

LONDON PREPARED: A CITY-WIDE ENDEAVOUR

An Independent Review of London's Preparedness to Respond to a Major Terrorist Incident

Lord Toby Harris, March 2022



FOREWORD

In May 2016, Sadiq Khan, then newly elected as Mayor of London, asked me to undertake an independent review into the city's preparedness to respond to a major terrorist incident. This followed the series of murderous terrorist attacks, involving firearms and bombs, across Western Europe in the previous year – notably those in Paris on Friday 13th November which killed 130 innocent people including 90 at the Bataclan Theatre. My review, however, looked at a range of possible attack scenarios, including vehicles used as a weapon (as in the attack in Nice in July 2016 which killed 86 people).



Lord Toby Harris

That review was published at the end of October 2016¹. Its key conclusion was that, compared to when I had last been heavily engaged in counter-terrorism matters five years earlier and following substantial investment in armed policing capabilities, the response of London's emergency services would be markedly quicker and better than would have been possible before. Nevertheless, I made more than a hundred detailed recommendations to further improve London's preparedness, the vast majority of which were subsequently implemented.

A further five years on, the Mayor has asked me to repeat the exercise² with a wider remit, not only to look at the learning from the terrorist incidents that took place in London and elsewhere in 2017 and subsequently, but also to consider the changing threat of terrorism facing the capital and any implications of the Covid-19 pandemic for London's immediate and long-term preparedness.

In the last six months, I have conducted over one hundred interviews with senior figures from the emergency services, the transport sector, City Hall, and local government, as well as with civil servants from several central government departments, the Speaker of the House of Commons, the Parliamentary Director of Security, and a number of other experts including Jonathan Hall QC. In addition, I held valuable roundtables with some thirty representatives from the business, faith, voluntary and community sectors. I also met with the senior leadership of the New York Police Department who shared their insights and experiences of preparing for and responding to terrorism. I am grateful to all those who have so freely given of their time to help inform this review. Any errors or misinterpretations are, of course, mine and not the responsibility of those who have spoken to me so openly and frankly.

This is therefore my report and I present it for wider consideration and discussion. In a number of instances, I have provided additional advice to the Mayor and others that it would not be appropriate to include in a public report because of its sensitivity.

My broad conclusion is that very substantial progress has been made by the emergency services and other agencies in response to my 2016 report and in following up the lessons of the attacks in 2017 and subsequently. I have been impressed by much of the work that has gone on, and in the detail and care that has been devoted to analysing what happened in the attacks on Westminster Bridge, on London Bridge, at Finsbury Park, at Parsons Green, at Fishmongers Hall, in Streatham and, of course, at Manchester Arena. In some instances, changes in

¹ London's Preparedness to Respond to a Major Terrorist Incident

https://www.london.gov.uk/sites/default/files/londons_preparedness_to_respond_to_a_major_terrorist_incident_-_independent_review_oct_2016.pdf

² <https://www.london.gov.uk/press-releases/mayoral/review-to-consider-changing-threat-of-terrorism>

response practice were implemented very quickly.

This progress will not of course bring back those people who tragically lost their lives in attacks over the last five years, nor will it ease the pain for those who loved them and still mourn their absence.

Indeed, this highlights the dilemma of all work on preparedness: how can you define what is enough? The risk of terrorism remains high. If you are caught up in an incident, the arrival of police armed response in, say, three or four minutes – which is rapid by any account – will feel like an eternity.

Moreover, the change in the nature of threat means that attacks are increasingly committed by individuals. They operate alone, frequently self-radicalising and learning techniques online. Attacks of this nature are inevitably harder to detect and prevent in advance. In the UK, we are fortunate in the quality of the investigatory work carried out by counter-terrorism policing and by the security agencies, but the reality is that not all attacks can be prevented. We need to be appropriately prepared against whatever might happen.

And there is no sign that the risks and threats are diminishing – quite the contrary. In online spaces, extremism is increasingly prevalent and, more worryingly still, has become almost normalised. This spills over into greater polarisation in the real world which in turn can and does lead to violence. International developments do not help. The fall of Afghanistan to the Taliban has acted as an inspiration to Islamist extremists around the world. There are now more ‘ungoverned spaces’ in which organised terrorism can be incubated. Terrorist techniques developed in various conflict zones are spread almost instantly on the internet.

Meanwhile, democracy and its values seem to be under increasing threat from hostile states and ideologies. Fake news, misinformation and the denigration of science are rife. The events in Washington DC in January 2021 coupled with populist rhetoric globally has led to the undermining of the rule of law in many countries. The UK has not been exempt from this.

In this report, I have not stuck to a rigid definition of terrorism. It seems to me that for an individual caught up in a murderous attack it does not matter much whether the perpetrator has identifiable terrorist ideology and objectives, is motivated by hate and prejudice in the absence of a political aim, or is the agent of a foreign power. Whatever is driving the perpetrator, the response of the emergency services and other agencies should be essentially the same. This also applies to incidents in which an individual experiencing sometimes very acute mental health problems, with or without an established terrorist ideation, is at the core. The objective for the authorities must be to intervene so as to prevent the attack or respond with sufficient speed so that casualties can be minimised.

London bears the highest risk of terrorism in the UK, containing as it does the largest number of high-profile targets and the greatest concentration of subjects of interest. I do not believe that this is always adequately recognised in the national allocation of resources. I acknowledge that the responses to the terrorist incidents in London since my report were speedier than could have been achieved elsewhere in the country. However, this is no reason to level down the capacity to respond in our capital and the place of greatest peril.

The loss of twenty thousand police officers in England and Wales between 2010 and 2019 meant the exodus of many of the most experienced. The Metropolitan Police Service (MPS) was not exempt from this. Nationally, police numbers are now rising. However, when the current uplift is completed, numbers across the country will still only be approaching their level a decade ago, although in London the numbers are due to reach an historic high by the end of March 2022. This increase is of course welcome, although due to parallel population growth, officer numbers in the capital will continue to remain at lower levels per capita than the highs seen between 2008 and 2010. Moreover, it has to be recognised that the net effect will be that forces will have a disproportionately high number of officers with limited experience. This also means that there is a shortage of detective capacity. In

addition, levels of support staffing, while slowly rising from a low in 2018, remain around 25% lower than a decade ago and this has implications for the availability of specialist capabilities including intelligence analysts and forensics experts.

The previous public spending review required counter-terrorism policing to make 'efficiency' savings, which has led *inter alia* to the loss of valuable outreach capability. The most recent review is likely to perpetuate a loss of flexibility in spend (for example, between police officers and other specialist resources) and is likely only to give certainty in terms of funding for one year making medium-term planning difficult. This is short-sighted and concerning.

Other services have also been squeezed significantly in the last decade. The London Ambulance Service is particularly stretched. However, this report emphasises the extent to which many services, especially those in local government, are an essential component in preventing terrorism and ensuring preparedness in the event of an attack. Ten years of austerity has left youth provision, mental health services, and the voluntary and community sector under-resourced – in some cases woefully so. The consequences of further cuts will be to leave the network that enables society to respond to those who need support to avoid falling into violent extremism, and to respond effectively and rapidly to an emergency incident, spread worryingly thin.

The Covid-19 pandemic has also had a number of consequences. First, extended periods of lockdown have provided those who are susceptible to radicalisation online with more opportunities to be incited into violent action. Second, the interruptions to business and the requirements of social distancing have changed how people meet and interact with each other. Places that would not previously have been regarded as targets have now potentially become so. Moreover, many of those employees who were experienced in routinely scanning the public spaces in which they worked for signs of potential trouble have lost their jobs or been deskilled through months of furlough; and there is a real risk that security will take second place as businesses desperately try to recover their losses from the pandemic.

Effective security, proper preparedness and the pro-active prevention of terrorism are far more than the responsibility of the emergency services. It has to be a broad endeavour that embraces local government, businesses and civil society, as well as each of us in our households and as we go about our daily lives as individuals. This shared responsibility will require a much greater willingness to share information and intelligence where it is appropriate to do so. In particular, the authorities must 'dare to share'.

In the same way, local government, the voluntary and community sector, and business all have parts to play. Indeed, every citizen and visitor can provide the crucial eyes and ears on which true vigilance depends. This is the same whole-of-society approach proposed in the chapter on resilience in the Government's integrated security and defence review published in March 2021³ that recognises that individuals, businesses and organisations all have to play a part.

My report reaches the same conclusion: security and preparedness needs to be built into London's fabric and effective protection against terrorist attack must be a city-wide endeavour.

Or as the Mayor put it on the second anniversary of the Westminster Bridge attack "*... those who seek to divide us, who try to break our communities, will never succeed. We stand united against terrorism and in hope for the future.*"⁴

³ 'Global Britain in a Competitive Age: the Integrated Review of Security, Defence, Development and Foreign Policy' <https://www.gov.uk/government/publications/global-britain-in-a-competitive-age-the-integrated-review-of-security-defence-development-and-foreign-policy>

⁴ <https://www.london.gov.uk/about-us/mayor-london/londonunited-memory-2017-westminster-terror-attack>

Above all, it is important that there is no complacency. There is a significant risk of a terror attack in London and we must not be lulled into any false sense of security that because most terror attacks are successfully foiled or rapidly interdicted, we do not need to be better prepared.

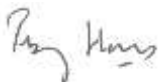
My review has found that as a city there has been much progress in the last five years and lessons have been drawn from and acted upon from the attacks that have taken place. However, there is always more that can be done, and my report makes many detailed recommendations. These are presented for consideration and discussion. Most of this report focusses on London, but I hope there will be a wider relevance for other cities.

Virtually all of the recommendations in my 2016 report have been implemented. The recommendations in this report are also intended for action. It is important that they are implemented so we are better able to resist and be better prepared for any future atrocity. Some can be acted upon by the Mayor and those agencies for which he is responsible. Others are aimed at government departments and agencies, at local authorities, and more broadly at business and civil society.

While I have made a large number of recommendations, most of these should, in my view, be relatively straightforward for the relevant bodies to take forward. Many are simply proposing modest improvements on arrangements that are already in place. They do not alter my overall finding that very substantial progress with respect to London's preparedness has been made in the years since my previous review.

To ensure that these issues identified throughout my recommendations are taken forward, the Mayor should prepare a report for scrutiny by the London Assembly and for wider debate. This should be completed within one year, and again at suitable intervals thereafter, to examine the progress that has been made on all of the recommendations which I have made in this 2022 report (R1).

Finally, I want to thank Jenny Cann (on secondment from the Home Office), Chief Superintendent Dawn Morris and her team in the Metropolitan Police, and the staff from MOPAC who have supported me in conducting this review.



LORD TOBY HARRIS

28th February 2022

DEDICATION

This report is dedicated to the sixteen people who were murdered in London by terrorists in the last five years:

Chrissy Archibald
Kurt Cochran
Andreea Cristea
Aysha Frade
PC Keith Palmer GM
Leslie Rhodes
Sebastien Belanger
Kirsty Boden
Ignacio Echeverria Miralles De Imperial
James McMullan
Alexandre Pigeard
Xavier Thomas
Sara Zelenak
Makram Ali
Saskia Jones
Jack Merritt

We owe it to them to ensure that they are not forgotten and that we do all that we can to prevent future similarly senseless and tragic deaths.

ABBREVIATIONS

ACS	Approved Contractor Scheme	ESN	Emergency Services Network
ACT	Action Counters Terrorism	FRS	Fire and Rescue Service
AFO	Armed Firearms Officer	GLA	Greater London Authority
ARV	Armed Response Vehicle	HART	Hazardous Area Response Team
BRC	British Red Cross	HMICFRS	Her Majesty's Inspectorate of Constabulary and Fire & Rescue Services
BTP	British Transport Police	HMPPS	Her Majesty's Prison & Probation Service
CBRN	Chemical, Biological, Radiological and Nuclear	IPCC	Independent Police Complaints Commission
CoLP	City of London Police	JESIPs	Joint Emergency Services Interoperability Principles
CONOPS	Concept of Operations for Emergency Response and Recovery	JOPs	Joint Operating Principles
CPNI	Centre for the Protection of National Infrastructure	JTAC	Joint Terrorism Analysis Centre
CSC	City Security Council	LAP	Local Authorities Panel
CSSC	Cross-Sector Safety, Security and Communications	LAS	London Ambulance Service
CTAA	Counter Terrorism Awareness Adviser	LESCC	London Emergency Services Coordination Centre
CTLP	Counter Terrorism Local Profile	LESLP	London Emergency Services Liaison Panel
CTOC	Counter Terrorism Operations Centre	LET	London Emergencies Trust
CTP	Counter Terrorism Policing	LFB	London Fire Brigade
CTPO	Counter Terrorism Protect Officer	LLAG	London Local Authority Gold
CTSA	Counter Terrorism Security Adviser	LRF	London Resilience Forum
CTSFO	Counter Terrorism Specialist Firearms Officer	LRG	London Resilience Group
DCMS	Department for Digital, Culture, Media and Sport	LRP	London Resilience Partnership
DfE	Department for Education	LRPG	London Region Portal Group
DfT	Department for Transport	LVWS	London Victim & Witness Service
DIM	Detection, Identification and Monitoring	MAGIC	Multi-Agency Gold Incident Command
DLUHC	Department for Levelling Up, Housing and Communities	MAI	Manchester Arena Inquiry

MAPPA	Multi-Agency Public Protection Arrangements	PAL	Publicly Accessible Location
MATRA	Multi-Agency Threat and Risk Assessment	PNC	Police National Computer
M/ETHANE	Major (incident); Exact (location); Type; Hazards; Access; Number (casualties); Emergency services	PND	Police National Database
MoD	Ministry of Defence	PUP	Police Uplift Programme
MoJ	Ministry of Justice	RED	Resilience and Emergencies Division
MOPAC	Mayor's Office for Policing and Crime	SCaN	See, Check and Notify
MPS	Metropolitan Police Service	SCC	Strategic Coordination Centre
MTA	Marauding Terrorist Attack	SCG	Strategic Coordinating Group
MTFA	Marauding Terrorist Firearms Attack	SecCo	Security Coordinator
NCSC	National Cyber Security Centre	SFO	Specialist Firearms Officer
NaCTSO	National Counter Terrorism Security Office	SIA	Security Industry Authority
NET	National Emergencies Trust	SOLACE	Society of Local Authority Chief Executives
NFCC	National Fire Chiefs Council	SOR	Special Operations Room
NICC	National and International Capital Cities (Grant)	SRC(E)	Security Review Committee (Extraordinary)
NPCC	National Police Chiefs Council	TINA	Terror Incident Needs Assessment
NSD	National Security Division	VCS	Voluntary and Community Sector
PAIE	Public Authority Information Exchange	VCSEP	Voluntary and Community Sector Emergencies Partnership
		VSP	Voluntary Sector Panel
		WCSP	Westminster Ceremonial Streetscape Project

Notes on terminology

- 'City Hall' is used throughout to denote the London Mayor's Office.
- The 'Security Service' is used to denote MI5.
- Counter Terrorism is abbreviated to CT throughout the report.
- R# denotes a numbered recommendation (see Appendix A for the full list).

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1. THE TERRORIST THREAT

The current threat level

- 1.1. For much of the past five years, the threat level in the UK has been set at SEVERE, reaching CRITICAL on two occasions. Currently (as of 28th February 2022), it is assessed to be SUBSTANTIAL (see Figure 1). This means that, on the basis of available intelligence, a terror attack in the UK is considered likely.

Figure 1: UK threat levels

Threat levels from international terrorism are set by the Joint Terrorism Analysis Centre (JTAC)⁵ and give a broad indication of the likelihood of a terrorist attack, as follows:

LOW means an attack is highly unlikely.

MODERATE means an attack is possible, but not likely.

SUBSTANTIAL means an attack is likely.

SEVERE means an attack is highly likely.

CRITICAL means an attack is highly likely in the near future.

In reaching a judgement on the appropriate threat level, several factors are considered, including:

Available intelligence. It is rare that specific threat information is available and can be relied upon. More often, judgements about the threat will be based on a wide range of information, which is often fragmentary, including the level and nature of current terrorist activity, comparison with events in other countries and previous attacks. Intelligence is only ever likely to reveal part of the picture.

Terrorist capability. An examination of what is known about the capabilities of the terrorists in question and the method they may use based on previous attacks or from intelligence. This would also analyse the potential scale of the attack.

Terrorist intentions. Using intelligence and publicly available information to examine the overall aims of the terrorists and the ways they may achieve them including what sort of targets they would consider attacking.

Timescale. The threat level expresses the likelihood of an attack in the near term. We know from past incidents that some attacks take years to plan, while others are put together more quickly. In the absence of specific intelligence, a judgement will need to be made about how close an attack might be to fruition. Threat levels do not have any set expiry date but are regularly subject to review in order to ensure that they remain current.

Terror attacks since 2016

- 1.2. The world does not stand still, and neither does the nature of those threats which confront countries, societies and individuals. As the UK's changing threat levels suggest, this is no less

⁵ <https://www.mi5.gov.uk/threat-levels>

true when we consider terrorism and since my previous review of London’s preparedness to deal with terror in 2016, the UK has experienced an unprecedented number of domestic attacks against its citizens⁶, leading to the tragic deaths of 43 innocent people with many more injured.

- 1.3. Figure 2 sets out the details of those attacks: most involved a single perpetrator, the majority were inspired by Islamist terrorist ideology, and several involved the use of a vehicle as a weapon. Each has driven widespread learnings for the police and other services involved in response, and I consider some of these in chapter 3.
- 1.4. As I set out in my foreword, this report does not abide entirely by the more rigid definition of terrorism employed by the police and security agencies. I have approached the matter from the perspective of public consequence, where it is arguably of little relevance whether a perpetrator of a murderous attack displays an identifiable terrorist ideology and objectives, is motivated by hate and prejudice in the absence of a political aim, or is the agent of a foreign power. Irrespective of the driver, the nature of the emergency response is the same. Hence while a probable state-sponsored assassination rather than terrorism per se, I have included the Novichok poisonings perpetrated in Salisbury and Amesbury in 2018.

Figure 2: UK⁷ terror attacks, 2017 – 2021

2017
<p>March</p> <p>A man drove a car into pedestrians on Westminster Bridge in London, killing four people and injuring over 40. After crashing, he fatally stabbed an unarmed police officer in the grounds of the Palace of Westminster before being shot dead by police. Daesh claimed responsibility.</p>
<p>May</p> <p>An improvised explosive device (IED) was detonated in the foyer of Manchester Arena as people were leaving a concert. Twenty-two people were killed with over 1,000 others injured. The attacker was killed in the explosion. Daesh claimed responsibility.</p>
<p>June</p> <p>Three men used a van to run over pedestrians on London Bridge. After crashing, they began stabbing people in and around venues in nearby Borough Market. Eight people were killed in the attack with 48 injured before the attackers were shot dead by police. Daesh claimed responsibility.</p>
<p>June</p> <p>A man drove a van into pedestrians close to London’s Finsbury Park Mosque, killing one person and injuring a further nine. Found guilty of extreme right-wing inspired terrorism-related murder and attempted murder, the attacker was sentenced to life imprisonment.</p>

⁶ Northern Ireland related terrorism perpetrated in Northern Ireland is out of scope for this Review.

⁷ While Northern Ireland was in scope as one of the four nations comprising the UK, this Review has not considered Northern Ireland related terrorism perpetrated in Northern Ireland or elsewhere. The list in Figure 2 is derived from incidents considered to be terrorism for the purposes of this Review (see paragraph 1.. 4). It is not based on the official methodology employed by CT policing and the security service to classify a terror attack.

September

A man detonated an IED on a train at Parsons Green Underground station in London. The partial explosion injured 23 people and a further 28 suffered crush injuries as crowds surged to exit the train. Convicted of attempted murder and causing an explosion likely to endanger life or cause serious injury, the attacker was sentenced to life imprisonment. Daesh claimed responsibility.

2018**March & June**

A former Russian military officer and double agent for the British intelligence services, and his daughter, were targeted by Russian military intelligence officers in Salisbury in March and poisoned by means of a Novichok nerve agent. Both spent several weeks in hospital in critical conditions, as did an attending police officer - all survived. Two further officers were treated for minor symptoms. In June, a man gave what he believed to be a bottle of perfume to a woman in Amesbury. The bottle in fact contained the nerve agent and after spraying it onto her wrist, she died. While the Metropolitan Police Service Counter Terrorism Command took over the investigation from Wiltshire police, the poisonings were not in fact considered to be an act of terror, rather the UK government believes it "*overwhelmingly likely*" the poisoning was ordered by Russian president Vladimir Putin, i.e. a state-sponsored assassination.

August

A man deliberately drove a car into cyclists and pedestrians near London's Palace of Westminster, injuring three people. Convicted of two counts of attempted murder and sentenced to life imprisonment, in passing sentence the Judge noted he had acted with terrorist motives.

December

A man stabbed and seriously injured three people in a knife attack at Manchester Victoria station. Convicted of three counts of attempted murder and a terror offence (thought to be Islamist inspired), he was sentenced to life imprisonment in a high-security psychiatric hospital.

2019**March**

A man stabbed and seriously injured one person in the Surrey town of Stanwell. Convicted of attempted murder, his offence was deemed by the judge to be a terrorist act motivated by the cause of white supremacy (i.e. extreme-right wing inspiration).

November

A convicted Islamist terrorist attending an event at Fishmongers Hall in London threatened to detonate a (fake) suicide vest before stabbing five other attendees, killing two. Restrained by members of the public and a plain-clothes police officer, he was shot by police officers on arrival and died at the scene. Daesh later claimed responsibility.

2020**January**

Two prisoners held at HMP Whitemoor (one serving a sentence for Islamist inspired terrorism) stabbed a prison officer and attacked two further members of staff who came to his aid. Judged to be an Islamist inspired terror attack, both were wearing (fake) suicide vests at the time. Since convicted of attempted murder, both had their sentences extended to life imprisonment.

February

A convicted terrorist, recently released on prison licence, stabbed and seriously injured two people in Streatham, London, before being shot dead by police. Daesh claimed responsibility.

June

A man with a knife stabbed and killed three people in a park in Reading, and seriously injured another three. He was convicted of three counts of murder and three of attempted murder in an Islamist inspired terror attack and was sentenced to life imprisonment.

2021

October

Conservative MP Sir David Amess was stabbed and killed while meeting constituents at his regular surgery. Thought to be an Islamist inspired attack, the perpetrator was charged with murder and the preparation of terrorist acts.

November

A passenger in a taxi which had drawn up outside the Liverpool Women’s Hospital detonated an improvised explosive device (IED), killing himself and causing minor injuries to the driver. While motivation at the time of writing remains unclear, the incident was confirmed as an act of terrorism.

- 1.5. Looking to the international context there have been a substantial number of deadly terror attacks in Western nations in the past five years, inspired by both Islamist and extreme right-wing ideologies and, as in the UK, often involving use of a vehicle as a weapon. While the majority of global casualties of terrorism are in conflict-stricken regions across (sub-Saharan) Africa, South Asia and the Middle East, these conflicts have notable implications for how the threat in the UK shifts and presents. Alongside attacks taking place across the West, they can and do act to inspire those seeking to cause harm in the UK.

Figure 3: Selected major terror attacks across Western nations, 2017 – 2021 (not exhaustive)

2017

April

In a shooting on the Champs-Élysées in Paris, France, one person was killed and three injured in a terror attack carried out by an Islamist extremist who was shot dead by police. Daesh since claimed responsibility.

June

The Champs-Élysées was targeted once again as an Islamist extremist deliberately drove a car loaded with guns and explosives into a convoy of Gendarmerie vehicles. The perpetrator died in the attack (there were no other casualties). Daesh again claimed responsibility.

August

A man drove a car into a crowd who were peacefully protesting a ‘Unite the Right’ rally in Charlottesville in the US. Killing one and injuring 35, the attacker espoused extreme right-wing beliefs and his attack was considered terrorism. He was convicted of murder, eight counts of malicious wounding, a hit and run and 29 hate crime charges and was sentenced to two life sentences plus an additional 419 years.

August

A man drove a van into pedestrians in Barcelona, Catalonia, Spain killing 14 people and injuring at least 130 more. After fleeing, he stabbed and killed another person. Several hours later, five men, thought to be members of the same Islamist terrorist cell and wearing fake suicide vests, drove into

pedestrians in nearby Cambrils. They proceeded to stab and kill one person and injure six more. All attackers were shot and killed by police and Daesh claimed responsibility for the attack.

October

In an Islamist inspired terror attack, a man drove into cyclists and runners in New York City in the US, killing eight and injuring eleven others. After crashing he was apprehended by police and later convicted of eight murders, 12 attempted murders, destruction of a motor vehicle and support for a terrorist organization – items indicating allegiance to Daesh were found in the truck.

2018

October

Eleven people were shot dead and a further six wounded in a terrorist attack at a synagogue in Pittsburgh in the US. Inspired by extreme right-wing views including anti-Semitism, the attacker faces charges which carry a maximum penalty of death or 535 years in prison.

2019

March

An extreme right-wing terrorist killed 51 people and injured a further 40 in consecutive terror attacks at two mosques in Christchurch, New Zealand. He live-streamed the first attack on Facebook. Convicted of 51 murders, 40 attempted murders, and engaging in a terrorist act the attacker was sentenced to life imprisonment without the possibility of parole.

April

Armed with a rifle, a man killed one person and injured three others in a synagogue in Poway, California, in the US. Evidence suggests the attacker was inspired by extreme right-wing narratives including those related to anti-Semitism. Apprehended by police, he is charged with multiple offences including several relating to hate crimes and faces the death penalty if convicted.

August

At a Walmart store in El Paso, Texas, in the US a man shot and killed 23 people and injured 23 more. Charged with capital murder, if convicted he will face the death penalty. He is thought to have been inspired by extreme right-wing narratives and associated terrorists.

October

After unsuccessfully trying to enter a synagogue in Halle, Germany, a man fatally shot two people nearby and subsequently seriously injured two others. Deemed extreme right-wing and anti-Semitic terrorism, the perpetrator was convicted of two counts of murder and seven of attempted murder and sentenced to life imprisonment.

2020

February

Targeting two shisha bars mainly frequented by Turkish citizens in Hanau, Germany, a gunman with extreme right-wing beliefs shot and killed eleven people and wounded five others in a terror attack. He then killed his mother, before committing suicide.

September

A man stabbed and injured two people outside the former headquarters of the French satirical magazine Charlie Hebdo in Paris (the site of an Islamic terrorist attack in 2015). Arrested near the scene, he is charged with attempted murder in association with a terrorist enterprise – and admits Islamist motivation. Six others were subsequently arrested in Paris in connection with the attack.

October

An Islamist extremist killed and beheaded a French teacher with a cleaver in Conflans-Sainte-Honorine, a suburb of Paris. He was shot and killed by police minutes later - ten people have since been charged with assisting the attacker.

October

Three people were killed, one of whom was partially beheaded, in a terrorist stabbing in Nice, France. The attacker, an Islamist extremist, was shot by police and taken into custody

November

An attacker armed with a rifle, handgun, and a machete and wearing a fake suicide vest shot at people in six locations across Vienna. He killed four people and injured a further 23, who suffered gunshot and stab wounds. The attacker was shot dead by police at the scene – Daesh subsequently claimed responsibility.

2021**January**

Over two thousand Trump supporters stormed the US Capitol building to disrupt Congress as it gathered to certify Joe Biden's presidential election victory. Entering the Senate chamber and numerous halls and offices, rioters assaulted law enforcement officers, vandalised property and occupied the building for several hours. Many were injured, including over 100 police officers, and five people died (resulting in varying degrees from the attack), including one police officer. Two pipe bombs were found at the nearby Democratic National Committee and Republican National Committee headquarters.

September

Seven people were seriously injured in a terrorist stabbing in a New Zealand supermarket. A known threat and under police surveillance at the time, the attacker was fatally shot by officers when he approached them with a knife. He acted alone but was thought to have been inspired by Daesh.

October

Using a bow and arrow, alongside other weapons, a man killed five people and injured several others in an attack in Norway. The perpetrator was thought to have been radicalised since converting to Islam.

The nature of the current threat in the UK

- 1.6. In 2016, when I conducted my last Review, the immediate concern was of marauding terrorist firearms attacks (MTFAs), seen most recently at that time in Paris in 2015 when a series of coordinated terror attacks in the city killed 130 people and injured over 400 others. While the threat of such an attack remains, the increasing risk of self-initiated attacks with bladed or other types of weapons following self-radicalisation, and the potential for terrorists to make use of CBRN related techniques, requires a diversification in understanding and capabilities which I explore throughout this Review.
- 1.7. As at July 2021, police and security agencies were managing over 800 counter-terror (CT) investigations, involving upwards of 3,000 subjects of interest (SOI).

Islamist inspired terror

- 1.8. The biggest threat in the UK remains that posed by Islamist terrorism. As illustrated in Figure 2, of the 14 attacks carried out in the UK between 2017 and 2021 which can be linked to ideology (i.e. excluding the Novichok poisonings), eleven were known to be perpetrated by Islamist inspired extremists. (This figure excludes the attack outside Liverpool Women's Hospital in 2021 where motivation remained unclear at time of writing). Of the 42 deaths of innocent people caused by those 14 attacks, 41 were at the hands of Islamist perpetrators. And of the 27 terror plots disrupted by police and security agencies over the same period, 18 were Islamist inspired.
- 1.9. Daesh continues to be the main source of inspiration but al-Qa'ida (AQ) and alternative militant Salafi-jihadist groups also have reach into UK communities, seeking to recruit and radicalise. Other Salafi-jihadist groups, including the proscribed terrorist organisation al-Muhajiroun (ALM, some of whose members have pledged allegiance to Daesh) have a physical presence in the UK, as do a number of groups who, while not proscribed as a terrorist organisation, do commonly express extremist and divisive narratives (e.g. Hizb ut-Tahrir, HuT).

The threat from the extreme right-wing

- 1.10. However, the threat from extreme right-wing terrorism is of increasing concern. In 2020/21, numbers of referrals to the Prevent programme prompted by extreme right-wing related concerns outnumbered those prompted by Islamist concerns for the first time - see Figure 4. (Prevent aims to safeguard people from becoming terrorists or supporting terrorism and represents one of the four pillars of CONTEST, the UK Governments counter-terrorism strategy – the others being Pursue, Protect and Prepare⁸).
- 1.11. In the past five years, the UK government has proscribed several groups associated with extreme right-wing narratives, namely National Action, Atomwaffen Division (AWD, also known as National Socialist Order), Sonnenkrieg Division (SKD), Feuerkrieg Division (FKD) and most recently The Base. As reflected by MI5 Director General Ken McCallum in his 2021 annual update, extreme-right-wing cases now comprise a substantial minority of the risk with around one in five counter-terrorist investigations associated with such ideologies. This is mirrored across the West – the latest Global Terrorism Index report⁹ noted the jump from one recorded far-right terrorist attack in 2010 to 49 in 2019. In that year alone, 89 deaths were attributed to far-right terrorists, 51 of which resulted from the Christchurch mosque attacks in New Zealand. In McCallum's words, 'extreme right-wing terrorism is here to stay'.

Other threats

- 1.12. Increasing tensions in Northern Ireland in 2021 led to significant outbreaks of violence and public disorder. Driven by a complex range of factors, not least of which is a by-product of Britain's exit from the European Union following the 2016 Referendum, the situation in Northern Ireland remains fragile with related terrorism a serious threat, particularly in Northern Ireland itself.

