

**IN THE MATTER OF THE INQUESTS  
INTO THE DEATHS FOLLOWING THE TERRORIST ATTACK  
AT FISHMONGER'S HALL**

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**SUBMISSIONS ON BEHALF OF THE  
METROPOLITAN POLICE SERVICE**

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**I. INTRODUCTION**

1. The Metropolitan Police Service (MPS) would like to once again express our deepest condolences to the families of those who died in this terrible attack. All of those who have attended the inquests or viewed them remotely have been moved by the love and dignity shown by the families.

**II. ARTICLE 2**

2. It has not been suggested in questioning by IPs or submissions from CTI that Article 2 might be engaged as a result of actions or omissions by MPS officers. Neither has it been suggested that acts or omissions by Counter Terrorism Policing Headquarters (hosted by the MPS under a collaboration agreement pursuant to the Police Act 1996) might engage Article 2.

**III. EMERGENCY RESPONSE AND LEARNING FROM PREVIOUS  
ATTACKS**

3. This note seeks briefly to address the emergency response to the attack following the declaration of Operation PLATO as this is a matter upon which the learned Coroner commented in his report to prevent future deaths (RPF<sup>D</sup>) following the London Bridge and Borough Market attacks which occurred on 03.06.17.
4. Whilst the matters which are briefly addressed below tragically could not touch upon the deaths of Saskia and Jack as the terrible injuries inflicted upon them were unsurvivable outside of a clinical setting, they have been set out to reassure the coroner that concerns expressed following his inquiries into the 2017 attacks have been addressed at a local and national level.
5. In the 01.11.19 RPF<sup>D</sup><sup>1</sup> the Coroner stated:

*the procedures of the emergency services performed well on the night of the attack. The Operation Plato strategy in particular resulted in a prompt and massive deployment of police and other services to the area which undoubtedly strengthened the emergency response.*

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<sup>1</sup> The (then) Chief Coroner's RPF<sup>D</sup> and the responses from IPs can all be viewed at <https://londonbridgeinquests.independent.gov.uk/documents-and-rulings/prevention-of-future-death-report/>

6. The RPFDF, however, noted that under the JESIP Joint Operating Principles in force in 2017 known as JOP3 and which related to a marauding terrorist firearms attack, there was a potential criticism that “zones” could remain hot or warm for significant periods of time delaying the deployment of non-specialist responders.
7. The Coroner noted, however, that this had been addressed by revised JESIP and NPCC guidance to police forces. In relation to this point he stated:

*The new guidance documents stress speed of deployment and contain new advice on decision-making in designation of hot and warm zones. They make clear that deployment of staff should not be delayed pending the arrival of Plato commanders from the three emergency services.....*

*In my view, the revision of the JOPs and Plato Guidance addresses the principal concerns raised by the evidence. It is encouraging to see that the emergency services had revised their procedures even before the detailed evidence was heard in these Inquests. Nevertheless, I still consider it appropriate to record concerns arising from the evidence in the Inquests. The evidence revealed weaknesses and limitations in emergency response procedures as summarised above. While they have been addressed in the main JOPs and Plato guidance document, I would like to stress to the emergency services that they should also be kept in mind when producing other procedural and guidance documents and when devising training exercises.*

8. Given the importance of these matters the coroner recommended within his RPFDF at MC13 (addressed to the LAS, MPS and COLP), greater speed and flexibility in the use of hot and warm zones and for training, planning and exercises to reflect this. In its response, the MPS reassured the Coroner that these matters were in hand and would feature in compliance visits, training, policy and table top exercises.
9. It is evident from the police response to this attack that the new policies are well embedded and worked effectively within the MPS and COLP to allow for in particular a quick designation of a warm zone and flexible working within the zones.
10. The evidence shows that the revised JOPS, NPCC Guidance for Police Forces and City of London and MPS policy and training resulted in the following:
  - (i) Quick and decisive action by firearms officers from both forces to identify, locate, confront and neutralise the threat from Khan.
  - (ii) A rapid deployment of emergency responders to the scene.
  - (iii) Effective nomination of Rendezvous points (RVP) for emergency responders and a forward command post (FCP) for commanders.
  - (iv) Effective control of police assets deployed to the scene from both forces by the ground assigned tactical firearms commander (Inspector Settle).
  - (v) The use of appropriate unarmed police assets within the hot zone such as the explosive ordinance (expo) dog handler.
  - (vi) A quick decision to designate London Bridge and Fishmonger’s Hall a warm zone once Khan had been neutralised and no indication was given by the expo dog as to the presence of explosives.

- (vii) A quick and effective decision once the bridge had been declared warm to bring paramedics and HEMS forward into the warm zone to enable them to enter Fishmongers Hall.
  - (viii) The decision at (vii) above was taken in the absence of the LAS commander who had not arrived at the FCP at this time (for which there is no criticism whatsoever of LAS). This reflects the point raised by the coroner in the RPFDD summarised at [7] above.
11. Of course none of the above would have been possible without the brave actions of all emergency responders deployed in response to the attack.

#### **IV. CONCLUSION**

12. In conclusion it would seem that to the extent that (non causative) concerns were raised in the London Bridge and Borough Market attack RPFDD, the changes since the 2017 attacks have had a positive effect. This allowed the earliest possible assessment of Izzie and Stephanie who were then evacuated from Fishmonger's Hall to receive urgent treatment at the RVP.
13. These inquests are solely concerned with the tragedy of Jack and Saskia's lives being so cruelly cut short. The above has been set out simply to reassure the coroner that matters previously raised appear to have been addressed. The MPS does not at present intend to make oral submissions on 25.05.21 but will of course be present to assist the coroner and IPs in any way we can.

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