If you isolated that and took it all away and just  
10 took everyone else there, we would have a much more  
11 forward, proactive conversation with the  
12 client/charity/company. We would probably need a lot  
13 more evidence as to why an event was categorised as low  
14 risk in their eyes, or any other level of risk, and then  
15 make a case-by-case judgment of whether that was  
16 a tenable event in our hall with our facilities.

17 I make no bones about it: we could shut down the  
18 hall and do no activity, it's the easiest thing in the  
19 world, stop the risk. In my background, if you are  
20 afraid of flying, don't fly, just ground the helicopter.  
21 The Fishmongers' Company wants to do things for the  
22 benefit of society, and this and the many other  
23 charities in this area and in mental health, another  
24 area which is sometimes connected into this, you know,  
25 very difficult issue of knife crime, one needs to make

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1 those judgments, well, fully informed by the facts to  
2 the extent one can get hold of the facts, and that is  
3 our position going forwards. We believe we have those  
4 processes that help us to the greatest possible extent.

5 Q. I'm not suggesting for a moment that an organisation  
6 like yours should not host a prisoner rehabilitation  
7 charity event, or that it shouldn't host such an event  
8 attended by ex-offenders, but if it was presented with  
9 the opportunity of hosting such an event in future, what  
10 questions do you think it would ask about the expected  
11 attendees?

12 A. The leading question is on what grounds do you make  
13 an assessment that the profile of the attendees overall  
14 is safe to have an event held in the community,  
15 remembering that these individuals — and I'm talking  
16 about the ex-offenders — still travel on trains, still  
17 travel on the underground, still shop in supermarkets,  
18 still go to the mosque, still go to the gym. They go to  
19 all of these things anyway because they are allowed to  
20 be in the community.

21 So on the basis they happen to be in one location  
22 for a period of time, does that make it specifically  
23 an enhanced risk that is untenable or intolerable and  
24 you shouldn't have, particularly if they are working on  
25 track records that may be many years out of custody,

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1 there's improvement written all over it.

2 Now, we can't individually assess attendees. We'll  
3 never have the resource in terms of time, we'll never  
4 have the background knowledge of individual sort of  
5 positions, as to whether this attendee is safe and that  
6 one isn't, we have to, in a sense, rely on the client  
7 charity, and they in turn, of course need to convince us  
8 that actually what we are doing is perfectly safe, or  
9 maybe they have reservations, in which case the  
10 discussion starts many months beforehand as to whether  
11 this is a sensible thing to be pursuing or not.

12 But, as with all matters, it's rarely black and  
13 white, there are shades of grey right across the  
14 position here, and if one takes domestic knife crime in  
15 London in 2019, many, many people, far too many people  
16 are killed from, you know — which one of those may be  
17 on the pavement just outside our hall, I don't know.

18 So all of what I'm trying to do is just quantify  
19 these relative risks, but what is very clear from this  
20 is that a terrorist offender with a short track record  
21 coming out of a high security prison is information  
22 I bitterly wish we had known beforehand, and could have  
23 done something about, which would have meant actually we  
24 can't hold that event.

25 Q. You have made that very clear, but may I just return to

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1 the question I asked: in future, if something like this  
2 were presented to you, what questions will you, your  
3 organisation, ask proactively about the attendees and  
4 their background?

5 A. Well, what is their background? What is the profile  
6 they hold? What is their present position? What is the  
7 risk associated with that individual as assessed by the  
8 appropriate state authorities?

9 Q. Now, if you had been told that: we have offenders with  
10 a range of convictions in their history, we don't ask  
11 the details and we're not necessarily told, or discover  
12 the details of particular offences, but these are people  
13 who have worked with us in our programmes for a  
14 considerable time, whom we feel we know and like and  
15 trust, thus a low risk event, would you accept that on  
16 trust in the future?

17 A. Well, one, in a sense, needs to see the same sort of  
18 paperwork evidence trail of how had they come to that  
19 judgment, what is informing it, what level of fidelity  
20 is there over what period of time, over what sort of —  
21 are we talking about violent offences, sexual offences  
22 or, in this case, extraordinarily, terrorism offences.

23 There are many factors that would go into that, but,  
24 as we know, charities do do this work and so I can't  
25 make an: it's definitely this or it's definitely that,

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1 but I would like to think we would consider it very  
 2 closely, but we would also have no hesitation in turning  
 3 it down if I was unsatisfied that the risk assessment  
 4 was what I would wish it to be.  
 5 Q. If an event of the kind held on 29 November 2019 were  
 6 held in future, and strip out for a moment the  
 7 particular offending history of Usman Khan, do you think  
 8 that there would be bag-searching for the event?  
 9 A. Yes.  
 10 Q. Do you think the metal detector would be used?  
 11 A. Yes. One has to also consider -- how can I put it --  
 12 think the problem right through to the finish. The  
 13 challenge with bag searches and knife arches, when you  
 14 have them already inside the building, is what you do  
 15 when you find someone with a knife, gun or bomb.  
 16 In military terms, if that's your challenge, you  
 17 start with the problem 200 yards down the pavement. If  
 18 it's already in there, you've still only got security  
 19 guards who have no authority to strike back beyond that  
 20 of self-defence, who have no weapons that they can use,  
 21 so you still have that ghastly set of minutes before the  
 22 police arrive with something that is going to be able to  
 23 deal with the problem, and I've thought oh so closely  
 24 that if Usman Khan had come into the building in the  
 25 situation he did, is he going to realise that he's about

1 to be searched and say: okay, fair deal, you've caught  
 2 me, here are my weapons and I will go back to jail for  
 3 however many years, or is he going to initiate his  
 4 attack there and then, and if he does initiate his  
 5 attack there and then, he's still inside an entrance  
 6 hall with almost exactly the same sort of people, with  
 7 almost the same run of minutes in which he can cause his  
 8 tragedy and mayhem.  
 9 Scenario three is he gets towards the building and  
 10 loses his nerve and turns round and goes back home.  
 11 Well, in his particular situation on that particular  
 12 day, he's still accompanied by Simon Larmour and others,  
 13 he would still have to explain himself in tag terms as  
 14 to why he did do what he did do or didn't.  
 15 But the mere possession of a knife arch doesn't  
 16 solve all of your problems unless you have, as you would  
 17 in, let's say, the Ministry of Defence, a ceiling to  
 18 wall physical barrier in which you've got individual one  
 19 by one entry simultaneous to the x-ray machine taking  
 20 your luggage through, locking you all in the same area  
 21 with very few other people around, blast wall  
 22 protection, protection for all other staff like  
 23 receptionists and all the rest of it.  
 24 So if Usman Khan was killed because he had a bomb,  
 25 so if you are dealing with that and he lets it off

1 outside of your knife arch, you're still going to end up  
 2 with the same problem. So it's a very, very difficult  
 3 thing to deal with when you've got unannounced violence  
 4 of such intent, violent intent coming towards you, and  
 5 in that sense, all of us members of the public have to  
 6 rely on the state authorities making judgments about  
 7 these very small percentage of people in society who  
 8 could think like this and could be moved to act in the  
 9 way that Usman Khan did, and the assessments that they  
 10 make, rightly or wrongly, as to whether they should be  
 11 in custody or going through the early stages of  
 12 rehabilitation, with all the conditions which may be  
 13 police escorts and probation officers and all of that,  
 14 none of which I pretend to know the detail of, but is it  
 15 the case that all of us can take a degree of safety that  
 16 they are providing us with that protection, if you like,  
 17 in broad society, because once they decide to turn and  
 18 then walk the streets, Usman Khan was effectively live  
 19 as a weapon when he left his flat that day, and we were  
 20 just the end game in that process.  
 21 Q. Just to get back to the question I asked, do you think  
 22 now you would have the metal detector in place for  
 23 an event of this kind?  
 24 A. Yes.  
 25 Q. And is it right that metal detectors, knife arches of

1 this kind, are used up and down the country in buildings  
 2 such as courts and other government buildings without  
 3 armed guards and blast doors and the like by way of  
 4 additional protection?  
 5 A. They are, yes.  
 6 Q. And that's because they provide a degree of protection,  
 7 or at least knowledge, at the point of entry of whether  
 8 people are bringing weapons into the building.  
 9 A. They provide deterrents, yes.  
 10 Q. Now, you were making some comments about statutory  
 11 agencies, police probation and so on, providing  
 12 protection. If you and your colleagues had been asked  
 13 about the level of security that would be in place for  
 14 the event by, for example, a probation officer or  
 15 a police officer managing Usman Khan, presumably you  
 16 would have answered all questions and given all details?  
 17 A. Yes.  
 18 Q. And if you had been asked to put in place by such people  
 19 in November 2019 a bag search, or metal detection or to  
 20 tell the City of London Police about the event, would  
 21 you have done that?  
 22 A. Yes. At that point we didn't have ownership of knife  
 23 arches, but we had trained staff who could have done  
 24 a manual search.  
 25 Q. Looking back and bearing in mind the results of the

1 Wallace review, do you consider on reflection that the  
 2 events of 29 November 2019 highlighted or exposed any  
 3 weaknesses in the security arrangements and procedures  
 4 at the hall?  
 5 A. Well, the security arrangements weren't matched to the  
 6 list of attendees that were coming through the door.  
 7 Q. In more general terms, do you think those events, as  
 8 tragic events sometimes do, exposed weaknesses which  
 9 you've been able to address?  
 10 A. Yes.  
 11 Q. Which are the most significant ones to your mind?  
 12 A. The greater degree of assessment required of the profile  
 13 of attendees coming to an event.  
 14 Q. Do you feel, however, that that is an area of  
 15 improvement which many similar bodies, similar venues,  
 16 would have shared?  
 17 A. Sorry, I don't understand the question.  
 18 Q. Well, do you think that many other venues, in fact, many  
 19 other organisations, would have been in the same  
 20 position of needing to improve in that area?  
 21 A. Yes.  
 22 MR HOUGH: Thank you very much. Those are all the questions  
 23 I have, there will be some more.  
 24 Questions by MR PITCHERS QC  
 25 MR PITCHERS: Commodore Williamson, I'm Henry Pitchers,

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1 I ask questions on behalf of the family of Saskia Jones.  
 2 Can we just start with a little recap over the  
 3 personnel at Fishmongers' Hall in autumn 2019, just so  
 4 the jury are clear.  
 5 In terms of security, you told us earlier that  
 6 Steve Noe, you described him as the security supervisor;  
 7 is that right?  
 8 A. He's the longest serving of the four security guards and  
 9 therefore sets the rosters and similar, yes.  
 10 Q. So was it -- was security supervisor his job title?  
 11 A. Yes.  
 12 Q. And does he have a written job description?  
 13 A. Yes.  
 14 Q. So if we saw that job description, it would describe his  
 15 position as supervisor?  
 16 A. Yes.  
 17 Q. Yes. I mean, are you aware of the contents of his job  
 18 description?  
 19 A. He doesn't have an additional level of training in  
 20 comparison with his peers, but he is the one who was  
 21 most senior and, therefore, controlled that area.  
 22 Q. Right, so of the security officers he was the most  
 23 experienced?  
 24 A. Longest serving, yes.  
 25 Q. And almost, therefore, by default became the supervisor

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1 of the less --  
 2 A. Yes.  
 3 Q. -- less long served; is that right?  
 4 A. Mm--hm, yes.  
 5 Q. But he didn't have any decision-making role in terms of  
 6 setting levels of security, coming up with risk  
 7 assessments or other protocols?  
 8 A. Correct, but equally he wasn't limited -- if he had  
 9 a suggestion, if any of them had a suggestion, then that  
 10 would be taken, but you're correct, it would be -- you  
 11 know, the policy for an event or a situation would be  
 12 effectively given to him and he would get on and enact  
 13 it.  
 14 Q. That's the point, isn't it. So, if you like, the  
 15 protocols and the policy would be set by others and  
 16 Mr Noe would assist in implementing that on a day-to-day  
 17 basis?  
 18 A. Yes.  
 19 Q. So in terms of employees who had some input into policy  
 20 and protocols would that be, on the security side,  
 21 Adam Cresswell?  
 22 A. Yes, amongst those, yes.  
 23 Q. Would he be the one who was most closely aligned with  
 24 issues of security?  
 25 A. Yes.