⁸ [CONTEST 3.0 \(publishing.service.gov.uk\)](https://www.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/978427/contest-3-0.pdf) (accessed 16/08/21)

⁹ Institute for Economics & Peace. Global Terrorism Index 2020: Measuring the Impact of Terrorism, Sydney, November 2020. Available from: [http://visionofhumanity.org/reports](https://www.visionofhumanity.org/reports) (accessed 15/08/21).

- 1.13. The threat posed by left wing, anarchist and single-issue terrorism equally remains and cannot be ignored. The concerns posed by actors operating in these spaces adds to the complexity of the threat picture being managed by the police and security agencies, diversifying the range of challenges and situations for which they must understand and prepare.
- 1.14. The past five years have seen the emergence of threats which lack clear ideological roots. Latest data from Prevent show numbers of referrals demonstrating a 'mixed, unclear and unstable ideology' (MUU) are growing. In 2020/21 and 2019/20 they comprised half of all Prevent referrals, up from 38% in 2018/19 (see Figure 4).
- 1.15. Understanding how to manage MUU risk is in its infancy but there is evidence among the cohort of an affinity with and fixation on both school massacres and 'incel' culture (i.e. 'involuntary celibate', a largely online subculture focused on members' perceived inability to find romantic or sexual partners and an associated deep hatred of women.) The perpetrator responsible for the first UK mass casualty shooting since 2010 (August 2021) had expressed sympathy for the incel movement, provoking consideration of whether his attack was in fact motivated by intent to further an ideological cause, i.e. terrorism. If the notion of incel-inspired terrorism is ultimately accepted in the UK as it has been in Canada¹⁰, there will be implications for the scope of those cohorts of individuals deemed to pose a terrorist risk.

Figure 4: Type of concern among those referred to Prevent, 2016/17 – 2020/21¹¹

Concern	2016/17		2017/18		2018/19		2019/20		2020/21*	
	n	%	n	%	n	%	n	%	n	%
Islamist	3,704	61	3,197	44	1,404	24	1,487	24	1,064	22
Extreme Right-Wing	968	16	1,312	18	1,388	24	1,387	22	1,229	25
Other	725	12	826	11	776	14	210	3	100	2
Mixed, unstable, or unclear	696	11	1,983	27	2,169	38	3,203	51	2,522	51
Total	6,093	100	7,318	100	5,737	100	6,287	100	4,915	100

*Total referrals in 2020/21 fell 22% compared to 2019/20 and represent the lowest number received since comparable data are available (year ending March 2016). This is likely to be due to effects of public health restrictions in place throughout the year to control the spread of Covid-19.

- 1.16. **From a protection and preparedness perspective, the potential for women, and by extension women only spaces, to be violently targeted by an individual seeking to further an incel-inspired cause, should be assessed. Those who own and manage such**

¹⁰ In 2020, Canada brought its first charge of 'incel-inspired' terror against a man charged with fatally stabbing a woman. The attack was deemed by police to have been motivated by an extremist ideology.

¹¹ [Individuals referred to and supported through the Prevent Programme, April 2020 to March 2021 - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/94444/Individuals_referred_to_and_supported_through_the_Prevent_Programme_April_2020_to_March_2021_-_GOV.UK.pdf) (see Table 6 in data tables, accessed 18/11/21)

spaces should consider seeking CT advice regarding protective measures (R2) – the training and guidance provided by the MPS as well as the Security Industry Authority (SIA), referred in chapters 4 and 18, could be usefully deployed for this purpose.

- 1.17. Then there is the potential for an attack of the kind perpetrated in Salisbury in 2018, i.e. one deploying Chemical, Biological, Radiological or Nuclear (CBRN) weapons. In that instance, while a hostile state act rather than terrorism per se (see paragraph 1.4) Novichok ended up killing a member of the public and causing significant, but non-fatal, harm not only to the individuals targeted, but also to those involved in the response and others. Access to such nerve agents is complex and likely to be facilitated by state intervention.
- 1.18. This does, however, mean that the UK more widely must be prepared to consider the possibility of hostile state-sponsored acts on its soil – with all the implications of the associated resource which such actors have at their disposal. As Salisbury demonstrated, even in the event of very targeted action (rather than a more indiscriminate attack), the devastation wrought, and the disruption caused can be very widespread.
- 1.19. It is of course not only nerve agents such as Novichok which pose a threat, and not only state actors capable of utilising such weapons¹². Other types of CBRN materials may be more readily available for those with malign intent who know where to look, offering potential to cause very significant public chaos and fear, economic damage and, of course, significant injury (fatal and otherwise). In considering preparedness, therefore, thought must be given to the capital's capacity and capabilities deployable in the event of a CBRN attack. Covid-19 showed how quickly what we consider to be our normal way of life can be disrupted with widespread lockdowns, social distancing and long-term economic consequences. This may mean that terrorists will consider the threat or use of CBRN agents to be an increasingly attractive proposition.
- 1.20. Substance-based attacks (e.g. those using acid) rose across the UK in the past decade with the majority perpetrated in London¹³, although here numbers have been falling since a peak in 2017¹⁴. Able to inflict very significant, often permanent and life-changing injuries very quickly, the potential for acid or other caustic materials to be utilised by those motivated by terrorist intent is ever-present. As such, thought must also be given to the capacity and capabilities particularly of the emergency services to ensure they are prepared to respond appropriately to the needs of those targeted by such material (see chapter 6).
- 1.21. The deliberate use of fire a weapon (FAW) within a wider marauding terrorist attack (MTA, see chapter 4 on London's Police and 6 on the LFB) is also being promoted within terrorist literature seeking to incite attacks. In response, the Centre for the Protection of National Infrastructure (CPNI), with support from the London Fire Brigade (LFB)¹⁵ has recently developed

¹² [Tony Blair: Speech at the Royal United Services Institute for Defence and Security Studies \(RUSI\) | Institute for Global Change](#) (accessed 08/09/21)

¹³ [ASTI | A worldwide problem](#) (accessed 01/02/22)

¹⁴ [Acid attacks in London 2019 | Statista](#) (accessed 13/10/21)

¹⁵ Led by CPNI in partnership with the Home Office (HO), National Counter Terrorism Security Office (NaCTSO) and the National Fire Chiefs Council (NFCC).

guidance aimed at those responsible for fire safety in a range of settings, to support mitigating actions.

- 1.22. Informed by analysis of previous MTAs involving the use of FAW this sets out a series of considerations for site safety and security planning, including the need to engage with relevant stakeholders and undertake comprehensive risk assessments. This is very welcome – fire and smoke inevitably make responding to an already challenging and complex situation all the more difficult. The ways in which fire might be used in support of terrorist aims are set out in Figure 5 – all have been utilised (or intended to be utilised) in planned or actual terrorist attacks (for example, the perpetrator of the attack against the mosques in Christchurch in 2019, see Fig. 3. Intended to use petrol to augment his firearms attack).

Figure 5: Fire as a Weapon¹⁶

Purposes of deployment
<p><i>Distract</i> – security officers and others, allowing attackers to enter a building.</p> <p><i>Augment</i> – harm caused via use of additional attack methods (bladed weapons, firearms etc).</p> <p><i>Evacuate</i> – potentially large numbers of people to create a target through formation of crowds.</p> <p><i>Disrupt or delay</i> – emergency responders from confronting attackers, carrying out lifesaving operations and extinguishing the fire.</p>
Hazards
<p><i>Fire</i> – people may evacuate into further danger or become trapped: the emergency services must firefight in parallel with rescuing victims and neutralising attackers, in a contracting timeframe.</p> <p><i>Smoke</i> – can cause rapid asphyxiation, disorientation, sickness, and death. Obscuring vision, it can hamper evacuation and cause widespread confusion.</p> <p><i>Speed and spread</i> – fire and smoke can spread rapidly across a wide area, particularly if an accelerant is used. This increases the size of the area which must be contained.</p> <p><i>Confusion</i> – fire, smoke and the continuous sounding of fire alarms will exacerbate confusion caused by an attack. FAW is likely to complicate response command, control and coordination.</p> <p><i>Compromised escape</i> – attackers may attempt to hinder evacuation by blocking egress routes, further complicating rescue attempts.</p> <p><i>Multiple threats</i> – responders will need to identify the whereabouts of attackers to neutralise the threat but the need to contain a fire in parallel will complicate prioritisation decisions.</p> <p><i>Emergency Service response</i> – emergency service vehicles may be targeted with petrol bombs or other incendiary devices on arrival at the scene.</p>

¹⁶ Adapted from [Fire as a Weapon Edition 1 FINAL.pdf \(cpni.gov.uk\)](#) (accessed 11/11/21)

Key changes in the wider context

- 1.23. While 2019 heralded the fall of the last remnants of Daesh's so-called 'caliphate' across Iraq and Syria, the threat of Islamist terrorism posed by the group and its like remains. As conflict continues to rage in Syria, consequent downstream influence continues in the UK: close to 1,000 UK-linked extremists have travelled with intent to join the group. Many have since sought to return to the UK, likely retaining extremist views and a wealth of new experiences and contacts.
- 1.24. The very rapid fall of Afghanistan to Taliban control following withdrawal of Western troops in 2021 further shifts the threat landscape. The country risks once again becoming the safe haven for Islamist terrorist groups it was considered to be pre-9/11. If greater permissions are afforded to AQ or other groups under Taliban rule, the resilience of (transnational) jihadist networks is likely to be boosted. Any associated expansion in capabilities for attack planning and production of terror glorifying propaganda (see below) - bolstered by messaging afforded by the fact of the Taliban essentially outlasting Western forces in the region - may affect the UK threat. Similarly, if Afghanistan tacitly or directly permits the establishment of terrorist training camps, there is a risk of UK citizens seeking to travel for training to conduct attacks elsewhere. From a public perspective, a poll in August 2021 showed almost two-thirds (64%) of the British public believe the Taliban gaining control of Afghanistan will increase the threat of terrorism within western countries¹⁷.
- 1.25. The prominence of jihadist groups elsewhere - most notably but not limited to Daesh, AQ and affiliates - across south and south-east Asia, the Middle East and North Africa (MENA) region, and increasingly across parts of Western and sub-Saharan Africa, shows no sign of abating. Regional branches of Daesh and AQ have their roots in Jihadist groups focused on local conflicts and other Jihadist groups from around the world may pledge allegiance to Daesh or AQ to gain notoriety and share resources. After Iraq and Syria, Nigeria features most commonly in Daesh propaganda output, as Daesh's West Africa Province (ISWAP, Daesh's West Africa branch) gains in strength. ISWAP's propaganda is also diversifying in focus, including, for example, material portraying the group as capable of governing nations alongside the more usual celebration of attacks and rallying of fighters.
- 1.26. The incitement of violence within African nations and across the West thus continues apace. Propaganda regularly calls for supporters to take action where and when they can, using whatever means possible, and hailing the 'success' of those who do. Events in Afghanistan, and attacks perpetrated by jihadist groups the world over, may well be co-opted to inspire groups and individuals in the UK and beyond to violent action.
- 1.27. Elsewhere, polarised views have increasingly become more mainstream – seen for example in the aftermath of the EU Referendum, during the General Election in 2019 and in response to Covid-19 and its lockdowns, masks, and vaccinations. This phenomenon is not of course confined to the UK. It is manifesting elsewhere and large movements, particularly across

¹⁷ [Daily Question | 17/08/2021 | YouGov](#) (accessed 23/08/21)

Europe and the US, have sought to bring more extreme political positions and views into the mainstream. Some have spilled over into violence (e.g. the 'yellow vests' protests in France in 2018 and more recently the 2021 riots at Capitol Hill in the US).

- 1.28. In online spaces, it is controversial content and views which spread faster and gather more attention than less provocative material¹⁸: disagreement spreads posts faster and further than agreement, effectively incentivising polarisation. Societal divisions and grievances which polarisation can exacerbate can thus lend themselves to exploitation by those seeking to radicalise others and mobilise violence.
- 1.29. And online environments, now an integral part of daily life for most people, facilitate that exploitation. For people vulnerable to such influence, it is all too easy to be drawn into online spaces characterised by rhetoric whipping up hatred against others, where propaganda of all kinds which glorifies violence and incites terrorist action is all too accessible. Then there are the extremist views and material shared, often anonymously, which do not breach legislation or terms and conditions governing use of individual platforms. They have the same cumulative effect on those who may be susceptible, but because they fall (just) over the line into what is permissible cannot be removed.
- 1.30. The new national iREPORTit app, created and funded through a City Hall initiative, is a welcome response to the proliferation of online terrorist and extremist content. Free to download, it allows individuals to anonymously report such content to the Counter Terrorism Internet Referral Unit (CTIRU). Run by the MPS, the CTIRU works with platforms to identify and bring to their attention content which breaches their terms of service, requesting that they remove it on a voluntary basis. Early indications are that the iREPORTit app increased the number of referrals to the CTIRU, suggesting it is an effective mechanism to both tackle harmful content and increase public awareness of the threat. The extent to which there is widespread awareness of the app, though, is unclear. **The MPS should consider more actively promoting the iREPORTit app and piloting a desk-top version, or consider developing a complementary website, to broaden accessibility** (R3).
- 1.31. The nature of the digital environment and the business models adopted by many platforms facilitate the creation and dissemination of propaganda and extremist narratives at pace and scale, appealing to sympathisers and drawing in the vulnerable. It is not only the content in itself which is problematic (although that is exponentially increasing in volume) – the dependence of online platforms on algorithms to recommend material to users means that very quickly an individual can move from viewing relatively innocuous content to being exposed to increasingly extreme material¹⁹.

¹⁸ Jasser, J., Garibay, I., Scheinert, S. & Mantzaris, A.V. (2021). Controversial information spreads faster and further than non-controversial information in Reddit. *Journal of Computational Social Science*. <https://doi.org/10.1007/s42001-021-00121-z> (accessed 06/09/21)

¹⁹ See for example [The Making of a YouTube Radical - The New York Times \(nytimes.com\)](https://www.nytimes.com) (accessed 28/01/22); Ribeiro, M.H., Ottoni, R., West, R., Almeida, V.A.F., Meira, W. *Auditing radicalization pathways on YouTube*. Proceedings of the 2020 Conference on Fairness, Accountability, and Transparency, January 2020 Pages 131–141

- 1.32. The impact of propaganda must not be underestimated. Radicalising material was accessed by most, if not all, perpetrators of terror attacks in the UK and elsewhere over the past five years²⁰. Alongside glorifying terrorism and terrorists, it incentivises engagement and promotes attack methodologies. A majority of these do not need high levels of skill or resource which means that the barriers for entry to action are low (see Figures 2 and 3).
- 1.33. Prompted in part by the 2017 UK attacks, live-streaming of attacks elsewhere (most notably the attacks in Christchurch in 2019) and publication of (extreme right-wing inspired) hate-filled ‘manifestos’, as well as continued production and dissemination of propaganda issued by official and unofficial media arms and supporters of Islamist terror groups, there have been significant efforts across government, industry and civil society to tackle terrorist content online.
- 1.34. Many platforms have adopted automated technology to detect and remove content and the Global Internet Forum to Counter Terrorism (GIFCT), founded in 2017 by Facebook, Microsoft, Twitter and YouTube (now an NGO headed by an Executive Director), brings together a diverse range of partners to counter its spread through sharing best practice and evidence, and developing cross-industry strategies. The battle to identify and remove terrorist content, however, remains, meaning its power to influence and radicalise remains a substantial part of the terrorist threat.
- 1.35. Indeed, Ofcom has found that around one in 11²¹ users of video-sharing platforms reported seeing radicalising or terrorist content in these spaces (16% of users reported material which encouraged violence towards others, 21% racist content, and 26% material encouraging hate). This is not surprising – Covid-19 lockdowns saw a significant rise in extreme right-wing and Islamist propaganda online (often via decentralised systems, adding to removal challenges), and in parallel, people spent more time, often alone, online - with educational establishments, workplaces, entertainment and community spaces closed²². During 2020, people in the UK spent an average of 3 hours 37 minutes a day on smartphones, tablets and computers (nine minutes more than in 2019)²³. For children, the figure was higher: 7- to 16-year olds estimated they spent 3 hours 48 minutes a day online²⁴. And young adults reported heavy use of social video. During the spring 2020 lockdown, nearly three-quarters of 15- to 24-year-olds said they watched content every day.

<https://doi.org/10.1145/3351095.3372879> (accessed 28/01/22); [Digital Technology and the Resurrection of Trust \(parliament.uk\)](#)

²⁰ See for example

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/776162/HC1694_The2017Attacks_WhatNeedsToChange.pdf (accessed 16/08/21)

²¹ Source: Ofcom, Video-sharing platform usage & experience of harms survey 2021. Q4. *Which, if any, of the following do you remember seeing or experiencing when using [VSP] in the last 3 months?* Base: used at least one VSP in the past 3 months, n=1,958.

²² See Miles Comerford’s contribution to the [GTI-2020-web-1.pdf \(visionofhumanity.org\)](#) (accessed 09/08/21)

²³ [Online Nation 2021 report \(ofcom.org.uk\)](#) (accessed 17/08/21)

²⁴ CHILDWISE Monitor Report 2021, fieldwork September 2020 to November 2020 <http://www.childwise.co.uk/>

- 1.36. It is reasonable to assume that while isolated at home, individuals potentially vulnerable to radicalising narratives may have seen or engaged with extremist content on video-sharing platforms and in other forums and spaces. Existing consumers of polarising propaganda may have become more deeply immersed, risking hardening of extremist views. While longer-term consequences have yet to manifest, the risks posed by such material are not going away. The government's Online Safety Bill will impose a duty of care on companies towards their users (overseen by an independent regulator). It remains to be seen how effective this will be in holding them to account for tackling illegal activity and harmful content on their platforms.
- 1.37. Online spaces have also heralded a change to the way threat manifests. The coordinated, group-based planning which characterised threat and attacks several years ago has been overtaken at least for the time being by 'self-initiated' (previously 'lone actor') terrorism. Now, individuals may be affiliated with, or inspired by, a particular ideology but not belong to an associated group or cell, complicating pre-attack identification of both individuals and plans. Indeed, Europol's Trend Report²⁵ notes all terror attacks across the EU in 2020 were carried out by lone actors (whereas disrupted plots mainly involved multiple suspects) and reminds us that Daesh and al-Qaeda continue to overtly incite lone-actor attacks in Western countries. Such actors, intent on terrorism of all kinds, can be very quick to mobilise, limiting opportunity for disruption in advance of them taking action.
- 1.38. Mental health needs increasingly characterise terrorists and those under live investigation, (which complicates processes to determine if an individual represents a CT threat). Perpetrators of attacks in London and elsewhere in recent years have histories of contact with mental health services and such needs are increasingly being seen among individuals referred to Prevent (42% of referrals nationally have multiple and complex issues, with 81% of those categorised as high concern assessed as having complex needs). And returning to the increasing threat from self-initiated terrorists, there is some evidence to suggest they are more likely to be suffering mental ill health than their group-based counterparts²⁶. And the Covid-19 pandemic has done nothing to stem already increasing rates of mental health concerns among the population as a whole. It is widely recognised that periods of lockdown limited activities known to be beneficial for mental health, decreasing opportunities for social integration and increasing feelings of isolation and loneliness for many. Given that such experiences and feelings can act to create or heighten vulnerabilities to radicalising influence, coupled with increasing time online it is not unreasonable to expect that those already vulnerable may have become more so (see also chapter 2).
- 1.39. A final consideration is prison. Not only is there a risk that while in custody terrorists further develop their skills and extremist networks, prison can also be a place where hitherto non-terrorist offenders are vulnerable to influence. One of the perpetrators of the attack committed inside HMP Whitemoor in 2020, for example, became radicalised while in custody. And the attacks at Fishmongers Hall (2019) and in Streatham (2020) demonstrate the very

²⁵ Europol (2021), European Union Terrorism Situation and Trend Report, Publications Office of the European Union, Luxembourg.

²⁶ Corner, E. & Gill, P. (2014). A False Dichotomy? Mental Illness and Lone-Actor Terrorism. *Journal of Law & Human Behavior*.

substantial risk posed by unrepentant, unrehabilitated terrorists released from custody. Of the 59 offenders in prison at the end of March 2020 with their main offence under the Terrorism Act (2000), 11 were due to be released by the end of March 2021 and a further 30 by the end of March 2025²⁷, which will inevitably represent a burden on the police, probation and security agencies.

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https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/902692/FOI_200528004_Prison_population_-_Terrorism_Act_2000_table_ods

2. THE LONDON DYNAMIC

The context

- 2.1. Since my previous review of the capital's preparedness for a terror attack, the country - particularly London - has experienced an unprecedented number of terror attacks inspired by both Islamist and extreme right-wing ideologies, Britain has left the European Union (EU), and is now emerging from a global pandemic. These events have exerted significant impacts in different ways on the way London operates as a hub for residents, workers and visitors.
- 2.2. Having borne the majority of the terror attacks in the UK since my previous Review, London continues to bear a disproportionate share of the UK terrorist threat - approximately 60% of the current CT caseload managed by the police and security services is London based. A disproportionate number of convicted offenders considered a terrorist risk are resident in and subject to management in London, and the capital also manages a disproportionately high Channel caseload²⁸. A key part of the Prevent programme (see chapter 7), Channel provides elevated levels of support to individuals particularly vulnerable to being drawn into terrorism.
- 2.3. And London is likely to be the intended destination for many UK citizens (and their families) wishing to return to the country following travel overseas to train, join and fight for terrorist groups such as Daesh. In such cases, the risk that individuals retain extremist views and a wealth of related experiences and contacts is likely to be high, requiring considerable proactive management.
- 2.4. In terms of London as a destination more widely, what attracts visitors also makes the city an attractive target for terrorists. Offering an unparalleled mix of globally iconic buildings and spaces, a hugely diverse culture and a strong economy, London remains one of the top three most visited cities in the world. In an average year, the city welcomes over 25 million visitors through its various airports, rail stations and Eurostar terminal and its resident population continues to grow. Latest data (mid-year estimates from 2020²⁹) put this at just over 9 million for the first time, a rise of 0.45% on the previous year. While a rise lower in magnitude than might have been expected were it not for Covid-19, and following an initial fall over the first full year of the pandemic, London's population has likely resumed growing, albeit at a slower rate than before the pandemic³⁰. Although the pandemic is not over, so implications for population remain uncertain to some degree, the capital is likely to continue to remain a draw over the medium to longer term.

²⁸ [Individuals referred to and supported through the Prevent Programme, April 2020 to March 2021 - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/94444/Individuals_referred_to_and_supported_through_the_Prevent_Programme_April_2020_to_March_2021_-_GOV.UK.pdf) (accessed 10/09/21)

²⁹ <https://data.london.gov.uk/dataset/londons-population> (accessed 10/09/21)

³⁰ See [Population change in London during pandemic UPDATE Feb2022.pdf \(airdrive-secure.s3-eu-west-1.amazonaws.com\)](https://www.amazonaws.com/Population_change_in_London_during_pandemic_UPDATE_Feb2022.pdf) for discussion (accessed 01/03/22)

- 2.5. London also continues to be one of the world's leading financial centres. Recent data³¹ positions it second only to New York, and as the only European centre in the top five (Frankfurt and Zurich sit ninth and tenth respectively) it is clear that, despite its departure from the EU and the pandemic, the capital so far remains a significant draw for major financial institutions and workers from around the world. It is also considered a leader in terms of fintech (technology-enabled financial innovation), coming fifth³² in the most recent global rankings where access to finance, the availability of skilled people and ICT infrastructure were the top three considerations.
- 2.6. Thus, as home to and a destination for millions of people for work and leisure, and as the seat of much of the country's legislative, economic and ceremonial power and influence, London continues to remain a target for terrorism. An attack in London, irrespective of precisely where, guarantees global coverage for whatever twisted cause and / or group a perpetrator(s) seeks to further and risks undermining that which makes the city what it is. Certainly, the number of tourists visiting London attractions fell below average during 2017³³ and estimates based on losses associated with previous terror attacks suggest the five that year (across London and Manchester) potentially led to a fall in economic output of around £3bn³⁴.
- 2.7. The fictional scenarios described in Figure 6 (devised for this review by Pool Re³⁵ and based on previous terror attacks and attempts) show how the impact and monetised costs (note these are limited to those associated with business and infrastructure damage, and business interruption) of just one terror attack in London can be very significant indeed. The extent of costs vary widely according to the methodology employed, the target(s) and the number of casualties.

Figure 6: Illustrating the costs of terrorism in London using a range of fictitious scenarios

Two Islamist extremists target a large shopping mall, 2pm Saturday:

How: Wearing imitation suicide vests, they attack shoppers with bladed weapons and enter restaurants and shops targeting patrons. Armed police arrive in five minutes, shooting and killing both perpetrators.

Primary impact: Ten people killed and a further 35 injured, including panic related crush and fall injuries. The mall is closed for the weekend. The nearby train station is evacuated but reopens later that day, with some minor disruption to local public transport. Parts of the mall reopen on Monday,

³¹ Wardle, M. & Mainelli, M. (March 2021). *The Global Financial Centres Index 29*. Long Finance and Financial Centre Futures.

³² Ibid.

³³ [ALVA | Association of Leading Visitor Attractions](#) (accessed 19/08/21)

³⁴ [The cost of terrorism in Europe | RAND](#) and [Terror attacks cost the UK economy £3bn last year, new research shows | The Independent | The Independent](#) (accessed 19/08/21)

³⁵ Based on bespoke actuarial calculations and modelled scenarios provided by Pool Re, who enable the UK insurance market to underwrite terrorism risk to commercial property. Figures and assumptions all peer reviewed by appropriate counter-terrorism and academic experts. Costs include those associated with physical damage and business interruption only: they **exclude** potential liability costs and any medical costs, legal and punitive damages associated with injury and loss of life.

but areas affected by the attack remain closed for five days, causing significant business interruption. Some limited damage to furniture and fittings, and some stock wastage.

Secondary impact:

No long-term impact on affected enterprises' balance sheets but some short-term wider economic impact with local shopping traffic depressed for several weeks after the attack.

Costs: < £2M

A self-radicalised extreme right-wing extremist targets a market, 11am Saturday:

How: Following hostile reconnaissance, an improvised explosive device (IED) made from off-the-shelf materials is left by market stalls. The small blast five minutes later causes significant fragmentation.

Primary impact: Four people die from blast and shrapnel injuries and a further 30 are injured. Several stalls are destroyed, and nearby shops suffer extensive though superficial damage. A large amount of stock is ruined. The market is closed for the rest of the weekend. The crime scene cordon is lifted on Monday, although repair work continues for a couple of weeks. There is no disruption to local rail services, but road traffic is temporarily re-routed.

Secondary impact: Some businesses cease trading due to death of owners and uninsured loss of capital stock. Other street markets in London close for several days as police conduct a threat assessment.

Costs: > £3M

A lone extreme right-wing extremist with bomb making expertise targets a central London nightclub, 11pm Friday:

How: A medium-sized vehicle fitted with an IED is parked on a road adjacent to the nightclub. The bomb detonates five minutes later.

Primary impact: The blast kills 80 people and injures over 500. Immediate infrastructure damage hinders emergency services access. Adjacent buildings are so badly damaged they must be demolished and those close by require substantial repair. Many vehicles are destroyed or damaged. Significant business interruption following rescue, investigation and reconstruction work. Some immediate disruption across London although public transport is largely unaffected.

Secondary impact: Many iconic local businesses cease trading due to losses. Significant long-term disruption in the area due to reconstruction work. A dip in tourism and inward investment.

Cost: £50M

A group of Islamist extremists target the financial district in a chemical attack, 11am Tuesday:

How: Coercing a transport company employee, the attackers acquire an articulated truck towing 18t of liquified chlorine. Removing its hazard signage and branding, they drive it into the centre of the financial district and leave the area. A peroxide-based charge on the tanker hull detonates, releasing pressurized liquid chlorine. A chlorine cloud blows into the main square and incites panic.

Primary impact: Fifty people die from gas exposure and over 500 more are injured, many severely. Principal buildings are engulfed, and the gas persists at surface level for some time. It persists for

longer below ground – the nearby underground station is closed along with large sections of the lines running through it. There is limited physical damage, but a major clean-up operation is required to disperse remaining gas pockets. The area is effectively closed for several days, causing significant business interruption.

Secondary impact: The attraction of London's financial centre reduces with tourism and inward investment falling in the medium term. Many are deterred from commutes and office working.

Cost: > £10M

- 2.8. The diverse mix of nationalities and cultures enriches life in London, ensuring it remains one of the most cosmopolitan cities in the world. With this comes, however, the need for communities to co-exist in harmony and to feel connected to the city as a whole. Terrorism thrives on division, and those who seek to radicalise exploit concepts of 'otherness' and notions of 'in-groups' and 'out-groups'. Where these efforts succeed, where individuals and communities are turned against one another, cohesion is diminished - and threat rises.
- 2.9. To understand and manage the risk of community tension and related threats it is crucial for police and other agencies, including local authorities, to have reach into communities within London. Trusted relationships with civil society organisations and community leaders, including religious authorities, are key to this and to ensuring communication and information sharing is two-way. In the event of any incident where lives are at stake the police and other agencies must be able to engage communities to understand reactions and fears, to reassure and, crucially in the case of terrorism, to help manage risk of subsequent planned, copycat or retaliatory attacks. I consider these issues further in chapters 4, 7 and 19.
- 2.10. These relationships can be affected by other issues that impact on community cohesion. Since 2016, for example, the Windrush scandal, the Grenfell fire, the Black Lives Matter (BLM) movement, and, of course, the pandemic have all affected different communities in different ways. Experiences may have done little to encourage trust in, and engagement with, the police and other authorities – particularly where history has done little to engender that trust. It is vital, therefore, that building relationships across all communities continues to be a priority for police and authorities with lead roles to play in risk and threat management – this is likely to be exacerbated as the capital emerges from the pandemic (see below).
- 2.11. The diversity of London's communities also means the city is host to a large number of diverse places of worship. These havens for peace and reflection can represent very large gatherings of people who, simply by virtue of their shared faith, can become targets for terrorists and worldwide, places of worship are increasingly becoming so. By extension, faith, or religious schools (including madrassahs) and cultural institutions may also be vulnerable – many of the largest of these operate in London. And, of course, then there are those public events marking religious festivals and other important dates in faith calendars which may equally represent a target. I return to issues related to places of worship in chapter 19.

The Protect Duty

- 2.12. The Government has accepted the principle of Martyn's Law (see Figure 7) and, in early 2021, the Home Office (HO) launched a consultation seeking views on how the public can be better protected from terrorist attacks (the 'Protect Duty'). This would broaden the emphasis from a historical focus on how people can be prevented from being drawn into terrorism to defensive measures designed to counter and / or mitigate the threat and impact of terrorist attacks.

Figure 7: Martyn's Law

Martyn Hett was one of 22 people who lost their life in the bombing of Manchester Arena in 2017. Visiting a theatre a year later Martyn's mother, Figen Murray, expected to see stringent security checks in place by way of learning from the abject failures which enabled the horrific terrorist attack which claimed her son.

Instead, she found very little changed and this became the catalyst for her campaign to enshrine in law a requirement for every venue and public space to install appropriate, risk-based security procedures to protect those working, visiting and passing through.

Her campaign came to be known as 'Martyn's Law' in honour of her son and all those who lost their lives before and since at the hands of terrorists, and is now encapsulated by the Government's proposed Protect Duty.

