

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

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SUBMISSIONS ON BEHALF OF  
THE COMMISSIONER OF THE CITY OF LONDON POLICE  
IN RESPONSE TO SUBMISSIONS RE  
REGULATION 28 REPORT ON ACTION TO PREVENT FUTURE DEATHS

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**INTRODUCTION**

1. These submissions are made on behalf of the Commissioner of City of London Police ('CoLP') in response to written submissions made in respect of the need for a Regulation 28 Report on action to prevent future deaths.
  
2. The written submissions filed on behalf of the bereaved families are understandably largely directed at issues surrounding the management of TACT offenders both in prison and on release. As CoLP had no role to play in respect of the management of Usman Khan, CoLP does not make any submissions on these issues, which are likely to be most effectively addressed by those directly involved. However, more generally, CoLP recognises the importance of effective management of all high risk offenders and supports any recommendations which the Coroner deems necessary to improve this process.

## SUBMISSIONS

4. The submissions which directly engage the actions of CoLP appear at page 26, paragraphs 62-64 of the written submissions made on behalf of the family of Saskia Jones. CoLP does not take issue with the legal framework set out in those submissions. The matter of concern raised in those submissions is stated as follows [62]:  
*“A matter of concern that arises from the evidence is the apparent lack of structured communication between the first responders on the scene.”*  
The submissions go on to identify the evidence relied upon in support of the aforesaid concern.
5. It is submitted that on the evidence and in particular, for the reasons set out herein, it is not necessary to make a Report on Action to Prevent Future Deaths (‘PFD Report’) to CoLP based upon this concern. Having made that submission, it is specifically conceded that there are always lessons which can be learned from tragic events such as those of 29<sup>th</sup> November 2019 and CoLP, working together with its partners, will continue to strive to improve all aspects of emergency response.
6. The Coroner is respectfully directed to the Medical Timeline prepared by Operation Bemadam (**DC6192**) and the CoLP CAD (**DC 6736**). It is unnecessary to set out the detailed contents herein but it is submitted that taken together, these documents evidence an extremely swift emergency response with effective communication between the control rooms and responders on the scene.

7. Addressing the particular concern raised in respect of communication between first responders at the scene it is submitted that, avoiding application of the benefit of hindsight, the following facts are material to consideration of this issue:
  - a) By the time of arrival of the first medical responders at the outer cordon, between 14:09:07 and 14:09:15, Khan was still alive and moving and believed to be in possession of a viable IED.
  - b) Operation Plato was declared by CoLP at 14:09:17.
  - c) There was sporadic active gunfire between 14:10:22 and the final shots at 14.11.59
  - d) The unchallenged evidence was that officers believed that, even after the death of Khan, there was a real and continuing risk by reason of the presence of the IED and the possibility of Khan not being a lone actor (see for example comments of G108 and YX97 14:13:25-14:13:29 and 14:15:55).
  - e) Notwithstanding that officers could not confirm that Khan had been neutralised (14:16:06), discussions were ongoing to facilitate the provision of first aid to the casualties by paramedics and HEMs (14:16:31- 14:17:56).
  - f) The ongoing risk in any incident must be the subject of continual dynamic risk assessments using the National Decision Model. The unchallenged evidence is that such dynamic risk assessments occurred in this case (see evidence of KH16, A87, YX97 and DC 6192).
  - g) The result of the EOD dog search was reported at 14:18:51. At 14:19:03 Khan was declared as “down”. At 14:19:25 the declaration of the warm zone was confirmed. At 14:20:54 it was communicated from the scene that Khan was now believed to have been acting alone.
  - h) Immediately thereafter, starting at 14:21:00 PC Hutchins, YX97 and other officers spoke directly to the medical responders at the scene and provided information and

cover for them to enter Fishmongers' Hall. Paramedics entered Fishmongers' Hall at 14:21:19 and HEMs at 14:22:26.

8. The assessment of risk and the designation of zones, where incidents fall under Operation Plato, is properly a matter for police officers. Those officers must (and did) take into account, the need to ensure that available medical professionals are able to attend to casualties as soon as reasonably practicable. The application of these clear and well-understood principles in this case worked effectively, resulting in paramedics entering Fishmongers' Hall within one minute of confirmation of declaration of the warm zone and HEMs approximately one minute thereafter.
9. At paragraph 3 of the Note provided by the IOPC dated 28 June 21, reference is made to a de-brief involving key police witnesses which took place on 7 January 2020. CoLP confirms that all of the relevant issues are being taken forward and actioned in so far as the necessary action may be the responsibility of CoLP.
10. It is submitted that it is not necessary to make any Rule 28 Report in respect of CoLP. However, it should not be understood from these submissions that CoLP is in any way complacent. CoLP works tirelessly to identify areas for improvement and put in place the necessary measures to ensure that those improvements are delivered. By way of recent example, the MPS and CoLP have recently put in place a command and control collaboration which is intended to further streamline communication by embedding a CoLP TFC in the MPS POD. In addition, CoLP trains regularly with its responder partners in live and table-top exercises. In particular, LAS personnel are involved in joint training and there is a present intention to include HEMs in ARV training

exercises. Only the huge demands on HEMs have prevented the first such training exercise being completed to date.

10. Sadly, despite the best efforts of CoLP officers and their responder partners on the 29<sup>th</sup> November 2019, Jack and Saskia could not be saved.

28 July 2021

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Temple