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1 Q. Yes. Because we heard from Mr Stevelman earlier in this  
 2 hearing and he seemed to be of the view that it was  
 3 Mr Cresswell who was head of security?  
 4 A. Yes, he's head of facilities, of which security is one  
 5 subset, yes.  
 6 Q. Yes. And I think in his witness statement Mr Cresswell  
 7 says that he was responsible for overseeing security.  
 8 A. Yes.  
 9 Q. Do you think that there was uncertainty as to roles and  
 10 responsibility regarding security prior to the attack on  
 11 29 November?  
 12 A. No. I'm perfectly happy to take it straight here, you  
 13 know, everything leads to me. There are people who  
 14 have, you know, jobs in events, in facilities, and the  
 15 various other sections within the -- you know, the  
 16 company, and there are overlapping areas, but I don't  
 17 think there's any confusion, no.  
 18 Q. So you don't accept that there was a lack of clarity as  
 19 to who was responsible for setting security policies  
 20 prior to 29 November?  
 21 A. No, that's not to say we can't put more clarity into it,  
 22 and we have done that since.  
 23 Q. So it's certainly clearer now, then?  
 24 A. Yes.  
 25 Q. And in terms of other significant personnel for this

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1 event, we've heard of an Amy Spolton; what was her job  
2 title?

3 A. She's the grants administrator.

4 Q. Grants administrator. And for those not familiar with  
5 this sort of organisation, what were her  
6 responsibilities?

7 A. So we have in her area maybe 25 organisations with which  
8 we have a relationship, charities, and she will conduct  
9 the diligence on behalf of the committee as to whether  
10 this charity has got financial accounts, has got  
11 a safeguarding policy, has got, you know, the checks and  
12 balances to make sure it's an organisation we can  
13 usefully, proactively deal with, and that's essentially  
14 the background work that she would do.

15 Q. But in terms of this event, she seems to have been, if  
16 you like, the primary point of contact within The  
17 Fishmongers' Company in dealing with Learning Together  
18 and making arrangements for this event?

19 A. In the first instance, yes.

20 Q. And we've also heard of Joanna Allinson. What was her  
21 job title and what was her role?

22 A. So she's double-hatted, so she's the chief operating  
23 officer for the company, so my deputy, and then she also  
24 had the executive lead for the trust, the committee that  
25 deals with all non-fisheries charity work.

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1 Q. Right. Again, from reading Ms Spolton's witness  
2 statement, it seems to have been in advance of the event  
3 her understanding that there would be ex-offenders  
4 attending?

5 A. Yes.

6 Q. That's -- you've no doubt seen that statement?

7 A. Yes.

8 Q. Yes. And it would seem to be based upon she understood  
9 what was meant by the word "alumni" in this context?

10 A. Yes, okay.

11 Q. She didn't, though, anticipate there would be serving  
12 prisoners attending, as I understand it?

13 A. Yes.

14 Q. And certainly didn't expect there to be any terrorist  
15 offenders?

16 A. Absolutely didn't.

17 Q. Am I right, you will have reviewed, no doubt, the email  
18 correspondence probably more carefully than I have,  
19 even, it would seem from reviewing that that  
20 Joanna Allinson, your deputy, wasn't told explicitly by  
21 Amy Spolton that it was expected that there would be  
22 ex-offenders in attendance; is that...?

23 A. That's correct, it's the lack of explicit descriptions  
24 that I regret.

25 Q. So it would seem that Ms Spolton interpreted "alumni" as

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1 including ex-offenders, but that doesn't seem to have  
2 been passed, if you like, up the chain of command?

3 A. No, and I think to be fair to Amy Spolton, it didn't  
4 come in in more explicit language either. So the sense  
5 that one is dealing with, you know, such a difficult set  
6 of people in terms of background didn't arrive, coming  
7 up the system. No lack of opportunity to allow it to do  
8 that, no problems with, you know, who talks to who,  
9 a small group of people working in the same building,  
10 you know, a few yards away from each other, seeing each  
11 other every day. The clarity of the language wasn't  
12 what I wish it had been.

13 Q. So from your understanding of the documentation and  
14 understanding of this place of work, when the green  
15 light was given to this event, Joanna Allinson didn't  
16 have an understanding about the fact that offenders of  
17 any sort were going to be attending?

18 A. Well, again, that's all in the language: offenders of  
19 any sort, so if we're talking about ex-offenders, so  
20 those in education coming as alumni and graduates  
21 through a programme, whatever happened in their past or  
22 their distant past is in the past and they are now very  
23 successful people coming through one way or the other.

24 Q. Just, quite specifically, she wasn't aware that there  
25 were former offenders attending the event when she gave

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1 the green light to it?

2 A. We all know that Learning Together work with former  
3 offenders.

4 Q. Is it your understanding she was aware of the fact that  
5 former offenders would be attending when she gave the  
6 green light to the event?

7 A. Yes, Learning Together, we all know that  
8 Learning Together work with former offenders.

9 Q. No, I'm asking about whether you knew they were going to  
10 be attending the event?

11 A. Not specifically, other than this term "alumni".

12 Q. That's why I'm trying to be clear. So we know from her  
13 statement what Ms Spolton interpreted by the term  
14 "alumni"; from my review of the email exchanges, there's  
15 nothing that told Ms Allinson, or hinted that there  
16 might be offenders attending; that's correct, isn't it?

17 A. Correct.

18 Q. And Charles Spicer, he's a member of the committee; is  
19 that right?

20 A. He's a member of the main board, he's a member of the  
21 court of the company; he chairs the philanthropy  
22 committee. The committee had made a decision to work in  
23 prisoner rehabilitation, it had done its diligence  
24 around Learning Together as one of many charities we  
25 deal with, and therefore, the principle as to whether

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1 they could use the building was a decision he took and  
 2 then the actual management of the event gets handed back  
 3 into the executive.  
 4 Q. Again, as I understand it from the email traffic, he was  
 5 happy to approve the event going ahead without passing  
 6 it for further consideration by the committee?  
 7 A. That's correct.  
 8 Q. And, again, from reading the documentation, there's  
 9 nothing that would have suggested that he was aware that  
 10 there were going to be offenders attending?  
 11 A. That's correct.  
 12 Q. And, again, as I understand it from his statement,  
 13 Mr Cresswell, he wasn't aware, your head of facilities,  
 14 almost head of security, he wasn't aware that there were  
 15 offenders, less alone terrorist offenders attending, was  
 16 he?  
 17 A. That's correct.  
 18 Q. And your head of events, Antonella Santos, she also  
 19 wasn't aware there would be offenders attending, let  
 20 alone terrorist offenders?  
 21 A. That's correct.  
 22 Q. So doesn't it seem like those with the responsibility  
 23 for making decisions were really in the dark about this  
 24 event?  
 25 A. That's correct.

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1 Q. As I understand your evidence in relation to risk  
 2 assessment, and I'm now talking about the system that  
 3 was in place prior to the attack on 29 November, as  
 4 I understood your evidence earlier, risk assessments for  
 5 specific events were only triggered by the presence of  
 6 VIPs or VVIPs?  
 7 A. Largely that is correct.  
 8 Q. Just for those of us who are curious, what's the  
 9 difference between a VIP and a VVIP?  
 10 A. Nothing, only what terminology you choose to use.  
 11 Q. An extra "very" in terms of importance. So, if you  
 12 like, it was the importance of some of the guests that  
 13 triggered the risk assessment, wasn't it, not concerns  
 14 about who else might be attending?  
 15 A. Yes, I mean, normally one can consider a VIP to be at  
 16 enhanced risk because they are the target. What's not  
 17 considered, of course, is the perpetrator who may be in  
 18 your midst.  
 19 Q. You say in one of your statements, you say this:  
 20 "A key point is that Joanna Allinson was in hospital  
 21 with an underlying health condition for much of August  
 22 and September, so with great hindsight one of several  
 23 checks and balances that might have been in the system  
 24 was probably just not available this time round."  
 25 Does that remain your view?

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1 A. Yes, it's the fact she was unavailable, just, you know,  
 2 around the building, seeing each other on a daily basis:  
 3 you've done this, done that, it's just the extra level  
 4 of experience. But the absence of one person doesn't  
 5 mean the whole system falls down, it was still working  
 6 in process terms well, and Jo Allinson was on the end of  
 7 her laptop on a daily basis, but it's never quite the  
 8 same as the face-to-face check and balance, have you  
 9 done this, done that, you know, everyday working.  
 10 Q. Obviously you gave that statement for the purposes of  
 11 the inquiry's investigations into what had occurred, and  
 12 you felt it was worth making that point, that she was  
 13 absent, and that meant that one of the several checks  
 14 and balances wasn't available?  
 15 A. Yes.  
 16 Q. So what was it, what was lost by her absence?  
 17 A. Just the extra level of experience that one can, you  
 18 know, bring to bear on any of life's potential risks.  
 19 You've got more capacity to maybe point something out  
 20 which hasn't yet occurred, of course, and you're trying  
 21 to work out what's further down the line. That's  
 22 a normal part of, you know, risk assessments, you're  
 23 always trying to work out the future, what could happen,  
 24 and the more capacity you have, particularly high level,  
 25 quality experience, you know, the better.

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1 Q. As unfortunately we know, the security that was in place  
 2 on the day pretty much came down to just controlling  
 3 entrance and exit through the front door.  
 4 A. I think that's a minimalist description.  
 5 Q. Well, there were no other protective measures for  
 6 attendees at the event, were there?  
 7 A. Well, just to recap, you've got the visual recognition  
 8 of every single person who is coming into the building  
 9 is known. We didn't have sufficient background of those  
 10 individual attendees, that's ground we've covered, but  
 11 our host organisation, Learning Together, did have that  
 12 information, so when they visually see and accompany to  
 13 the event Usman Khan, and others, they ask: this is  
 14 a person we've worked with before, we are familiar with,  
 15 it's very difficult for Fishmongers' Hall to override  
 16 them and say: well, I know you've worked with them  
 17 before and I know they've been a graduate of your  
 18 programme and then to say: actually, but we still don't  
 19 think they're coming in our building.  
 20 Q. We'll come onto that in a moment, but if we just  
 21 actually stand back and look at what was in place, the  
 22 only security for those attending was control as to  
 23 entrance and exit from the building, wasn't it?  
 24 A. Well, you see you've got visual recognition —  
 25 Q. That's just taking a register, isn't it, checking that

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1 they are the people who have been invited?  
 2 A. If your definition of the only level of security is back  
 3 to knife arches and wands, then security is always  
 4 multi-layered, it's always got many elements to it.  
 5 Q. Well, not here, there weren't multiple layers to it  
 6 really, were there. There was a register, you had to be  
 7 invited.  
 8 A. Mm-hm.  
 9 Q. And then you had to be let in, and you had to be let  
 10 out.  
 11 A. Yes, and you're on camera and you've got a lanyard, and  
 12 you're recognised by everyone else in the event. And  
 13 then, of course, in the case of Usman Khan, you've got  
 14 what every member of the public -- what the person  
 15 sitting on the train coming down from Stafford would  
 16 probably --  
 17 Q. I'm talking about the hall itself now.  
 18 A. Mm-hm.  
 19 Q. So essentially Khan, no checks on him going in, so he  
 20 was just locked inside the building with the other  
 21 guests, wasn't he? Once he was in, there was no  
 22 protection for other guests from Khan?  
 23 A. Correct.  
 24 Q. Can we have on the screen, please {DC5009/6}. So just  
 25 to put this into context, this is a document to which

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1 you've already been taken, and it's page 6 from the  
 2 strategic risk register, which as you've described is  
 3 a document -- I think as you have put it -- a living  
 4 document, something that evolves over time, and this is  
 5 the iteration of September 2019.  
 6 A. Mm-hm.  
 7 Q. So this is about two months or so before the attack;  
 8 yes?  
 9 A. Mm-hm.  
 10 Q. And we can see the bottom row, R6, is the one that we're  
 11 most concerned with, which is the risk of breach of  
 12 security, terror inside. So this is the relevant risk  
 13 that covers what actually transpired. We can see the  
 14 last sentence in the right-hand column, the right-hand  
 15 box under "Risk treatment options":  
 16 "Option to step-increase visible security presence  
 17 and screening of guests at selected events."  
 18 So this is obviously -- this is two months before  
 19 the attack, yes?  
 20 A. Yes.  
 21 Q. And as we read this, The Fishmongers' Company had  
 22 already identified a possible control measure of  
 23 screening guests for selected events?  
 24 A. Mm-hm.  
 25 Q. Yes?