- 2.13. The attack at Manchester Arena in 2017 shone a light on the need to clarify what constitutes a public space, who is responsible for that space, and what their protective responsibilities should be. Now referred to as 'Publicly Accessible Locations' (PALs, formerly 'crowded spaces / places'), under the proposed Protect Duty owners and operators of PALs would be legislatively required to consider and where necessary adopt protective security measures. Defined as any place to which the public or any section of the public has access, it has been suggested that the Duty might apply to any PAL with a capacity of 100 or more, or any business employing more than 250 people that operate PALs. The latter is likely to include entities operating multiple outlets (such as shops and restaurants) – and along with other criteria, will bring into scope potentially over 900 places across London – including places of worship and surrounding spaces.
- 2.14. Each PAL ultimately subject to the Duty will require advice and support to enable compliance and installation of protective measures where necessary. For London, this means a wide variety of spaces and places in scope, including upwards of 35 stadia and numerous routes to places of interest which lend themselves to congestion (e.g. approaches to the museum estate at South Kensington, and to Wembley stadium). It will also draw in places commonly a focus for protests and marches in the capital (e.g. Parliament Square, Trafalgar Square and Whitehall), which remains a natural congregation point for demonstrations drawing supporters from across the UK. Recent activity has included rallies related to the pandemic (e.g. lockdowns, vaccinations, masks), the BLM movement, Extinction Rebellion and concerns around violence against women and girls, as well as a wide range of smaller demonstrations. A total of 548

such protests and similar activity required a police presence between January and October 2021.

- 2.15. While protective security considerations are likely to confer wider safety and security benefits alongside those related to counter-terrorism (e.g. reduction or deterrence of crime and antisocial behaviour), realising them may well require additional investment from owners and operators of PALs. The Duty will also increase the number of businesses and organisations in scope for expert advice on protective security. Led by the Metropolitan Police Service (MPS) for London and their cadre of highly trained CT Security Advisers (CTSAs), CT Protect Officers (CTPOs) and CT Awareness Advisers (CTAAs), this is likely to increase pressure on a small function which already experiences retention challenges due to higher salaries offered elsewhere for its sought-after skills.

The Covid-19 pandemic

- 2.16. While central London is seeing a gradual return of workers and visitors following the lifting of pandemic lockdowns and restrictions, numbers have not yet returned to pre-pandemic levels and continue to fluctuate with respect to ongoing changes in infection rates and risk. Many of those living in the capital or commuting in for work continue to work from home on a regular basis, meaning the traditional notion of 'rush hours' at the beginning and end of the working day has to some degree shifted. Passenger numbers on some parts of the transport network at particular times have reduced, large offices remain quieter than previously and footfall in some traditionally busy parts of the city is lower.
- 2.17. It is too soon to know whether this reflects a permanent shift, but any displacement of people potentially expands the scope of places at risk. London boroughs outside the centre are likely to see people congregating in larger numbers in parks, markets, high streets and other local venues, rather than travelling into the centre of the city as they may have done pre-pandemic.
- 2.18. And while very welcome, the visible hardening of many of London's iconic sights and places may in parallel encourage displacement of attention of would-be terrorists to such outer boroughs. This does not, of course, diminish the risk of central targets – irrespective of crowds, these iconic buildings and spaces will remain attractive to would-be terrorists. Since my previous Review, I have been pleased to see hostile vehicle mitigation barriers erected on the eight central London bridges although note that the process of replacing the temporary measures with more permanent solutions in keeping with engineering, design, aesthetic and environmental constraints has yet to be completed. This should be resolved as swiftly as possible (see chapter 3).
- 2.19. Across the capital, as elsewhere, outdoor living and pavement hospitality are increasing. As with other post-pandemic shifts it is too soon to know whether this will remain (particularly through the winter months) but nonetheless, while more tables are placed beyond traditional premise boundaries, this effectively expands the perimeters of spaces which businesses and others responsible for pavements and pedestrianised areas will need to consider from a security perspective (see chapter 17).

- 2.20. This brings associated challenges. Not only are security considerations unlikely to be a priority for a public desperate to resume 'normal life', they may well not be uppermost in the minds of cash-strapped businesses mindful of the need to also invest in Covid-secure premises. This coincides with a probable loss or dilution of security skills and experience following staff furloughs and redundancies: businesses across the capital will need to be incentivised to reinstate knowledge and protective measures. Meaning further pressure on the MPS' CTSA function to provide widespread security related guidance and training.
- 2.21. The advent of Covid-19, and the associated shift for many to working from home seems also to have had an impact on the housing market. People across the UK have moved out of cities in search of more space, and particularly for those in and around London who are no longer tied to the capital for work, for more affordable housing. The extent to which this movement is permanent remains to be seen, but if the trend does not reverse, it may have implications for recruitment into and retention of officers and staff within London's emergency services.
- 2.22. More broadly, the post-Covid economic slowdown risks exacerbating existing inequalities and associated frustrations, anger and grievances which are so often co-opted by terrorist recruiters and those seeking to incite violence. As the country was in the grip of the pandemic, community tensions rose as groups blamed others for the virus and encouraged adherents to engage in activities designed to spread Covid-19 among particular communities³⁶. While overall recorded crime in London (MPS plus City of London) fell between 2019/20 and 2020/21 by around 18 per cent, hate crime rose by over nine per cent.³⁷
- 2.23. The importance of formal counter-terrorism activity being underpinned by wider community and societal activity cannot be underestimated. Community tensions and other grievances – resulting from real or perceived injustices and disparities both Covid-19 related and otherwise – risk fuelling frustration and anger among individuals. In some cases, this can create vulnerabilities to radicalising rhetoric from those seeking to capitalise on feelings of alienation and discrimination. A pre-existing ideological driver is not always necessary - such rhetoric can simply provide a hook for an individual to attach an existing sense of frustration and anger.
- 2.24. The pandemic has in some places facilitated a very positive building and strengthening of relationships between local partners, with some evidence of increased cross-agency working. For example, the experience of dealing collectively with Covid-19 has shone a light on how whole communities can be served by faith institutions, which have in many instances provided a space to feed, vaccinate and inform those across the wider community, and offered much needed support for the lonely and vulnerable. It is important this is not lost, and that links built up between public agencies and the communities they serve are not allowed to fade.

³⁶ See for example [COVID-19: How hateful extremists are exploiting the pandemic \(publishing.service.gov.uk\)](https://publishing.service.gov.uk) (accessed 22/01/22)

³⁷ [Crime in England and Wales: Police Force Area data tables - Office for National Statistics \(ons.gov.uk\)](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1023568/prc-hate-crime-open-data-121021.ods) and https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1023568/prc-hate-crime-open-data-121021.ods (accessed 12/10/21) Hate crime is defined as 'any criminal offence which is perceived, by the victim or any other person, to be motivated by hostility or prejudice towards someone based on a personal characteristic'.

Elsewhere however, there is more to be done in terms of partner working and information sharing, which I set out in chapter 13.

- 2.25. The stresses which the pandemic has brought to bear across all sectors have been felt perhaps most acutely within the NHS. With twin consequences of unprecedented demand for health services coupled with widespread reduction in staff due to Covid (both illness and isolation requirements) the already high demands on the NHS are exacerbated - one survey³⁸ reported half of emergency departments were forced to hold patients in ambulances outside the hospital every day during one week in August 2021. This suggests there is no flex in the system to handle the significant and immediate demand which response to a major terrorist incident would necessitate (see chapter 5 for further consideration of implications for the London Ambulance Service, LAS).
- 2.26. In terms of vulnerabilities, all those participating in this review with responsibility in some way for managing terrorists and the broader pool of subjects of interest have discussed the growing predominance of mental health needs among these cohorts. In recognition of this trend over recent years, three national CT Vulnerability Support Hub's (VSH) have been in place since 2016, representing a partnership between NHS forensic mental health teams and policing and seeking to better identify and manage risk among Prevent referrals, i.e. those considered at risk of being drawn into terrorism. With the exacerbation of mental health issues which has unquestionably been wrought by the pandemic (resulting, for example, from extensive isolation, loss of loved ones, lockdowns and pressures on relationships and finances) it is questionable whether one Vulnerability Support Hub to support the entirety of London will continue to be adequate. (See chapter 5 for further consideration of mental health provision.) And there remains, of course, the wider issue of adequate availability of mental health provision to meet referral demand.
- 2.27. Ultimately, the medium to long term impacts of the pandemic, including the permanence of changes to living and working habits, remain unknown. While this is as true for London as elsewhere, security considerations, preparedness planning and mitigations here will require particular flexibility and resilience as the city remains a high-profile target for those seeking to cause harm. London and Londoners likely bear an enhanced threat, particularly as restrictions lift, as wider dynamics at play in the capital mean security related implications of the pandemic are likely to be felt more keenly.

Refugee resettlement

- 2.28. Resettlement in the UK of refugees displaced from their homes by conflict, violence and persecution is currently managed through four schemes in partnership with the United Nations High Commissioner for Refugees (UNHCR) and the International Organization for Migration (IOM)³⁹.

³⁸ [Dramatic Increase in ED Corridor Care and Ambulance Hand-over Delays \(medscape.com\)](#) (accessed 15/09/2021)

³⁹ [Refugee Resettlement in the UK \(parliament.uk\)](#) (accessed 07/09/21)

- 2.29. The Vulnerable Persons Resettlement Scheme (VPRS, launched 2014) and the Vulnerable Children's Resettlement Scheme (VCRS, 2016)⁴⁰ specifically supported those fleeing the conflict in Syria. The Gateway Protection Programme (launched 2004) is open to refugees in urgent need of resettlement or who are living in a protracted refugee situation anywhere in the world, and the Mandate Scheme (established in 1995) caters for recognised refugees who have close family members living in the UK. The VPRS, VCRS and Gateway are due to be consolidated under a future new UK Resettlement Scheme (UKRS).
- 2.30. In addition to these established resettlement schemes, the recent Afghan Relocations and Assistance Policy (ARAP)⁴¹ offers relocation or other assistance, according to various criteria, to those seeking to flee Afghanistan since its fall to the Taliban in August 2021.
- 2.31. Despite its intentions, for some communities' refugee resettlement can be a fraught affair. Refugees can be perceived as 'jumping the queue' for services often in short supply with high demand, with housing a particularly contentious issue as appropriate accommodation for sometimes large refugee families is limited. Where stock is available, it tends to be within poorer areas of the country – resulting in a very uneven distribution of resettled refugees across the UK with relatively few located in Southern regions, including London⁴².
- 2.32. Of those who are resettled in London, however, it is similarly the poorer boroughs which accommodate most if not all those seeking sanctuary. Meaning the anti-immigration narratives commonly adopted among, for example, factions of the extreme right-wing to stir up anger and division are likely to take more significant hold in those communities already suffering deprivation and tensions. Detailed, local understanding of these grievances and contexts is crucial in managing tensions, which will need to be carefully considered as Afghan refugees are placed across the capital. Individuals and communities will need to be supported and protected, in parallel with monitoring and management of any risk of rising tensions spilling over and representing more serious concerns.
- 2.33. Similarly, boroughs containing hotels and other venues used to house refugees and asylum seekers while their applications to remain in the country are processed may represent a target. This risk will need to be carefully considered and monitored at local level.

Firearms and the UK border in London

- 2.34. Compared with 2016, the situation with respect to firearms in London has markedly improved. The past year (2021) marked a ten year low in the number of discharges (114 in the first six months of the year compared with 183 over the same period in 2020) with a corresponding increase in the number of firearms seized (450 in 2020/21 compared to 366 in 2019/2020). While this is against an unknown baseline of firearms held across the capital, and it is too early

⁴⁰ [Vulnerable Persons and Vulnerable Children's Resettlement Schemes Factsheet, March 2021 - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/97121/vulnerable-persons-and-vulnerable-childrens-resettlement-schemes-factsheet-march-2021.pdf) (accessed 06/09/21)

⁴¹ [Afghan Relocations and Assistance Policy: further information on eligibility criteria and offer details - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/97121/afghan-relocations-and-assistance-policy-further-information-on-eligibility-criteria-and-offer-details.pdf) (accessed 06/09/21)

⁴² [Asylum and refugee resettlement in the UK - Migration Observatory - The Migration Observatory \(ox.ac.uk\)](https://www.migrationobservatory.ox.ac.uk/publications/2021/07/07/21-asylum-and-refugee-resettlement-in-the-uk) (accessed 07/09/21)

to know if this an anomaly caused by successive pandemic related lockdowns, coupled with the fall in discharges it is a positive story.

- 2.35. In terms of firearms held legally within London, the MPS monitors almost 31,000 licence holders, all of whom have passed a CT check. The vast majority are for Club or Registered Firearm Dealers, the remainder are personal shotgun and firearm certificates. Licence holders are regularly checked, the results of which can mean arrests for various offences and subsequent licence revocations, representing a reassuring degree of proportionate oversight of the use of legal firearms. Across England and Wales, London in fact has one of the lowest densities of legal firearms ownership and the number of persons covered for a shotgun permit has fallen over recent years⁴³.
- 2.36. However, while the level of gun crime in the UK is one of the lowest in the world and figures suggest it is falling, the potential for harm remains. One only need look internationally to see the harm which terrorists continue to cause with firearms (see Fig. 3, Chapter 1) and the National Crime Agency reports that illegal firearms continue to be trafficked into the country, often concealed in vehicles on cross-Channel routes.
- 2.37. And demand on the UK Border Force for cargo and vehicle checks has increased since the country left the European Union. While more staff have been recruited, their capacity (and training) to inspect, identify and intercept firearms hidden within an exceptionally high volume of container traffic is unclear. Similarly, it is unclear where accountability for border security ultimately rests. London's geography effectively brings the border right into the capital via St Pancras International, Heathrow and London City airports, and the River Thames – while HM Revenue & Customs, Border Force and the police all have a role to play in managing those border entry points, overall responsibility for security is blurred.
- 2.38. Compounded by the risk of complacency driven by the UK's status as an island nation, its strict gun laws and the fact that gun culture does not predominate, it is important that screening and searching commensurate with the volume of port traffic is in place. All those involved should be clear as to their role and that of partners – I return to the issue of partnership working in chapter 13.

The role of the Mayor

- 2.39. The democratically elected Mayor of London continues to hold arguably one of the most powerful political positions in the country. Responsible for city-wide policies, strategies and budgets, the sheer scale and complexity of London means the position necessarily affords very significant responsibility. I am pleased that following my previous review, this fact is now reflected in the Government's response to national and London focused emergencies, with the Mayor an integral attendee at relevant COBR meetings. It is important that not only does this continue but that the Mayor's Office is alerted as soon as any major incident in London is

⁴³ [Statistics on firearm and shotgun certificates, England and Wales: April 2020 to March 2021 - GOV.UK](https://www.gov.uk/government/statistics/statistics-on-firearm-and-shotgun-certificates-england-and-wales-april-2020-to-march-2021) (www.gov.uk) (accessed 15/09/21)

called, by whichever service has taken command, so they can be appropriately briefed in order to engage directly with Londoners as soon as possible.

- 2.40. The success of inclusive briefing was well demonstrated following the attacks in London in 2017 and more recently, where the Mayor was provided with comprehensive and timely advice by the MPS, the Mayor's Office for Policing and Crime (MOPAC) and other partners.

3. ADAPTING LONDON'S PREPAREDNESS AND LEARNING LESSONS

- 3.1. I have, overall, been impressed by the response to the recommendations I set out in my 2016 Review. The large majority have been fully or partially implemented, with several more rendered obsolete as the circumstances which precipitated them have moved on. (See Appendix D for a complete list of those recommendations, actions taken and current status.)
- 3.2. I also recognise that the landscape has moved on very significantly in the past five years. There has evidently been much thought given to, and learning from, not only my previous report but from the reviews, inquests and public inquiries into the terror attacks which have taken place in the intervening years, and the inspections of counter-terrorism and associated activity nationally and within London. This has quite rightly included a focus on how victims and their loved ones, the bereaved and the witnesses at the heart of any attack are supported. I note, for example, the cross-government Victims of Terrorism Unit (VTU) set up to coordinate support and deliver a joined-up, consistent approach. There is still, however, more which could be considered in terms of the needs of these very vulnerable groups, which I set out in chapter 15.

Learning since 2016

- 3.3. The public inquiries and inquests following the attacks perpetrated in the UK since my last review have generated huge amounts of learning for all those involved in counter-terrorism activity. Whether specifically in the Prevent, Pursue, Protect or Prepare spaces (i.e. the four pillars of CONTEST, the UK government's counter-terrorism strategy⁴⁴) or more widely across public and private sector partners at local and national level, there has been - and continues to be - much to absorb from the comprehensive scrutiny which has followed these events (the inquiry related to the bombing at Manchester Arena in 2017 remains live at the time of writing, and while not terrorism per se, preliminary hearings as part of the inquest related to the events in Salisbury in 2018 are underway).
- 3.4. It is of course crucial not to wait for an inquest or inquiry to conclude – all those involved in a response must begin the process of learning as soon as internal debriefs get underway, even if initial lessons are modified in due course as more emerges from any subsequent investigation. I have seen, for example, evidence of action taken by the Metropolitan Police Service (MPS) in response to immediate aftermath debriefs, well in advance of official reports following the 2017 attacks in London.

⁴⁴ [CONTEST 3.0 \(publishing.service.gov.uk\)](https://www.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/544444/contest-3-0.pdf) (accessed 16/08/21)

- 3.5. I have observed the lessons most relevant to London's current preparedness and am reassured by the extent of learning which I have seen evidenced across the emergency services and other partners in response – although note there is more to be done in some areas including with regard to practical aspects of managing information flows within and between services during incident response, enabling the right staff to have access to the necessary IT systems and command centres and ensuring training for response takes place at the right levels. While I do not replicate specifics of the various inquests and inquiries here as these are available in the respective detailed reports, I have reflected on primary themes both in this and subsequent chapters.

The London attacks

The emergency services and working together:

- 3.6. I am largely reassured by work undertaken by the MPS, in conjunction with the London Ambulance Service and Fire Brigade (LAS, LFB) to identify and embed learning across the emergency services and to act on recommendations stemming from the respective inquiries. I am also pleased that much of the police specific learning (which informed a comprehensive refresh of guidance governing the MPS Command & Control response to a terrorist attack) has informed national CT response guidelines. For example, in recognition that armed police officers are not always first on scene (indeed, are unlikely to be even in London), guidance is now less proscriptive in terms of a requirement for other responders to wait for them to arrive before entering the scene.
- 3.7. As noted in the Chief Coroners report on the attack at London Bridge in 2017, the response was well-managed and established procedures worked well – including between the City of London Police (CoLP) and the MPS. The attack took place at the physical border between the two forces and the report noted strong collaboration throughout the incident. I am thus confident that my previous recommendation to consider merging the two is now redundant.
- 3.8. Challenges with inter-agency collaboration were evident in the response to the attack at Manchester Arena⁴⁵, but I have been reassured the failings identified there would not play out in London. The emergency services, including the CoLP and the British Transport Police (BTP), have high levels of experience and confidence in dealing with attacks of the type we have witnessed over the past five years and I am reassured by an increased focus on partnership based training and exercising (see chapter 14).

Communication:

- 3.9. The attacks at Westminster and London Bridge in 2017 did, however, highlight a need for greater clarity and communication regarding the MPS command structure and the role of the CT network in incident response. As a result, new roles have been designed and implemented. A CT liaison officer brings together the CT investigation with the overall London Gold and Silver response command structures (see chapter 4), ensuring information from one appropriately and swiftly informs the other, and a CT fusion liaison officer more closely aligns

⁴⁵ [Microsoft Word - Kerslake Arena Review PROOFED.docx \(kerslakearenareview.co.uk\)](#) (accessed 10/09/21)

intelligence and command decision making. They ensure incoming intelligence and related information is, where possible, rapidly de-classified and passed to the operational command team to improve decision making, similarly passing information identified during the response back to the intelligence team. It is important that all those likely to play a part in response to terrorism are aware of the positions and respective responsibilities of others and are facilitated to share information accordingly – these new roles are very welcome.

- 3.10. There was also a need for swifter confirmation of the individuals representing partner agencies across the London Resilience Forum (LRF⁴⁶, see chapter 13) and I have been assured steps have been taken to address this.
- 3.11. The attack at Parsons Green that same year highlighted the importance of operational terminology being sufficiently flexible to communicate the level of response necessary. While the MPS declared Operation Plato, as per national protocol in the event of a terrorist attack, this led to automatic deployment of resources far greater than necessary to respond to the scale of attack and level of injuries sustained. Processes facilitating clearer communications and sharing information early on regarding the scale of an attack are now in place, allowing the LAS and LFB to be flexible in their response. This allows proportionate multi-agency deployment but on a lesser scale when appropriate.
- 3.12. The efficacy of inter-agency communication regarding identification and location of victims and survivors was a theme of emergency responses to the 2017 London attacks and, too, to the Grenfell Tower tragedy. The importance of this is twofold – firstly, because information must be passed quickly to friends and families of those caught up in an attack, and secondly so information can be gathered from witnesses.
- 3.13. Progress has been made in this respect – NHS England are now the single source of information regarding provision of casualty numbers, and an IT system is now in place to record details of victims and track those hospitals to which the injured are taken. MPS frontline responders can now access this information on mobile devices, meaning details can be passed to friends and families more efficiently, and the capability is complemented by the Major Incidents Public Portal (MIPP). An online tool which went live in 2018, this allows the public to upload evidence which may assist police investigations. While it proved valuable in investigations following the attacks at Fishmongers Hall (2019) and Streatham (2020) I am, however, unclear as to how aware the general public are of its existence. **The MPS should develop pre-prepared public communications setting out the MIPP capability to ensure the swiftest possible issue in the event of a future attack (R4).**
- 3.14. Furthermore, early in 2020, a proposed London Emergency Services Coordination Centre (LESCC) was trialled. This tested permanent representation from the LFB and LAS in the MPS Special Operations Room (SOR, see chapter 13), as recommended in the inquest into the

⁴⁶ This ensures London's preparedness in the event of emergencies and coordinates activities of a range of organisations in support.

London Bridge attack. It aimed to cement working relationships and improve inter-agency communications in the event of any kind of major incident, supporting rapid real-time shared situational awareness.

- 3.15. While this would not amount to a single control room (not desirable for any of the emergency services given the very different nature of calls coming through the 999 system to each), there is potential value in embedding personnel from the three emergency services in this way. Relationships and mutual understanding of ways of working and pressures experienced by partners on a day to day basis would inevitably be strengthened, which would likely benefit the response to a major incident.
- 3.16. However, a number of other improvements to ways of working (e.g. the Tri Service Call, see below), both intra- and inter-agency, mean the need for an LESCC has since reduced. An assessment of whether it would bring sufficient additional value is underway to inform a decision regarding whether to proceed: this must take into account the resource implications for all three emergency services, given the need to maintain individual control rooms. How an LESCC would work in partnership with those individual control rooms would similarly require careful consideration to mitigate any risk of duplicative or opposing communications in the event of a major incident.
- 3.17. The 'Tri Service Call' is an open call to facilitate immediate situational awareness between the individual control rooms of the LFB, MPS, and LAS. Its implementation has significantly improved communications between the emergency services in the event of any major incident. With capacity to bring in the BTP and CoLP where required, it is a critical part of the immediate information sharing and response decision making between the emergency services. It strengthens the mechanisms for rapid information sharing in alignment with the JESIPs (see chapter 13) and I have been assured of its value across the emergency services. As above, it will be a key consideration in determining the future of any LESCC.
- 3.18. Improved communication systems do not, however, replace the need for regular intra- and inter-agency training and exercising. When under pressure, frontline responders are likely to revert to what they know, to the requirements of their own role and service. The checklists in control rooms reminding staff of the need to operate in a multi-agency fashion are valuable but amidst the chaos and uncertainty at the scene of an attack, it is regular exercising which will embed those ways of working in the moment and avoid a return to the operational silos highlighted in a number of inquiries and reviews.
- 3.19. I am therefore reassured by an increased focus on multi-agency training, testing and exercising but recognise the challenges in removing staff to engage in such events when they may never in fact have to put that learning into practice. I consider this, however, to be a justified cost that is more than outweighed by potential benefits.
- 3.20. There is also, I believe, opportunity to develop clearer channels of communication with local communities most immediately affected by any attack. Community impact briefings should be sought before public messaging is released, so the command structure is aware of any

particular tensions or concerns and can moderate narratives accordingly. However, arrangements need to be in place to ensure this can be done at speed, so as not to cause undue delays. The use of trusted and current, credible community partners to deliver initial messages should, as highlighted by reflections on the attack at Finsbury Park, always be considered and I explore partnerships with London's communities in more detail in chapters 7, 19 and 20.

The incident response model

- 3.21. The emergency response model of 'Hot, Warm and Cold Zones' merits comment. Areas of an attack scene are designated according to threat, i.e. hot zones where attackers still are (or may be), warm zones where attackers are not believed to be but where a threat remains (e.g. because they may return) and cold zones where no known threat exists.
- 3.22. During the 2017 attacks, this meant in some instances LAS responders were, had they followed the model to the letter, unable to enter higher threat zones to treat the injured. Such action was proscribed in hot and permitted in warm zones only for specialist trained and equipped staff. In some instances, however, they disregarded the model and entered hot and warm zones to treat casualties – while this meant more of the injured could be tended to, it also meant those staff were not supported in delivering the job for which they had trained.
- 3.23. In recognition of its inflexibility, the model was substantially overhauled in 2019. The new version of the Joint Operating Principles (JOPs, see chapter 13) governing the emergency services response to a marauding terrorist attack now allows emergency responders from the LAS and LFB to be in hot and warm zones with support from armed police.
- 3.24. New guidance also makes clear that deployment of staff should not be delayed pending the arrival of Incident Commanders from all three emergency services. I am reassured that this increased flexibility will allow for swifter and more comprehensive aid to be administered at the scene of a future attack, although deployment must only take place following a dynamic risk assessment (considering the attack methodology) by the appropriate emergency service in order to protect the safety of responders.
- 3.25. The Chief Coroner's report⁴⁷ into the attack at London Bridge does, however, note that training and exercising of emergency services staff should test responses where the extent and boundaries of zones are unclear, when there may need to be re-assessment of zones in real time, and how to assist when casualties are positioned in dangerous areas. I am satisfied that considerable effort has since been made to do this, but **the Mayor may wish to ask MOPAC, the LFB and the LAS to ensure that the content of training and exercising with respect to zoning is kept under continuous review** (R5).

⁴⁷ [Microsoft Word - Determinations - individual personal narratives FINAL.docx \(independent.gov.uk\)](#) (accessed 10/09/21)

Mitigating against the use of vehicles as weapons

- 3.26. The attacks at Westminster Bridge, London Bridge and Finsbury Park in 2017 demonstrated the capacity of motor vehicles to be utilised as a lethal weapon and terrorist attacks using vehicles as weapons have increased over recent years. Temporary vehicle security barriers were subsequently installed throughout Westminster and along the eight central London bridges. Those along Westminster Bridge have now been made permanent.
- 3.27. In addition, the Westminster Ceremonial Streetscape Project (WCSP) has delivered a number of welcome physical protective security measures around the Palace of Westminster. These provide an effective way to rapidly 'lock down' the areas they contain (through the use of gates, for example, which are locked and unlocked via a series of security codes held by the MPS). The permanent measures have blended effectively into the environmental, architectural and historical context of Westminster, providing both protection in the case of a terror attack and wider functionality for ceremonial events held in the area. The permanent installations have significantly reduced costs associated with maintenance of the temporary measures and are a crucial element of protective security in what is arguably one of the most iconic areas of London.
- 3.28. It is reassuring that the process of implementing the bridge and the Palace of Westminster measures began so swiftly following the Westminster Bridge attack. This demonstrates strong working relationships between the MPS as lead agency and several delivery partners, namely Westminster City Council, Transport for London (TfL) and the Centre for the Protection of National Infrastructure (CPNI).
- 3.29. And the implementation of permanent measures on Westminster Bridge is very welcome. However, the process for installing similar lasting solutions should now be completed where measures remain temporary across the remaining bridges. The significant funding implications and complexities regarding which authority should take primacy should not hold this process up further (also noted by the Chief Coroner in his inquest into the attack at London Bridge). **Funding should be identified, and work begun as soon as possible. Given the national significance of some of the bridges in question, it is appropriate that central government step up in support. The Cabinet Office and HM Treasury should work with City Hall to rapidly identify and allocate adequate funding to allow the necessary works replacing temporary with permanent structures to begin (R6).**
- 3.30. Similarly, the option to extend the WCSP to encompass Trafalgar Square in recognition of its regular use for public events and its focus for protest and demonstrations requires further support from partners, and funding has yet to be committed. Ownership of the unprotected environs of Trafalgar Square is unclear – as a classic 'grey space' (see paragraph 1.73), there is thus no clear security management regime (see below for more detailed consideration of such spaces) and clarification is required to address this.
- 3.31. **Funding should be prioritised to undertake the work (estimated at approximately £3 million) in recognition of the iconic nature of the area, its location on the edge of the Government Security Zone and the fact it regularly draws large crowds of people. Given**

the national significance and use of Trafalgar Square, it is reasonable to expect central government to assist here: Cabinet Office and HM Treasury should work with City Hall to identify the required funding and commence the work (R7).

- 3.32. More broadly, the approach to security across the GSZ requires refreshing. A greater degree of coordination is required from partners responsible for identifying and mitigating risk and managing security of this high-profile part of the capital. **There is therefore a strong case for reviving the use of Parliamentary Sessional Orders, refreshing and updating their legal focus so they can better respond flexibly to sudden changes in risk and threat and be enforced effectively (R8).**

Information sharing in the management of convicted terrorists

- 3.33. The attacks perpetrated at Fishmongers Hall in 2019 and in Streatham early the following year brought CT considerations within HM Prison & Probation Service (HMPPS) into sharp focus, particularly in terms of the management of risk within and outside prison. Some of those considerations, and a number of conclusions regarding terrorist offender management identified principally by the Fishmongers Hall inquest and the 2020 review of Multi-Agency Public Protection Arrangements (MAPPA) governing management of high-risk offenders⁴⁸ by Jonathan Hall QC, are pertinent to considerations of preparedness.
- 3.34. One of the most important of these relates to information sharing between agencies responsible for offender management - a theme to which I return throughout this Review. The MAPPA review found local police leads are not always informed when convicted terrorists, and those not convicted of terrorist offences but who have acquired terrorist ideation, are released from prison to be managed on licence within their area.
- 3.35. The inquest into the Fishmongers Hall heard evidence that intelligence suggesting the perpetrator intended to commit an attack upon release from custody was not communicated to those responsible for his management. While that individual was not managed within London (he resided in Staffordshire and travelled to London to attend the offender rehabilitation event at which he committed his attack), the finding highlights the critical importance of effective information sharing across agencies and regions.
- 3.36. While not responsible for community offender management per se (which is the remit of the National Probation Service, the police and MAPPA) it has been put to me from representatives of several of London's local authorities that they often feel inadequately informed regarding the threat posed by those convicted of terrorism, or considered to pose a risk, who reside in their borough. This deserves mention given the reality that the majority of over 200 offenders currently in custody for a terrorism-related offence will ultimately be returned to the community. (Including 11 with a main offence under the Terrorism Act (2000) due to have been released by the end of March 2021, and the further 30 expected to be released by the

⁴⁸ [supervision-terrorism-and-terrorism-risk-offenders-review.pdf \(publishing.service.gov.uk\)](#) (accessed 18/09/21)

end of March 2025⁴⁹). The same holds for the similar number of those incarcerated who are considered to represent a terrorist risk (although their principal offence is not terror related).

