

# INQUESTS INTO THE DEATHS ARISING FROM THE FISHMONGERS' HALL AND LONDON BRIDGE TERROR ATTACK

## SUBMISSIONS ON BEHALF OF THE FISHMONGERS' COMPANY

1. The following narrow submissions are made in response to the written submissions of CTI and the draft questionnaire circulated on 21<sup>st</sup> May 2021. They are directed solely at the matters which the jury should be invited in particular when answering proposed question 5 (Submissions §4(e)9iii), §73(c), and §74(c), as elaborated on the Draft Questionnaire. The Company makes no submissions on CTI's summary of the law (§§5-10), article 2 analysis and conclusions (§§11-65), or proposal regarding PFD reporting (§§77-85), save to agree with these sections, and no submissions regarding determinations (§§65-76) beyond those set out below.
2. The issue which is identified for the proposed Fifth Question is: *was there any omission or deficiency in the security measures for the event at Fishmongers' Hall which contributed to the deaths of Jack Merritt and Saskia Jones?* (§73(c)). This is intended to encompass information security – the adequacy or otherwise of information provided to Fishmongers' Company by Learning Together and/or those managing Khan, and physical security – the physical security measures at the event itself for which the hall was provided free of charge.
3. So far as available security measures at the event were concerned, those included:
  - a. Measures which other organisations responsible for controlling Khan's movements in the community might have identified and deployed – including:
    - escorting and supervising Khan in his journey from home and to and whilst at the event. Fishmongers' Hall do not and did not have the means or authority to contain or neutralise an armed attacker;
    - advising Learning Together and/or Fishmongers' Company as to appropriate security measures; refusing to amend his licence conditions so as to prohibit his attendance
  - b. Measures used by the Fishmongers' Company – security staff; external CCTV; guest list through which attendee was identified on arrival by and known to Learning Together; controlled door egress; wearing of lanyards.

- c. Measures which the Fishmongers' Company might have employed – including pat-down and/or visual bag searches (for which staff were trained), or using metal detectors. Metal detection would have required hire or purchase and would never have matched the level of security systems in place at a high security prison. Relevant context for consideration of such measures is that no analogous previous educational event (as described by Dr Ludlow) – outside the Houses of Parliament/prison context – had utilised such measures (T/8/p71).
4. So far as the adequacy or otherwise of information provided to Fishmongers' Company by Learning Together is concerned: the risk register completed for the Company by Control Risks in April 2019 had identified a lone actor terrorist attack as an important risk to be addressed; at no stage had Control Risks or the Company considered the possibility that an individual designated as a high or very high risk to the public might actually be invited to an event (T/10/pp57-58) and remain unidentified as such; by November 2019 the prospect of asking detailed questions of event organisers about those who would be attending was under active consideration (T/10/p64) (T/10/p86, p120-123). Limited if any additional relevant information could have been provided had it been sought (as it would now be) from Learning Together, because of the limited information that organisation had been provided with. Had Learning Together been provided with further information, Usman Khan would not have been invited to the event, at all (T/9/p107).
5. The Company therefore respectfully submits that the list of considerations and issues to which the jury's attention should be directed when considering Question 5 should be amended as follows: [amendments shown in *bold blue italicised text*]:
- *Whether or not those responsible for managing and/or for investigating Usman Khan ought to have implemented any security measures in respect of his attendance at the event.*
  - The fact that Fishmongers' Hall had a number of security measures for the event, including *(a) job protected door egress controlled by staff*; (b) security staff on the door at most times; (c) CCTV at the entrance; *(d) guest list through which attendee was identified on arrival by and known to Learning Together*; *(e) identity lanyards.*
  - The fact that Fishmongers' Hall did not *own* any metal detector or *employ* any arrangements for bags to be searched on entry, *bearing in mind that even then such*

*measures would never have matched the level of security systems in place at a high security prison.*

- *The fact that Learning Together had no experience of any analogous educational event (outside the prison/Houses of Parliament) context being equipped with metal detection or bag searching.*
  - The fact that staff of the Fishmongers' Company (a) were aware that all attendees had been invited by the Learning Together programme, but (b) were also aware that attendees might include *ex-offenders* who had committed serious criminal offences.
  - The fact that the Fishmongers' Company had *had* a risk register *since April 2019* which identified the risk of a lone actor terrorist attack as an important risk to be addressed, *which risk was not intended to capture the risk of an attacker invited to an event.*
  - Whether or not those involved in organising the Learning Together event properly informed the Fishmongers' Company of the types of persons attending the event.
  - Whether or not those responsible for managing and/or for investigating Usman Khan ought to have given any advice on security measures to the Learning Together organisers and/or the Fishmongers' Company.
  - Whether or not the Fishmongers' Company ought to have implemented any additional security measures, based on the information it had at the time.
6. The Company takes this opportunity to emphasise that it is a learning organisation. It has sought to educate itself and others, as the inquests have heard, since these tragedies, as to how, and the extent to which, it can safely provide a venue in the future to organisations carrying out important societal and charitable functions. It will continue so to do, with the assistance of this inquest process. Nothing in these submissions is intended to detract from or undermine that philosophy.

**Sarah Le Fevre  
Three Raymond Buildings  
24<sup>th</sup> May 2021**