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1 A. Yes.  
 2 Q. And as I understand those words, that's precisely the  
 3 control measure that would have identified Khan on the  
 4 list of attendees, and identified his background?  
 5 A. I agree.  
 6 Q. Yes. And that suggested control mechanism was still in  
 7 place when the strategic risk register was updated  
 8 in November of 2019?  
 9 A. Sorry, I don't quite follow what you're asking me.  
 10 Q. Well, this went through another iteration, didn't it?  
 11 A. It is continually updated, but that was the entry as on  
 12 29 November, yes.  
 13 Q. So it remained?  
 14 A. Yes.  
 15 Q. But nothing was done, nothing at all was done to try and  
 16 implement that suggested control mechanism?  
 17 A. Well, yes, but that's not to suggest there weren't  
 18 a thousand other things going on in the company,  
 19 including risks with risk to life that all needed to be  
 20 managed and attended to, so it wasn't left to be admired  
 21 for years into the future, it was something that we  
 22 needed to look at more -- in more detail, and then if  
 23 there were actions to be taken, we would have taken  
 24 them. That's why it's there.  
 25 Q. But it's clear, isn't it, just so we're sure, this isn't

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1 just hindsight; this control measure was identified  
 2 two months before the attack?  
 3 A. Indeed, and let's say this awful event had happened in  
 4 the January rather than the November, I would like to  
 5 think we would have got to the detailed analysis of --  
 6 that's my entry, my writing -- the detailed analysis of:  
 7 right, this is coming straight out of the Mansion House  
 8 event, and what are we going to do about that, and  
 9 I would like to think we would have made those  
 10 additional security precautions, introduced the  
 11 necessary changes. We just hadn't got round to doing it  
 12 by 29 November.  
 13 Q. Can we have a look, please, at document {DC5067/1}. So  
 14 this is a document headed "Commercial Hire Agreement  
 15 between The Fishmongers' Company and..." effectively  
 16 a blank for a name. Am I right that is a draft contract  
 17 to be used for future events?  
 18 A. I think so. I just would need to -- I just -- that's  
 19 the front sheet. It probably is.  
 20 Q. Well, are you aware that subsequent to the attack,  
 21 I think as part of the review, a new draft contract has  
 22 been --  
 23 A. I'm more than aware, I specifically drafted key sections  
 24 of that because this is so important to get right that  
 25 I wanted to be sure that as the person in charge of

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1 operational risks for Fishmongers' Company, I know  
 2 exactly what it is we are now demanding, if you like, of  
 3 our clients .  
 4 Q. Yes.  
 5 A. So very familiar in that sense.  
 6 Q. So I think if we go to {DC5067/4} at the top. So we see  
 7 there clause number 2:  
 8 "There is a need for the Supplier to protect all  
 9 visitors and employees entering the building.  
 10 Accordingly, to inform the preparation of appropriate  
 11 security arrangements, we need to understand if there is  
 12 an enhanced level of security risk owing to:  
 13 "(a) the background and/or profile of individual  
 14 attendees, and/or:  
 15 "(b) the type of activity undertaken by the Client."  
 16 A. Yes, paragraphs 2 and 3 are my own words.  
 17 Q. And, as you say, 3 goes on:  
 18 "Defining the likelihood and consequence of  
 19 a security risk is not an absolute science but relies ,  
 20 at least in part, on an open declaration of relevant  
 21 factors, the detail of which is far more likely to be  
 22 known by the Client than the Supplier."  
 23 The supplier being Fishmongers' Company?  
 24 A. Yes.  
 25 Q. "This includes, but is not limited to:

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1 "(a) individuals who may be VIPs, celebrities or  
 2 otherwise holding a newsworthy profile, politicians ,  
 3 senior military officers , significant post—holders in  
 4 the public sector, and ex—offenders holding declarable  
 5 convictions."  
 6 This is obviously a longer contract than just those  
 7 clauses, but that's very much on point, isn't it?  
 8 A. It is, and I am absolutely open to suggestions as to  
 9 what else might be in 3(a) or 3(b), but that was my  
 10 draft about a month after 29 November, in order to  
 11 tighten up the system.  
 12 Q. So going forward, organisations looking to book events  
 13 will be contractually obliged to provide this  
 14 information?  
 15 A. Yes. You'll see, if you chose to go further down the  
 16 document, you'll see there are signature requirements  
 17 against a whole range of sectors. One is to deal with  
 18 cost and the commercial elements, another is to do with  
 19 the audience and that type of requirement, and there's  
 20 four or five checks and balances that are in there,  
 21 which should be done on initial broaching of the  
 22 contract in the first instance, which as I say could be  
 23 up to a year—ahead, in the case of Learning Together  
 24 would have been in approximately August before  
 25 the November, to recheck that at the 10—day point so

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1 that you've got no change that has happened without both  
 2 parties cited, because that's the time in which you're  
 3 going to make the practical arrangements to make sure  
 4 you're absolutely where you want to be, and then to  
 5 further check that on the day so you're really sure what  
 6 it is you're dealing with on any event.  
 7 Q. So if we imagine this contractual documentation applying  
 8 to the Learning Together event, it clearly would have  
 9 provided you with the information generally about those  
 10 with offending histories being present, and also  
 11 specifically about a terrorist offender being present?  
 12 A. It would have tidied up a great deal —  
 13 Q. It's a lot more than tidying up, isn't it, it's given  
 14 you that substantive information?  
 15 A. It's taking the loose to be the tight, yes.  
 16 Q. Then that information would mean that the proposed event  
 17 would be falling into category D, the table that we  
 18 looked at before?  
 19 A. Yes.  
 20 Q. I mean, no ambiguity about that?  
 21 A. No ambiguity.  
 22 Q. It's certainly category D, and category D would mean  
 23 there would be a presumption that the event wouldn't go  
 24 ahead?  
 25 A. Correct, based on Usman Khan.

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1 Q. Well...  
 2 JUDGE LUCRAFT: You said based on Usman. If one looks at  
 3 this, it's declaring:  
 4 "... open declaration of relevant factors ...  
 5 [including ]... ex—offenders holding declarable  
 6 convictions."  
 7 So that would be anyone with a declarable  
 8 conviction.  
 9 A. Yes, okay, my mistake. The whole event in the scenario  
 10 put together by Learning Together for 29 November would  
 11 be a category D event, it would not take place.  
 12 MR PITCHERS: So even without Usman Khan's proposed  
 13 attendance, it would have been a category D event?  
 14 A. Correct. My mistake earlier, correct .  
 15 Q. And as a category D event, as I say, the presumption is  
 16 the event doesn't go ahead?  
 17 A. Yes.  
 18 Q. And presumably to overcome that presumption, you would  
 19 be require to be provided with lots of reassuring  
 20 evidence to enable you to form the view that there was  
 21 not too much risk associated with what was proposed?  
 22 A. Yes.  
 23 Q. So would it be fair to say with the current protocol in  
 24 place, it's likely that this event wouldn't have gone  
 25 ahead at all at Fishmongers' Hall?

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1 A. Yes.  
 2 Q. And if we can just follow this through, but even if it  
 3 were to go ahead now, as you've said already in answers  
 4 to other questions, there would be lots of other  
 5 security measures in place which weren't in place on  
 6 29 November?  
 7 A. Yes.  
 8 Q. There would be the arch?  
 9 A. The principal one would be not less than a police escort  
 10 of, well, the right prisoners.  
 11 Q. Okay. So police escort, but also an arch?  
 12 A. Yes. I would like to think under those circumstances he  
 13 would have been searched a long time before he came near  
 14 our building.  
 15 Q. Yes. And also a bag search?  
 16 A. Whatever it takes.  
 17 Q. Yes. If you had known that a terrorist offender was  
 18 attending, would you have liaised with the City of  
 19 London Police?  
 20 A. Undoubtedly, yes, and in fact I like to think it was the  
 21 other way around, the City of London Police would have  
 22 liaised with us because they knew that a terrorist  
 23 offender was on their patch.  
 24 Q. Right, so if the City of London Police were aware he was  
 25 coming, you would hope that they would liaise with you?

1 A. And I would have expected them to do so because we have  
 2 a very good working relationship, and absolutely -- to  
 3 be really clear here, we're a charity trying to do good  
 4 for others. If there's a terrorist out there that needs  
 5 a level of professional oversight by state authorities,  
 6 I would like to think they would be coming to us first,  
 7 but what we're identifying here is that, could we do  
 8 more to make sure that it doesn't happen  
 9 unintentionally.  
 10 Q. So you would expect the City of London Police to make  
 11 contact with you, but if they didn't, you would also,  
 12 presumably, make contact with them to seek some input?  
 13 A. It's a failsafe if you are doing it in both directions.  
 14 Q. Am I right that there is some precedence for  
 15 Fishmongers' Company objecting to a particular type of  
 16 offender appearing at an event that had been arranged?  
 17 A. If you are referring to an event with The Clink  
 18 Charity --  
 19 Q. Yes.  
 20 A. -- in May of 2019, then yes, there was a request not to  
 21 have sex offenders working as part of their sort of  
 22 experience, as part of The Clink Charity for one  
 23 particular event.  
 24 Q. So that was an event obviously some months before the  
 25 Learning Together event, involving a charity that worked

1 with offenders, and The Fishmongers' Company  
 2 specifically asked not to have sex offenders attending  
 3 that event?  
 4 A. Yes.  
 5 Q. Yes. So, as I say, precedent for picking out a type of  
 6 offender and objecting to them attending?  
 7 A. Yes.  
 8 MR PITCHERS: Thank you, those are all the questions I have.  
 9 JUDGE LUCRAFT: Thank you.  
 10 Mr Armstrong.  
 11 Questions by MR ARMSTRONG  
 12 MR ARMSTRONG: Thank you. Commodore Williamson, I ask  
 13 questions on behalf of Jack's family. This was  
 14 obviously an enormous shock to everybody and including  
 15 to you and your company.  
 16 A. Yes.  
 17 Q. It's fair to say, isn't it, that prior to this, you were  
 18 already doing quite a lot of the thinking about security  
 19 issues?  
 20 A. Yes.  
 21 Q. And this has galvanised you into completing that  
 22 thinking and firming it up?  
 23 A. And sharing it with others.  
 24 Q. Yes. Can I -- we've seen those documents, but is it  
 25 fair to say that prior to that, you were also -- you

1 were a company that relied heavily on your relationships  
 2 and those relationships of trust, people you were  
 3 dealing with?  
 4 A. Yes.  
 5 Q. You were dealing with trusted partners and people who  
 6 you knew were in turn dealing with people who they knew?  
 7 A. Yes.  
 8 Q. Can I just -- I don't want to ask -- I know we've had  
 9 lots of questions about what the position would be now;  
 10 can I just go back to what the position was then and  
 11 just test essentially a threshold question.  
 12 If Learning Together had called you in August 2019  
 13 when this was set up -- and these are questions about  
 14 what would have put up an alarm bell for you -- and  
 15 said: we are bringing people to your building, a number  
 16 of them are ex-offenders, one or two of them are current  
 17 offenders but they will be escorted, there are others,  
 18 this is some of the profile of offences, and if they had  
 19 said this to you, if they had said: we know these  
 20 people, we think that they are fine, we have been  
 21 working with them for some months, but it is the kind of  
 22 thing that we are anxious that you think about yourself,  
 23 what do you think in August 2019 you would have done  
 24 then?  
 25 A. Well, the one extra thing was, that conversation should

1 really be happening CEO to CEO, not through the  
 2 administrative channels to set up the administrative  
 3 arrangements.  
 4 The most difficult bit in all of this is you've got  
 5 -- in making the risk assessment around what you've just  
 6 described, is you have people who are much more  
 7 experienced than any event management organisation such  
 8 as Fishmongers' Company, you know, people who are head  
 9 of security at Whitemoor Prison, people who are  
 10 probation officers, people who are in the police, in the  
 11 judiciary, you know, people who are familiar with the  
 12 template and are clearly also happy with it, so  
 13 I'm thinking now as to --  
 14 Q. Can I stop you there. It sounds like what that is doing  
 15 is what you're now doing, which is a line of enquiry,  
 16 which you say: okay, what do other people say about this  
 17 who know more about it than I do; is that fair?  
 18 A. Yes.  
 19 Q. So it's a train of enquiry question?  
 20 A. Yes.  
 21 Q. If the answer to that train of enquiry is saying: well  
 22 those are the people who say we should be checking, so  
 23 if somebody like Amy Ludlow or Ruth Armstrong says to  
 24 you or to the CEO or whoever: we think they're fine, but  
 25 people are telling us that checks should be done and you