- 3.37. The nature and scope of information provided to local authorities by those responsible for offender management (through, for example, CT Local Profiles, CTLPs) is not as helpful as it might be. I consider this in further detail in chapter 13 on partnership working but am pleased to note that CT Policing (CTP) are working with local authorities to review CTLPs and look more widely at engagement and communication with respect to national security matters.
- 3.38. While there are rightly limits on what information can be shared and with whom, in some circumstances, this represents an unacceptable barrier to ensuring those responsible for building relationships with and overseeing terrorist offenders in the community are adequately informed. Work to co-locate elements of CT policing and the security services in one place in London is underway (see chapter 13). This is due to complete in 2023 and represents a big step in facilitating joint working and intelligence sharing, but there are currently no plans to house other partners in that building. To my mind this is a gap which I discuss further in chapter 13.

Offender management

- 3.39. Following the attacks at Fishmongers Hall and in Streatham, there has been significant investment in CT capabilities within HMPPS. Addressing several principal failings highlighted by the associated reviews and inquests, this investment has supported development of:
- ***The Joint Counter-Terrorism Prisons and Probation Hub***. Bringing together experts from across the CT sector, the Hub will coordinate swifter and more comprehensive information and intelligence exchange between partner agencies to counter risk in prisons and probation. Seeking to provide a shared understanding of the threat presented by those in custody and on licence, I am satisfied the Hub will facilitate more routine and systematic sharing of appropriate information: it is important this capability is maintained.
 - ***Community management***: New National Security Offender Management Hubs deliver specialist management of terrorist offenders and those who represent a terrorist risk. Offender managers working from these Hubs will have smaller caseloads than is standard, which I am assured will better facilitate the specific management required by these cohorts. Strengthening the toolkit of supportive measures is also welcome. For example, the vast majority of terrorists are now housed in Approved Premises (which provide intensive supervision for those who present a high or very high risk of serious harm) for up to a year post-release from custody, allowing closer monitoring for twice as long as previously. Polygraph testing⁵⁰ will further support risk management.

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https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/902692/FOI_200528004_Prison_population_-_Terrorism_Act_2000_table_ods

⁵⁰ Made mandatory for high risk offenders convicted of terrorist offences or offences related to terrorism through the Counter-Terrorism and Sentencing Act 2021.

- 3.40. In addition to these measures which are now live, investment is being made to reduce the risk of reoffending by terrorists. The attack at Fishmongers Hall highlighted failings in assessment both of risk and of the extent to which terrorists have genuinely addressed risk through specialist rehabilitation programmes. In recognition, a Counter Terrorism Assessment & Rehabilitation Centre is being created. This will deliver a comprehensive assessment and rehabilitation strategy, programme and suite of products for those convicted of terrorism offences, and those at risk of being drawn into terrorism, who are serving sentences both in custody and the community. The success of this centre will depend heavily on the recruitment of necessary specialists including CT-trained psychologists, and the model will need to allow for hand-in-glove working with the aforementioned Offender Management Hubs.
- 3.41. I also note that, reflecting the historic nature of the threat, the assessment and management within HMPPS of Islamist terrorist and terrorist risk offenders is more developed than that for extreme right-wing terrorists. As the threat from the extreme right-wing grows (see chapter 1) it is important that assessment and management practices are tailored accordingly. The Joint Extremism Unit (JEXU), a specialist taskforce created in 2017 which brought together operational and strategic expertise to lead counter terrorism work in prison and probation settings, has recently seen a welcome expansion.
- 3.42. I welcome creation of the National Security Division (NSD) within the newly unified Probation Service, within which the above Hubs will operate, but this must remain adequately staffed (recognising a general wider deficit of probation officers) to ensure caseloads remain manageable. This requires the necessary resources to be ring-fenced and kept under review in light of those caseloads – a commitment which must be matched for other partner agencies involved in enhanced management not just of terrorists, but of serious organised criminals and other very high-risk offenders. I consider it sensible for the NSD to lead in managing not just terrorism-related cases but others where there are serious public protection issues, and those involving serious and organised crime, but care must be taken to ensure this does not in time dilute the attention required to manage the risk posed by terrorist risk offenders.
- 3.43. Recognising that offender management is not the sole preserve of criminal justice agencies, the investment in HMPPS-led processes also requires shoring up through stronger working relationships with partners outside the justice system and CT policing, i.e. in local authorities, within communities and with police officers working at borough level in London's 12 MPS Basic Command Units. **Members of the London CONTEST Board must ensure appropriate representation from their organisation, so as to support full consideration of the community management of terrorist risk offenders whether related to their offending or otherwise (e.g. housing provision) (R9).**
- 3.44. I am largely reassured by the steps being taken within HMPPS to prevent another attack of a similar ilk to that which was allowed to happen at Fishmongers Hall. The direction of travel is positive although I note the scope of the change programme in hand – currently around a third complete. **Funding to complete the remaining two-thirds must be ring-fenced and the Ministry of Justice (MoJ) and HO should confirm this position, particularly given the**

ever-increasing diversification of the threat and its heightened nature in London (as set out in chapters 1 and 2) (R10).

- 3.45. Finally, what happened at Fishmongers Hall demonstrated significant deficiencies in protective security measures, including entry and screening arrangements. While I realise there must be an optimism associated with endeavours to rehabilitate offenders to steer them away from reoffending, there is no such thing as 'zero risk', particularly in relation to individuals convicted of the most serious of crimes. I have been assured that checks on engagement by convicted terrorists in external events such as the one held in Fishmongers Hall are now much stricter - but adequacy will hinge on effective information sharing between those responsible for managing offenders and those responsible for running and hosting events.

The Manchester Arena attack

- 3.46. As I reflected previously, I consider the significant failings in the inter-agency response identified in the first stage of the inquest into the attack at Manchester Arena to have more limited resonance in London. Notwithstanding the need for improvements in some areas, I am confident that current relationships across London's emergency services, and the work underway to strengthen these, means the capital would be well served by the immediate response.
- 3.47. There are, however, three substantial and linked issues onto which this inquest has shed light from a London preparedness perspective. These are i) CCTV coverage, ii) training of security staff and iii) protection of London's 'grey spaces', particularly those surrounding entertainment and sporting venues. London has many hundreds of such venues (in terms of football alone, the city houses thirteen professional, several dozen semi-professional and several hundred amateur clubs). These range in capacity from 90,000 in a full Wembley Stadium to under one hundred, and while I am somewhat reassured by the comprehensive and swift response taken by the MPS to findings as they emerge from the Manchester Arena inquiry, the issues have resonance for others who own and manage public spaces across the city.

CCTV

- 3.48. CCTV across London and its transport network is inconsistent and coverage is not 100% (although it is improving), and I explore this in more detail in later chapters, including how CCTV might be more efficiently harnessed to augment security capabilities among those working particularly in the transport and service sectors. There are, however, practical considerations related to CCTV deployment which the Manchester Arena inquiry highlighted.
- 3.49. Most obviously, the CCTV blind spot within the Manchester Arena footprint allowed the perpetrator to remain unnoticed and therefore unchecked for 20 minutes. As the first report from the inquiry⁵¹ concludes, he likely identified this area during earlier hostile reconnaissance – a fact which in itself points to the role of CCTV in potential deterrence. Had the area been covered by CCTV, the perpetrator's loitering might have been identified as suspicious – his backpack, hat and bulky clothing would likely have drawn attention and heightened suspicion.

⁵¹ [Manchester Arena Inquiry - Volume 1: Security for the Arena \(publishing.service.gov.uk\)](#) (accessed 20/09/21)

This shows the potential value of CCTV: where staff are trained in security matters (such training is a separate issue to which I return below), CCTV facilitates identification of individuals behaving in ways outside normal expectation. This holds as true for wider criminality as it does for CT and protective security.

- 3.50. Accepting that complete CCTV coverage at events and other public spaces is not always possible or appropriate, it is imperative that operatives responsible for security and safety are briefed on blind spots, with physical patrols of those areas prioritised. **As part of security planning for events in London, CCTV blind spots across venues and surrounding area should be explicitly identified in advance and mitigations set out for how those areas will be monitored and protected. Plans should not be agreed unless this detail is clear** (R11).
- 3.51. Consideration should also be given to how CCTV capabilities could harness emerging artificial intelligence (AI) techniques to automatically flag anomalous behaviours inconsistent with the wider context - I return to this in chapter 22 on the use of technology. Certainly, the way in which the perpetrator of the attack at Manchester Arena was behaving and was dressed set him apart from others in the Arena that night.
- 3.52. CCTV supplemented by AI should not give rise to undue concern – after all, staff across transport systems, for example, are trained to identify and challenge anomalous behaviours as part of managing wider public safety. An individual present on a train station platform for much longer than is usual could represent a security threat, or alternatively could indicate a person considering an attempt on their own life – either situation warrants intervention. If CCTV were proactively able to identify such precursor behaviours, this represents an additional, efficient pair of informed ‘eyes’ to augment staff response.
- 3.53. Finally, local authorities across some London boroughs have disinvested in parts of their CCTV capabilities, including monitoring of footage from those cameras still active. This is unfortunate and should be reconsidered (see chapter 7).

Security across London's stadia and other venues

- 3.54. It is, of course, not enough simply to ensure CCTV coverage. There must be sufficient numbers of CCTV-trained operators to monitor the feed in real time to allow for intervention – and that training must include the CT perspective to ensure operatives are familiar with hostile reconnaissance and other behaviours which may be precursors of a terrorist attack.
- 3.55. The operator of Manchester Arena, along with the company subcontracted to provide crowd management and event security, failed to ensure that staff monitoring CCTV on the night of the attack possessed the necessary licences, training and experience to do so. **Security plans for events in venues across London should not be agreed without confirmation that all staff, irrespective of employer, who are responsible for any aspect of those plans, have been appropriately trained** (R12).

- 3.56. The 35 stadia with the largest capacities across London have, since 2020, received direct advice and support from police CT Security Advisers (CTSA's). Eighteen CTSA's provide this function across the city - supported by CT Awareness Advisers (CTAAs) and CT Protect Officers (CTPOs), who focus on business engagement and delivery of CT awareness packages. I return to this cadre in chapter 4 on London's Police, but note in the context of Manchester Arena the critical importance of these roles (although in some areas of London there is more work to be done to ensure open and trusting working relationships between CTSA's and local partners).
- 3.57. The voluntary nature of engagement with CTSA's, however, means take-up of advice among business and venue owners and operators is varied: as and when the Protect Duty (see chapter 2) comes into legislative force this is likely to increase demand for their guidance. All owners of publicly accessible locations (PALs) will be required to consider protective security to some (as yet unknown) degree – so given the number of spaces which would, under the Duty, become PALs in London, **there needs to be an uplift to the monies made available to the MPS by the Home Office to support training more CTSA's** (R13).
- 3.58. Following the Manchester Arena attack, I am reassured by the evidence I have seen of the MPS' increased focus on security across London's stadia – although the events which took place at Wembley during the latter stages of the Euros Championship in 2021 gave rise to considerable concerns (which I consider further in chapter 4).
- 3.59. One of five full-time MPS Security Coordinators (SecCos) is now responsible, in partnership with CTSA's, for ongoing guidance and advice on security arrangements, including how to respond to any intelligence related to events. SecCo's devise and review the event security plans for the command team required for any event – these must meet a set of pre-determined criteria. Following the Manchester Arena attack, those criteria have been widened to allow more events to fall into scope for such plans.
- 3.60. It is, however, of some concern that resource limitations mean a necessary focus on the largest venues. While smaller venues across the sporting, hospitality, shopping and entertainment sectors receive protective security advice and guidance (largely from CTAAs and CTPOs rather than the more highly skilled CTSA's), it is largely incumbent upon business and premise owners to seek this out and respond accordingly.
- 3.61. The extent to which non-mandatory security matters are a priority for businesses likely to be focusing on revenue and Covid-19 security is unknown: until such considerations become law under the Protect Duty, this represents a vulnerability across large swathes of London's venues. **The HO should work to pass the necessary legislation to enact key principles of the Protect Duty as soon as the parliamentary timetable allows. Associated resources must be made available to support partners in implementing their responsibilities under the Duty** (R14).
- 3.62. The perimeter of what constitutes a venue, and therefore the area for which an owner or operator is responsible, also merits consideration. Security measures typically restrict access to the points which afford entry to an event itself – but as the Manchester Arena attack

demonstrates, the area around those points can represent a target. Particularly when people are seeking to enter and are subject to security searches which cause queues, or to exit – when, as in Manchester Arena, huge volumes of people are seeking egress at the same time.

- 3.63. I have been made aware of ‘high footfall’ measures which allow searching en masse (used to create safe ‘fan zones’ during the Euros) – these allow for a continual flow of people so the risk of crowds building up outside a protected area is lessened. The harnessing of technology to avoid the need to more thoroughly search all those seeking entry to a venue, and thus mitigate against unintended consequences of more traditional security measures, is welcome.
- 3.64. Physical security measures should be considered where the environment and infrastructure allows – such as the hostile vehicle measures being installed in front of the Royal Albert Hall (although this requires clear ownership of spaces). Where they do not permit, and queues are an inevitable aspect of controlled entrance, security provisions should consider those queues as within scope and staff trained accordingly.
- 3.65. Physical security measures should be complemented by virtual ones. Most if not all venues hosting events of any size and profile are likely to promote and sell tickets online – as such, their website arguably becomes part of their venue perimeter and offers potential to act as the first line of security defence. For example, rules around bringing bags, food and drink into a venue might be detailed online, along with information about standard search procedures to support visitors to know what to expect and come prepared to engage with security processes. Explicitly stating that CCTV is in place is a tactic encouraged by CPNI as part of wider deterrence mechanisms and could usefully be added to a venue’s website, particularly for smaller venues unlikely to have resource to operate substantial in-person physical security measures. **Advice regarding how a venue might flag security on its website should be a core part of CT police guidance (R15).**

Enabling and embedding a security mindset beyond events

- 3.66. The Manchester Arena attack highlighted the interoperability between public and private sector in terms of protective security responsibilities. The failings of the arena operator and its subcontractor showcase the role staff should have been trained to play in keeping the public safe. Security cannot be solely the preserve of the police and this is as true in London as anywhere else. Security capabilities and standards operating within the private sector are inconsistent and, in some cases, lacking. Moreover, while the MPS’ CT specialist advisers guide businesses and venue operators across the city, as with stadia this is a limited resource so there must be a clear responsibility placed upon employers and other operators of public spaces to consider security in a consistent manner.
- 3.67. In parts of London, including the financial districts in Canary Wharf and the City, security departments ensure those working in front line or customer facing roles, including front-of-house functions, are formally trained using materials developed by the CPNI in conjunction with the police (led by the National Counter Terrorism Security Office, NaCTSO, and the National Project Servator Team, NPST) and the Security Industry Authority (SIA). These include

modules aimed specifically at CCTV operators and security managers as well as elements intended for all staff.

- 3.68. The suite of products within 'Action Counters Terrorism' (ACT) and 'See, Check and Notify' (SCaN) contain a wide range of materials which represent extensive updates to the previous packages known as Projects Argus and Griffin. Summarised in Figure 8, both offer a wide range of freely available online materials and guidance, including several short videos which highlight risks and threats in an accessible way.

Figure 8: ACT and SCaN

ACTION COUNTERS TERRORISM (ACT)

The ACT package contains several strands aimed at different audiences with different purposes:

ACT - Report Suspicious Activity: designed to support the general public in identifying potential terrorist activity and providing a mechanism to report it anonymously.

ACT - Report terrorist or extremist online content: recognising the proliferation of harmful material available online which directly or inadvertently can play a role in radicalisation, this aspect clarifies the type of content which should be reported, and how to do so anonymously.

ACT – Early: complements the Prevent programme through showcasing what radicalisation might look like in a friend or family member and how to spot the signs. The site encourages someone to report concerns and provides a mechanism for doing so anonymously.

ACT Awareness: an e-learning product originally designed for staff working in crowded places (e.g. shopping centres, entertainment venues), this is now accessible to staff throughout UK based companies and organisations as well as to the general public. Modules cover topics including how to identify and deal with suspicious behaviour and items, what to do in the event of a bomb threat and how to respond to a firearms or weapons attack.

ACT Security: developed in partnership with the SIA, ACT Security represents the most recent addition to the ACT suite (launched 2021). It is a specialised training package designed specifically for front line security operatives.

SEE, CHECK AND NOTIFY (SCaN)

The SCaN package is aimed at businesses and organisations to help them prevent and tackle a range of threats related to hostile reconnaissance for the purpose of criminal activity, unlawful protest and terrorism. It focuses on maximising safety and security through utilising existing resources (namely people) and alongside the content aimed at all staff, several specialised modules of varying lengths and formats target those in particular roles.

When delivered in full (with modules undertaken in a particular order), SCaN aims to change the entire security culture of an organisation, embedding a systematic approach to disrupting hostile reconnaissance.

With the exception of SCaN For All Staff, which organisations can download and run themselves⁵², and SCaN for Security Managers which can be accessed through the CPNI website⁵³, SCaN is currently delivered by accredited SCaN trainers, the majority of whom are CT Security Advisers and CT Protect Officers. A version of SCaN For All Staff has been developed that can be built into an organisations existing security awareness training and delivered using in house trainers where available.

SCaN For All Staff: covers vigilance, suspicious activity and reporting.

SCaN For Customer-Facing Staff: covers suspicious activity, vigilance, the 'power of hello' and reporting for those who have direct contact with customers and other partners.

SCaN For CCTV Operators: aimed particularly at control room operators monitoring live feeds, this covers identifying suspicious activity, awareness of observational and judgmental errors and working with the police.

SCaN For Communications Professionals: this includes those working in internal communications roles, marketing, media liaison and digital.

SCaN For Security Managers: a mentoring programme in form, this aims to empower security managers to create a difficult environment for individuals or groups seeking to cause harm to the organisation.

SCaN For Decision-Makers: a briefing for senior executives.

- 3.69. Mainstreaming security in this way can bolster capabilities of the MPS in protecting London on a daily basis, but the extent to which this happens more generally is unclear. The security guards employed by most if not all of the businesses operating along Oxford Street in the heart of the busy West End, for example, would be a useful complement to MPS officers who patrol the area in terms of spotting suspicious behaviour. I am, however, unclear as to the extent to which those staff are trained to look beyond the internal premise of the business they are employed by, which risks creating vulnerabilities.
- 3.70. Moreover, any gaps in the level and currency of security awareness are likely to have been exacerbated by the Covid-19 pandemic. This has worsened vulnerability, as appropriately trained staff have faced redundancy, made decisions to pursue alternative jobs or have been furloughed in the last two years. This has meant that security related skills and knowledge have reduced significantly.
- 3.71. It should be a requirement for all those working in a professional security role, as well as those with public facing responsibilities (including in customer service and reception roles) to

⁵² <https://www.youtube.com/watch?v=qkgN4Bwhpf8&t=3s>

⁵³ <https://www.cpni.gov.uk/Scan>

undertake the ACT Awareness e-learning as a minimum. As recommended by the Manchester Arena inquiry, online training should be followed up with in-person training to check understanding and build confidence. Training should be refreshed annually with records kept by a business or organisations security lead.

- 3.72. Reflecting the huge variety of roles and settings which this will encompass, with consequent variety in what individuals can reasonably be expected to be responsible for with respect to security, **CPNI may wish to consider whether there is scope for supplementary material tailored for use by specific groups. For example, for customer-facing staff in specific types of settings where considerations may differ depending on role** (e.g. receptionists, waiting staff, those behind tills as well as those performing guard roles) (R16). They may benefit from seeking feedback from users on applicability of materials to particular roles and settings.

Grey space

- 3.73. 'Grey space' is one where there is a lack of clarity over ownership, or where various neighbours, partners or tenants share responsibility. This lack of clarity represents a challenge for security, highlighted in such tragic fashion by the Manchester Arena attack. Grey space can exist inside a venue, as was the case in Manchester, or outside – for example, concourses like the one which connects London's O2 stadium with North Greenwich Underground station. Similarly, if one of London's parks hosts an event, responsibility for ensuring the safety of those attending could fall between the local council, the event organisers, the owners of any food and drink outlets within the perimeter, the Highways Authority as owner of primary access routes and the public transport provider(s) responsible for nearby stations and bus stops.
- 3.74. Other crowded places, such as the Columbia Road flower market, are equally challenged – stakeholders recognise such areas represent a target due to their popularity and associated crowds, and there is desire for security measures to be installed. But lack of clarity over which stakeholder 'owns' which part of the space and is therefore responsible for funding is effectively stalling progress. This situation is replicated across London boroughs.
- 3.75. As part of their refreshed approach to supporting London's venues, the MPS are working with partners including owners and operators to identify grey spaces and who should take responsibility for them in terms of security. This is bringing together SeCo's, CTSA's and CTPO's meaning police advice is more joined up, but more work needs to be done to ensure partners likely to have some responsibility conferred by ownership or part-ownership of a space, such as local councils and TfL, are engaged. These are complex considerations with financial implications once responsibility is assumed. And installation of security within grey spaces, both on a day to day basis and during events, requires multi-agency communication, agreement and action, including funding. **Given the importance of protecting grey spaces, as showcased by the attack at Manchester Arena, MOPAC should ensure an annual report on progress is published** (R17).

4. THE POLICE SERVICE

- 4.1. The Metropolitan Police Service (MPS) is the lead agency responsible for coordinating the response to a terror attack in London. When I conducted my previous review in 2016, the immediate concern at that time was of Marauding Terrorist Firearms Attacks (MTFAs) but MPS response plans and guidance have since developed significantly to take account of shifting threats and attack methods. The MTFA terminology has been updated to 'Marauding Terrorist Attack' (MTA, i.e. a fast-moving attack where a perpetrator or perpetrators remain on the move) and I am confident that adaptations made by the MPS to policy and procedures, detailed in its refreshed Terrorist Guidance, are sufficiently comprehensive to guide its response in a wide range of scenarios.
- 4.2. These adaptations are numerous, underpinned by findings from external inquiries and reviews (discussed in chapter 3) alongside internal feedback following officer and multi-agency debriefs, allowing for crucial on the ground operating issues to be addressed. For example, investment in a new suite of radio mics followed identification of problems with radio communications during the Fishmongers Hall attack in 2019. There has also been a refresh of contingency plans to guide how, for example, the MPS works with Transport for London (TfL) with respect to traffic controls in the event of an incident - testimony to an increased and explicit focus on partnership working.
- 4.3. I am also pleased to see the adaptations made to testing and exercising (T&E) procedures. Much thought has gone in to ensuring a comprehensive, realistic but challenging approach which is similarly increasingly inclusive of response partners. I note, however, the challenges arising from restrictions imposed by pandemic related lockdowns in terms of maintenance of T&E, particularly in person, and offer some further reflections in chapter 14. However, it is essential that T&E programmes are maintained and, where appropriate, involve other partner agencies.
- 4.4. Counter Terrorism Policing (CTP) comprises a collaboration across UK forces with CT units based regionally. The largest is based in the MPS, i.e. SO15 Command, and sits alongside CTP headquarters which houses the senior command functions and a number of the national CT capabilities. I am satisfied that this model represents the most effective and efficient use of the considerable expertise held in the MPS. Her Majesty's Inspectorate of Constabulary and Fire & Rescue Services (HMICFRS) consider the support provided by the MPS to the network of regional Counter Terrorism Units to be good, and I am confident that arrangements remain fit-for-purpose, delivering both for London and regional forces. There is no reason to alter these arrangements – indeed to do so would be hugely disruptive and bring no obvious benefits.

The immediate response to a terrorist attack

- 4.5. When a terror attack is identified in London, pre-agreed protocols are triggered within the MPS and other emergency services under guidance known as Operation Plato. This activates a multi-agency, coordinated and enhanced emergency response. It can be prompted by a low

sophistication terrorist attack involving bladed weapons or vehicles but is, of course, also the response to more complex attacks involving multiple terrorists equipped with firearms or explosives.

- 4.6. Due to the complexity of London, the MPS has developed a bespoke protocol response. This enhances that which is in place nationally to allow for the necessary additional coordination of the high volume of London assets and MPS departments. I have been assured that the bespoke Plato guidance and protocol in place for London has been reviewed several times and found to be both fit for purpose and in line with the national guidance.
- 4.7. The Joint Emergency Services Interoperability Principles (JESIPs, see chapter 13) underpin how the emergency services coordinate their response. These have been further developed into additional Joint Operating Principles (JOPs, chapter 13) to specifically support the necessary multi-agency response to an MTA and ensure interoperability across the emergency services.
- 4.8. Once the MPS control centre is informed of a suspected terror attack, a decision will be made regarding deployment of Specialist Firearms Officers (SFOs). This includes the deployment of Counter Terrorism SFOs (CTSFOs) - who provide a 24/7 immediate response capability - to help officers first on the scene contain and neutralise the threat.
- 4.9. The JOP and JESIP frameworks set out requirements for response beyond the immediate attendance of the emergency services (i.e. blue light services of police, ambulance and fire). In qualifying circumstances, this means a Strategic Coordinating Group (SCG) will be convened. Stood up in the event of any sort of major incident, membership varies depending on the nature of what has happened – although in practice it tends to be similar and will involve the emergency services alongside other members of the London Resilience Forum (LRF) as appropriate. Further detail about the multi-agency organisations and frameworks activated by a terror attack in London can be found in chapter 13.
- 4.10. Throughout the operational response, oversight of police officers involved is given by trained senior officers located, if the situation demands, in the Special Operations Room (SOR, see chapter 13). Directions issued from the MPS Gold and Silver Command (responsible for strategic and tactical decisions) based in the SOR are now audio recorded – this is probably sufficient in terms of facilitating accountability of decision making, although it has been put to me that video recording of the SOR could also be considered.
- 4.11. In the event of a terrorist attack, it is highly likely that COBR (the government's civil contingencies coordinating mechanism) will meet to provide high-level direction and decision making and to keep the government apprised of the situation. In attendance are government ministers alongside senior police and other emergency services leaders, the military, security services and senior government officials. Importantly, in response to my recommendation in 2016, the Mayor of London is now a standing member of any COBR that relates to an emergency in the city, ensuring the interests of London and Londoners are directly represented.

- 4.12. In the event of a prolonged terrorist attack that exceeds the capability or capacity of the police to neutralise, service personnel from across all three military commands (Army, Navy, Air Force) can be deployed to support and free up police officers. This assistance is requested from the Ministry of Defence under the Military Aid to Civil Authorities (MACA) principles.
- 4.13. Military firearms support is provided under a UK-wide arrangement known as 'Operation Temperer', which recognises the highly trained capabilities within the military and their potential to augment the police armed firearms capacity when the severity of a situation demands. Deployment of Operation Temperer allows for military troops to replace police Armed Firearms Officers (AFOs) usually responsible for guarding high-profile sites. Maintaining these guard functions is important in the event of an attack, particularly in London given the changing nature of the threat (see chapters 1 and 2) and the volume of high-profile sites across the city and replacing AFOs with armed military officers frees up the former to support the wider MPS response. In order to minimise the risk of public concern at military deployment (see below), troops are initially deployed to free up AFOs stationed at non-public facing locations.
- 4.14. Since my previous review, Operation Temperer has been deployed twice, both times in 2017. Firstly, following the bombing at Manchester Arena and secondly in the aftermath of the attempted bombing at Parsons Green station. Troops were deployed as described above, backfilling armed police roles' around the country, and the swiftness with which this happened is testimony to the efficacy of the MoD's regular, cross-agency testing and exercising regime. Working relationships between the MPS and the military are collaborative and informed, and I am content with the support available from the military if and when circumstances in London require.
- 4.15. Specialist troops can also be authorised to take part in a direct operation to confront and neutralise a terrorist threat. This increases police capacity and capability to respond to, for example, multiple MTAs taking place simultaneously across different sites, of the kind seen in Paris in November 2015. In light of developing threat assessments, the military and police continue to keep the level and availability of this type of support under constant review. Active engagement by the military in the range of forums which govern preparedness and emergency response across London is welcome and allows ongoing refinement of military support and contingency options with respect both to responding to major incidents and managing planned events.
- 4.16. Only in the most extreme situations would military troops be deployed in routine patrolling of the streets of London directly alongside the police. Should there ever be cause for this, it is important to reiterate my recommendation from 2016. **Namely that timely public communications must take place in parallel, led by senior politicians in conjunction with senior police and military leaders, to explain, reassure and give confidence to Londoners and its visitors as to the purpose and role of military officers they may see on their streets** (R18).

- 4.17. The Ministry of Defence Police (MoDP) also have a presence in London and at nearby locations, including their training centre in Essex and the Atomic Weapons Establishment near Reading. This reassuringly allows for further capacity in the event Operation Temperer is deployed and ensures the MoDP remain able to backfill MPS specialist roles and provide an increased police presence in high-risk locations.

Armed police response

- 4.18. The armed uplift programme began in 2016 following the terror attacks in Paris in 2015 which highlighted the vulnerabilities of large cities to multiple MTAs. Completed in 2021, this has significantly enhanced the MPS' armed capability across London, as well as bolstering capability across the City of London Police (CoLP) and the British Transport Police (BTP). Numbers of AFOs and Armed Response Vehicles (ARVs) have risen to satisfactory levels. A built-in cross-capability means officers and vehicles are trained in and equipped to provide an immediate response to an MTA, as well as to a less conventional chemical, biological, radiological or nuclear (CBRN) attack (see chapter 12). A Strategic Firearms Commander role provides 24/7 oversight and assurance of the enhanced firearms capability and is part of the senior command team in the event of an incident.
- 4.19. Reflecting the increased capacity across the various elements of London's policing, **there should be more joint firearms training involving the MPS, the CoLP and BTP. The London Fire Brigade (LFB) and London Ambulance Service (LAS) should continue to be engaged, to ensure all first responders are aware of what to expect and how to work within and support a firearms response** (R19).
- 4.20. The benefit of investment in London's armed police capability is evident when considering the events which took place at London Bridge in June 2017. Within eight minutes the three terrorists who killed eight people and injured dozens more had been confronted and shot dead by armed police officers, on this occasion from the City of London Police. Widely heralded as an unprecedentedly swift response, there is no doubt the speed of deployment and action taken by those officers saved countless lives. Similarly, in 2019 firearms officers were on the scene at Fishmongers Hall within five minutes of being alerted and within one hour, over 50 ARVs were standing by to provide support, if needed.
- 4.21. Focusing on responses to high-profile attacks masks, however, significant variation in response times to firearms incidents more generally. The MPS respond to around ten such incidents per day – any one of which, could, of course, turn out to be a terrorist attack. And average response times for ARVs vary significantly between Basic Command Units (BCUs, see paragraph 4.76), from under five minutes to almost 12 minutes⁵⁴. This may in part be a function of regularity – the three BCUs with the highest number of firearms incidents averaged the lowest ARV response times. As I noted in 2016, however, it remains the case that as impressive a response time of under five minutes is on paper, it will still seem an eternity to anyone directly caught up in any incident where a firearms response is required. Almost 12 minutes will feel immeasurably more so. **In order to minimise ARV response times, the MPS**

⁵⁴ Taken from internal MPS data for the year ending 31st July 2021.

should continue to monitor and review where ARVs are based in response to new information and changing environments (R20).