1 should yourself be satisfied.  
 2 A. Yes.  
 3 Q. What then?  
 4 A. Those are the checks that need to be done.  
 5 Q. Okay. Thank you very much.  
 6 Can I just -- and if you, just to finish that off,  
 7 if you get to the end of that enquiry and you're told:  
 8 this is the profile, these are the individuals, we think  
 9 probably okay, but there are always unknowns with this  
 10 cohort of prisoners, and some of them are carrying  
 11 relatively high risk profiles, what then do you think  
 12 Fishmongers' would have done?  
 13 A. Well, the default option of course is to cancel, saying:  
 14 this is too difficult for us. We know our limits, we  
 15 know what we're trying to -- this is a balance of  
 16 judgment. I've got no problem whatsoever in turning  
 17 something down and saying: do you know what, I don't  
 18 think so.  
 19 Q. Okay.  
 20 A. But the only thing I would stick on is just to make sure  
 21 that because something has happened in the past or the  
 22 very distant past, it doesn't necessarily mean it is  
 23 absolutely true for the event in question. So, I mean,  
 24 take Covid. This country is unsafe because it's had so  
 25 many people killed from Covid in the past year, but it

1 doesn't mean it's always unsafe in the future, and so  
 2 one has to make an assessment of: are all these factors  
 3 still true, even if they were absolutely true in the  
 4 past, and in the way it's described at the moment,  
 5 I'm thinking this is difficult at the very least, so  
 6 category C, you know, mm, I think we might be in  
 7 category D here.  
 8 Q. Okay. Did you think that then as well, even  
 9 in August 2019, you were thinking at least added  
 10 precautions?  
 11 A. I wish that had been the case, and I wish the language  
 12 had been far clearer to make it certain that we knew  
 13 what we were dealing with.  
 14 Q. Yes, okay. All right, I think that's probably as far as  
 15 I can take it.  
 16 One last thing. If there had been -- you had  
 17 a discussion with my learned friend Mr Hough about  
 18 discussing the difficulties of knife arches and what  
 19 happens because he might surrender, he might go away, or  
 20 he might be caught. Can I just ask a question arising  
 21 out of that: when you do use the arch, and it may be  
 22 that you have not used it yet, the intention is in the  
 23 normal way, I assume, that somebody goes through the  
 24 arch but the bag is separately searched?  
 25 A. Yes.

1 Q. So that goes round the side and the security guard opens  
 2 it?  
 3 A. Well, there's no point doing one without the other.  
 4 Q. No, sure. No, exactly. I thought that would be the  
 5 case but there was some discussion about what might  
 6 happen at the arch, because the jury might feel, given  
 7 some of the evidence that they've heard, that those  
 8 knives were most likely in the bag, so if those knives  
 9 were discovered --  
 10 A. No, I fully accept, there's no point doing one without  
 11 the other.  
 12 Q. -- Mr Khan wouldn't have the bag to launch an attack at  
 13 the moment they are discovered. I was just checking  
 14 that.  
 15 Thank you very much, Commodore Williamson.  
 16 A. Thank you.  
 17 JUDGE LUCRAFT: Thank you.  
 18 Questions by MR GRIFFIN QC  
 19 MR GRIFFIN: Commodore Williamson, my name is  
 20 Nicholas Griffin and I represent Cambridge University.  
 21 I want to start by asking you a little bit more  
 22 about contact between the company and Learning Together  
 23 in advance, in the months in the run-up to the November  
 24 event.  
 25 First of all, the point to begin with is this, isn't

1 it : where Fishmongers' Company is interested in  
 2 a charity that falls within its areas of interest , it  
 3 really wants to learn more about them, and indeed, it is  
 4 very active in that regard?  
 5 A. Yes.  
 6 Q. Can we have a look, please, at the Madingley Hall event,  
 7 and you've mentioned that briefly, and we know that the  
 8 then Prime Warden attended, along with someone called  
 9 Alex Woolgar—Toms who was your head of secretariat?  
 10 A. Yes.  
 11 Q. So we have an example in March of 2019 of two senior  
 12 members of Fishmongers' Company, attending  
 13 a Learning Together event.  
 14 Would the normal course of events be, and we can  
 15 look at a document if we need to, that once a member of  
 16 the company has attended an event of that type, they  
 17 would then feed back information about the event to The  
 18 Fishmongers' Company more generally?  
 19 A. Yes. We need to be clear: this was a social invitation  
 20 and they went and witnessed for the first time something  
 21 happening in this charity in this way, in a different  
 22 location, and were very positive about it.  
 23 Q. And of course, there may be more specific ways that  
 24 information would be passed back, for example, to the  
 25 Philanthropy and Grants Committee, which would be

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1 a committee with oversight and responsibility for  
 2 considering charities for future involvement?  
 3 A. Yes.  
 4 Q. And I don't need to take you to it, but would it  
 5 surprise you to learn that there was a report back to  
 6 that committee shortly after the meeting?  
 7 A. Sorry, I misheard.  
 8 Q. Would it surprise you to learn that shortly after the  
 9 event at Madingley Hall, those attending did feed back  
 10 to the committee about their occasion there?  
 11 A. Is that a --  
 12 Q. Would it surprise you to hear that?  
 13 A. No.  
 14 Q. Can we move on to April 2019, and I think you're aware  
 15 that Amy Spolton, the grants officer, actually attended  
 16 Whitemoor Prison to meet up with Learning Together  
 17 there?  
 18 A. Yes.  
 19 Q. And that, again, is that part of the process of getting  
 20 to know a little bit more about an organisation that you  
 21 may be interested in supporting?  
 22 A. Yes. Yes.  
 23 Q. And moving on to May of 2019, again, there is then  
 24 an application for funding from Learning Together in  
 25 order to kit out a study centre at Whitemoor?

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1 A. Yes.  
 2 Q. And I think you actually sent a letter in May, on  
 3 15 May, to them confirming that a grant of £10,000 is  
 4 being made by the company to Learning Together?  
 5 A. Yes.  
 6 Q. And moving forward again to July 2019, we have  
 7 Amy Spolton and one of your liverymen attending the  
 8 opening event of the study centre at Whitemoor?  
 9 A. Yes.  
 10 Q. Can we put up, please, and I'm hoping I'm going to have  
 11 luck with this reference, {WS0444A-16/1}. Thank you.  
 12 Could you first of all just enlarge the top. Yes,  
 13 can we see here an email from Amy Spolton on  
 14 26 July 2019 to you, and copying in Joanna Allinson?  
 15 A. Mm—hm.  
 16 Q. And can we see the first paragraph:  
 17 "Dear Toby,  
 18 "As discussed, please see below a report on the  
 19 event at Whitemoor."  
 20 And can we just drop down under "Background",  
 21 please. Thank you. Can we see here, we'll look at  
 22 a couple of bits, but can we see here the kind of report  
 23 back that Amy Spolton would be giving you, feedback of  
 24 an event that had been attended?  
 25 A. Yes.

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1 Q. And we can see under "Background":  
 2 "On Thursday 18 July, [the liveryman in question]  
 3 ... and ... Amy Spolton, represented the Company at [the  
 4 event] at ... Whitemoor..."  
 5 Just towards the middle of that paragraph:  
 6 "... Learning Together brings together prison  
 7 learners at HMPs Whitemoor, Grendon and Warren Hill with  
 8 university students ..."  
 9 At the next paragraph we can see the  
 10 Fishmongers' Company were invited after the £10,000  
 11 donation and we can see that that money was directed  
 12 towards furnishing the study centre, Learning Together  
 13 was recommended to the Company by Lord Cairns, a senior  
 14 member of the Fishmongers' Company, and the now Prime  
 15 Warden, David Robertson, and head of secretariat, had  
 16 attended the dinner that we've spoken about already.  
 17 Can we drop down to under "The event", we can see there  
 18 the second paragraph:  
 19 "The 60 or so guests were a mix of around 20—30  
 20 Whitemoor inmates, the Governor and prison staff, and  
 21 supporters and guests of Learning Together and  
 22 Cambridge's Institute of Criminology."  
 23 And you can see:  
 24 "At a sandwich lunch on arrival, guests mingled..."  
 25 That's the kind of information that would be fed

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1 back after members of the company had attended events of  
 2 this type?  
 3 A. Yes.  
 4 Q. Thank you. And moving on, we have heard that  
 5 in October 2019, the company awarded a further grant to  
 6 Fishmongers' Company. The jury have seen a copy of the  
 7 application, it was for a role that was called community  
 8 builder.  
 9 A. Mm—hm.  
 10 JUDGE LUCRAFT: I think the grant is to Learning Together  
 11 from Fishmongers' Company rather than a grant to the  
 12 Fishmongers' Company.  
 13 MR GRIFFIN: Thank you very much, sir, I should be  
 14 absolutely accurate about that.  
 15 The application was by Learning Together.  
 16 A. Yes.  
 17 Q. And Fishmongers' Company ultimately agreed to make it  
 18 for the community builder role, and can we put up on the  
 19 screen, please, {WS0444A—25/1}. Thank you. Can we see  
 20 here a letter dated 25 October to Dr Ludlow. Can we  
 21 just show the bottom of the page, please? This is from  
 22 Jo Allinson, so she is the deputy clerk and the chief  
 23 operating officer. Thank you. We can see there just  
 24 under "Dear Dr Ludlow":  
 25 "I'm pleased to confirm that the trustees of the

1 Fishmongers' Hall Charitable Trust have awarded a grant  
 2 of £30,370 in 2019, and in principle for a further two  
 3 years ... to support the post of Community Builder at  
 4 Learning Together. The multi—year grant is agreed  
 5 subject to satisfactory annual reporting by you and due  
 6 diligence on the part of the FCCT..."  
 7 Is that the company's charitable trust?  
 8 A. Fishmongers' Company Charitable Trust.  
 9 Q. "... including oversight of your annual accounts."  
 10 And we can see that:  
 11 "The [relevant] committee, which considers  
 12 applications ... was impressed to learn of the impact of  
 13 your work to date. It recognised that a community  
 14 builder, who could further strengthen and maintain  
 15 relationships among participants and continue to instill  
 16 your ethos of learning through community on an ongoing  
 17 basis, would be a valuable asset."  
 18 So that's October. Clearly the process of learning  
 19 more about Learning Together, of applications for  
 20 grants, as you've come to learn more about them, grants  
 21 at a higher level being made by the company?  
 22 A. Yes. It says "subject to due diligence". I can expand  
 23 on what that might include, if you would like?  
 24 Q. By all means, yes.  
 25 A. So one of the aspect of due diligence, in addition to

1 many pages of financial diligence, is that of  
 2 a safeguarding policy, to which I understand that the  
 3 response by Learning Together was that we sit underneath  
 4 the Cambridge University safeguarding policy, which is  
 5 a big tick in the sense that Cambridge University is  
 6 obviously a huge and established organisation, as  
 7 opposed to a start—up charity that is run by one person  
 8 and the proverbial cat, where you're not quite sure  
 9 whether they've got, you know, any necessary checks and  
 10 balances in place. So they're underneath Cambridge  
 11 University safeguarding policy, which is excellent.  
 12 A caveat to that from Learning Together was that  
 13 they were also establishing their own more local  
 14 Institute of Criminology or Learning Together specific  
 15 CIC diligence, and that included nascent risk assessment  
 16 policies. All of this is giving us a sense that it is  
 17 moving in the right direction, they have got their own  
 18 checks and balances and that is a good sign, and that's  
 19 part of what's implicit in this letter.  
 20 Q. Thank you very much. So the situation when we  
 21 reach November in 2019 is that, in fact, The  
 22 Fishmongers' Company, including senior individuals  
 23 within the company, knew a good deal about  
 24 Learning Together as a programme and as an organisation;  
 25 would you agree?