- 4.22. In the event of a major incident in any of London's boroughs, a proportion of ARV's on patrol elsewhere are likely to be redeployed in support. **The Mayor may wish to seek assurance that, when ARVs are redeployed, the distribution of those remaining is automatically reassessed so as to best align their availability with the greatest areas of risk** (R21).
- 4.23. I remain of the view that, as I reflected in 2016, arming police officers as standard is not the right solution to decreasing response times. This would be at the expense of the look and feel of London, generating a visible shift in the approach to London's policing. The training and ongoing supervision of AFOs includes a welcome focus on psychological as well as physical strength and equipping currently non-armed officers to carry firearms would necessitate similar. I am not convinced the associated costs would be sufficiently outweighed by the benefits. Equipping more officers with Taser capability, to enable temporary neutralisation of a perpetrator in advance of an ARV arriving on scene, may offer a compromise and this is considered in more detail in paragraphs 4.65 to 4.69 below.
- 4.24. The unique nature of policing in the capital is also a consideration with respect to the question of arming all frontline officers. London remains in the global political and media spotlight and when its police discharge a firearm, the world watches. Investigations led by the Independent Office for Police Conduct (IOPC) have often taken many years to resolve - this is too long, notwithstanding the complexity of some of the investigations. While progress has been made by the IOPC in the timeliness of investigations, more needs to be done as long, drawn out processes place the officers involved, as well as others affected by the firearms discharge, under considerable or even intolerable pressure. While I am assured this is not acting to deter officers from seeking to join the AFO cadre, if a standard requirement of frontline policing was to bear arms there may be consequences for recruitment, alongside obvious increased demands for training and supervision.
- 4.25. The uplift in numbers of armed officers on rota across London reassures me that previous reliance on overtime to meet demand is reduced and I am confident the MPS is well prepared to respond swiftly to several MTAs happening simultaneously without affecting response to business as usual demand.
- 4.26. Importantly, the uplift programme has increased not just the number of AFOs but the number of officers responsible for their training and supervision, in recognition of the need for ongoing support to ensure the quality of this specialist function. Investment in the physical infrastructure of firearms training facilities has however not kept pace. While virtual reality technologies enable officers to practice more frequently in a cost-effective, efficient fashion, access to physical facilities in and around London is restricted. Demand is greater than anticipated when facilities were built, and provision remains lower than ideal. Recognising the ancillary requirements attached to increased numbers of frontline officers is important, and I return to this issue below.

- 4.27. I am confident, however, that specialist requirements surrounding deployment of armed capabilities in response to a terror attack in the capital are now adequately met, subject to the comments made above. The number of ARVs deployable in London, coupled with the Intervention Response Team (IRT) which is on duty 24/7 (housed within the MPS' Specialist Firearms Command) allows for a comprehensive response at all times.
- 4.28. That said, provision of people and equipment is not the end of the matter. In 2017 a survey of firearms officers (N=840)⁵⁵ suggested many felt the length and frequency of training to respond to a MTA was inadequate, that they were insufficiently well briefed on the changing nature of the terrorist threat and tactics, and that weapons and equipment were not sufficiently suitable for their role.
- 4.29. Only around half of those participating felt they had sufficient briefing to know what to do in the event Operation Plato is declared (those who received training in the previous six months were more likely to feel confident) and a large majority were concerned about support post-incident, including with respect to media scrutiny which was an issue for increasing numbers of officers. Many did not feel confident to seek help without being judged. In the interests of ensuring firearms officers are properly supported, and to help manage any risk to retention, **the Mayor's Office for Crime & Policing (MOPAC) and the MPS should consider re-running this survey of firearms officers now the armed uplift is complete to understand the extent to which these issues are still felt to be current** (R22).
- 4.30. The MPS CTSFO capability more widely comprises around 100 CTSFOs based across seven teams, two of which are on duty at all times. This capability forms the London 'CTSFO Hub', which is interoperable with five counterpart Hubs across the rest of the country. Each of these also houses an IRT, although not all are operable on a 24/7 basis (availability may be via an on-call basis). This arrangement facilitates mutual aid should it be required. There remains, however, a reliance on overtime to fully staff those regional centres due to ongoing recruitment challenges across the UK. This means there is a risk that if mutual aid is needed to support the capital, the system may become strained in a situation involving multiple simultaneous attacks.
- 4.31. Firearms officers are now all trained for deployment in a marine setting. This provides some reassurance regarding protective security along the River Thames, as AFOs are able to cross from land onto vessels, and to move from vessel to vessel if threat necessitates. A minimum of two vessels are on 24/7 patrol on the river and they are joined by an armed crew on average twice in each 24-hour period, at variable times for variable periods. I discuss policing of the River in more detail in chapter 9.

Recruitment and retention of police officers

- 4.32. In response to the government's commitment in 2019 to recruit an additional 20,000 police officers across England and Wales by 31 March 2023, as at the end of December 2021 a total

⁵⁵ MOPAC internal survey of MPS firearms officers, conducted following my 2016 preparedness review.

of 4,288 new recruits had joined the ranks of the MPS and CoLP⁵⁶ (since April 2020). This means a total of 34,907 officers in post across the capital and by the end of March 2022, the MPS expects to have more officers than at any time in its history. However, the parallel continuing rise in London's population means that despite this welcome increase, on a per capita basis officer numbers continue to remain at lower levels than highs last seen between 2008 and 2010.

- 4.33. Around one-fifth of the new officers who provided data hailed from a minority ethnic background, just under two-fifths were female. While this represents a more diverse intake relative to the cadre of officers as a whole (16% of existing officers across the MPS and CoLP were from a minority ethnic background as at December 2021, under one third were female) there is clearly more to be done to ensure London's police more closely reflects the demographics of the communities they serve. I return to the importance of relationships between the police and local communities below.
- 4.34. Across the cadre of officers within the armed commands, there is a similar need to do more. As at September 2021, around one in ten were female and around the same number were from a minority ethnic background⁵⁷. Both groups are therefore under-represented compared to the number of women and officers from minority ethnic backgrounds across the force as a whole.
- 4.35. Moreover, while the funding to uplift police officer numbers is welcome, it is ringfenced for recruits destined for the front line. Such recruits, however, generate associated demands for other administrative and specialist functions, such as forensic services and analysis. As a result, there is a risk that such functions in time become overwhelmed. **The Home Office (HO) should ensure that when making resources available for additional police officers this is accompanied by resources to ensure that necessary support facilities increase in parallel** (R23). This includes ensuring more experienced officers, particularly Sergeants, have time and resources to support new constables – recent research⁵⁸ suggests this is expected to be a challenge. (Over half - 53% - of survey respondents from the MPS' federated ranks felt there will not be enough Sergeants / Line Managers to supervise new recruits, compared with 45% of respondents nationally.)
- 4.36. Furthermore, consideration is needed now as to what happens when the national uplift comes to an end in 2023. It would be a mistake to slow down recruitment at that point. **A long-term national policing plan is needed which identifies the capabilities (in terms of police officers, including specialisms, and support functions, such as digital forensics and analytics) that are needed up until 2030, and how these resources are to be delivered** (R24).

⁵⁶ [Police officer uplift, quarterly update to December 2021 - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/news/police-officer-uplift-quarterly-update-to-december-2021) (accessed 14/02/2022). Note these data are based on headcount and not Full Time Equivalent (FTE) figures.

⁵⁷ Taken from internal MPS data for September 2021. The number of female armed officers from a minority ethnic background is too small to allow analysis.

⁵⁸ [pay-and-morale-2020-metropolitan.pdf \(polfed.org\)](#) (accessed 15/11/21)

- 4.37. The intake of new officers cannot replace like-for-like those experienced officers leaving the MPS and CoLP. Around half of those based in Emergency Response Patrol Teams, for example, have less than two years of service. The implications of retirement and moves to other sectors, particularly from highly trained, specialist commands, are concerning.
- 4.38. Indeed, it is possible that a lack of senior experience of public order policing of very large football matches contributed to what happened during the Euros final at Wembley Stadium in the summer of 2021 (see Figure 9). Certainly, the implications of other factors unique to the day which had potential to interact with more standard football concerns did not seem as well considered as they might have been. As the Casey Review of that day found⁵⁹, many of the events which unfolded were foreseeable by all involved in organising and running the event, including the MPS. The report does, however, also acknowledge that the police took action around the stadium incursion with considerable skill and courage and ensured the situation was stabilised shortly after kick-off.
- 4.39. I have heard about an interchange programme which enables officers to gain experience across commands and build relationships with colleagues elsewhere to take with them into future roles, but this is unlikely to provide a rapid solution to the most pressing of imminent skills gaps. There is also a national shortage of trained police detectives, which has inevitably impacted on the availability of detectives to support counter-terrorist policing in the capital. **The HO, College of Policing and the National Police Chiefs Council (NPCC) should consider urgently the best way to increase the number of trained detectives across policing in England and Wales to ensure CT policing capabilities are adequately resourced** (R25).
- 4.40. From a preparedness perspective, moves by highly trained CT Security Advisers (CTSAs) into private security firms are a particular worry, as London continues to open up and seeks to safeguard its people, businesses and spaces post-pandemic. This is likely to be heightened still further once the Protect Duty (see chapter 3) comes into force. The relationships CTSAs build across the capital and the advice they provide with respect to protective security is invaluable.
- 4.41. The demand for their services (and that provided by the similarly specialist but less qualified CT Protect Officers, CTPOs) can only increase. **The MPS and NaCTSO should consider how to increase the number of CTSAs and future-proof this high value asset through resilient succession planning** (R26, see also R13). The 26 CTSAs currently in post across the MPS and CoLP represent around 16% of those employed in police forces across England and Wales. While they are supported by 52 CTPOs and two CTAAAs, given the increased threat faced by London relative to other parts of the country, and the nature of that threat particularly post-pandemic, this would seem to be inadequate and not proportionate to the risk.
- 4.42. Changes within wider society may also threaten the development and resilience of experience and skills within police commands, including CT. The concept of policing being a 'job for life' is to some extent becoming increasingly outdated

⁵⁹ Available at [Baroness Casey review into events at the UEFA EURO 2020 Final has been released \(thefa.com\)](https://www.thefa.com/news/2021/07/14/071421-baroness-casey-review-into-events-at-the-uefa-euro-2020-final-has-been-released)

- 4.43. MPS retention data suggest a relatively large proportion of officers leave the service after four years or less (although the majority of those leaving do so via normal retirement), and around one-third of those in active service have less than five years police experience. This is possibly due in part to the police service being seen by some as a stepping-stone to other careers. New entrants are keen to progress quickly, moving perhaps more swiftly than their predecessors out of frontline posts to experience a range of other roles, with some then exiting the force to move onto the next chapter of their working life.
- 4.44. This critical mass of (in)experience presents a certain level of risk for CT preparedness – the pipeline of officers with the necessary skills and experience to take over from those retiring may not be sufficiently resilient. **The MPS should consider how to bolster officer retention – research to better understand the drivers of departure among those who leave after only a few years may help inform this** (R27).
- 4.45. Facilitating a return to the police for those who leave to gain valuable and often transferable skills elsewhere should be easier than it is at present. If such individuals were able to take up positions at more senior levels shortly after re-entry, rather than being required to start further down the ladder, this may go some way towards mitigating the risk of an insufficiently resilient cadre of senior officers. **The MPS should look at how it might allow ex-officers to re-enter the rank they left, but with a fast track promotion route available which recognises transferrable skills accrued outside the service** (R28).
- 4.46. One particular area of concern is the need for further digital forensic skills. The SO15 Command houses the National Digital Exploitation Service (NDES), a function set up to exploit increasingly vast amounts of digital intelligence and evidence. The expertise provided by NDES is heavily in demand – not surprising given the technically expert society of the 21st century.
- 4.47. The potential of NDES is however limited due to the way police data and intelligence continues to be stored – i.e. largely ‘on premise’ rather than via secure cloud-based storage solutions, meaning searches across different data sets are often not possible. **The MPS should consider bolstering the NDES function to ensure the ever-changing threat posed by digital capabilities can be appropriately understood, and that those same capabilities can be harnessed for investigative and protective purposes. The piloting of cloud-based secure data storage solutions should be expedited** (R29).
- 4.48. **Recent restructures within the MPS reduced the number of police Prevent leads and consideration should be given to reversing this decision** (R30), given the changing nature of the threat, the importance of local communities in supporting preparedness and the key role played by Prevent in identifying and reducing risks of radicalisation. I return to the importance of Prevent throughout this Review.

- 4.49. I am satisfied that the model of CT Policing serves London and Londoners well, and am comfortable this is enhanced rather than jeopardised by the MPS' leadership of the national CT Network. Indeed, this has the overall effect of strengthening the MPS.
- 4.50. I am, however, concerned that internal structures mean the Prepare Command within the MPS is distinctly separate from Protect, despite significant CT related shared interests and priorities. There is no shared oversight or line management at working level and while the London CONTEST Board provides some umbrella accountability, the current operating model which sees the two commands work together well depends largely on working relationships between respective leads and their teams. **I have seen evidence of a shared approach to policy, training and wider learning across the separate Prepare and Protect Commands but the resilience of the approach needs strengthening to withstand the departure of specific individuals** (R31). This could be achieved through, for example, closer physical co-location, a closer alignment of business as usual and ensuring the requirement to build close working relationships is embedded in job descriptions and performance management processes.
- 4.51. It would also be advantageous to ensure more routine information sharing across the commands within the Specialist Operations Business Group. The CT Command (SO15) approach to sharing of information is predicated on a case by case basis, in accordance with due legal process. While this represents a sensible and pragmatic approach, there should be a formal procedure by which relevant information is shared, should any threat be identified which warrants such sharing. Moreover, it is my view that there may be value in other commands being informed in some instances when an individual no longer merits inclusion on the SO15 caseload but who may continue to require a degree of police attention. There are more significant questions regarding information sharing practices within and beyond the MPS, to which I return in subsequent chapters.
- 4.52. The MPS' Public Order command has lead responsibility for policing protests and public events, but as by definition this likely means large crowds there is inevitably some practical overlap with protective security considerations designed to mitigate against terrorist activity. Mass gatherings of hundreds if not thousands of people in publicly accessible locations represent a terrorist target and the requirements for policing the Euros in London during the summer of 2021 demonstrate this practical blurring of public order considerations with CT. While the inquiry led by Baroness Casey considered in detail how fans were able to break into Wembley during the Euros final, I set out some implications from a CT perspective in Figure 9.
- 4.53. Particularly as the country emerges from the pandemic, **the MPS should ensure its programme of testing and exercising – whether via table-top, role play or a combination – includes scenarios which require public order issues to be considered in parallel with a terror attack** (R32). This should include the policing of football matches across London. Such events are clearly not an either / or situation with respect to public order and terrorism, meaning CT considerations should be integral to briefings for public order officers. Contingency planning should be kept live, relevant and up to date, cognisant of the potential cumulative impact of prevailing factors in any situation.

Figure 9: Where public order meets CT - policing the Euros final at Wembley Stadium, 2021

According to the Football Association, 'unprecedented' levels of disorder were experienced during the Euros final. The attempt by large numbers of ticketless fans to gain access to the stadium, breaking through barriers, turnstiles and gates, took the MPS and the stadium by surprise and security measures were unable to withstand the attempt.

Those policing the final were well acquainted with the layout of Wembley and the surrounding locale, and pre-tournament training with the stadium operator, led by Protective Security Operations (PSO) Security Coordinators, considered CT issues. However, the incursion suggests a failure to expect the unexpected, with implications of the combination of unique factors prevailing on the day inadequately planned for.

England reaching its first international final in 55 years, coupled with good weather and a relaxing of Covid restrictions, was likely to heighten the celebratory mood and numbers in the area. Crowds were likely to form in surrounding venues and, given limited capacity due to social distancing, spill out into spaces around the stadium.

Those crowds grew once turnstiles opened. Additional checks on Covid vaccination status lengthened wait times and limited local broadband bandwidth further increased delays while individuals waited for documentation to load on their devices. If access to any venue is dependent on digital services, there should be a back-up plan in case of failure to minimise the risk of crowds forming which can create a target.

While significant uplift was made in the number of stewards and security personnel on duty for the final, lockdowns meant many had little if any recent experience in managing an event on the scale of one in Wembley at full capacity. The training and qualifications of those in the security industry are considered in chapter 18 – certainly what unfolded at Wembley suggests a capability gap. Stewards struggled to contain the emerging situation and with frustration among ticket holders mounting as queues formed and kick-off approached, non-ticket holders - perhaps emboldened following several hours of alcohol consumption - were incited to try and push their way into the stadium.

Social media showed chaotic scenes outside the stadium which, coupled with posts from those inside who illegally gained access, incited others. While this did not give rise to any terrorist related activity or attack, the potential for it to have done so, through targeting of crowds outside the stadium or through incursion of an unchecked, unscreened malign actor, is clear.

Equipment and Funding

4.54. The National and International Capital Cities Grant (NICC) is designed to fund the MPS' delivery of its unique responsibilities directly linked to London's status as capital of the UK and one of the most iconic and significant cities in the world. The HO continues, however, to only part fund the NICC despite the increasingly challenging nature of policing the capital. The shortfall (£159 million in 2020/21) means the MPS must fund its NICC responsibilities through reducing activity elsewhere or otherwise divert mainstream funding.

- 4.55. Even where CT funding is protected, those activities do not operate in isolation, meaning funding withdrawn from wider activities is likely to impact negatively on management of CT risk. Where local authorities step in to plug gaps, this amounts to London's communities effectively subsidising those national functions for which the MPS is responsible. **The HO should consider how it can in future fully fund the NICC to ensure London is properly protected without reducing other resources for the capital** (R33).
- 4.56. It is unfortunate that, when the CT Policing budget is finally agreed (at the time of writing it had yet to be confirmed), it will be on a one-year basis with clarity of the assumptions governing settlements for subsequent years within the current spending review period still pending. This is not ideal. The lack of longer-term certainty prohibits sustainable planning of CT measures and activity, much of which requires consideration and a commitment to investment over a longer period.
- 4.57. A one-year settlement without clarification of future settlements also affects the sustainability of recruitment. Individuals (officers and staff) recruited in-year may not be affordable in future years if budgets are then reduced. Leading to headcount reductions, which inevitably drive future pressure to recruit once again. This is an unnecessary and costly revolving door situation with respect to recruitment and headcount.
- 4.58. The drive to recruit more police officers through the Police Uplift Programme (PUP) is welcome. However, this has failed to deliver the agreed uplift to national CT Policing (where officers must be drawn from territorial policing) meaning the function remains under-resourced with particular challenges for the MPS given the heightened CT risk in London (see chapter 2). **The National Police Chiefs Council (NPCC) should urgently seek a resolution with regional forces to identify and allow appropriate officers to transfer into CTP and allow the function to grow** (R34) (the wider PUP will ensure those territorial posts are filled).
- 4.59. As I have discussed elsewhere (see paragraph 4.36), an uplift in officer numbers necessitates an uplift in ancillary skills required in support, often brought by specialist police staff (e.g. analysts and forensics - including digital). The CT Policing budgets for the current year and remainder of the spending review period must allow for sufficient recruitment of staff in support of additional officers allocated under the PUP.
- 4.60. The wider efficiencies demanded by the HO across all policing capabilities apply similarly to CT. Efficiencies are possible here and are being delivered, however the HO has imposed constraints on how these can be achieved, for example through disallowing at this point a reduction in a CT police presence at the border. Inability to reduce posts in some areas means more pressure and less flex elsewhere. The strong likelihood that the two per cent inflation rate accounted for in the CT policing allocation will be outstripped by a much higher inflation rate more widely is likely to exacerbate this.
- 4.61. **In order to achieve the most from CT settlements I therefore recommend that the HO consider: i) allowing more flex in the way in which the MPS' CT function is able to discharge its budget, particularly with respect to efficiency measures, and ii) that future**

CT policing settlements are agreed with accompanying clarity on the likely parameters within which subsequent annual allocations will be made (R35).

- 4.62. Learning from the response to the Novichok attack in Salisbury in 2018 has informed training developed by the MPS, and specific exercises now consider the interplay between deployment of CBRN materials and terrorist intent. While ARVs themselves are not fitted with CBRN response equipment, the MPS operates a small number of vehicles equipped with specialist CBRN kit, and CTSFOs are trained to deliver a firearms response if required within a CBRN incident. I set out further considerations regarding a CBRN attack in chapter 12.
- 4.63. I am confident that the specialist capabilities which exist within the MPS to respond to a CBRN incident on a 24/7 basis are of high quality. However, inevitably the scale is limited, and I have been made aware of the shelf-life of equipment critical to this function. Ensuring it remains current and adheres to necessarily high minimum standards is a significant on-going cost. While there is an inevitable tension in ringfencing funding for purchase and maintenance of costly equipment which might never be used, the advent of Covid-19 highlights the critical importance of immediate availability of fit for purpose apparatus, including Personal Protective Equipment (PPE). As such, funding for this must as a minimum be maintained and should remain ringfenced.
- 4.64. Similarly, the MPS maintains a small but specialist drone and counter-drone capability, in place since the events at London Gatwick Airport in late 2018. The terrorism risk posed by drones is covered in more detail in chapter 22, but the MPS capability is a highly prized asset which again as a minimum must be maintained, and ideally bolstered, as a core part of understanding and planning for emerging and future threats. Demand for its services is increasing in line with rising criminal use of drones more widely (e.g. to deliver items over the walls of prison establishments) so it is crucial that sufficient CT-focused capability be maintained.
- 4.65. I previously reviewed the use and availability of Conductive Energy Devices (CEDs) across the MPS. More commonly known as Tasers, these represent a means of neutralising a target without physical (possibly lethal) force – and very often, simply the threat of Taser discharge is sufficient: most targets surrender once they see the ‘red dot’ on their body. All AFOs also carry a Taser, providing a less harmful means of target neutralisation should a situation be containable without a firearm discharge.
- 4.66. The number of MPS officers trained and equipped to use Taser has risen substantially: standing at around 4,500 in 2016, the force now has over 8,000 trained Taser users and is on course to deliver a further 2,000 (across armed and unarmed commands) by late 2022. Given the rising threat particularly from self-initiated terrorists using bladed weapons, this offers some reassurance. **The number of officers trained and equipped with Tasers should be kept under review by the MPS to ensure numbers remain on track and keep pace with the changing nature of threats (R36).**

- 4.67. As the Director of the IOPC commented upon release of his report on Taser use⁶⁰, they are a valuable tool in keeping the public and police safe in dangerous circumstances. They offer a less-lethal option for dealing with such situations – although possession of a Taser does not mean it need always be used. Notwithstanding its limited representativeness of general Taser use (most cases of Tasers drawn do not result in discharge but, reflecting the role of the IOPC, the majority of the 101 cases it reviewed had done so), the report identified missed opportunities to de-escalate situations, alongside concerns around prolonged and multiple discharges.
- 4.68. As such, the MPS must ensure a rigorous programme of training (including refresher courses) and ongoing supervision of officers who carry a Taser. Community trust and engagement with police is crucial in countering terrorism (see below), meaning Londoners must be confident that police use equipment appropriately: the MPS must follow the updated national guidance and training on use of Taser which was prompted by the IOPC report.
- 4.69. I have been made aware of several improvements which the MPS has proactively made to its training programme, including the addition of a variety of scenario tests to complement classroom learning – these are welcome. **Statistics on Taser use by London’s police should, however, continue to be published by MOPAC to ensure public scrutiny and accountability** (R37).
- 4.70. Footage recorded from the body-worn cameras used by MPS, BTP and CoLP officers cannot currently dock and download into a shared network due to differences in operating systems. This means sharing footage recorded by different forces in real time to support an ongoing response is not possible. The cameras recently procured by the MPS, however, can be docked and footage downloaded into the system operated by any force which uses the same camera. **The BTP and CoLP should seek to explore the feasibility of procuring the same body-worn camera as the MPS when their respective contracts are up for renewal. The cameras worn by AFOs are different again and MPS, BTP and CoLP procurement should collaborate in advance of the first contract to come up for renewal to explore options to allow the same make of camera to be procured, allowing (in time) for real-time downloading of footage** (R38).

The National Police Air Service

- 4.71. Police air support is provided by the National Police Air Service (NPAS), in combination with drone capabilities. The majority of NPAS assistance is provided through its fleet of helicopters, supporting responses to crime in action and (to a lesser extent) aiding searches for missing persons. Since its inception in 2012, delivery of NPAS has been led by West Yorkshire Police (WYP), on behalf of all 43 forces in England and Wales and the BTP. WYP no longer wish to perform this role: as a result, the MPS and West Midlands Police are both currently considering whether they wish to take on this responsibility.

⁶⁰ [IOPC Taser review 2021.pdf \(policeconduct.gov.uk\)](#) (accessed 28/09/21)

- 4.72. In 2017, an HMICFRS review of NPAS⁶¹ identified a number of areas for improvement and since that time, the service has not met the needs of the MPS. A decision to become the lead force for delivery may allow the MPS more scope to shape the delivery model in future but as identified by HMICFRS, there are challenges in operating a national delivery model able to cater effectively to the demands of large cities alongside rural based forces.
- 4.73. I am not convinced those challenges have been adequately resolved, nor that continuing to invest in helicopters as the principle mechanism of air support is sensible – at least not for London. They can take time to operationalise in dynamic, rapidly moving situations when often, and certainly in the case of a terror attack, minutes mean the difference between life and death. The fleet is relatively old, meaning significant costs are accrued in maintenance, and the geography of London with its mix of narrow streets and high-rise buildings means landing a helicopter is not always straightforward or quick.
- 4.74. Drones (see chapter 22) are an alternative to helicopters in some situations (although less so in the City of London given the predominance of its high-rise buildings) and offer distinct advantages: they are more cost effective, can be deployed more rapidly, do not require significant landing space and are environmentally compatible with London’s low-carbon zones. While not without complexities and currently more limited in terms of load bearing capabilities, increasing investment in drone capacity to take on more of those responsibilities traditionally delivered via helicopter seems sensible.
- 4.75. Ensuring the MPS is supported by an air service appropriate for its needs, at the right price, is essential to its operational effectiveness. Whether this service is delivered via a future iteration of NPAS or a different model entirely, the development and provision of drones and other air assets in addition to helicopters should not be held back.

Policing and communities

- 4.76. In 2018/19, the policing of London moved from a model comprising 32 Borough Command Units, i.e. one per borough, each led by a Borough Commander (at Chief Superintendent rank), to 12 Basic Command Units (BCUs), each led by a BCU Commander (also Chief Superintendent). The boundaries of each BCU now incorporate up to four individual boroughs. Each BCU contains a CT Protect Officer and other CT functions, including Prevent Officers.
- 4.77. While this model no doubt enables efficiencies through economies of scale, and I welcome the allocation of CT specialisms in each BCU, I have heard from several local authority Leaders and Chief Executives that sharing the time of the lead officer, i.e. the BCU Commander, with other boroughs has diluted the relationship. BCU Commanders are spread thinly and from the perspective of some local authorities, are struggling to remain in touch with communities and keep leaders up to date. High crime boroughs are perhaps understandably liable to receive the lion’s share of attention from their BCU Commander – less time spent with other boroughs within a BCU, however, threatens relationships and jeopardises partnership working and information sharing. **Four years on from implementation of the new BCU model, it would**

⁶¹ [planes-drones-and-helicopters-an-independent-study-of-police-air-support.pdf \(justiceinspectrates.gov.uk\)](#) (accessed 29/09/21)

be sensible for MOPAC to assess whether the expected benefits as set out in the business case have been realised. Views of local authorities and community partners should be taken into account and ways to strengthen partnership working identified and acted upon (R39).

- 4.78. This is particularly important given the high level of turnover of officers at BCU Command (and previously at Borough Command) level. While the expectation is for them to remain in post for at least two years, in some cases they are in role for only a few months – this is too short a period of time in which to form robust and trusted relationships with partners (see chapter 7). **The MPS should consider a minimum three-year tenure for BCU Commanders and look at how it might better protect those taking up the posts from being moved into other roles prematurely** (R40). If local authority Leaders, Chief Executives and communities were able to count on a greater degree of longevity in this regard, it may go some way towards assuaging the discontent among some boroughs at the 12 Area model.
- 4.79. Conversely, direct relationships with CTP in some instances are stronger with some local boroughs reporting they are a more reliable source of information than BCU Commanders. **This may of course reflect a breakdown between CTP and BCU Commanders and the MPS should look at information flows between these roles to ensure it is two-way and both are informed about local issues** (R41). Vetting and clearances may also be acting as a barrier, which I consider elsewhere, particularly in chapter 11.
- 4.80. The CTP campaign slogan '*Communities Defeat Terrorism*' highlights the importance of community partnerships. These relationships, however, require a level of trust to flourish for any 'policing by consent' model to work. If individuals and communities do not feel listened to or supported by their local police, if they do not feel empowered to engage and communicate, to raise concerns and issues, then those radicalising narratives which feed off grievances and seek to alienate particularly young and vulnerable people from those around them through offering a more inclusive (ultimately violent) alternative risk being strengthened. This holds irrespective of terrorist ideology or motivation - distrust of police and police interventions ultimately undermines legitimate policing work (in all areas not just CT).
- 4.81. I know from my own past experiences that building positive, strong relationships with local communities is not easy. It requires consistent reaching out and engagement with those communities. It needs to recognise their diversity and complexity and the dynamic way in which they change and reshape themselves over time. It means much more than simply talking from time to time with self-styled community leaders whose salience with the communities they purport to represent may no longer be as strong as they think it is.
- 4.82. The relationship needs to recognise and acknowledge the complexities which historical and more recent events bring to bear on the dynamic between the public and the police. This includes the use of Stop and Search and Terrorism Act (TACT) related powers. The horrific sexual assault and murder of a young woman by a serving police officer in 2021 has also profoundly undermined confidence in the police. Rather than shying away from such matters, there needs to be robust mechanisms for addressing community concerns at local level.

- 4.83. These are the necessary pre-cursors for effective engagement on counter-terrorism matters. London's communities and individuals must feel able to raise concerns regarding radicalisation with authorities including the police (and the Prevent programme depends heavily upon this) and in the advent of an attack, to trust in the action and advice provided by the police. I have heard from some local authorities where community relations with the police are strong and that trust and continuous engagement lie at the heart of this.
- 4.84. I consider that the MPS needs to do more to reach out and engage with communities. This goes beyond engaging on faith and religious issues (which I consider further in chapter 19) – local officers must demonstrate an ongoing desire to listen and show meaningful evidence of having done so. It means actively reaching out to communities including those furthest away from the mainstream where arguably, if there is a rising risk of radicalisation it is least likely to be identified. It should include communities spread across the city (for example, different refugee diaspora) and **City Hall should consider whether there is more it could offer in terms of linking up those communities and sharing related information with local police leads** (R42).
- 4.85. Much of this hinges on effective information sharing and partnership working. Engagement with local community leaders is key, but I have heard concerns from several quarters that those leaders are not always sufficiently current. The MPS must work with local authority leaders to refresh these partnerships on a regular basis: their points of contact affording reach into communities must have currency and credibility with local populations. From a terrorism preparedness perspective, younger cohorts are particularly important for they can often be the most vulnerable to radicalising influence - ensuring they feel represented by the right people is critical.
- 4.86. Local MPS safer neighbourhood teams (SNTs) are crucial to building links with local communities, and facilitation of trust and reassurance will likely enhance the potential for the sharing of valuable local intelligence. Neighbourhood policing is also a key route through which officers themselves can spot unusual or concerning behaviours that may indicate underlying vulnerabilities and risk of all kinds. The uplift in the number of officers (see paragraph 4.58) should in part be used to ensure that the network of dedicated local SNTs is brought back and reinvigorated.
- 4.87. In my previous review I recommended the wider use of Project Servator, which I am pleased to see has been taken up by the MPS. This is a dual-purpose policing tactic, acting to disrupt and deter criminal activity, including terrorism, in parallel with providing a reassuring presence for the public. It is an important part of the MPS' engagement with communities and seeks to embed a culture of vigilance and encourage suspicious activity to be reported – it should be maintained at current levels of deployment or better still enhanced.
- 4.88. Project Servator involves the police carrying out a deployment anywhere, at any time. Some elements are highly visible, such as uniformed police officers, dogs and horses, armed officers and vehicle checkpoints. Others are less so and can include plain clothes officers and briefed

CCTV operators, although the deployment is always highlighted on social media to extend its reach. Most if not all Servator related public engagement is usually undertaken by uniformed officers – where plain clothes officers do so, it should be done sensitively and in accordance with current guidance.