1 A. So we just need to take stock, if you like, in that  
 2 sense. We're a team of 45 executives, we've got 34  
 3 court members, we've got 700 members of the company  
 4 overall, we've got many charities in play, we've got  
 5 many commercial events coming through the building,  
 6 about 200 a year, we've got a whole host of things  
 7 happening right across the piece. This is one element  
 8 of what I described as the haystack, and therefore my  
 9 own personal background, as I've mentioned earlier, is  
 10 I've never before been in a prison before in my life, so  
 11 I haven't got that instant recognition of, you know,  
 12 that instinctive understanding of the risk factors that  
 13 may be in play, and in particular, the — I wouldn't  
 14 like to transpose the risk factors which would be  
 15 applicable inside a prison setting to automatically  
 16 being identical to those which were out in the  
 17 community.  
 18 JUDGE LUCRAFT: I think the question though, Commodore, that  
 19 Mr Griffin was asking, was that by November 2019, the  
 20 company knew quite a bit more about Learning Together.  
 21 I appreciate your point about it being a field that you  
 22 are not particularly familiar with what in context that  
 23 might bring with it, but I think the question was more  
 24 directed at The Fishmongers' Company having a greater  
 25 awareness of Learning Together by November 2019 than,

1 for example, they might have done at the beginning of  
 2 2019, because of the process that was gone through with  
 3 the emails?  
 4 A. Yes, a growing awareness. Unfortunately I didn't have  
 5 as much as I would have liked.  
 6 MR GRIFFIN: Understood. And I think your evidence is that  
 7 it wouldn't have surprised you to learn that  
 8 ex-offenders would be amongst those attending  
 9 the November event?  
 10 A. Yes.  
 11 Q. And that that knowledge wouldn't necessarily have  
 12 prompted any greater security from you?  
 13 A. Well, we return to the same dilemma, if you like. It's  
 14 whether the person in intensive care, you know,  
 15 a patient with all the machinery around them to keep  
 16 them alive and, you know, then becomes the same person  
 17 you might see a few months later out in the community,  
 18 recovering, rehabilitating, getting better one way or  
 19 the other.  
 20 They're still patients, they're still people who  
 21 have come -- in this case, prisoners, they're still  
 22 people who have had offending histories. I didn't  
 23 equate one with the other.  
 24 Q. I understand. I understand, but you had had an event  
 25 I think in May that year, we've heard about it,

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1 involving The Clink Charity organisation. That involved  
 2 ex-offenders attending and, indeed, working alongside  
 3 staff?  
 4 A. Yes.  
 5 Q. There had been no problem with that as a concept?  
 6 A. No.  
 7 Q. And no additional security?  
 8 A. Correct.  
 9 Q. Thank you.  
 10 So can we just finally move on to the issue of  
 11 knowledge that those attending the event in November  
 12 might include people with serious previous convictions,  
 13 including for serious violence, and indeed for  
 14 terrorism.  
 15 My understanding of your evidence is that, as  
 16 at November, that -- to use your words -- wasn't  
 17 necessarily a showstopper; that you attributed  
 18 significance to the fact that someone might be lawfully  
 19 at large in the community on licence, having served  
 20 a sentence?  
 21 A. Yes.  
 22 Q. That you would want to rely on an appropriate authority  
 23 to make decisions about what someone like that should or  
 24 should not do?  
 25 A. Yes.

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1 Q. In this case, Dr Armstrong and Dr Ludlow were aware that  
 2 Usman Khan had been reviewed for attendance specifically  
 3 at this event by the people -- police, probation and  
 4 others -- responsible for him in the community and had  
 5 been given permission to attend; is that the kind of  
 6 information that would have been of interest?  
 7 A. Obviously so.  
 8 Q. And I think you point to the fact that others attending,  
 9 including with convictions for very serious violence,  
 10 were actually amongst the forefront of those who were  
 11 confronting Usman Khan during and after the attacks?  
 12 A. Yes.  
 13 MR GRIFFIN: Thank you.  
 14 JUDGE LUCRAFT: Thank you.  
 15 Mr Hough, I'm not sure anyone else has any further  
 16 questions for Commodore Williamson.  
 17 MR HOUGH: Thank you very much, Commodore, those are all the  
 18 questions we have for you.  
 19 JUDGE LUCRAFT: Thank you very much for coming to assist the  
 20 enquiry.  
 21 A. Can I, your Honour, just say that The  
 22 Fishmongers' Company will put a stone plaque in place  
 23 later this summer to commemorate the tragedy. If any of  
 24 the emergency services, but most particularly if any of  
 25 the family, at any stage in the future, feel that that

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1 would help in their own personal rehabilitation, we  
 2 would of course -- the building is theirs. I cannot  
 3 tell you how much we care about this. It's hurt us all.  
 4 JUDGE LUCRAFT: Thank you.  
 5 MR HOUGH: Sir, would that be a convenient time for our  
 6 mid-afternoon break?  
 7 JUDGE LUCRAFT: We will take our mid-afternoon break there.  
 8 Thank you.  
 9 (3.20 pm)~&  
 10 (A short break)  
 11 (3.36 pm)  
 12 (In the presence of the jury)  
 13 JUDGE LUCRAFT: Yes, Mr Hough.  
 14 MR HOUGH: Sir, the next witness is Detective Chief  
 15 Superintendent Dermot Robinson.  
 16 DETECTIVE CH SUPT DERMOT ROBINSON (sworn)  
 17 JUDGE LUCRAFT: Good afternoon, superintendent. If you are  
 18 happy to, please do feel free to remove your mask while  
 19 giving evidence, and if you would prefer to sit rather  
 20 than stand, whichever you feel most comfortable doing.  
 21 A. Thank you.  
 22 Questions by MR HOUGH QC  
 23 MR HOUGH: First, would you give your full name and rank for  
 24 the court.  
 25 A. My name is Dermot George Robinson, I am a superintendent

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1 with the City of London Police.  
 2 Q. Mr Robinson you understand I ask you questions first on  
 3 behalf of the Coroner, then you may be asked questions  
 4 by others. You made a witness statement in these  
 5 matters on 3 December 2020, you may refer to that as you  
 6 wish.  
 7 Your rank, you have told us, is superintendent at  
 8 the City of London Police. What does your current role  
 9 encompass?  
 10 A. My current role is a -- I've been temporarily promoted  
 11 to the rank of temporary chief superintendent so I've  
 12 got responsibility for all matters to do with crime  
 13 including counter-terrorism and Special Branch. At the  
 14 time of my statement I was a substantive superintendent.  
 15 Q. Summarising your career very briefly, no doubt unfairly  
 16 briefly, is it right that over the last 20 years most of  
 17 your posts have been in counter-terrorism?  
 18 A. That's correct.  
 19 Q. Do you understand that you're being called to give  
 20 evidence to discuss in general terms protective security  
 21 arrangements in the City of London area?  
 22 A. Yes.  
 23 Q. And do you understand that your evidence is generic  
 24 because there is no evidence that anyone informed the  
 25 City of London Police about the Learning Together event

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1 at Fishmongers' Hall in advance of that event?  
 2 A. Yes, I do.  
 3 Q. May I begin with the question of how the City of London  
 4 Police contributes to combating terrorism in the City  
 5 area. Does this have a number of different strands?  
 6 A. It does.  
 7 Q. First of all, does the force have a Special Branch, like  
 8 other forces, which gathers intelligence and carries out  
 9 investigations about terrorism matters?  
 10 A. Yes, it does.  
 11 Q. Secondly, does the force, again, like other forces, have  
 12 personnel called Counter-Terrorism Security Advisors?  
 13 A. Yes, we do.  
 14 Q. In brief, what is that job? What do they do?  
 15 A. Counter-Terrorism Security Advisors are specialist  
 16 officers who, by nature of their job title, give  
 17 specific advice. It is a tiered level of advice that  
 18 they give. Their work is coordinated centrally by the  
 19 National Counter Terrorism Security Office, and their  
 20 work is primarily focused around those sites that are  
 21 part of the critical national infrastructure, or crowded  
 22 places, as well as provided protective security advice  
 23 to anyone in the City who deems it a requirement for  
 24 them.  
 25 They are generally funded centrally through the

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1 Home Office funding and three of the posts that we have  
 2 in the City are funded through Home Office funding. We  
 3 have taken the view that it is worth contributing more  
 4 to that, so we have a further two CTSA posts that are  
 5 funded from our core grant in recognition of the demand  
 6 across the City of London.  
 7 Q. So in the City area there are five specialist officers  
 8 who advise on protective security for locations in the  
 9 City both proactively for certain types of location, and  
 10 generally for businesses in the City area and others in  
 11 the City area?  
 12 A. Yes, that's correct.  
 13 Q. We've been talking about protective security. Is it  
 14 right that protective security itself is a broad  
 15 category?  
 16 A. Sorry, is a?  
 17 Q. Broad category.  
 18 A. It is, indeed, yes.  
 19 Q. Including not only physical security, but also  
 20 personnel, security staff, planning and so on?  
 21 A. That's correct.  
 22 Q. So the advice of these advisors won't just be about  
 23 bollards and knife arches and so on; it will also extend  
 24 to procedures, plans, number of staff in place, and so  
 25 on?

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1 A. Very much so, and the development of a culture of  
 2 security within organisations as well.  
 3 Q. Does the City of London Police also preside over a group  
 4 called the Contest Steering Group?  
 5 A. The Contest Steering Group is the governance by which  
 6 our counter-terrorism policing in force is coordinated.  
 7 Q. Does that gather both police from the City of London  
 8 force and also colleagues from the  
 9 City of London Corporation, the local authority, to  
 10 address aspects of the terrorist threat?  
 11 A. It does, it does that through a meeting at least  
 12 fortnightly shared by the City of London Police  
 13 Commander.  
 14 Q. Turning then to deployments of police to combat  
 15 terrorism, is it right that the City of London Police  
 16 has a number of tactics and resources in general terms  
 17 to combat terrorism?  
 18 A. That's correct.  
 19 Q. And is one notable example a project pioneered by the  
 20 City of London Police called Project Servator?  
 21 A. It is, yes.  
 22 Q. Again, if you can summarise it briefly, what does that  
 23 do?  
 24 A. Project Servator consists of a group of specially  
 25 trained officers whose primary role is to detect and

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1 deter hostile reconnaissance, that is the part of the  
 2 terrorist 's planning that requires the terrorist to  
 3 carry out some visits to an area. They'll do that by  
 4 identifying unusual behaviour and liaising with  
 5 businesses in the local community as well, and also  
 6 a communications package, which has two strands to it,  
 7 one about reassurance, and also making those who may be  
 8 intent on hostile activity in the City aware of the fact  
 9 that there is this unpredictable method of policing that  
 10 takes place in the Square Mile.  
 11 Q. In the latter respect, does this involve, as you have  
 12 said, unpredictable but highly visible deployments of  
 13 these trained officers in areas around the City?  
 14 A. It does, and it's a scalable model of policing and it  
 15 can be supported by police dogs, horses, et cetera.  
 16 Q. I would now like to ask you some questions about crowded  
 17 places, because one of the questions we may be  
 18 interested in is the circumstances in which a force like  
 19 yours will proactively engage with the owners of  
 20 a building in order to give advice about  
 21 counter-terrorism measures.  
 22 Now, is it right that from 2014 the Home Office  
 23 introduced a process called Protective Security  
 24 Improvement Activity?  
 25 A. It is.

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1 Q. And is it right that under this process, places could be  
 2 designated as "Crowded places"?  
 3 A. They were, they were designated by the Home Office.  
 4 Q. Now, under this process, is a crowded place a term of  
 5 art, not just somewhere we might colloquially look at  
 6 and regard as being full of people?  
 7 A. That's correct.  
 8 Q. And in general terms, does that term "crowded place"  
 9 designate a location or environment to which members of  
 10 the public have access that may be considered more at  
 11 risk from terrorist attack than other places by virtue  
 12 of crowd density and/or the nature of the site?  
 13 A. That's correct.  
 14 Q. Have a number of high profile locations around the  
 15 country been designated as crowded places in one of two  
 16 tiers, tier 1 or tier 2?  
 17 A. Yes.  
 18 Q. And in making those designations, are national criteria  
 19 applied?  
 20 A. Yes.  
 21 Q. I think those are sensitive criteria?  
 22 A. That's correct.  
 23 Q. So we have certain places, tier 1 and tier 2 crowded  
 24 places, which the Counter-Terrorism Security Advisors  
 25 will identify, reach out to, and give proactive advice

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1 about counter-terrorism; yes?  
 2 A. That's correct. Within tier 1 there are also critical  
 3 national infrastructure sites as well.  
 4 Q. In addition, could Counter-Terrorism Security Advisors  
 5 identify further places in their area as crowded places,  
 6 even though they didn't meet the national criteria?  
 7 A. That's correct. They would be tier 3 sites and they may  
 8 reflect, for example, new developments that are created  
 9 subsequent to the creation of the tier 1 and tier 2  
 10 sites.  
 11 Q. Is it the case that like tier 1 and tier 2 sites, tier 3  
 12 sites would qualify for that proactive advice by  
 13 Counter-Terrorism Security Advisors about protective  
 14 security?  
 15 A. Yes.  
 16 Q. In 2019, how many tier 1 and tier 2 crowded places did  
 17 the City of London have?  
 18 A. From memory, I think we had six at that time.  
 19 Q. And that gives us an idea, does it, in an area as  
 20 central, in every sense, as the City of London, if that  
 21 area only has six, that suggests that these are  
 22 locations treated with particular care?  
 23 A. Yes, activity was very much focused on them.  
 24 Q. Now, was the Fishmongers' Hall a tier 1 or tier 2  
 25 crowded place?