- 4.89. A key part of Project Servator is a focus on behavioural detection, meaning officers are trained to identify individuals who may be planning or preparing hostile reconnaissance. Officers use these deployments as opportunity to talk to members of the public and highlight the valuable role individuals can play as 'eyes and ears' to help detect and prevent terrorism and crime more widely.
- 4.90. While largely well received and considered a successful adjunct to detection and prevention, choice of deployment location must be informed by local context, which strong relationships with the local community facilitate. There is always a risk that Project Servator raises concerns rather than reassures, if people mistakenly interpret it as a response to an imminent threat rather than one part of the MPS' overall tactical toolbox.

The British Transport Police

- 4.91. London's vast and complex transport system is policed by the MPS Safer Transport Teams (within the Roads and Traffic Policing Command) who focus on surface (bus and road) networks, in partnership with the CoLP, and the British Transport Police (BTP) who are principally concerned with the rail, Underground and Docklands Light Railway (DLR) network. They work to reduce crime across the network, increase confidence among travellers and keep the network running. Funded largely by train operating companies, Network Rail and, in London, Transport for London (TfL), in the event of a terror attack on any part of the transport system officers from the dedicated MPS or CoLP teams, or the BTP, are likely to be the first to respond.
- 4.92. Playing a key role in CT efforts across the transport network in London, the BTP has recently increased its cadre of AFOs and ARVs through an internal efficiency programme – this is very welcome. Similarly welcome are the assurances I have received that working relationships and preparedness arrangements between the MPS and BTP are good.
- 4.93. There is increasing focus on joint testing and exercising between the BTP and TfL in support particularly of managing incident response. This means the BTP are aware of developments being piloted by TfL to deliver some aspects of critical incident management remotely (for deployment when circumstances compromise staff availability) and are able to account for these in their own planning.
- 4.94. The BTP continue to deploy Project Servator as part of their tactical CT activity across London (and more widely across the UK) and this should be continued as a critical part of managing CT risk across the transport network.
- 4.95. Much has been made to me of the single text number which allows the travelling public to communicate concerns to the BTP, including regarding potential terror risks and threats. This

was introduced in part to enable transport users to seek help, or report concerns, in real time without fear of alerting the subject of their concern. (It would not be desirable to call the police to report sighting of a weapon, for example, or racial abuse, from a nearby passenger).

- 4.96. The BTP live monitor all incoming messages, issuing a text acknowledgement to senders and engaging further to identify details and allow appropriate action to be taken (e.g. asking for the train carriage number, or whether a sender is content to identify themselves to police officers despatched to the next station stop). Where a situation demands it (someone has just been robbed or assaulted, for example) then the operator will escalate the report for immediate BTP action and will alert the appropriate geographical police force if required. In my view, this represents a valuable mechanism for reporting crime and related concerns and allows the public to do so quickly and unobtrusively. It represents an effective way of surmounting some of the barriers which can otherwise stand in the way of reporting, although there are gaps in its advertisement across London, to which I return in chapter 21.

City of London Police

- 4.97. The City of London Police (CoLP) are responsible for policing what is commonly referred to as the 'Square Mile' and which is managed by the City of London Corporation (i.e. the local authority). The City is not only the major business and financial centre for London, as well as host to many well-known and iconic venues and spaces but contains a substantial number of potential terrorist targets. It has a relatively small resident population (around 10,000) but on a daily basis accommodates up to around 600,000 workers and visitors.
- 4.98. In 2016 I expressed concerns about the impact on interoperability and response times with policing responsibility shared between the MPS and CoLP. The terror attacks experienced in London since then, most notably at London Bridge in 2017 and Fishmongers Hall in 2019 which both took place at the physical border between the two forces provided an effective test of these working relationships.
- 4.99. The joint police response (and de-briefing exercises) to both attacks demonstrated to me that in practice, coordination, communication and response across the forces was supportive and complementary. I have heard from both CoLP and the MPS, as well as the BTP, that interoperability continues to work well on a daily basis, importantly within CT functions but in others too. Joint training and exercising and shared ways of working have strengthened that interoperability, demonstrated more recently in the effective management of large-scale protests by Extinction Rebellion in locations across London which drew on both CoLP and MPS resource. I return to training and exercising in chapter 14, but it has been pointed out to me that given the importance of interoperability, a dedicated central team responsible for developing, organising and delivering this critical function across the emergency services would be very beneficial, rather than depending upon exercises led by one service to draw in others.
- 4.100. The inquest into the attack at London Bridge reached a similar conclusion, finding no evidence that having two police forces involved in response created any problem, and nothing to suggest any capacity to create difficulties in future. All the evidence was of good collaboration

between the two forces. The inquest also noted that the CoLP has pioneered a number of protective security tactics and has developed a nuanced understanding of the commercial centre it is responsible for policing. As such my view now is that previous concerns have been addressed and there is no need to consider a merger of the two forces.

- 4.101. That said, primacy must be clear when something happens on the border of the two jurisdictions. It is crucial for officers from both forces to know who has assumed which leadership role, the various operations centres must be large enough to accommodate officers from both forces and I note from de-briefings following the attack at Fishmongers Hall that a disconnect between SO15 in the MPS and CoLP had limited vital information sharing. The MPS and CoLP should work together to ensure mechanisms are in place to address these issues, alongside others identified throughout the reassuringly extensive de-briefing process.
- 4.102. As with the MPS and BTP, the CoLP also operates Project Servator – deployment across the three police forces operating in London provides further reassurance around interoperability.
- 4.103. The CoLP hold positive and strong relationships with businesses across the City of London and have partnered with that community to fund production of 200 trauma packs for use in the aftermath of an attack. These first aid kits, for use by any person regardless of their level of training, support treatment of life threatening injuries and aim to enhance London’s first aid preparedness, increase first aid resilience amongst the general public and improve the survivability of a person with life threatening injuries. The CoLP have mapped the location of each one to enable swift deployment and the packs have since been adopted by National CT Policing Headquarters (NCTPHQ, responsible for national CT policy and strategy) with plans to roll them out across the National CT network. **These trauma packs are a welcome addition to the preparedness landscape and MOPAC should consider, in conjunction with local authorities, how to support wider provision across London boroughs** (R43).

Policing London following the UK’s departure from the European Union

- 4.104. Since I completed my previous Review, the UK has completed its departure from the European Union (EU) following the 2016 referendum. I highlighted then the need to ensure maintenance of the variety of international policing arrangements which work to keep our citizens safe. Nowhere is this more relevant than in policing London.
- 4.105. As the UK is now considered by the EU to be a third country, and remains by virtue of its island status outside the Schengen area, it is no longer legally possible to remain a part of some of the information sharing systems to which it once belonged. In cross-border policing, therefore, the MPS, along with the remainder of the UK’s police forces has returned to previous mechanisms of cooperation through Interpol and bilateral channels. Such arrangements were previously used with EU Member States up until 2015 (and of course exist for the remainder of the world).
- 4.106. The UK is also investing in longer-term capabilities to support law enforcement data sharing through the International Law Enforcement Alerts Platform (I-LEAP). A new domestic alerting platform, I-LEAP will allow UK enforcement agencies to access, share, and take action on alerts

related to people, documents and objects with Interpol in real time, with plans to build connections with international partners on a reciprocal basis in slower time.

- 4.107. Mechanisms to facilitate the fast and effective exchange of criminal record information, DNA, fingerprint and, in due course, vehicle registration data between the UK and EU Member States to aid the investigation of crime and terrorism remain in place, as do those to ensure streamlined extradition arrangements. **I recommend that the Mayor should from time to time seek assurances from the MPS on the adequacy of these law enforcement data sharing arrangements** (R44).

5. THE LONDON AMBULANCE SERVICE AND WIDER HEALTH CONSIDERATIONS

- 5.1. The London Ambulance Service (LAS), along with the Metropolitan Police Service (MPS) and the London Fire Brigade (LFB), plays a very significant role in the event of any major incident in London that results in mass casualties.
- 5.2. Removed in 2018 from the special measures into which it was placed in 2015 (following a report by the Care Quality Commission), the LAS was widely commended for its response to the terror attacks in London across 2017, and to the Grenfell Tower fire that same year. However, as one of the busiest ambulance services in the world, and the busiest in the UK, like all aspects of the health service in London and across the country the LAS continues to face unprecedented demand.
- 5.3. The National Health Service (NHS) is currently facing pressure unlike anything it has experienced in its 73-year history - indeed, nine in ten NHS leaders recently described the current demands on their organisation as unsustainable⁶². The mutual support provided across the emergency services during the Covid-19 pandemic has undoubtedly strengthened working relationships and interoperability with consequent benefits for preparedness considerations. However, I am extremely concerned about the current capacity of the LAS and the NHS in London to respond to a major terror attack.

Balancing business as usual with responding to a terrorist attack

- 5.4. Both funding and performance of the NHS are matters outside the scope of this Review, as are detailed considerations of the nature of and reasons behind the pressures it faces. The advent of Covid-19 in 2020, however, following what the NHS Confederation and NHS Providers described as '*the longest and deepest financial squeeze in its [NHS] history*'⁶³ deserves mention. The added pressures brought by the pandemic have effectively drained the LAS of flex in terms of spare capability and capacity.
- 5.5. The Association of Ambulance Chief Executives (AACE) said that in October 2021, every ambulance service in England was at the highest level of alert and paramedics warned services were regularly holding up to 300 calls because there was no ambulance available⁶⁴. The LAS was no different and continues to experience some of the highest levels of demand in its history. In July 2021, the service declared a 'business continuity incident' following a surge in

⁶² [Under pressure | NHS Confederation](#) (accessed 16/11/21)

⁶³ [A-reckoning-continuing-cost-of-COVID-19.pdf \(nhsconfed.org\)](#) (accessed 16/11/21)

⁶⁴ Mahase, E. *Ambulances queue outside A&Es as 999 calls pile up*. British Medical Journal, 2021, 375:n2590.

999 calls, meaning its normal service risked falling below an acceptable level. Callers classed as urgent but not life-threatening were advised to seek alternative care or make their own way to hospital.

- 5.6. And while that status was stood down after several hours, the LAS remains under very substantial pressure. As elsewhere, response times are increasing not just because of rising demand but because crowded hospitals mean ambulances cannot hand over patients, leading to queues outside emergency departments. The number of handovers taking longer than the national target of 15 minutes has increased dramatically over the past year⁶⁵ ⁶⁶. And if an ambulance is in a queue, it is not available to respond to new calls - while the average LAS response time to category 1 calls (for life-threatening injuries and illnesses) was around seven minutes in October 2021, for category 3 and 4 calls it was four hours⁶⁷.
- 5.7. Similarly, an ambulance queuing outside a hospital which is unable to admit the patient inside cannot respond to a major incident. This is problematic not just because it risks the swiftness of a life-saving response but because a queue of ambulances in itself has potential to become a target for terrorism. The terrorist attack perpetrated outside a Liverpool hospital in November 2021⁶⁸ shows that hospitals can present a target which arguably, if a significant and visible part of the emergency response to an attack is sitting outside it in a queue, is exacerbated.
- 5.8. I have been advised that NHS England is working with the LAS and other providers to ensure crews can quickly transfer patients in the event that a major incident, including a terror attack, is declared in London when ambulances are queuing outside hospitals. Plans include drawing on mutual aid via major hospitals elsewhere in the country, although I have some concerns regarding feasibility of this given the capacity issues experienced in London are evident elsewhere.
- 5.9. I am also sceptical about assurances that in the event of an attack, sufficient hospital patients will discharge themselves to free up beds. While this has taken place to some extent following previous attacks, I consider it less likely in current times given the proportion of in-patients presenting with very serious health issues, both Covid-19 related and otherwise (in part due to health conditions worsening through inability to access care during the pandemic).
- 5.10. **The Mayor may wish to seek assurance from the DHSC that should a major terrorist attack be carried out in London, the contingency measures in place to treat casualties in the context of current nationwide demands on the NHS, including across acute care capabilities, are realistic** (R45).

⁶⁵ [RCEM Acute Insight Series: Crowding and its Consequences \(cloudinary.com\)](#) (accessed 18/11/21)

⁶⁶ <https://aace.org.uk/wp-content/uploads/2021/11/AACE-Delayed-hospital-handovers-Impact-assessment-of-patient-harm-FINAL-Nov-2021.pdf> (accessed 13/12/21)

⁶⁷ [Statistics » Ambulance Quality Indicators Data 2021-22 \(england.nhs.uk\)](#) (accessed 16/11/21)

⁶⁸ An individual detonated an improvised explosive device (IED) while in a taxi outside the Liverpool Women's Hospital on Remembrance Sunday.

- 5.11. The MPS CT Security Advisers (CTSAs) should also work with NHS England, the LAS and the NHS in London to ensure hospitals and related sites such as vaccine centres across the capital have protective security measures in place. These must ensure buildings (including internal areas containing equipment which could be harnessed for malign intent), grounds and ambulance waiting areas are adequately protected.
- 5.12. Given the exceptional pressure on the LAS, it is understandably difficult to continue to ringfence specialist resources. The LAS maintains two Hazardous Area Response Teams (HARTs, see paragraph 5.18) who have undergone specialised training to enable them, for example, to treat injuries resulting from exposure to chemical, biological, radiological or nuclear (CBRN) materials. While I recognise that reserving the HART teams to enable swift deployment in case of a major incident is increasingly challenging given wider demands, it is crucial this capability is maintained to ensure resilience in case their specialist capabilities are required.

LAS engagement with the threat picture and multi-agency working

- 5.13. The LAS is a standing member of the Security Review Committee (SRC, see chapter 13) which is welcome and ensures their exposure to the current threat picture and London-specific considerations. However, to ensure awareness at appropriately senior levels of decision making, the Chief Executive of the LAS may wish to consider attending where possible. As a relatively recent appointment this would also support building of wider relationships with partners.
- 5.14. Furthermore, it has been put to me that **there is no longer a forum which regularly brings together the chiefs of the three emergency services. The emergency services may wish to work together to address this. And while the LAS meets regularly with the London Mayor, to my mind there would be value in similar engagement with the Deputy Mayors responsible for Policing and Crime, and for Fire and Resilience - the LAS should consider this with City Hall** (R46). This would help to shore up inter-agency working, showcase a culture of partnership, and to identify and resolve issues at a strategic level.
- 5.15. At a working level, however, I am assured that cross-agency relationships are more firmly entrenched. As they do for the MPS and LFB, the Joint Emergency Services Interoperability Principles (JESIPs, chapter 13) govern the LAS approach to incident response, and these are well embedded through multi-agency exercising (see below). I am confident that in responding to a future terrorist attack, the challenges witnessed with, for example, the emergency services response to the attack at Manchester Arena would not present themselves in London. That said, it is worth checking that front-line responders across London's emergency services are clear on which service takes primacy for the various aspects of response. **The LAS, LFB and MPS should collectively reassure themselves that relevant guidance and training is sufficiently clear and understood by those likely to be first on scene of any terrorist attack** (R47).
- 5.16. Both technical and personnel coordination between the LAS control rooms and those of the MPS and LFB is strong. This enables the LAS to see, when alerted to a sudden need to attend

an incident en masse, that they are dealing with a terrorist event and ensure an appropriately equipped response is despatched with paramedics properly informed.

Equipment, training and funding

- 5.17. Four major trauma centres are maintained in London, which in the event of an attack will take in the most seriously injured victims. In my previous review I queried whether four is sufficient to deal with significant numbers of very seriously injured casualties resulting from, for example, a multi-site marauding terrorist attack (MTA). I was assured then and have been similarly assured now that four centres are sufficient. However, I have some concerns about how quickly they might become saturated, particularly in the current climate and recommend the assumptions underpinning this assurance are revisited in light of the heightened demand across London.
- 5.18. I have equally been assured that London's two HARTs are sufficient, although I similarly retain a concern that in the event of a multi-site MTA this would represent inadequate provision. A further 13 HARTs are funded nationwide which are interoperable with the London capability (staff undergo the same training and operate with the same equipment) and in theory would provide support. However, their availability for deployment given the pressures currently experienced by ambulance trusts across the country is uncertain.
- 5.19. Moreover, latest data⁶⁹ shows London experienced a much higher number of HART activations over the year from December 2020 to December 2021 relative to all other regions: 6,555 compared to between 800 and 3,638 for HARTs outside the capital. In my view, this strongly supports the case for London's HART capabilities to be bolstered by a third team: this should be centrally funded and baselined into core funding to include the costs of staff, training, uniform and associated capital. **The DHSC should look to review the LAS settlement accordingly, with respect to HART capability** (R48).
- 5.20. The provision of a Tactical Response Unit (TRU) within the LAS offers some mitigation (though to my mind not sufficient) against an overly stretched HART capability. Trained to similar levels as HARTs, the TRU works alongside the LFB and MPS in the event of a terrorist attack involving firearms. Its paramedics are trained to work directly within the warm zone (see chapter 3) of such incidents (and in exceptional circumstances, the hot zone). This is very welcome as it recognises the specific and heightened terror threat faced by London and helps mitigate against what in my view is a relatively limited HART capability.
- 5.21. Non-specialist LAS responders are also now able to enter the warm zone (equipped with a stab vest) following revisions to JESIPs and the Joint Operating Principles (JOPs, which guide the emergency services response to an MTA). However, while the vast majority of specialist responders (in the TRU and HARTs as well as those liable to adopt a command role in a major incident) have completed the requisite training for warm and hot zone deployment, the programme for non-specialist ambulance staff has been delayed by Covid-19.

⁶⁹ From the LAS national reporting database.

- 5.22. Given the wider pressures the LAS are facing, it is understandably challenging to extract staff for training. Where possible, however, facilitating non-specialist participation should be prioritised to ensure that should an attack happen, LAS responders will be in the best possible position to deliver potentially life-saving care. The fact it is now possible to identify how many ambulance staff are on duty across the country with specialist MTA capabilities provides some reassurance that if required, mutual aid could be provided to London as the LAS proceeds with its training programme for all front line responders.
- 5.23. Similarly, staff trained in responding to a CBRN incident are likely to require refresher training following the hiatus imposed by the pandemic. **The LAS should ensure CBRN refresher training takes place where it has not yet done so as soon as is practically possible** (R49).
- 5.24. The LAS are a core partner in multi-agency testing and exercising (see chapter 14), including in recent exercises designed specifically to test the revised JOPs. Both specialist and non-specialist responders participate, in recognition that the former may well not be first on scene at a major incident. As with the MPS and LFB, I have been assured that learning from all exercising informs reviews and refreshes of the LAS response.
- 5.25. The LAS also deliver a session on the MPS tactical firearms commander course. This sets out the LAS response to an MTA and the principles of casualty management from an LAS perspective. An important means of ensuring a key partner understands LAS pressures, priorities and demands in a response situation, **the LAS should consider providing similar input on their MTA response to senior LFB commander courses** (R50).
- 5.26. The totality of LAS funding is clearly inadequate for the pressures on the service. The LAS should receive additional centrally-provided funding to reflect the heightened costs inherent in providing an emergency ambulance service to a capital city (in terms of the number of people, including visitors, and the number of regular and very large events it hosts), alongside the uplift (see below) which reflects the additional threats of terrorism. While it has received additional monies related to pandemic related pressures, there is a risk that once that is abstracted, remaining funding will be insufficient to deliver against what is expected to continue to be heightened demand through both the 999 and 111 services.
- 5.27. NHS England do award the LAS a funding uplift to reflect the increased risk of MTAs faced by the capital and the consequent additional demand on the LAS as part of the emergency response. However, as with HARTs and TRU funding, this uplift is agreed on an annual basis. **Reflecting the consistent level of heightened risk and threat in London, all three sources of uplift should be baselined into LAS funding: NHS England should look to facilitate this for future funding LAS settlements** (R51).
- 5.28. Funding for the LAS is managed through one of five Integrated Care Systems (ICS) which meet the health and social care needs of Londoners and visitors to the capital. These partnerships bring providers and commissioners of NHS services across each of five areas of London together with local authorities and other local partners to plan health and care services to meet the needs of their population. One ICS holds the relationship with LAS on behalf of the

remaining four, and therefore must secure their agreement to the LAS funding settlement. This means those four are effectively remote from the decision but can theoretically hamper the outcome. As the LAS operates as one service across the whole of the capital and does not respect the boundaries of individual ICS', it is difficult to see how this funding model can operate efficiently.

- 5.29. The model also means each individual ICS has an emergency planning responsibility, which will account for population and environmental dynamics specific to its area. This contrasts with the way in which the MPS and LFB handle emergency response planning – both operate as one service across the capital, which is how the LAS in effect operates. It does not respect the artificial boundaries which the ICS model has introduced. I am concerned this might lead to five different sets of expectations about how the LAS should respond in the event of a terrorist attack (or other type of major incident) which feels both ineffective and inefficient.
- 5.30. **The method of channelling the LAS funding through one ICS on behalf of the rest of London should be reviewed and the option to retain allocation via NHS England (London Region) should be considered** (R52). The LAS needs to be treated as a pan-London service in structure as well as practice, enabling it to continue to function at the London regional level in terms of resilience planning and delivery.

Balancing security with accessible care

- 5.31. The detonation of an improvised explosive device (IED) in a taxi which had drawn up outside the Liverpool Women's Hospital in late 2021 highlights the external vulnerabilities of hospital buildings. It has also been put to me that it would not be difficult to mount an incursion into a hospital. While wards and other clinical spaces can generally be accessed only by those with a pass to open doors, reception and waiting areas are publicly accessible and can often become very crowded.
- 5.32. While I am not minded to recommend further securitising what should remain welcoming, reassuring and available public places, induction programmes and refresher training for clinical and administrative staff working in primary care settings (including GP surgeries) should include material to help staff feel confident to challenge an individual if they are concerned. **The CTSA's should work with the DHSC to ensure this is covered in training materials and guidance for those working in primary care settings** (R53).

The Prevent Duty in London's healthcare provision

- 5.33. The role of the Prevent programme in preparedness is discussed in further detail in chapter 7. Given, however, that health (excluding primary care⁷⁰) is among those authorities legally required to have due regard to the need to prevent people from being drawn into terrorism⁷¹

⁷⁰ Primary care providers, including GPs and dentists, do however have a professional and ethical duty of care with respect to safeguarding. The need to prevent someone from radicalisation falls within scope and primary care providers will take action in this wider safeguarding capacity if they have concerns.

⁷¹ [Revised Prevent duty guidance: for England and Wales - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/84444/Revised_Prevent_duty_guidance_for_England_and_Wales.pdf) (accessed 17/11/21)

(and is currently the third highest Prevent referral sector, behind education and the police⁷²) it is worth mentioning with respect to London's healthcare providers.

- 5.34. The Home Office (HO) ceased to fund regional NHS Prevent Coordinator leadership roles in 2020. This is concerning as it means that the mechanism for delivering strategic oversight and leadership at local level has significantly diminished. It was through these roles that information, including locally specific risk, threat and policy updates, alongside wider advice was provided to healthcare staff across each region. While not yet taking effect in London as the region has maintained the function, albeit via a more generic safeguarding role, this represents a single point of failure as it is reliant on the person who previously held the role, with the commensurate knowledge and experience, remaining in the organisation.
- 5.35. Having reviewed the nature of support and advice provided to NHS England (London Region), I am confident in the value of such a function. Regular newsletters and briefings cover important, health-focused, CT topics including public awareness campaigns, sources and manifestation of radicalisation risk, and how to share information appropriately while having regard to data protection and patient confidentiality. Materials benefit from London-focused input from MPS Prevent leads which is testimony to the strong, regional multi-agency relationships which dedicated roles within partner organisations facilitate. **The HO should reinstate funding for Prevent leads across all NHS England regions – this would safeguard the London function from staff changes. Alternatively, they may wish to consider creating wider regional CONTEST Coordinator roles, responsible for considering all aspects of CT as relevant for provision and delivery of health services** (R54).
- 5.36. Prevent awareness training is available for all staff who provide services to NHS patients across London, including those in primary care. While there is no specific duty on the latter to do so, I have been assured there is a high uptake of training (notwithstanding the position adopted by the British Medical Association with regard to Prevent more broadly⁷³). A number of GPs for Adults and Children act as GP Prevent Champions and are helping drive understanding of, and engagement with, responsibilities to flag radicalisation concerns under the mantle of safeguarding. These arrangements have been broadly effective and should continue.
- 5.37. However, there is room for improvement in the sharing of information between health and the police. Health practitioners, concerned about breaching patient confidentiality, can understandably be reticent to provide records when asked by CT Policing to do so. **The DHSC should do more to encourage this, clarifying the grounds under which data can and should be shared or volunteered without patient consent. In turn, the police, local authorities and other statutory partners should do more to clarify why the data is needed, i.e. for Prevent case management purposes** (R55), including providing a form of words to articulate in broad terms that there is a terrorist risk and it is in the public interest for health records to be shared.

⁷² [Individuals referred to and supported through the Prevent Programme, April 2020 to March 2021 - GOV.UK \(www.gov.uk\)](https://www.gov.uk) (see Table 17 in data tables, accessed 18/11/21)

⁷³ [Doctors' responsibilities with anti-radicalisation strategy \(bma.org.uk\)](https://www.bma.org.uk) (accessed 17/11/21)

- 5.38. It would also be valuable for health practitioners who do share information, and for those who make a Prevent referral, to receive feedback on subsequent action taken where appropriate. Having even the briefest sense of outcome would allow a practitioner to reconcile the patient record and go some way to reassuring them of the value of the process and thus encourage future referrals.

Mental health, including autism spectrum disorder, and the risk of terrorism

- 5.39. The role played by poor mental health and autism spectrum disorder in heightening an individuals' vulnerability to radicalisation, and potentially raising the risk of a subsequent terrorist attack, continues to be explored in depth by research programmes led by various parts of government and academia. This is important. Perpetrators of several terror attacks across the country in recent years, as well as those convicted of other terror related offences, have suffered periods of mental ill health, most recently the man who detonated an improvised explosive device outside the Women's Hospital in Liverpool in November 2021. Across sectors and services, I have repeatedly heard how poor mental health, alongside a variety of other complex needs, is increasingly characterising the choices and actions of self-initiated terrorists and others under live investigation by the police and security services.
- 5.40. Detailed commentary on the mechanisms of mental health, diagnoses and service provision in relation to terrorism is outside the scope of this review and is explored at length elsewhere, including by Jonathan Hall QC⁷⁴ with respect to terrorism and terrorism risk offenders subject to Multi-Agency Public Protection Arrangements. In terms of preparedness, however, an understanding of mental health is likely to be beneficial – although the point has been made to me that conflation of mental health issues with other sorts of vulnerabilities and needs is not uncommon. Care must be taken to ensure that other needs exhibited by vulnerable individuals, such as difficulties caused by access to employment and housing, learning disabilities, autism or substance addiction (where they do not arise from issues with mental health), are not de-prioritised by an assessment of poor mental health which may or may not be the primary cause of concern.
- 5.41. Around half or more of those referred into Prevent are aged under 21⁷⁵. And a number of those convicted each year after a charge for a terrorism-related offence are similarly aged under 21⁷⁶. Moreover, young people more generally are increasingly suffering with poor mental health. I am therefore concerned by the practical disconnect between support services provided to young people via the Child and Adult Mental Health Service (CAMHS) and those provided to adults, i.e. from the age of 18. The threshold for intervention with adults is higher than that for children, meaning where a young person vulnerable to radicalisation who

⁷⁴ [supervision-terrorism-and-terrorism-risk-offenders-review.pdf \(publishing.service.gov.uk\)](#) (accessed 17/11/21)

⁷⁵ [Individuals referred to and supported through the Prevent Programme, April 2020 to March 2021 - GOV.UK \(www.gov.uk\)](#) (see Table 4 in data tables, accessed 18/11/21. The absolute and proportionate fall in referrals among those aged under 21 in the past two years is likely to be the result of pandemic related lockdowns, leading to a drop in referrals from the education sector.)

⁷⁶ Between April 2016 and March 2021, around 18% of all those convicted of terrorism-related and non-terrorism-related activity following an initial charge of terrorism were aged under 21 (from [Operation of police powers under the Terrorism Act 2000, financial year ending March 2021 - GOV.UK \(www.gov.uk\)](#) see Table A.10 in data tables, accessed 30/01/21)

presents with mental health issues is supported via CAMHS, that support may well disappear once they reach the age of 18, and / or they disengage.

- 5.42. This risks a vulnerable young person effectively falling through the gaps of service provision which, for some, may heighten vulnerability to being drawn further into radicalisation and raise the risk of future violence. **This gap in provision must be reviewed urgently by the DHSC: the current cliff edge whereby support is abruptly removed when a young person passes a particular chronological age that may bear no relationship to their emotional age should be addressed** (R56).

6. THE LONDON FIRE BRIGADE

- 6.1. As one of the three blue light emergency services, the London Fire Brigade (LFB) plays a crucial role in preparedness for and response to any major incident in the capital. While the Metropolitan Police Service (MPS) remain the lead agency for a terrorist incident response, the LFB (along with the London Ambulance Service, LAS) are a vital partner in terms of both coordinating and delivering that response. In a terrorist incident, LFB commanders will co-locate with their LAS and MPS counterparts, both at the scene (normally at the forward command point, FCP) and in the Specialist Operations Room (SOR, see chapter 13). This helps ensure a joined up operational response with shared oversight, situational awareness and decision making.
- 6.2. The busiest fire and rescue service (FRS) in the country and one of the largest firefighting and rescue organisations in the world, demands on the LFB are high and complex, in part because of the size and density of London's population. And careful thought must be given to how fire safety measures resulting from those demands support rather than compromise CT and protective security. A holistic view of safety is important, to ensure consequences of actions to address one set of considerations do not adversely affect the other. Evacuation procedures following a fire alert, for example, can create crowds unless people are guided otherwise. Keeping building doors open to facilitate swift exit in an emergency may risk allowing potential attackers an ingress opportunity.
- 6.3. The LFB, in partnership with the Centre for the Protection of National Infrastructure (CPNI) have developed advice to support those responsible for security and public safety to mitigate the risk that fire alerts might be used deliberately to create crowds and further the impact of a subsequent attack. **This advice regarding fire alerts should be shared with partners including local authorities, the MPS and the Security Industry Authority (SIA, see chapter 18) to ensure it features in wider guidance to businesses, personnel responsible for evacuation protocols and others working in the security industry (R57).**
- 6.4. Along with other agencies and services the LFB has had to adapt to the changing nature of the terrorist threat to ensure it remains able to respond effectively to major incidents in addition to servicing business as usual demands. The increasing risk of self-initiated attacks with bladed or other types of weapons following self-radicalisation (including through marauding terror attacks – MTAs), and the potential for terrorists to make use of chemical, biological, chemical or nuclear (CBRN, see chapter 12) weapons requires the LFB to diversify its capability.
- 6.5. The LFB is a standing member of the London MTA Board, the CT Policing CONTEST Board and the Security Review Committee (SRC, chapter 13). I am confident, therefore, that they are plugged into key forums to inform that diversification through the sharing of intelligence and engagement in multi-agency thinking. However, there is potentially more which firefighters might offer in terms of intelligence based on their business as usual activities, to which I return in paragraph 6.23.

Responding to a marauding terrorist attack: the London firefighter 'role map'

- 6.6. Alongside firefighting responsibilities, all firefighters are trained (with annual refreshers) in the LAS designed and run Immediate Emergency Care (IEC) programme, and I am pleased to note that following my previous review a new 'Enhanced Immediate Emergency Care' course is being rolled out. This equips those trained to undertake enhanced casualty treatment and recovery alongside colleagues from the LAS, enhancing collective life-saving capabilities in the event of a major incident.
- 6.7. However, the capacity of the FRS nationwide and, for the purposes of this Review, the LFB, to use its resources to maximum effect in response to an MTA remains a challenge. I first raised this matter five years ago, and the lessons learnt following the terror attacks in 2017 provide further evidence of the need for a more flexible and risk-based FRS response model.
- 6.8. The recent National Fire Chiefs Council (NFCC) review clarified the need for the service to improve its MTA capability generally, and to embed this within conventional firefighting operations. In setting out a three-tier response to terrorist incidents (see Figure 10), the review recognises changing attack methodologies and varying risk and threat. The resulting operating model is currently being considered, along with new National Operational Guidance applicable to all terrorist incidents including MTAs and CBRN attacks.
- 6.9. I understand the LFB agree with the NFCC position that firefighters can and will respond to a terrorist incident as part of their standard responsibilities for which they are already trained. Moreover, I understand that the Fire Brigades Union (FBU, and the LFB workforce, with whom there has been extensive consultation) support the requirements of Level 1 and 2 as outlined, significantly improving the MTA capability which the LFB can provide.
- 6.10. Level 2 represents a specialist response requiring enhanced training. At this level, firefighters must be equipped with appropriate Personal Protective Equipment (PPE) in order to operate where firearms or more complex attack methodologies are being used. The LFB currently maintains two specialist teams able to discharge this responsibility, able to reach much of London in 20 minutes. However, an extraordinary amount of harm can be caused in that time and the likelihood is it will not be one of those teams first on the scene of an attack - as demonstrated in London (and Manchester) in 2017 and again at Fishmongers Hall in 2019 and Streatham in 2020. The latter case in particular showcases the dispersed nature of the threat in London, beyond the central zones.
- 6.11. Responding to the threat and risk profile in London the LFB, in consultation with the MPS, thus consider it appropriate that all firefighters in the capital are trained to Level 2 in order to best protect the public and provide the most effective, comprehensive response. I understand the FBU are in agreement. To my mind this is very positive, having stressed five years ago the importance of reaching such an agreement to enable suitably equipped and trained firefighters to respond to all MTA incidents, irrespective of the attack methodology.

Figure 10: a three-tier FRS response to terrorist attacks

Level 1 (Mass Casualty Rescue): All firefighters in the UK must be trained and equipped to respond to a Level 1 incident. This allows for fire hazard management, rescue and treatment of multiple casualties, and response to major incidents, for example transport accidents as well as terrorist attacks involving bladed weapons, vehicles and explosive devices.

Level 2 (Specialist Response): Firefighters trained to Level 2 are additionally able to support the multi-agency response to a terrorist attack involving firearms or more sophisticated weaponry. As with Level 1, they will provide a firefighting capability as per the Joint Operating Principles (JOPs).

Level 3 (High Threat Environments): The Level 3 capability enables firefighters to work in high threat environments in partnership with the police. In London this level of response is provided by the Specialist Entry and Rescue Teams (SERT).

- 6.12. Agreement has now been reached, following what seem to have been inordinately protracted discussions, on remuneration that reflects the mainstreaming of Level 2 duties for all LFB firefighters. (I understand a similar agreement is being reached in Greater Manchester.) It is extremely unfortunate, however, that there is a risk this will fall at the final hurdle. Her Majesty's Inspectorate of Fire and Rescue Services (HMICFRS) have formally written and published a letter to the London Fire Commissioner and Chief Fire Officer for Greater Manchester Fire and Rescue Service expressing concern about the proposed agreement. **In the interests of protecting Londoners and maximising the capabilities available through the LFB, it is important the arrangements regarding the mainstreaming of Level 2 duties are allowed to proceed as agreed** (R58).

CBRN, acid and marine attacks

- 6.13. The LFB have substantially developed their CBRN capabilities in the last five years. Driven by learning post-Grenfell, the gas monitors being installed onto every appliance support detection of risk in stairwells and other closed spaces which could be targeted by those seeking to weaponise noxious substances. Once installed, however, it will be important to ensure these are regularly tested.
- 6.14. As per Figure 10, those firefighters accredited at the current equivalent of response Level 3 are also able to work as part of a high threat response team in partnership with the police (including CT Specialist Firearms Officers, CTSFOs). This recognises the specific and heightened risk faced in the capital (the LFB are the only FRS in the UK with this capability).
- 6.15. The LFB also chairs the London CBRN working group. This brings together the emergency services, the London Resilience Group (LRG, see chapter 13) and the military to focus on CBRN capability including joint doctrine, training and operations. The group has implemented a range of exercises, hosted on rotation by each agency, to test commander decision making. This latter is particularly important given issues with leadership and incident command and control capabilities which emerged during the Grenfell Tower fire inquiry⁷⁷. **To avoid**

⁷⁷ [GRENFELL TOWER INQUIRY: PHASE 1 REPORT OVERVIEW](#) (accessed 14/10/21)

duplication and conflicting guidance and ensure efficiencies where possible, the LFB chaired working group must link into the national CBRN capabilities led by the NFCC and CT Policing (through the National Police Chiefs Council (NPCC)) (R59).

- 6.16. The LFB has well-established protocols for responding to acid attacks and while none thus far have been motivated by terrorist intent, the potential for this remains. **Effective response to the use of acid should be understood beyond the FRS, who should ensure their guidance continues to be disseminated to emergency service partners and those involved in treating victims across the capital (R60).**
- 6.17. Protocols for the LFB role in response to a terror attack on the water, i.e. the River Thames, are less clear. While work is underway to address this, **the resulting guidance regarding the LFB response to a waterborne attack will require assurance. This programme should be prioritised (R61)** – as pandemic restrictions on travel are lifted, the maritime CT threat will begin to rise as, for example cruise ships once again travel into London via the River to dock at Greenwich. I explore preparedness considerations regarding the River Thames in chapter 9.
- 6.18. Overall, I am clear that substantial effort has gone into providing a nationwide and London focused level of assurance regarding the response to CBRN incidents. A similar level of assurance is now needed in respect of the response to maritime attacks.

Testing and exercising

- 6.19. I consider matters related to testing and exercising in detail in chapter 14 but such is their importance, they merit mention here too. It is crucial that training, testing and exercising with respect to responding to terrorist attacks is conducted collaboratively across the emergency services. Such activity must also involve the respective control rooms.
- 6.20. Specific challenges were noted by the Grenfell inquiry regarding LFB leadership and command and control capabilities. As the country emerges from the pandemic, the LFB should invest in regular in-person delivery of incident leadership training and exercising. I accept it will not always be possible for experienced leaders to adopt command positions in the event of a terror attack, so regular testing and exercising is key to mitigating against risks posed by a lack of experience.
- 6.21. The audio recording of LFB command decisions during an incident, now in place following Grenfell alongside video recording of the command suite itself, will support ongoing learning and it may be useful to draw on this material as part of ongoing training.
- 6.22. The role of the FRS in preventative work needs to be acknowledged in the CT space. Firefighters engaged in fire prevention work with households and businesses should be trained to ensure they are not only providing appropriate advice on CT protection where appropriate but can identify and report concerns about any signs of extremist materials or terrorism preparations in the premises they visit.

- 6.23. I have been told the LFB plan to roll out online training to help firefighters identify signs of radicalisation and other CT risks. Intended to slot into the current package on safeguarding (to identify, for example, signs of domestic violence, child abuse, and elder vulnerabilities), this is a welcome addition. The content must, however, dovetail with wider police CT standards and guidance and must clearly flag referral pathways for firefighters to report CT related concerns. **Training materials must be regularly refreshed to account for changes in the threat and evidence regarding the nature of visible risk factors, and firefighters should undergo refresher training** (R62).

Resources, equipment and funding

- 6.24. I am satisfied that resources available to the LFB to respond to a major terrorist incident, including one perpetrated across multiple locations, are adequate. The Grenfell fire in 2017 significantly stretched the service, with 70 of its 142 fire appliances in operation at the peak of response. While this obviously diluted the rest of the brigade, I have been reassured that capacity even then remained sufficient to continue to meet business as usual demand (acknowledging that the Grenfell fire took hold in the middle of the night when more usual demand is likely to have been lower). I note, however, that in the 2021 London floods there were so many dispersed calls requiring an LFB response that support and assistance from neighbouring fire services had to be requested.
- 6.25. And if all LFB firefighters are trained to Level 2 (see above), they will need to be equipped with appropriate PPE. This will require advance planning, and it will be necessary to retain sufficient stocks to enable equipment to be readily replaced either because of use or because it has reached the end of its shelf life. Appropriate funding will need to be ringfenced to support this.
- 6.26. During the Covid-19 pandemic, many firefighters worked, off shift, side by side with LAS counterparts via ambulance co-crewing. Attending over 150,000 ambulance calls during the pandemic, this offered an effective means to understand the operational pressures experienced by a key partner (and vice versa), crucial in effective multi-agency response to a major incident. I have been assured the practice did not jeopardise LFB capacity and capability but where it continues, the LFB should ensure its impact continues to be carefully monitored to ensure this does not change.
- 6.27. As part of national resilience, the FRS can call upon a Detection, Identification and Monitoring (DIM) capability to advise and support their response to a CBRN incident. In London, three DIM vehicles are maintained, two of which are funded by the Home Office (HO) and a third which is supported by the Mayor and LFB. Involving specialist advisers and equipment, these teams detect the presence of hazardous material, identify or classify it, and monitor its ongoing presence or absence. Reducing risks to emergency responders, the public and the environment, this function is a key element of London's preparedness. **As such, the HO and City Hall should ensure funding is ringfenced to maintain the DIM capability as a minimum and ideally to expand it, as the need to harness cutting edge technology to detect and identify substances will only ever increase** (R63).

- 6.28. In support of LFB responsibilities regarding decontamination following a CBRN incident, three Mass Decontamination Units are maintained in London (plus two more for training purposes which can be deployed in extremis). This must continue – the Novichok incident in Salisbury (see chapters 1 and 12) demonstrated the vital role and necessity of extensive decontamination provision in responding to a CBRN incident.
- 6.29. **Finally, while I have seen no evidence that allocating the funding for LFB CT functions via the CT policing budget is problematic, it would be preferable if it were direct.** This would streamline the process and better enable the LFB to forecast and plan its requirements (R64).

7 LOCAL GOVERNMENT ACROSS LONDON

- 7.1. The local authorities governing each of London's 32 boroughs and the City of London (the latter is overseen by the City of London Corporation) play a fundamental role in preparedness for a terrorist attack and are responsible for leading recovery. Restoring normality can require a very wide range of issues to be addressed, to which those boroughs affected by terrorism and other major incidents would no doubt attest. And rebuilding the physical infrastructure of a community, alongside restoring emotional, social, economic and physical wellbeing can take, in some cases, many years.
- 7.2. In terms of terrorism, the extent and longevity of recovery are likely to depend on the nature and scale of an attack. Immediate practical considerations are almost always likely to include how and when to reopen any closed roads, other transport routes and buildings, alongside significant community reassurance. However, while it will be the boroughs directly affected by an attack or attacks which bear the brunt of responsibility for response, there may be consequences for others, particularly where a threat continues to be assessed as live with potential targets beyond the originally affected borough.
- 7.3. The principle of mutual aid means neighbouring boroughs may be drawn on to augment the principal responding authority's capabilities. I have been assured that since my previous Review, much effort has been put into standardising core components of emergency response across London boroughs to ensure mutual aid is not inhibited by differences local operating procedures. This is reassuring and will help ensure smooth running of mutual aid as and when it is required.
- 7.4. However, while the presumption of mutual aid is welcome, and should continue, it must not become relied upon as a standard part of response. It should remain the exception rather than the rule. With the reduction in funding experienced across London boroughs over several years (see below) there is very little spare capacity to enact mutual aid capabilities.
- 7.5. Local authority capabilities with respect to preparedness and recovery cannot be considered without reference to the financial situation within which they operate. While London Councils (the umbrella group which represents all 32 boroughs and the City of London) welcomed the funding boost announced in the 2021 Budget and Spending Review, they pointed out that the extra investment will not bring funding back to 2010 levels. Overall, London boroughs have seen a 25% reduction in funding in the last decade with no such equivalent fall in demand for the services they provide⁷⁸.

⁷⁸ [Much-needed funding boost welcome but no 'age of optimism' for council finances – London Councils responds to the Budget and Spending Review | London Councils](#) (accessed 02/12/21)

- 7.6. With that in mind, it is pleasing that significant steps have been taken by local authorities, in partnership with others, to address the recommendations in my previous Review. Substantial improvements have been made. Importantly, I have been assured by both local authority representatives and their emergency service partners that preparedness arrangements have been significantly enhanced in light of learnings following those major incidents which have befallen London since my previous Review, particularly with respect to multi-agency working.
- 7.7. That is not to say, of course, that there is not more to be done and this is addressed in the remainder of this chapter. One particular challenge is likely to be the high turnover of Chief Executives expected in the coming months. There may also be some changes amongst Leaders and Mayors following elections in May 2022. **Succession planning must ensure that those coming into senior local authority roles are rapidly inducted into their responsibilities in the event of an emergency or terrorist incident. They must be provided with appropriate training and involved in an (ideally live) exercise with partners as soon as possible** (R65).

Structures and forums

- 7.8. A number of structures underpin resilience (incorporating both preparedness and recovery) across London's boroughs and the City of London. Critical are the London Local Authority Gold (LLAG) arrangements which empower a nominated Chief Executive to discharge emergency response functions on behalf of all local authorities affected by an incident. Clearly a key role, it is crucial that whichever Chief Executive is on duty has the necessary capabilities to discharge this function (see previous paragraph). The Local Authorities Panel (LAP) oversees the LLAG arrangements, with support for operational delivery largely managed through the London Resilience Group (see chapter 13).
- 7.9. Following the terror attacks across the capital in 2017, and the tragedy at Grenfell Tower, an independent review concluded that the LLAG arrangements were fit for purpose and largely operated effectively in guiding a collective response. It did, however, make several recommendations which chime with some of the themes I consider in this chapter, suggesting there is more work to be done in shoring up arrangements. These include testing community engagement and liaison plans with key community and faith groups, and agreeing the role of elected officials in preparedness, response and recovery (including a community leadership role in addition to any operational role).
- 7.10. The new (2019) Resilience Standards for London's local authorities, which replace the previous Minimum Standards for London, resulted from a review of how boroughs and the City of London Corporation individually and collectively assure preparedness⁷⁹. **Designed to support continuous improvement, alongside assuring capability and readiness, self-assessment against the Resilience Standards is recommended every three years as a minimum and the Mayor may wish to satisfy himself that this is taking place within all boroughs** (R66).

⁷⁹ These complement the National Resilience Standards which are produced by the Cabinet Office (CO) for use by Local Resilience Forums nationwide.

- 7.11. A range of further advice and guidance supports Chief Executives and others to understand their roles in preparedness and undertake assurance. The recently developed Concept of Operations for Emergency Response and Recovery (CONOPS) helps those across local authorities involved in emergency preparedness and response to understand their own role and how it relates to others within their organisation and other local authorities. Importantly, and in recognition of the multi-agency nature of response to major incidents, the CONOPS aligns to the frameworks which underpin emergency services response more widely (including JESIPs, see chapter 13).
- 7.12. **London Councils should arrange for these guiding documents and principles, including the CONOPS, to be reviewed to ensure they remain current after the Covid-19 pandemic** (R67). In particular, it is important that they realistically reflect capabilities and expectations from a principal responding local authority in the event of a major incident, and from others under mutual aid expectations. Cross-borough responses can be challenging given the complexity of local authority structures and this may be further complicated with the involvement of central government.
- 7.13. **The LAPs current review of local authority emergency planning, in support of future policy and strategy, should complete as soon as possible** (R68). This needs to consider the lessons of the Covid-19 response and the nature of relationships with and support from central government (which have not always been well coordinated or joined up). Local authorities have welcomed the Resilience and Emergencies Division (RED) in the Department for Levelling Up, Housing & Communities (DLUHC) as the primary interface with central government. However, there is some concern that it is not sufficiently resourced, as a result it has been suggested that the RED is not as effective as it might be in engaging with local areas during a major incident, nor well enough linked in across central government at appropriately senior decision making levels. **DLUHC should review the RED resources and consider how emergency and resilience planning work led by different government departments could be better coordinated** (R69).
- 7.14. Underneath the overall London Resilience Forum (LRF) are borough resilience forums within each borough and the City of London. It should be standard for neighbourhood policing, as well as local CT police leads, to routinely attend these, in conjunction with borough-based representatives from the London Fire Brigade and London Ambulance Service. **I heard from one authority whose local borough resilience forum had facilitated ACT Awareness training (see Figure 8) across all departments engaged in preparedness and response: this is good practice and should be adopted across all London's local authorities** (R70).
- 7.15. More consistently bringing borough resilience forums together in support of mutual aid arrangements would be advantageous. Some local authorities have taken steps to enhance their sub-regional coordination and collaboration arrangements – this is welcome. **Those authorities who have not yet done similar should work with the LRF to consider where effective partnerships might be built at a sub-regional, but supra-borough, level** (R71), ensuring that local knowledge and connections can be retained.

- 7.16. Since my previous review, the Centre for the Protection of National Infrastructure (CPNI) has initiated a quarterly meeting to which those with protective security responsibilities in local authorities across the country are invited. This 'Public Authority Information Exchange' (PAIE) is an important mechanism which allows the latest domestic and international terrorism threat picture to be set out from the perspective of managing risk and preparedness at local level. It also allows local authorities to share experiences and best practice in terms of protective security challenges and solutions, and for CPNI to share the latest material on related matters such as pre-employment screening checks and CT training opportunities.
- 7.17. Despite strong attendance from local authorities outside London, few of those within the capital are regularly represented at the PAIE (and generally not at senior level). **I strongly recommend that all London's local authorities routinely participate in the PAIE, ideally at senior level** (R72). As CPNI's 'Passport to Good Security', aimed at senior executives across organisations, points out - good governance in terms of accountability for security at board/executive level is key in identifying and mitigating threat (see chapter 17).
- 7.18. Local authorities across London chair their respective borough Safety Advisory Group (SAG). These forums are instrumental in determining, for example, whether planned events can take place in the borough, and are responsible for issuing certificates to indicate they are considered safe to go ahead. The SAG plays an important role in ensuring risk and threat are managed appropriately to ensure the public are protected when attending local events: they must remain sufficiently independent and empowered to ensure necessary measures are implemented even if these bring additional burden for an event operator.
- 7.19. Testing and exercising are considered in detail in chapter 14 but the specific focus on London's local authorities that is brought by Exercise Preparer is welcome. This facilitates the testing of local processes, including communications and response, between all London boroughs and with central government, in advance of Exercise Safer City which is run by the London Resilience Group each year across London. The recent expansion of this to bring in wider response partners is important in terms of supporting the principles of multi-agency working: **all local authorities should participate in the annual Exercise Safer City, including Chief Executives and Leaders/Mayors** (R73).
- 7.20. Elected local authority Leaders/Mayors have a vital role to play in preparedness and incident response, particularly with respect to community reassurance. This has become even more critical with the prevalence of social media and as borough figureheads it is vital that they (together with Chief Executives and local Members of Parliament) are informed quickly of critical incidents as they arise, with regular updates, to facilitate effective and timely community communications. Alongside suspected terror attacks, this should include all incidents involving firearms (whether terrorism related or otherwise) – an ability to engage with communities following more frequent, lower level incidents will help ensure they have credibility, authority and reach in the case of a major incident.

The Protect Duty at local level

- 7.21. As I have considered elsewhere, there will need to be very clear guidance as to whose responsibility it will be to ensure the safety and security of those publicly accessible locations (PALs) which the Protect Duty will bring into scope. The spaces likely to fall in scope for local authorities will be wide-ranging in nature and purpose, meaning associated measures to keep users safe and secure will need to be similarly varied. **The Home Office (HO) and City Hall should work with CPNI to produce a framework of options to help local authorities understand what should be considered with respect to the Protect Duty** (R74).
- 7.22. Local authorities are not only the owners of many public places and spaces, but they should also have a role under the Protect Duty to ensure the Duty is adhered to by other owners and operators of PALs in scope. This will need to recognise the wider pressures on local authorities and a regime developed that is balanced and proportionate. Local authorities must of course then apply the agreed standards to their own responsibilities where they own or operate PAL in scope. **London Councils, the HO and City Hall may wish to consider collaborating on such a Protect Duty adherence regime** (R75).
- 7.23. In some boroughs, the local authority has disinvested in CCTV. This is unfortunate as it plays an essential role in public protection (and investigation activity) – all local authorities should be encouraged to make more use of CCTV, particularly in respect of publicly accessible locations. **The Department for Levelling Up, Housing and Communities (DLUHC) should work with City Hall to ensure all boroughs are able to invest in adequate, up to date CCTV coverage** (R76).
- 7.24. I have considered some of the challenges brought by increased demand for outdoor living in chapter 2. Local authorities are responsible for issuing pavement licences allowing businesses to effectively expand their premises: in exercising these responsibilities they should ensure that proportionate and appropriate requirements are placed on venues and operators of specific events to mitigate the risk of terrorist attack. **A special team of CT Security Advisers (CTSAs) should be made available to support local authorities in this function and consideration should be given to making completion of the ACT Awareness e-learning a condition of pavement licences (as well as other licenses)** (R77). I consider pavement licences further in chapter 17.
- 7.25. I previously recommended that a statutory obligation for resilience should be designed into the development of new buildings: the government view at that time was this was unnecessary as existing guidance to consider such matters was sufficient. It remains my view that this does not go far enough – indeed, recent research⁸⁰ suggests a lack of awareness and knowledge

⁸⁰ i) McIlhatton, D., Berry, J., Chapman, D., Christensen, P., Cuddihy, J., Monaghan, R. & Range, D. (2020). Protecting Crowded Places from Terrorism: An Analysis of the Current Considerations and Barriers Inhibiting the Adoption of Counterterrorism Protective Security Measures. *Studies in Conflict & Terrorism*, 43:9, 753-774, DOI: [10.1080/1057610X.2018.1507311](https://doi.org/10.1080/1057610X.2018.1507311) (accessed 05/12/21)

ii) McIlhatton, D., Monaghan, R., Berry, J., Cuddihy, J., Chapman, D. & Christensen, P. (2019). Protecting Commercial Real Estate and Crowded Places from Terrorism. *Journal of Real Estate Literature*, 27:1, 103-116, DOI: [10.1080/10835547.2019.12090494](https://doi.org/10.1080/10835547.2019.12090494) (accessed 05/12/21)

among some (particularly smaller) developers and their clients (particularly within the private sector), and a failure to understand the potential for design-based mitigating protective security measures.

- 7.26. Consideration of the terrorist threat should become standard in all development and redevelopment across London's local authorities. Blending protective measures into the aesthetics of a build or redesign is of course important, and they must not hamper the purpose for which a building or space was originally intended (or exacerbate other risks, such as surface water flooding). **However, ensuring project briefs specify proportionate consideration of protective security upfront would help ensure safety by design, particularly for projects which will ultimately contain a PAL. This should be a requirement laid down by the National Planning Policy Framework issued by the DLUHC and supported by the Planning Inspectorate (R78)** - it is far more efficient to build in from the beginning rather than retrofit in the future.
- 7.27. Encouragingly, the Protective Security Command in the Metropolitan Police Service (MPS) are working with 'Police Crime Prevention Initiatives' (PCPI) to develop 'Protect by Design'. PCPI are a longstanding, not-for-profit crime prevention organisation (owned by the Mayor's Office for Policing and Crime, MOPAC) who are responsible for 'Secured by Design'. This is a highly successful physical security initiative of some 30 years standing, which focuses on improving the security of buildings and their immediate surroundings.
- 7.28. Protect By Design is a complementary initiative which aims to equip venues with an understanding of appropriate, realistic and cost-effective CT protective security mitigation. It is therefore aimed at those involved in the planning, design and development of the built environment, from preparation of local planning policy to commissioning, planning, design and management of new development schemes, through to detailed building design. Similar to the notion of 'Safer by Design' with respect to fire safety, which of course was given added impetus following the tragedy at Grenfell Tower in 2017, this offers potential to provide tested options for consideration in project design briefs. **The Protect By Design initiative should be piloted in London as soon as practicably possible, with robust evaluation in place to inform a subsequent decision regarding roll out nationwide (R79).**
- 7.29. **Local authorities should ensure the emergency services are appraised of planning applications regarding new developments and reconfigurations of existing buildings, both externally and internally, to support their response in the event of a terror attack. Planning departments should take the views of the emergency services into account when considering applications (R80).**
- 7.30. There is a concern that detailed building plans are sometimes made publicly available during the planning and licensing process in such a way that a would-be terrorist can access them as part of any preparations for an attack. **Local authorities should ensure that where such detailed building plans are required, for example in licencing applications, they are submitted on a closed basis with careful consideration of what necessarily must be made**

publicly available. Full access should be limited to appropriately cleared individuals (R81).

- 7.31. Hardening protective security can be a costly endeavour and while plans are in place, many of London's iconic places remain unprotected. This is partly because London's unseen infrastructure means options can be limited – for example, underground cabling and tunnels mean measures with a significant below ground requirement cannot be deployed. I have been assured that alternatives are available but join-up between CPNI, the Protective Security Managers employed by local authorities and CTSA's could in some boroughs be improved to fully consider appropriate options and agree affordable solutions. Effective installation of protective security requires a multi-agency approach in the same way as effective response to a major incident – the aforementioned potential trial of Protect by Design may usefully inform considerations.

The Prevent programme

- 7.32. While the focus of this review is preparedness, issues related to the remaining pillars of the government's CT strategy (set out in CONTEST⁸¹) have inevitably been raised, particularly with respect to the Prevent programme. Prevent aims to safeguard people from becoming terrorists or supporting terrorism and has recently been subject to an independent review of its operation and focus⁸². While I do not wish to venture onto ground covered by that review, the views of Prevent put to me have largely been positive, with widespread recognition that in the face of increasing levels of extremism and polarising narratives within mainstream society (see chapter 1) it represents a crucial part of identifying and managing risk and offers a welcome focus on the need to safeguard vulnerable individuals.
- 7.33. Nationally, those local authorities in which the risks of radicalisation are assessed to be the highest (according to a range of criteria) receive additional funding to help manage that risk. Local community partnerships seek to identify and safeguard vulnerable individuals from being drawn into terrorism, and support those already engaged in terrorist activity to disengage and rehabilitate. A total of 23 London boroughs received this priority funding in the last round of allocations, which is used to support a range of safeguarding and local engagement activity. **However, reflecting the raised nature of risk from terrorism across the capital (see chapter 1), the HO should ensure every London Borough receives some degree of direct funding for their Prevent work and it would not be sensible for the HO to reduce the support it provides to London in future funding rounds** (R82).
- 7.34. **This support for Prevent should be made on a three-year rolling basis** (R83). Prevent activities are not single year projects and the current annual funding arrangement risks local authorities losing gains made in-year as they cannot recruit people into posts or otherwise plan for more than a year at a time due to the risk of funding being withdrawn. This is particularly problematic where those working in the programme, who have gained the trust and knowledge of individuals referred for support, leave either pre-emptively for fear of losing

⁸¹ [CONTEST 3.0 \(publishing.service.gov.uk\)](https://publishing.service.gov.uk)

⁸² [Independent Review of Prevent: ways of working - GOV.UK \(www.gov.uk\)](https://www.gov.uk)

their post, or following the next allocation round if funding is removed. For Prevent to maximise the chance of positive impact Prevent officers must establish mature links with relevant communities through continuity of support and staff – this is jeopardised when funding is not guaranteed beyond a year

- 7.35. Requirements vary borough to borough in response to varying local demographics and nature of risk, so I was pleased to hear about the National Prevent Referral mechanism being developed by the Home Office (HO) and rolled out through CT Policing. A means to increase consistency in the nature of referrals, this will also support professionals to know what signs they should be looking for to gauge whether individuals ought to be referred. While standard across the health and education sector, it is important that all local authorities in London adopt this tool to help standardise the referral process, recognising that the pilot phase showed its use increased the amount of information gathered and the overall quality of referrals.
- 7.36. More emphasis should be given to the Action Counters Terrorism (ACT) Early campaign (part of the wider ACT programme) which seeks to raise awareness of the signs of radicalisation and encourage anyone concerned about someone they know to contact Prevent. **Local authority staff should receive ACT training relevant to their role** (R84). Those working in a wide range of local authority services, from social work to refuse collection and parking enforcement, are exposed to many hundreds of local settings on a daily basis and should be aware of the signs of radicalisation, or vulnerability to such, meaning a referral to the Prevent programme would be advisable. Similarly, they should be aware of what suspicious behaviour or activity which they may otherwise come across in the course of their work (such as hostile reconnaissance) looks like and be aware of how to make an appropriate report to the police.
- 7.37. Local authorities should continue to have autonomy in appointing local Prevent officers - they are best placed to ensure individuals undertaking these roles have the necessary reach into and trust among communities. Prevent delivery and the premise of the CT Policing campaign that 'Communities Defeat Terrorism' are undermined if local people feel unable to raise concerns with, and take advice from, their local Prevent representatives, particularly where they feel uncomfortable engaging with local police.
- 7.38. I was struck by the fact that referrals into Prevent from the education sector in London are consistently lower than the national average - around 18% in 2020/21, compared with around 25% nationally⁸³ (in 2019/20 the difference was even more stark, with 21% of London referrals coming from education settings compared with 31% of all referrals nationally, and 23% and 33% respectively the year before that). This suggests there is more to be done in terms of the provision of, and role for, Safer Schools Officers.
- 7.39. Provided by the Metropolitan Police Service (MPS), Safer Schools Officers have an important part to play in Prevent (alongside the range of other important work that they do). **They should be a priority for all Basic Command Unit (BCU) Commanders** (R85) who lead

⁸³ [Individuals referred to and supported through the Prevent Programme, April 2020 to March 2021 - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/92424/individuals-referred-to-and-supported-through-the-prevent-programme-april-2020-to-march-2021.pdf) (see Table 17 in data tables, accessed 06/12/21)

London's 12 Basic Command Units (each encompassing two, three or four boroughs), irrespective of the local demography. In turn, **local authorities should foster strong links between schools and other educational establishments, including colleges and universities, in their areas so information and learning on issues including CT can be shared** (R86).