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1 A. No.  
 2 Q. Had it been nominated by the CTSA's as a tier 3 crowded  
 3 place?  
 4 A. No.  
 5 Q. Had any other livery halls been nominated as a crowded  
 6 place, either as tier 1 or tier 2 or by the local  
 7 advisors as tier 3?  
 8 A. No.  
 9 Q. Now, as a result, was the effect that Fishmongers' Hall  
 10 did not qualify for proactive advice, a CTSA going down  
 11 and taking a view about the quality of protective  
 12 security?  
 13 A. It wouldn't have received that level of venue-specific  
 14 advice, but would have had generic advice.  
 15 Q. Now, is it the case that in mid-2019, a new tasking was  
 16 given by the National Counter Terrorism Security Office  
 17 to CTSA's, the advisors?  
 18 A. That's correct.  
 19 Q. And what was that tasking?  
 20 A. That tasking was to consider locations within each force  
 21 area that may be attractive to a terrorist, and it  
 22 considered a number of criteria, again, similar to the  
 23 earlier example you cited, so that's sensitive and  
 24 wouldn't be revealed openly.  
 25 Q. Was that then adding a further layer of locations that

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1 may receive special advice?  
 2 A. It was the start of a process to identify potential  
 3 further areas. The first stage was to look at how  
 4 attractive a target may be, and the next stage would  
 5 have then been to look at how vulnerable those venues  
 6 may be. Simply because somewhere is attractive, it may  
 7 already have some very significant security measures in  
 8 place, so it gives us an indication of where our work  
 9 should be prioritised .  
 10 Q. Now, did Fishmongers' Hall, or indeed any of the other  
 11 livery halls, qualify for additional guidance under the  
 12 scoring system that was developed?  
 13 A. No, none of them fitted the criteria that was coming  
 14 from the Home Office.  
 15 Q. In summary, and without getting into anything sensitive,  
 16 why was that?  
 17 A. They were neither iconic sites , nor freely open to the  
 18 public, nor generally having significant crowd density.  
 19 Q. In addition to the site—specific bespoke advice that  
 20 might be given to crowded places and to these further  
 21 sites identified by the scoring system, do  
 22 Counter—Terrorism Security Advisors also give forms of  
 23 general advice to businesses in their local force area?  
 24 A. Yes, they do.  
 25 Q. As part of that, do they also give workshops, courses

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1 and outreach events?  
 2 A. Yes.  
 3 Q. May we put on screen, please, {WS5003—2/2}.  
 4 Do we see here a leaflet produced by the City of  
 5 London CTSA's detailing the training being offered?  
 6 A. They do. And each one of those has some commonality in  
 7 terms of threat level input, but they are aimed at  
 8 a slightly different audience, depending on each  
 9 package.  
 10 Q. Can we go to page 3, please {WS5003—2/3}, now we can see  
 11 that this refers as one of the forms of session or  
 12 intervention that is offered, ACT, Action Counters  
 13 Terrorism Awareness. Can you tell us what that is?  
 14 A. Action Counters Terrorism is a generic name that's given  
 15 to the national suite of products that are available for  
 16 Counter—Terrorism Security Advisors, in particular to  
 17 deliver to their local communities. This specific one  
 18 is a generic one that will take into account —  
 19 virtually every presentation that we give takes into  
 20 account the current threat level and identifying and  
 21 recognising what could be suspicious activity, how to  
 22 respond to it, what a policing response would look like,  
 23 and a response to a firearms or a weapons attack.  
 24 It's aimed generally at organisations and local  
 25 businesses, and moving further along, that second one

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1 you will see is a "Document Awareness Workshop". That  
 2 is aimed at people who are generally HR professionals or  
 3 who are involved in viewing identification documents,  
 4 that could include front of house staff as well, to make  
 5 them aware of what forged documents may look like, just  
 6 to increase their capability .  
 7 The next one, "ACT Operational", is aimed primarily  
 8 at — it's very similar to ACT Awareness, but it's more  
 9 around the individuals and those who are frontline or  
 10 front of house, and "Postal Awareness Workshop" is  
 11 around postal security and the handling of incoming  
 12 post, making sure it's dealt with in a safe way and how  
 13 to deal with suspicious packages.  
 14 Q. Those are some examples of training sessions available  
 15 free of charge through your Counter—Terrorism Security  
 16 Advisors?  
 17 A. That's correct.  
 18 Q. We can take that off screen now.  
 19 Is it right that in 2018, a livery company called  
 20 the Plaisterers ' Company arranged two counter—terrorism  
 21 awareness training events for livery hall staff in  
 22 conjunction with your officers?  
 23 A. That's correct.  
 24 Q. In brief, what did those events extend to? What advice  
 25 did they contain?

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1 A. I think at that time it may have still been called  
 2 Project Griffin which was a precursor to the ACT  
 3 operation, but the content is generally very similar .  
 4 It would have started off with a threat input, so making  
 5 sure that people understand the context of  
 6 counter—terrorism policing, why there is a threat, and  
 7 that gave us then, if you like, the justification then  
 8 to take that back into their own organisations and have  
 9 those conversations about how they can protect  
 10 themselves.  
 11 They will then describe what, that phrase, hostile  
 12 reconnaissance, as I say, that visible carrying out  
 13 a reconnaissance of a potential target, what to look  
 14 for, how to report it to the police and what the  
 15 policing response would be, and how to collect the  
 16 information that the police would need at the time as  
 17 well, so it's identifying that unusual behaviour.  
 18 Additionally, looking at what a marauding terrorist  
 19 attack could look like and how to respond to it, and the  
 20 message, really, is take all of this back into your  
 21 working environment, review your contingency plans,  
 22 review your practices, make sure they are fit for  
 23 purpose, test and exercise, and if you need anything  
 24 specific from us, we're here.  
 25 Q. Is it right that you have checked the list of attendees

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1 of that event?  
 2 A. Yes.  
 3 Q. And is it right that from The Fishmongers' Company, they  
 4 included Mr Cresswell and Mr Noe?  
 5 A. Those names were on the list, yes.  
 6 Q. In addition, going a little further back, was there  
 7 a table-top exercise called Project Argus organised by  
 8 City of London Counter-Terrorism Security Advisors in  
 9 2012 which was, in fact, hosted by the  
 10 Fishmongers' Hall?  
 11 A. That's correct.  
 12 Q. What did that cover?  
 13 A. Project Argus is, as you say, sir, a table-top exercise,  
 14 it's a scenario which is a terrorist attack in, probably  
 15 at that time it would have been a shopping centre, and  
 16 it talks people through step-by-step the event itself,  
 17 encourages conversation and discussion at individual  
 18 syndicates, and then again asks the question: how  
 19 prepared are you in your organisation for such an event,  
 20 go back and consider your own business continuity plans  
 21 and your existing plans around response, and test and  
 22 exercise those.  
 23 Q. In the course of that exercise, I think an information  
 24 pack was provided for all attendees; is that right?  
 25 A. Yes, that will be the normal course of events.

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1 Q. If we look, please, at {WS5003-8/6}. Did that  
 2 information pack provided to delegates include advice on  
 3 counter-terrorism protective security from NaCTSO, the  
 4 National Counter Terrorism Security Office?  
 5 A. Yes.  
 6 Q. And if we go, please, to {WS5003-8/21} of that document,  
 7 can we see that part of that addressed physical  
 8 security?  
 9 A. Yes.  
 10 Q. And then {WS5003-8/22}, please, do you see that as part  
 11 of that, advice was given on access control to prevent  
 12 unauthorised people entering buildings?  
 13 A. Yes.  
 14 Q. Security passes, screening and patrolling, including  
 15 random screening of hand baggage?  
 16 A. Yes.  
 17 Q. Traffic and parking controls, doors and windows, further  
 18 down the page. If we could go to further down the page,  
 19 please, you see doors and windows.  
 20 Then over the page {WS5003-8/23}, integrated  
 21 security systems, including alarms, CCTV and so on?  
 22 A. Yes.  
 23 Q. So it's right that a number of years before the attack  
 24 at Fishmongers' Hall, there was an event at  
 25 Fishmongers' Hall at which this advice was given,

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1 covering all these topics.  
 2 JUDGE LUCRAFT: I think, Mr Hough, that was in 2012.  
 3 MR HOUGH: 2012, Project Argus, yes.  
 4 That, of course, as you've said, is generic advice  
 5 rather than specific to any one livery company, but it  
 6 was advice made available to all of the livery  
 7 companies?  
 8 A. Yes.  
 9 Q. Now, in addition, does the City of London Police  
 10 organise something called a Crime Prevention  
 11 Association?  
 12 A. It's not organised by the City of London Police, it's  
 13 a separate charitable organisation, it probably sits  
 14 once a month, but at every one of their meetings the  
 15 City of London Police will attend. They generally take  
 16 place in livery halls, and it's an opportunity for  
 17 members of the Crime Prevention Association, they  
 18 represent the business community, effectively, in the  
 19 City, and they come along, there's usually a speaker  
 20 talking around a specific event, but at every event  
 21 there will be City of London Police input around crime,  
 22 crime prevention and terrorism threat.  
 23 Q. Is it right that one such event was hosted at  
 24 Fishmongers' Hall on 25 November 2019?  
 25 A. That's correct.

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1 Q. So four days before the attack we're concerned with.  
 2 A. That's correct.  
 3 Q. Did that event include a crime update by a colleague of  
 4 yours and a counter-terrorism update by you?  
 5 A. I was scheduled to attend that day, but I can't remember  
 6 why, but I didn't in the end, but a colleague provided  
 7 the input, and the way it works is that our Special  
 8 Branch will put together a generic set of points for  
 9 an individual to go along and deliver it. So the  
 10 content would be the same, regardless of who delivers  
 11 it.  
 12 Q. Are you able to say what, in broad terms, the content of  
 13 that presentation was on that occasion?  
 14 A. In very general terms, it would have reflected whatever  
 15 the threat level was at the time, which I think was  
 16 substantial, meaning an attack is likely, so a  
 17 significant threat level.  
 18 Q. That is the JTAC national level?  
 19 A. That's the JTAC national one, yes, I think that was the  
 20 threat level at the time. It would have talked about  
 21 any significant events that may have taken place since  
 22 the previous Crime Prevention Association, so any  
 23 terrorist events, whether they be nationally or  
 24 internationally, and try to interpret those into what  
 25 they could mean for members so there was learning for

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1 them in terms of -- again, going back to their  
 2 businesses and making sure they are as safe and secure  
 3 as they can be.  
 4 Invariably, looking ahead to any events that  
 5 businesses might need to be aware of, whether that be  
 6 protest or anything else, protest not being terrorism  
 7 but anything that could disrupt our business community,  
 8 and invariably there will be a reminder of our  
 9 Counter-Terrorism Security Advisors, our CTSA's, and the  
 10 offer that's available from them.  
 11 Q. Can we move on to operational planning and the event at  
 12 Fishmongers' Hall. Is it right to say that most events  
 13 hosted by businesses and organisations, including livery  
 14 companies within the City area, have no City of London  
 15 Police involvement.  
 16 A. That's correct.  
 17 Q. But can police assistance be requested on a case by case  
 18 basis?  
 19 A. Yes, it can.  
 20 Q. So, for example, we will typically see police officers  
 21 out in force for major sporting and large-scale music  
 22 events?  
 23 A. Yes.  
 24 Q. Are there particular advice documents produced by The  
 25 National Police Chiefs Council on when police assistance

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1 should be provided?  
 2 A. Yes, there is, and as you say, that includes those  
 3 larger events when, for example, the roads may be  
 4 closed, or festivals taking place.  
 5 Q. Now, where an event is brought to the attention of the  
 6 City of London Police, what, in broad terms, what, in  
 7 general terms, is the process for assessing it and  
 8 deciding what, if any, police presence it requires?  
 9 A. It's a process that's undertaken within our operational  
 10 planning department, it's not an area I have  
 11 responsibility for, but my understanding is that they  
 12 will assess all of the information that's made available  
 13 to them, they will assess whether the event is likely to  
 14 attract, for example, protest, and they will rely on the  
 15 information given to them by the organisers.  
 16 There are certain criteria around public order  
 17 events that may require a policing plan to be put in  
 18 place. So the operational planning department will  
 19 risk-assess each one of the event notifications that  
 20 comes their way. They will risk-assess those into red,  
 21 amber or green status. Depending on that, if it's  
 22 towards the red or amber end of that risk assessment,  
 23 a gold commander could be appointed, who will have  
 24 overall charge of policing that event, and depending on  
 25 the scale and the nature of the event, they may well

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1 have other resources available to them.  
 2 Q. Turning to the event at Fishmongers' Hall, as you've  
 3 confirmed, City of London Police weren't informed that  
 4 that specific event would be taking place, and weren't  
 5 asked for assistance with it?  
 6 A. That's correct.  
 7 Q. Given what you know of the event, would you have  
 8 expected City of London Police to be informed of it?  
 9 A. I think if we'd been told there was an event, or in the  
 10 absence of any other information, I wouldn't have  
 11 expected the mere existence of an event to be notified  
 12 into the City of London Police.  
 13 Q. So the fact that there was an event taking place at  
 14 a livery company concerned with prisoner rehabilitation  
 15 and attended by recently released offenders and some  
 16 serving prisoners on day release, you wouldn't expect  
 17 that fact to be something that was passed on to the City  
 18 of London Police?  
 19 A. I would expect that everyone who has been involved in  
 20 any of the management of those attending the event or  
 21 the event itself, who have the information available to  
 22 them, to make an assessment on that, and make  
 23 an assessment of any risk or any benefit that the City  
 24 of London Police could bring to that event.  
 25 Q. But if you, as a senior police officer knowing about

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1 counter-terrorism, were asked should an organisation  
 2 such as The Fishmongers' Company inform the City of  
 3 London Police of an event with this profile, would you  
 4 say yes or no?  
 5 A. I would say yes, and at that time we would -- we didn't  
 6 produce a specific document that set out from  
 7 a counter-terrorism perspective which events should be  
 8 made available to us, so at the events we've mentioned  
 9 earlier, we would encourage people to know who was  
 10 attending events and if they had concerns, to contact us  
 11 and we would have a discussion, but there was no  
 12 specific documentation available at that time.  
 13 Q. Is there now?  
 14 A. There is now, in the immediate aftermath of the tragic  
 15 events at Fishmongers' Hall, and I would say within  
 16 days, we produced a document that set out advice to  
 17 event organisers, which included, amongst other things,  
 18 knowing who is attending your event, understanding your  
 19 staffing requirements, if you're having agency staff are  
 20 they properly vetted, are all of your staff briefed?  
 21 Any communications package, so that might be around  
 22 a reassurance message in advance that you're coming to  
 23 this event, we'll make it really safe, we'll make it  
 24 really secure, and that can have a deterrent effect, and  
 25 checking your processes and procedures, and also

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1 liaising with other businesses in the local community as  
 2 well to create that general awareness.

3 Q. Now, you've said that you would have thought it was  
 4 a good idea for the Fishmongers' Company to tell the  
 5 City of London Police about this event that was due to  
 6 take place because of its profile. What was it in  
 7 particular about the profile of this event that would  
 8 have made that a good idea?

9 A. I think I would only have expected Fishmongers' Hall to  
 10 make us aware of it if they had been made aware of any  
 11 particular risks around that, and that CTSA offer of  
 12 discussing through protective security may have been  
 13 something that they could have found valuable, but  
 14 I think only if they had identified those risks,  
 15 otherwise I wouldn't have expected them to be telling us  
 16 about the mere existence of an event.

17 Q. So, again, if you had been asked as an experienced  
 18 counter-terrorism officer should The  
 19 Fishmongers' Company tell the local force, the City of  
 20 London Police, about the fact that they're holding  
 21 an event with current and recently released offenders,  
 22 just that fact, you would say: you don't necessarily  
 23 need to tell us, only if there is something about it  
 24 that makes it higher risk.

25 A. Correct, not necessarily.

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1 Q. Again, as an experienced officer in this field, what  
 2 would you expect to tell an organiser like The  
 3 Fishmongers' Company that an event is high risk? What  
 4 information from any source will give them the  
 5 indication that this is a high risk event and cause them  
 6 then to speak to you?

7 A. An event like this where we're talking specifically  
 8 about people who have -- have served a custodial  
 9 sentence in prison, I think the nature of the offending  
 10 is relevant, I think whether there's any significance  
 11 around the venue of Fishmongers' Hall is relevant and  
 12 whether there has been -- for those who are managing  
 13 those former offenders, whether there's anything in  
 14 there that causes them any concerns, a change in  
 15 behaviour or anything else, whether there will be other  
 16 events taking place at the same time, the scale of the  
 17 event, is it likely to attract any public attention,  
 18 those sorts of things.

19 Q. Looking at the role of another set of people, you  
 20 started to mention them, those responsible for managing  
 21 an offender who has been released into the community, if  
 22 a probation officer or a police officer responsible for  
 23 managing a terrorist offender in the community became  
 24 aware that that person was attending an event in  
 25 a livery hall or another significant building in the

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1 City of London, would you expect that probation officer  
 2 or that police officer to get in touch with the City of  
 3 London Police?

4 A. I would expect them in the first instance to use their  
 5 multi-agency structure to look at what their collective  
 6 knowledge of that person is, and make an assessment of  
 7 risk, make some decisions around what mitigation could  
 8 be put in place in the first instance.

9 Q. By mitigations, what sort of measures are you talking  
 10 about?

11 A. Whether the individual should travel to the event,  
 12 whether there should be some physical checks made of  
 13 them before they leave home, and protective security  
 14 measures around the venue. Ultimately the CTSA's, for  
 15 example, give advice, but the ownership of the risk and  
 16 the decision is with the venue itself.

17 Q. Do you consider that there is any value in this scenario  
 18 in the managing police or probation officer contacting  
 19 the City of London Police as the force responsible for  
 20 the building if they do have any concerns but want the  
 21 person to attend the event?

22 A. If that would help them in making their assessment, then  
 23 yes. If it's an area they're unfamiliar with or  
 24 a building they're unfamiliar with, or they simply want  
 25 a point of contact that they can liaise with, then yes,

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1 we would welcome that.

2 Q. If the City of London Police had been contacted by The  
 3 Fishmongers' Company, and told the basic facts of this  
 4 event, that it was going to be attended by recently  
 5 released offenders and some current offenders on day  
 6 release, do you think that the force would have given  
 7 any advice, or made any enquiries?

8 A. I think it's unlikely that there would have been any  
 9 policing plan put in place around that, purely if the  
 10 information was: here is an event consisting or  
 11 comprising some former offenders.

12 Q. That's an answer to part of the question. Do you think  
 13 any enquiries would have been made, for example, along  
 14 the lines: what sort of offenders, what's their  
 15 offending history?

16 A. If we had been aware of the fact that there were  
 17 offenders or people there who had been convicted of  
 18 terrorism offences, and that had come into our  
 19 operational planning department, as a matter of course,  
 20 Special Branch would have carried out some enquiries  
 21 around that to inform the decision-making process.

22 Q. A slightly different question: if you had been told that  
 23 there are offenders coming, would you have said: tell us  
 24 what their offending history is?

25 A. Yes, I think we would have done as part of any

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1 conversation with the organisers around protective  
 2 security, which we would have — which is part of the  
 3 core offer made by the CTSAs.  
 4 Q. If there had been a positive request for a police  
 5 presence at the event, what would have determined  
 6 whether that police presence was provided?  
 7 A. The operational planning department's risk assessment  
 8 that I referred to earlier.  
 9 Q. Given all that you know about the event now, other than  
 10 the fact that an attack was planned, but all that you  
 11 know about the profile of attendees, including  
 12 Usman Khan's background, do you consider that a request  
 13 for police presence at this event would have been met  
 14 with a yes or no answer?  
 15 A. I think that's an impossible question to answer  
 16 definitively. Clearly with the benefit of hindsight, we  
 17 wish things had been done very differently. But on the  
 18 basis of what we know, I think, as I say, it would have  
 19 gone through that risk assessment process. If that  
 20 process determined a policing presence, there would have  
 21 been a policing presence, but again, I would have been  
 22 looking for those mitigating factors to be put in place  
 23 long before the event took place itself.  
 24 Q. Is the practical answer that in all likelihood  
 25 there wouldn't have been a policing presence but that

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1 you would have been seeking to give advice to ensure  
 2 that some mitigating measures were taken?  
 3 A. Yes.  
 4 Q. If there had been a request for police advice in advance  
 5 of an event of this kind about security arrangements,  
 6 what do you think would have been the advice given?  
 7 A. The advice given by CTSAs at that level is, as we've  
 8 said earlier, generic, and we take into account the  
 9 individual event, the host and the nature of it, and our  
 10 advice to any event organiser or venue manager is always  
 11 based around what is right for them, so first of all,  
 12 they've got to go back and take that advice and decide  
 13 whether it's realistic advice that they can introduce,  
 14 can they actually afford to put those measures in place,  
 15 and is it resilient and robust.  
 16 But our advice would certainly have been around  
 17 ensuring that they knew who was attending the event well  
 18 in advance; that they had measures in place as  
 19 a condition of entry so that they were absolutely sure  
 20 who was coming into the building, we may have considered  
 21 knife arches, I really can't tell if we would or not,  
 22 but it is advice and it is up to them to make that  
 23 decision themselves. But certainly around briefing of  
 24 staff, staff awareness, if there are former offenders  
 25 attending an event.

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1 Q. In simple terms, if you are told that former offenders,  
 2 particularly former offenders with serious offences in  
 3 their history, are attending an event, then you can give  
 4 advice, including about the potential use of a knife  
 5 arch or bag search?  
 6 A. We could give that advice.  
 7 Q. And you might well do so?  
 8 A. We might do. Because we wouldn't necessarily, just  
 9 because there are people there, as I said earlier, who  
 10 have served custodial sentences. It depends on the risk  
 11 posed by them either collectively or individually.  
 12 Q. Now, turning to a specific topic, is it right that on  
 13 occasions before the attack, the City of London Police  
 14 had provided firearms officers for security at events at  
 15 Fishmongers' Hall?  
 16 A. Yes, that's correct.  
 17 Q. What was the reason for those deployments when firearms  
 18 officers were provided?  
 19 A. They would be as part of a VIP visit to the venue. VIPs  
 20 will often have their own dedicated protective security  
 21 teams, and we will support those teams in protecting  
 22 that individual at the venue and provide a local  
 23 liaison.  
 24 Q. In the aftermath of the attack on Fishmongers' Hall on  
 25 29 November 2019, is it right that your force has given

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1 assistance and guidance with protective security to The  
 2 Fishmongers' Company and the other livery companies?  
 3 A. Yes, that's correct.  
 4 Q. In brief, what has that involved?  
 5 A. In the immediate aftermath of the event, we contacted  
 6 Fishmongers' Hall, all of the businesses in that  
 7 location and all of the livery halls, and that led on to  
 8 a briefing event at one of our police stations  
 9 in December, which was an opportunity to remind all of  
 10 the representatives that the threat level is what it is,  
 11 if anyone needed to after what had happened the previous  
 12 week or two.  
 13 Fishmongers' Hall also shared their experience to  
 14 bring home exactly what it was and to continue that  
 15 offer of security advice and remind people of the need  
 16 to have those basic measures in place, but it was  
 17 a reinforcement of existing messages.  
 18 We also, as I said earlier, produced a document  
 19 around advice to event organisers.  
 20 Q. Thank you very much, superintendent, those are all the  
 21 questions I have.  
 22 A. Thank you.  
 23 MR HOUGH: I'll just look to see whether others have  
 24 questions.  
 25 No, I see not.

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1 JUDGE LUCRAFT: Thank you very much indeed for coming.  
 2 A. Thank you. And, before I stand down, if I may, just on  
 3 behalf of everyone at the City of London Police, offer  
 4 our sincere condolences to the families of Saskia and  
 5 Jack. I cannot begin to imagine how difficult this must  
 6 have been.  
 7 MR HOUGH: Thank you very much indeed, officer.  
 8 A. Thank you.  
 9 MR HOUGH: Sir, we have some short statements to be read.  
 10 JUDGE LUCRAFT: Very good. We'll resist the temptation to  
 11 join in, Mr Moss, with the introduction, we are very  
 12 familiar with it.  
 13 MR MOSS: Sir, you mustn't hold back if you would like to!  
 14 Sir, I will read the evidence of two witnesses, one  
 15 is Jorge Lopez, the other Vincent Cirimele.  
 16 JUDGE LUCRAFT: Thank you.  
 17 MR MOSS: These are statements which you are admitting into  
 18 evidence under Rule 23 of the Coroners (Inquests) Rules  
 19 2013. I have given the names of the makers of the  
 20 statements. The nature of the written evidence has been  
 21 communicated to interested persons through disclosure,  
 22 and those interested persons have had the opportunity to  
 23 view those statements on the disclosure platform, and  
 24 could have objected to the evidence being read but have  
 25 not done so.

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1 Sir, so I start with a brief section from the  
 2 evidence of Jorge Lopez. You have that at {WS0529}.  
 3 MR JORGE LOPEZ (read)  
 4 MR MOSS: "I have been working here at the Fishmongers' Hall  
 5 for about seven months..."  
 6 This witness statement is given on 12 February 2020:  
 7 "... and I'm in charge of setting up the rooms for  
 8 events. I'm part of a small team of three people.  
 9 "On Thursday, 28 November, my manager informed me  
 10 that during the shift, I would have to set up a room for  
 11 an event. I was given a sheet of paper with basic  
 12 details for me to know how to set up the room. On this  
 13 day, my two colleagues and me prepared the tables and  
 14 the bar area and the projector.  
 15 "About five days after the incident, there was  
 16 a staff meeting for all employees of the  
 17 Fishmongers' Hall, and we were then told that the  
 18 conference held there on 29 November involved  
 19 ex-convicts, and if we had known this before, my  
 20 colleagues and I could have arranged further security  
 21 for that day. During the meeting it was discussed how  
 22 it happened. We were asked how we were feeling, and we  
 23 were offered support if we needed it."  
 24 Sir, I then turn to the evidence of  
 25 Vincent Cirimele. I start with {WS0324A}, and he says

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1 as follows.  
 2 MR VINCENT CIRIMELE (read)  
 3 MR MOSS: "I am an expert in a field of forensic science and  
 4 I have been requested to provide a statement. I confirm  
 5 I have read the guidance booklet known as  
 6 Disclosure: Expert's Evidence and Unused Material which  
 7 details my role and documents my responsibilities in  
 8 relation to revelation as an expert witness. I have  
 9 followed the guidance and recognise the continuing  
 10 nature of my responsibilities of revelation.  
 11 "I hold a Master's Degree in Biochemistry and a PhD  
 12 in Toxicology, both awarded by Louis Pasteur University,  
 13 Strasbourg, France. My thesis was entitled 'The  
 14 analysis of xenobiotics incorporated in hair by gas  
 15 chromatography coupled to mass  
 16 spectrometry: applications in clinical and forensic  
 17 toxicology'. I am the scientific director of ChemTox  
 18 since December 2009, I have over 15 years of experience  
 19 in the field of toxicology analysis of hair, body  
 20 fluids, tissues and other material for alcohol, drugs  
 21 and poisons and the subsequent interpretation of the  
 22 results obtained."  
 23 On 10 December 2019, the expert received a beard  
 24 hair sample obtained from Usman Khan:  
 25 "The beard hair sample was segmented and analysed

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1 for signs of drug abuse to assess if there is any  
 2 evidence that Usman Khan has been exposed to these drugs  
 3 prior to death. The beard hair sample was approximately  
 4 6 cm in length and black in colour. The hair was tied  
 5 together, but badly aligned. The cut end was marked.  
 6 The sample was wrapped in aluminium paper foil."  
 7 Sir, the expert then goes on to explain that having  
 8 received approximately a 6 cm length of hair, he cut it  
 9 into three sections, each of 2 cm, and tested each of  
 10 those for signs of drug contamination, and sir, I would  
 11 ask if we could please have on the screen {WS0324A} and  
 12 there is a table at the bottom of page 4 and the top  
 13 of page 5 which I think and hope we can have on the  
 14 screen at the same time. {WS0324A/4-5}.  
 15 So looking at that table, the rows are various  
 16 chemical substances for which the expert was testing,  
 17 the columns represent the sections of hair being tested,  
 18 the first column 0-2 cm, the next 2-4 cm, and the third  
 19 4-6 cm, and those results allowed the expert to reach  
 20 these conclusions.  
 21 "The beard hair findings suggest the occasional use  
 22 of cocaine by Usman Khan over the more recent time  
 23 period before death. The findings also suggest the  
 24 occasional exposure to heroin over the same period, but  
 25 I cannot exclude external contamination as a possible

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1 contributor of the drug being present in the beard hair.  
 2 There is no evidence to suggest that Usman Khan was  
 3 a repeated cocaine and heroin user over the oldest time  
 4 periods covered by the two distal beard hair section  
 5 tests."  
 6 Sir, following those conclusions being given in the  
 7 report, four written questions were put by your team to  
 8 the expert for him to prepare a further report, and  
 9 I shall read those four questions and answers, and  
 10 I would ask that those questions are put on screen in  
 11 turn. They are at {WS0324B/3}.  
 12 Question 1:  
 13 "In your 17 February 2020 report you state that your  
 14 findings are suggestive of the fact that Usman Khan had  
 15 used cocaine and heroin 'within the more recent time  
 16 period covered by the proximal beard hair section test'  
 17 but not 'within the oldest time periods covered by the  
 18 two distal hair section tests'."  
 19 JUDGE LUCRAFT: I'll just pause, Mr Moss, because I think we  
 20 were expecting the document to come up on the screen.  
 21 MR MOSS: Sir, I'm sure it will by the time I have finished  
 22 reading the question, the reference again is  
 23 {WS0324B/3}.  
 24 JUDGE LUCRAFT: Thank you.  
 25 MR MOSS: Thank you.

1 "At page 4 of your report, you state that, depending  
 2 on the rate of growth of Usman Khan's beard hair, the  
 3 hair tested would represent a time period of between  
 4 approximately 5 and 7 months before Usman Khan's death.  
 5 Are you able to be any more specific as to when  
 6 Usman Khan took each of cocaine and heroin? Are you  
 7 able to say, for example, whether or not Usman Khan took  
 8 these drugs in the month before his death?"  
 9 And the expert answered as follows:  
 10 "Drugs are incorporated into hair to a greater or  
 11 lesser degree following their use, and thus hair  
 12 provides a long term history of drug use. As drugs are  
 13 predominantly incorporated within the hair follicle  
 14 beneath the surface of the skin then there is a delay in  
 15 the hair emerging above the skin sufficiently to be  
 16 present in a cut sample. If the hair is cut close to  
 17 the skin, then there is an approximately 2-week period  
 18 excluded from the sample.  
 19 "When dealing with beard hair, some estimates of  
 20 times and patterns of use can be proposed based on a  
 21 mean growth rate of 0.9 cm per month (beard hair growth  
 22 rate is variable, but is typically within the range 0.75  
 23 to 1.2 cm per month).  
 24 "In this case the beard hair sample was 6 cm in  
 25 length and their whole length analysis could represent

1 approximately a 6 to 7-month period before death,  
 2 assuming an average beard hair growth rate of 0.9 cm per  
 3 month, but could also represent a larger time period,  
 4 taking into account the variable beard hair growth rate.  
 5 "Using segmental analysis (3x2 cm long beard hair  
 6 segments in this case) from the root to the tip ends, a  
 7 distribution patter of the drug along the hair shaft  
 8 could be obtained, showing, for example, a decrease,  
 9 an increase, or a constant use of a drug.  
 10 "In this case, heroin marker 6—monoacetylmorphine,  
 11 was only detected in the proximal hair section."  
 12 And sir, I pause there to say that  
 13 6—monoacetylmorphine is a substance that the expert  
 14 explains in his earlier report naturally occurs in the  
 15 body after heroin enters the body.  
 16 The expert continues:  
 17 "The same was observed for cocaine and cocaine  
 18 metabolites, norcocaine and benzoylecgonine."  
 19 Thankfully, sir, you will have it on the screen, so  
 20 you will know if I've got that wrong:  
 21 "This 2 cm—long beard hair section test covers  
 22 approximately a 1.6 to 2.6 months period before death  
 23 taking into account the largest beard hair growth rate  
 24 variability (0.75 to 1.2 cm/month).  
 25 "So drug—use occurred during an approximate time

1 period between late August/early September and  
 2 mid—November 2019, but it is not possible to say more  
 3 accurately when drug use occurred as the proximal  
 4 2 cm—long beard hair section was tested in its whole  
 5 length section."  
 6 Sir, the second question, if we could have it,  
 7 please, on page 3:  
 8 "Are you able to comment on whether Usman Khan took  
 9 each of cocaine and heroin on one occasion or on  
 10 multiple occasions? If you are able to assess that  
 11 Usman Khan took each of cocaine ... more than once, are  
 12 you able to comment on [the] frequency of use of each?"  
 13 Answer:  
 14 "The measured cocaine concentration could be  
 15 characterised as low when compared to the concentrations  
 16 generally reported in cocaine addicts, suggesting  
 17 occasional use of cocaine by Usman Khan in the time  
 18 period covered by the proximal beard hair section test  
 19 (approx between late August/early September and  
 20 mid—November 2019).  
 21 "The ... 6—monoacetylmorphine concentration could be  
 22 ... characterised as low when compared to the  
 23 concentrations generally reported in heroin addicts,  
 24 suggesting occasional, possibly unique, exposure of  
 25 Usman Khan to heroin within the same time period.

1 "I'm not able to comment on the frequency regarding  
 2 cocaine or heroin use/exposure as the measured  
 3 concentrations are mean values for a given period of  
 4 time."  
 5 Question 3 of 4:  
 6 "Are you able to comment on the quantity of each of  
 7 cocaine and heroin which Usman Khan took at that time,  
 8 or times?"  
 9 Answer:  
 10 "It has been widely described in the literature that  
 11 a correlation often exists between the amount of drug  
 12 consumed and the drug concentration measured in a hair  
 13 specimen, and for increasing intake, increasing drug  
 14 concentrations are observed.  
 15 "It is also widely reported that the consumption of  
 16 the same amount of drugs by different individuals can  
 17 lead to significantly different concentrations in their  
 18 respective hair samples.  
 19 "Drug incorporation into hair varies with age, sex,  
 20 health, hair type, colour and texture, and is dependent  
 21 on other factors.  
 22 "So, due to inter-individual variability, it is not  
 23 possible to say the amount of drug consumed by  
 24 Usman Khan starting from the heroin and cocaine markers  
 25 concentrations registered into his beard hair specimen."

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1 And, sir, finally we asked:  
 2 "Are you able to comment on how the use of each of  
 3 cocaine and heroin would have affected Usman Khan's  
 4 judgment and decision-making, both in general and at the  
 5 time of the attack?"  
 6 And the expert answered:  
 7 "Usman Khan's judgment and decision-making regarding  
 8 each drug is dependent on drug concentrations in his  
 9 blood specimen at the time when the drug was present  
 10 within the body.  
 11 "Hair testing results is a mean evaluation of drug  
 12 exposure over a long period of time (weeks to months)  
 13 and the beard hair results cannot be used to estimate  
 14 the influence of these drugs on the behaviour of  
 15 Usman Khan at the time of interest."  
 16 And, sir, that is the end of the third report.  
 17 JUDGE LUCRAFT: Thank you very much.  
 18 MR HOUGH: Sir, it may be very tempting to ask Mr Moss to go  
 19 through some of those chemical names again, but we can  
 20 no doubt resist that temptation.  
 21 JUDGE LUCRAFT: Yes.  
 22 MR HOUGH: Sir, after hearing evidence concerning  
 23 Learning Together and concerning The  
 24 Fishmongers' Company, we're now moving to evidence  
 25 tomorrow concerning the life and background of

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1 Usman Khan, his preparations for the attack, and then on  
 2 to his involvement with state agencies, prison,  
 3 probation and police.  
 4 JUDGE LUCRAFT: Yes. And the good news for the jury is that  
 5 we are pretty much on target, Mr Hough, as to where  
 6 we thought we would be at this stage. We are keeping  
 7 a very strict look on timings, and to some extent it's  
 8 really just an opportunity for me to say how important  
 9 it has been for us that the jury have been here spot on  
 10 time each morning. That's very much appreciated by me  
 11 indeed.  
 12 But we'll pause there, Mr Hough, and we'll pick up  
 13 on matters tomorrow morning at 10 o'clock. Thank you  
 14 very much.  
 15 (In the absence of the jury)  
 16 I'll rise.  
 17 (4.34 pm)  
 18 (The court adjourned until 10.00 am on  
 19 Tuesday, 27 April 2021)  
 20  
 21  
 22  
 23  
 24  
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