- 7.40. Policing support for Prevent liaison has been reduced as a result of the Service Efficiency Review. Such savings are short-sighted and should be reconsidered. **All BCU's should have a lead officer on Prevent who routinely attends all local authority led Prevent meetings** (R87).
- 7.41. In some parts of London, there are a significant number of unregistered "supplementary" schools which fall below the regulatory radar because they provide fewer than 18 hours of schooling per week (see chapter 16). **The Department for Education (DfE) should bring forward proposals as to how such establishments can be subject to some form of regulatory control and inspection to ensure any risk of them being co-opted by those seeking to radicalise young people can be identified and mitigated. The knowledge and intelligence available to individual local authorities should be used to support these arrangements** (R88).

The role of local authorities in managing convicted terrorists and terrorist risk offenders

- 7.42. Many senior local authority figures reported good working relationships with CT Policing and the security services, noting this enabled co-operation on matters such as providing a base for surveillance of subjects of interests. While this is very welcome and should continue, it was also put to me that local authorities are often not informed when terrorist offenders and those at risk of terrorism are released from custody into their local area.
- 7.43. Given the role of the local authority in building community relations, supporting integration and delivering services which play a key role in the management of risk of all sorts of reoffending (including housing provision and facilitating access to employment opportunities), this is not an acceptable position. **HM Prisons and Probation, alongside the security service, should ensure local authorities are included as standard in pre-release arrangements for terrorist offenders and those considered a terrorist risk, along with local Prevent leads** (R89). Their local knowledge will enable adequate provision to be put in place to manage an offender which takes account of local dynamics, helps mitigate the risk of community tensions and, ultimately, supports community (re)integration.
- 7.44. It was also put to me that while local authorities are usually aware of returning foreign terrorist fighters resettling in their area, relevant information known to the security services is not always shared. This makes it more difficult for community concerns and any arising tensions to be managed. I discuss issues regarding partnership working and information sharing in chapter 13 and the principle of 'Dare to Share' equally applies here.
- 7.45. The interface between local authorities and the security services needs to be more open so that safeguarding activities and the risk of radicalisation can be properly managed. There is of

course a balance to be struck and it will not always be appropriate for the security services to share intelligence, but effective preparedness and resilience depends on a certain level of openness with trusted partners about risk and threat. Individuals released from prison, or returning from overseas terrorist theatres, need to live somewhere and those responsible for that, for their living situation and for their family, alongside the wider community, must be properly appraised.

- 7.46. With respect to returning foreign terrorist fighters, the courts are not consistent in the way they consider applications for children and young people to be made Wards of Court. **Where a returning fighter is permitted to return to a family home, there is a potential risk of the radicalisation of any children also resident. The Ministry of Justice (MoJ) should provide guidance and training to support the judiciary in applying the law consistently in this area** (R90).
- 7.47. **The DfE should also review the legislation on child protection to consider whether the definition of 'significant harm' is fit for purpose in terms of the risk of radicalisation** (R91). Parents and other family members involved in radicalising young people in the home are not necessarily neglectful carers – they can provide a loving and supportive family environment. However, that environment may be one that delivers 'significant harm' by radicalising the young person concerned.

Local authorities, communities and local policing

- 7.48. It has been consistently put to me that the quality and effectiveness of the relationship between BCU Commanders and borough leadership teams has been diluted with the move in 2018/19 from 32 Commanders to 12. As I set out in chapter 4 on London's police, virtually every local authority Leader/Mayor or Chief Executive that I spoke to, particularly but not exclusively those in lower crime boroughs, has highlighted that sharing the time of their BCU Commander with other boroughs has weakened the relationship.
- 7.49. This is compounded by the fact that BCU Commanders do not remain in post long enough to cement relationships, either with professional partners or communities across the boroughs within their purview. One local authority Chief Executive, in post for six years, was now on their eighth BCU Commander. Elsewhere, a local authority was on their third BCU Commander in less than two years. As I recommend in the chapter on London's police, the multi-borough Command structure and the tenure of Commanders should be reviewed. **MOPAC and the MPS should consider involving local authorities in the appointment of Borough Commanders** (R92).
- 7.50. Strong working relationships between local authorities and police hinge, like so much, on frequent engagement: BCU Commanders should be in regular contact with the Leaders/Mayors and Chief Executives of each individual borough in their Area. Both the political and administrative leadership of each borough should be routinely informed of emerging and ongoing issues, including with respect to any local CT related operations. In addition, formal meetings – perhaps quarterly – should be held to review police and crime issues in each borough, and BCU Commanders should ensure they receive sufficient briefing

from CT Policing. Effective information sharing is crucial to enable local authority representatives to support community engagement and reassurance where necessary.

- 7.51. I consider police engagement with London's communities more widely in chapter 4 but have observed that in some local authorities, perceptions are of a diminished local presence where officers, if they are seen, are generally in vehicles rather than on the street. If officers are not visible and accessible to the public, information and observations as well as concerns about behaviour that might be relevant for both CT and other criminal matters is likely to be less forthcoming. Where relationships are stronger, this follows direct engagement with communities on their terms – see Figure 11 for an example of one such endeavour. **I encourage all BCU Commanders across London to look to this as an example of best practice in community engagement and to consider similar where appropriate** (R93).

Figure 11: Police engagement in Croydon

Initiating community dialogue

- The Black Lives Matter (BLM) movement, which began in 2013, gained significant international momentum following the murder of George Floyd by a police officer in Minneapolis in the United States (US) in 2020.
- Protests took place across the US and many were organised across the UK in a show of solidarity and to highlight racism faced in daily life, including from law enforcement.
- Among members of Croydon's substantial Black community, concerns grew regarding their ability to protest and remain safe amid fears of counter-protests.

- Collectively recognising the need to meet regularly to discuss such concerns and build strong relationships, the police and local community set up a weekly meeting to bring representatives together.
- This has since morphed into a forum to discuss a wide range of community issues and concerns, is regularly attended by around 60 people and chaired by a community representative.
- It provides a mechanism through which the police can provide progress reports on local activity and update on any pan-London major incidents, as well as hear directly from the community about issues affecting them.

- While open to all, attendance reflects local demographics so is predominantly comprised of members of the Black community representing local businesses, community projects and support groups alongside individuals with an interest in their local area.
- A representative from the BCU senior leadership team attends the weekly meetings, and the BCU Commander attends monthly in a welcome demonstration of commitment to community relationships. Equally welcome is the representation from the local authority each week.
- The forum has facilitated a two-way relationship between the police and a part of the local community where trust in the police has historically been low.

- Demonstrating visible commitment to hearing, understanding and responding to community concerns has, over time, supported engagement with sensitive issues including the signs of radicalisation and how concerns can be reported.
- Regular dialogue allows the police to demonstrate the breadth of their activity and to openly discuss and answer questions and concerns regarding police matters raised in the press and on social media.
- And the forum allows the local authority and police an opportunity to work together and demonstrate unity to a part of the local community which they both serve.

- 7.52. Diminished trust in the police, particularly among young people, can of course also play into and fuel grievance narratives employed by those seeking to radicalise vulnerable individuals. Several local authorities expressed concerns that this was increasingly becoming a problem, particularly where there were also perceptions among communities and local authorities alike that local issues such as drugs and violence were not considered priorities for the police.
- 7.53. Meaning that when the police turn to communities to ask for support and information in the event of a major incident, they are likely to receive short thrift. Not being seen as present for communities in fair weather and foul will affect public engagement in times of exception, such as during and following a terrorist attack which in turn may affect the local authority's capability to support communities and assist recovery. Similarly, failing to explain the local context of police activity (e.g. a drive to improve safety following a rise in knife crime in a local area) can further undermine relationships – particularly when it comes to the use of powers such as Stop and Search which can be contentious.
- 7.54. In addition, some local authorities were very critical of the local policing Independent Advisory Groups (IAGs) which they felt were not representative of local communities. **Local police should discuss with local authorities the individuals they are considering appointing to IAGs and should implement a separate IAG for young people to improve engagement in a way which empowers rather than alienates youth communities** (R94). Similarly, City Hall (including the Mayor's Office for Policing and Crime, MOPAC) might benefit from more engagement with local authorities about who they are working with at local level.

Local authority links with communities

- 7.55. As with the police, strong links with communities are crucial in ensuring local authorities are aware of the emergence of tensions and untoward activity. I heard from one Chief Executive who was passionate about the borough's Community Cohesion Partnership Group. This regularly passed on information that helped the authority work with local faith and community groups to understand and respond to particular needs of different communities in a unifying way. It had also alerted the local authority to groups known for expressing extremist and divisive narratives who had been handing out leaflets to the public, enabling appropriate action to be taken.

- 7.56. Such local community engagement will be central to the work of any local authority. It is important that particular efforts are made to hear from isolated, dispersed or alienated communities, some of whom may not have a trusting relationship with authorities. There is no one model for this, but arrangements for engagement should be shared with BCU Commanders so local police teams, where appropriate, can be part of the process.
- 7.57. **At least once a year, BCU Commanders, Leaders/Mayors and Chief Executives should review one another's engagement plans so community developments can be assessed and key leaders within communities identified. I am clear that relationships with different community and faith leaders must be regularly refreshed to ensure those leaders remain current, credible representatives and are seen as trusted voices to support messaging from the local authority and other partners** (R95). For example, those who spoke on behalf of young people two decades ago are unlikely to have relevance to young people in those same communities today.
- 7.58. The impact of sudden changes to community dynamics following wider events can be significant. Where those changes are orchestrated by central government, as was the case in 2021 following the commitment to resettle Afghan refugees following the withdrawal of Western troops from Afghanistan, the lead department must engage local authority Leaders/Mayors, Chief Executives and other senior figures. Swift assimilation of new arrivals is key in managing any risk of heightened tensions with existing communities. Local leaders must be provided with the necessary information in as timely a manner as possible to facilitate engagement with their communities.
- 7.59. Several Leaders/Mayors and Chief Executives reported to me that their boroughs are seeing a rise in overt extreme right-wing extremist activity, often fuelled via locally focused, hostile social media. Concerns regarding the potential for a rise in radicalisation of all types among communities who feel disenfranchised and left behind are rising: I note in the response from London Councils to the 2021 Spending Review⁸⁴ that London's allocation (3.8%) from the Levelling Up Fund is the lowest of all English regions, with the lowest allocation per project. While it is of course right that the Fund prioritises the most deprived communities across the country, the wider challenges faced by London (see chapter 2) may exacerbate the difficulties faced by its local communities which have failed to secure additional financial support, many of which contain pockets of very severe deprivation.
- 7.60. This places even more importance on identifying and engaging active, current community leaders. And young people must form a central plank of engagement strategies – almost half (46%) of Prevent referrals across London in 2020/21 were aged under 21⁸⁵. If a local authority has limited engagement with youth in their area, if it fails to understand their concerns and challenges, it will likely struggle to understand whether and how extremism may have taken hold.

⁸⁴ [London Councils' Spending Review Response | London Councils](#) (accessed 07/12/21)

⁸⁵ [Individuals referred to and supported through the Prevent Programme, April 2020 to March 2021 - GOV.UK \(www.gov.uk\)](#) (see Table 10 in data tables, accessed 06/12/21)

- 7.61. Local youth provision is important, not only in countering radicalisation but also in mitigating pressures on young people to engage in gang activity and other antisocial behaviour. Inevitably, this provision has reduced over the last decade. **The DLUHC, in conjunction with the Department for Education (DfE) should consider directing additional funding to local authorities to enable youth provision to be strengthened in the most stressed areas, and local authorities in turn should work closely with youth communities to understand how best to deploy any additional funds** (R96).
- 7.62. I was impressed by the model developed by Camden Council to gather insight into issues faced by local communities. This has professionalised the process through the creation of dedicated 'Community Researcher' roles (see Figure 12). Advertised locally, these roles are designed to bridge the gap between different sections of the community (including young people, parents, and those from different faiths) and the local authority to enable two-way information sharing.

Figure 12: working with communities in Camden

The Community Researchers programme
<p>A novel and proactive approach to engaging with local communities, the Camden programme trains and employs local people (on a part-time basis, with a mix of paid and voluntary posts) to undertake research, engagement and consultation for Camden Council and a range of other clients keen to deepen their understanding of the area and the needs of local people.</p> <p>The programme is built on the principle that local people know their areas and issues better than anyone else: by harnessing this knowledge and insight into the communities they serve, the local authority can take more informed decisions about how it improves local services.</p> <p>It operates a pool of over 20 experienced researchers who have lived and worked in the borough.</p>

- 7.63. The programme enables participatory co-design of services for local citizens and is a strong indication of local authority intent and investment in understanding its communities. A means of building up relationships in non-crisis times, this type of proactive engagement can stand an authority in good stead in the event of a terror attack, where communications with and reassurance of the local community are paramount in managing anxieties and risks of copycat or reprisal attacks. As with police relationships, local authorities must maintain dialogue with their communities on an ongoing basis, not simply when they need the community to engage, in order to build trust and help people feel safe to engage and raise concerns.
- 7.64. In terms of incident response, it is similarly important to involve communities where possible in appropriate decision making. A number of London boroughs formally involve community representatives in both response and post-incident recovery, and I encourage others to consider similar.

- 7.65. As above, it is no good for local authorities and others (including the police) who depend on information and support from local communities to support their response to an attack to expect this to be forthcoming apropos of nothing. They must actively build relationships with community partners, maintain a visible presence across the communities they serve and engage regularly to develop trust and openness and address suspicion and anxieties head on.
- 7.66. The role of locally elected councillors at ward level is important in this endeavour. Their understanding of communities at a granular level can be extensive, meaning they can play a key role as additional 'eyes and ears' and clear mechanisms whereby they are able to share relevant information with local authority officials and the police should be in place. **Ward councillors are often well appraised of those community leaders and figureheads who have strong links into different communities and should be consulted when the local authority seeks to refresh those relationships** (R97).
- 7.67. **Where local police Safer Neighbourhood Teams exist, they should ensure they are linked into local councillors** (R98), whose role in community reassurance is important. As with elected Leaders and Mayors, they should always be notified of any critical incident occurring in their patch.

8. LONDON'S TRANSPORT NETWORK

- 8.1. Transport for London (TfL) is the integrated transport authority responsible for delivering the Mayor's aims for transport. It runs most of London's public transport services, including London Underground (LU), London Buses, the Docklands Light Railway (DLR), London Overground (LO), TfL Rail, London Trams, London River Services, London Dial-a-Ride, Victoria Coach Station, Santander Cycles and the Emirates Air Line. TfL also manage the 350 miles of London's red route strategic road network⁸⁶ and work in collaboration with the 32 London boroughs, plus the City of London, who are responsible for local roads and local transport planning and improvements.
- 8.2. Network Rail (NR) and train operating companies run the railway services into the capital, and the major hub stations including Waterloo, Victoria, Paddington, Euston and King's Cross St Pancras. TfL, local authorities and London's transport operators, in partnership with dedicated policing teams in the Metropolitan Police Service (MPS), British Transport Police (BTP) and the City of London Police (CoLP), are responsible for the security of all those using and working within the system.
- 8.3. In usual (pre-pandemic) times, over half of all rail journeys made in the UK take place on the LU. With over 600 people per minute entering the busiest stations during peak times of day, simply managing flow and movement safely represents a significant challenge. And while passenger numbers across the network fell very substantially during the Covid-19 pandemic, passengers are now returning to public transport, with the number of journeys made by walking and cycling also on the increase.
- 8.4. London's transport providers prioritise security considerations and have comprehensive processes in place to respond to terror attacks. I have been assured that their security focus has not reduced as a result of the pandemic, despite the consequent pressure on budgets due to the huge drop in passenger numbers, as the terrorist threat remains irrespective. However, innovation and improvement, and trialling and adoption of new measures over and above those currently in place, are likely to be hampered by the current financial position.

Protective security measures

- 8.5. Since my previous Review, TfL has worked increasingly closely with partners across local authorities, the MPS (particularly CT Security Advisers) and the Centre for the Protection of National Infrastructure (CPNI) to build protective security decision making into operations, projects, programmes and improvements. This builds on the strong foundations already in place on LU and across the railways: London's transport sector has a long history of close

⁸⁶ A network of major roads which make up five per cent of the roads but carry up to 30% of London's traffic.

working with CPNI and the BTP to incorporate the latest security thinking and design into both daily operations and upgrade programmes (such as the Crossrail project, HS2 and the extension of the Northern LU line).

- 8.6. TfL have also moved forward corporately in terms of their leadership and prioritisation of security matters since my previous Review, with a dedicated Executive level Security Group now overseeing and leading security considerations across the organisation. This Group builds and expands the strong security leadership and governance that is already in place within LU. The benefit of this pan-modal Executive Security Group is exemplified in considerations on how new guidance and protocols regarding a marauding terrorist attack on the LU could be applied to other modes such as the bus network. I was pleased to note that CPNI act as technical advisers to the TfL Executive Security Group and am reassured that the overall response framework has been guided by the CPNI led ASCEND project⁸⁷.
- 8.7. The framework does not currently include explicit guidance related to countering hostile use of drones. I retain some concerns about the potential risk posed by drones with respect to overground railway lines (including in terms of hostile reconnaissance) and while I appreciate that risk is likely to be small, nonetheless **TfL and NR should consider developing a counter-drone strategy** (R99). I also appreciate there are similar frustrations to those expressed by airport operators with respect to lags in the necessary policy, ethical and legal parameters which must govern the use of drones (including the regulation and management of London's airspace) and which have consequent implications for counter-strategies. I am sympathetic to these frustrations, while recognise the complexity of the various considerations at play, which I discuss in more detail in chapter 22.
- 8.8. TfL have recently established a welcome policy regarding the incorporation of protective security considerations into the streetspaces surrounding stations and for which they are responsible. This is a significant step and evidences TfL's recognition of their role as a highway authority, responsible not only for travel but for transport hubs, stations and associated spaces, many of which are frequently very crowded. Informed by the increased threat of vehicles as weapons this policy sees highway improvements subject to a security review and, where, necessary a full threat and vulnerability risk assessment.
- 8.9. However, it is not always clear who is in fact responsible for the implementation and maintenance of physical security features in streetspace, which can lead to delays in the implementation of protective measures (as continues to be the case on the central London bridges where responsibility for turning temporary measures into permanent structures remains unresolved, see chapter 3). Physical security measures, and their design on the approach to busy stations are covered by Department for Transport (DfT) regulations, but there is currently no obligation on local authorities, other land-owners or businesses to work with rail operators to take action.

⁸⁷ [MTA Guidance SG ASCEND Improving Organisational Response \(OFFICIAL\) OPEN SOURCE FINAL V2.1\[1\].pdf \(cpni.gov.uk\)](#) (accessed 18/10/21)

- 8.10. Moreover, the government's stated position that the 'user pays' for security measures is a difficult principle to implement on the road network. It is not clear how the users of London's roads are defined, and how they would be charged for the costs of security. The issue of funding responsibility is likely to be central to the introduction of Protect Duty in due course (see chapter 3) which will mandate action to be taken in publicly accessible locations (PALs), including crowded pavements, streets and other public spaces. **City Hall should coordinate a programme identifying where further protective measures are needed (or where temporary structures need to be made permanent) around the transport infrastructure, so responsibility for funding can be determined. This should consider findings from the review of potential 'grey spaces' (see chapter 3) being undertaken by London's airports (see chapter 10) (R100).**
- 8.11. There is also the potential for inconsistency in the design of protective street furniture. TfL are keen for a less obvious approach, citing a risk that the more noticeable any equipment is, the more obvious any unprotected areas become. Some local authorities, however, tend to favour more obvious measures, keen to overtly reassure local residents and the wider public about where they have invested in on-street protection. Different approaches must not be allowed to delay implementation and a mixed palette of items should be deployed – some visible, others less so.
- 8.12. What must not be lost sight of is the potential for unintended consequences of whatever approach is adopted. For example, railings can mitigate against hostile vehicle attacks but in different circumstances could present a risk if they prohibit large crowds of people from exiting a space quickly. It is also important to not, inadvertently, create a 'map' of protected and unprotected spaces, particularly around those crowded spaces which often characterise London's transport hubs.

Responding to an incident on or around the transport network

- 8.13. I have been assured by NR that their updated incident management policy (the National Emergency Plan) brings it in line with the Joint Emergency Services Interoperability Principles (JESIPs, see chapter 13) which allows for better working with partners in the event of a terrorist attack. I understand similar policies and approaches are in place across the rail industry. The National Rail Security Programme (NRSP), in place since 2017, has broadened both the scope of spaces subject to security regulation and the focus of security searches. So alongside remaining alert for suspicious or unattended packages, staff are now required to be alert to unusual or suspicious behaviour. In partnership with the government and the police, the rail industry also played a central role in the development and launch in late 2016 of the 'See It. Say It. Sorted.' public communications campaign (see chapter 21).
- 8.14. TfL have bolstered the resilience of critical incident management capability across the LU. This reflects the fact that local incident response management can be compromised in the event of an attack as staff may be injured, or the situation may mean it is not safe for them to respond. Drawing on ASCEND recommendations, LU are investing in capabilities to support remote response. With engagement and support from the BTP, this includes: keeping ticket gates

open to facilitate swift exit (based upon lessons learnt during the terrorist attack at Parsons Green station in 2017), switching on signage to encourage and guide transport users to move quickly away from the threat, and keeping lifts running to evacuate disabled customers.

- 8.15. These capabilities are currently being piloted in 32 LU stations which vary in passenger throughput and operating environment and are due to be rolled out more widely to a further 50 as part of the next phase. Comprehensive testing and evaluation will support development of the case for subsequent roll out: **TfL must treat this as a priority to ensure the remaining stations secure enhanced remote response capabilities in due course (where they are proven to offer benefit)** (R101).

Building a security culture across the transport network

- 8.16. LU's approach to security risk management and incident response continues to mature with respect to the changing threat. Its strategy, focused around core principles of Prevent, Respond and Recover, seems to me to be sensible and comprehensive:
- **Prevent:** staff and customers are encouraged to be vigilant. Public communications across the LU promote the role of travellers as 'eyes and ears' and reinforce the importance of reporting activity or persons that seem out of the ordinary. Environments are overhauled to minimise opportunities for persons or packages to be hidden, and LU work closely with the BTP on their patrolling rotas to support deterrence and detection.
 - **Respond:** based on the same principles as those governing blue light incident response, this focuses on keeping staff and customers safe by guiding them swiftly away from areas of threat and preventing others from entering those zones. The approach is proportionate based on level of assessed risk and immediacy (ranging from moving passengers away from the immediate vicinity of an unattended bag to full evacuation of a station once the police confirm it represents a threat).
 - **Recover:** once the threat or hazard is no longer present, the priority becomes reinstating services as quickly as possible and supporting the police with investigation.
- 8.17. Learning from the security mature approach in LU provided a mechanism for TfL to develop an informed programme approach to protective security across modes which remain unregulated by the DfT. This pan-TfL programme, due to complete in March 2022, should assist in identifying potential security vulnerabilities and assuring subsequent action plans, including for example how to bring the variety of bus operators and coach companies operating from London Victoria Coach Station in line with a standard suite of security measures. Varying contractual arrangements make this complex and so **introduction of the voluntary security standards for bus and coach operators being developed by the DfT should be expedited. Consideration should be given to making these the basis for subsequent regulatory standards** (R102).
- 8.18. Both NR and TfL security strategies have, as mentioned previously, a welcome emphasis on promoting vigilance in staff training. Alongside training in identification of and response to suspicious items, customer facing staff across surface and underground systems receive training in identification of unusual or suspicious behaviour and on how to report it, using the

WHAT protocol. This guides them to attend to key elements of the behaviour and gather the information necessary to advise subsequent decision making and / or inform action, namely: *'What are they doing? How are they behaving? Alone or acting with others? Threat – what type might they pose?'*.

- 8.19. I have heard from all operators about a welcome shift whereby staff are increasingly encouraged to raise concerns within a more open security minded culture across the organisations. **As passenger volumes continue to rise following the pandemic, all customer facing staff should be given refresher training or otherwise have their competence in this regard assured. This must be prioritised and the DfT should ensure that current financial restrictions, particularly on TfL, do not preclude this** (R103).
- 8.20. The BTP are also working with police and rail industry partners to explore innovative CCTV and other data technologies to identify and safeguard vulnerable individuals, minimise disruption and improve public safety. The pilots are being developed with external scrutiny from independent advisory groups and stakeholders in line with current national guidance and legislation, which will help ensure potential measures do not introduce inadvertent bias. Moreover, the Information Exploitation Programme is seeking to enhance the capability of the whole railway system to understand and address public safety, disruption and safeguarding challenges more widely: this is a welcome example of effective data sharing and collaboration.
- 8.21. Of course, many people act in ways which others might consider to be outside social norms, and nowhere is this more the case than in London. Drink and drugs can also make people behave differently so it is important that transport operators continue to emphasise the 'no false alarm' principle in support of a reporting culture. And where safe to do so, staff should continue to be encouraged to approach individuals about whom they may be concerned. Not only does this display active security management to anyone who may be undertaking hostile reconnaissance, it offers material for use in subsequent training courses.
- 8.22. The regular 'security awards' system operated by London Overground (LO) positively acknowledges staff who report suspicious behaviour and items. Similar schemes exist across the rest of TfL to recognise and celebrate individual staff contribution to an improving safety and security culture and should be considered by other transport operators if not already in place.
- 8.23. Where staff in TfL have concerns about colleagues, an 'insider threat' policy and process provides a mechanism to allow concerns to be raised anonymously. I have been assured that use is made of these, including to report colleagues who have openly espoused extremist views and sympathies which may merit investigation. **The Home Office and the MPS should ensure that Prevent policy and operational leads are aware of TfL's 'insider threat' procedures and TfL must flag concerns where appropriate, perhaps through the Security Review Committee** (SRC, see below) (R104).
- 8.24. This reporting channel also allows staff to raise other types of concern, for example around espionage and fraud as well as wider worries regarding health of colleagues. An important

complement to formal employment vetting processes (see chapter 11), **TfL's procedures supporting staff to raise concerns about colleagues should be highlighted in induction training and actively promoted in staff communications** (R105).

- 8.25. In light of the terror attack committed in Liverpool in 2021, where the perpetrator detonated an improvised explosive device as he travelled in a taxi, TfL must continue to progress the security programme work underway with its Taxi and Private Hire (TPH) Licensing Directorate. This should ensure that licensed taxi and minicab drivers operating across London – including companies operating via ride-hailing apps such as Uber and Bolt – participate in terrorism awareness training and that operators have access to relevant and up to date briefing materials from police partners.

CCTV and traffic cameras

- 8.26. CCTV coverage of the majority of LO stations and lines is largely good. However, coverage, particularly of some areas of LO stations, may not always be 100%. Although staff patrols focus on those areas, given the facilitative role played by a CCTV blind spot in the attack at Manchester Arena in 2017, this is inadequate. **While I accept that some of these CCTV blind spots will afford less opportunity for harm than others, they should be eradicated where practical and cost-effective to do so. If this is not possible, their location should be factored into the design of staff security checks and patrols** (R106).
- 8.27. **The LO operator (Arriva Rail London, ARL) should also consider reversing its policy that CCTV footage cannot be reviewed by LO station staff** (R107). Currently a function only available to off-site staff who download the material, this means station staff cannot backtrack footage to view behaviour of any individual before they have sparked concern. The facility to do this would support staff in making decisions about whether to approach an individual or otherwise report concerns.
- 8.28. **Not all modes of rail within TfL provide direct CCTV feeds to the BTP Control Room: this is a missed opportunity in terms of enhancing capabilities in the event of incident response and should be reviewed by the BTP, TfL and City Hall. Rectifying the situation should be a priority for future financial investment** (R108).
- 8.29. Not all trains running on the LU have in-carriage CCTV. **While LU has a programme to upgrade the rolling stock to incorporate CCTV where it is absent, this is subject to funding: the situation should be resolved, and the programme accelerated as soon as possible** (R109).
- 8.30. NR have explored opportunities offered by 'smart CCTV', capable of automatically flagging behaviours which evidence from previous incidents suggests could be precursors both to attempted suicide and a range of criminal, including terrorist, acts. LU are considering deploying similar technology in a pilot exercise. While this potentially offers value in terms of preparedness, TfL will need to understand the NR experience and what worked, including how staff are trained to intervene based on such footage. **TfL and NR should ensure linkage with**

BTP's work on innovative use of CCTV (see paragraph 8.20) and any pilot must be subject to robust evaluation to ensure that inappropriate biases are avoided (R110).

- 8.31. CCTV on London buses is the responsibility of the different operators and across the fleet, technology varies. Not all buses are equipped with CCTV which is viewable in real time and in my view, this represents a missed opportunity for rapid intervention in the case of any criminality which takes place, not least a terror attack. On some routes and for some models of buses, CCTV data is stored on the bus itself and these can only be downloaded once the vehicle returns to the garage. I have been told that remedying this to enable real time download requires capture, maintenance and storage facilities that are currently not available. However, **bus operating companies should be encouraged to enable CCTV feeds from within their buses to at least be viewable by TfL's Control Centre and thus be available to the police in real time if necessary** (R111).
- 8.32. CCTV coverage of TfL's highway network is good. Around 1,300 traffic cameras are in place and I welcome the inter-connectivity between TfL and the MPS which allows a direct feed into MPS control rooms. I similarly welcome the extent to which TfL's traffic lights can be controlled centrally. This does highlight, however, the importance of cyber security (although this is outside the scope of this Review). The centralised traffic light control system, elements of the traffic camera system, and many other critical transport systems are in scope of the Network and Information Systems Regulations. The management of cyber security risk within these systems is prioritised by TfL and overseen by the DfT as the regulator and TfL's close partnership with the National Cyber Security Centre (NCSC) ensures they are provided with appropriate advice and technical support.
- 8.33. TfL can also utilise Flexible Deployment Cameras (FDCs) to give visibility of parts of the road network with known CCTV gaps or limited coverage, or where a fault occurs with CCTV at a critical site. This is important in terms of preparedness, and I welcome the full access the MPS has to the feed returning from these cameras, when circumstances demand.
- 8.34. However, the permissions which must be in place before use of FDCs is allowed means they cannot be deployed in under 12 hours, nor can they be deployed for surveillance activity (as per guidance from the Camera Surveillance Commissioners Office and data protection legislation). They are therefore not a solution in instances where intelligence suggests activity linked to terrorist (or other criminal) intent is taking, or will take place, in an area with no CCTV coverage.
- 8.35. TfL are also exploring Mobile Rapid Deployment Cameras (RDC) technology on the road network, which could be deployed much more swiftly than FDCs (within two hours). Pending successful testing, a small number are likely to be available for use from Spring 2022, although as RDCs are designed to assist real-time road network operations they will be similarly limited in terms of use. Access to their feeds will, however, be made available to the MPS if required and this is welcome.

The TFL Control Centres

- 8.36. The Network Management Control Centre manages London's busiest roads, road tunnels and bus network. The LU Control Centre (LUCC) and (LU) Line Service Control Centres are a crucial part of coordinating response to any incident taking place in or around a station. The LO control centre is co-located with the LUCC and works closely with the Network Rail Control Centre.
- 8.37. I was pleased to see a focus on interoperability which allows TfL's Network Management Control Centre to connect with the MPS control room and maintain a direct channel into the Security Service and the National Highways Agency. Co-location of MPS officers helps embed relationships and supports shared situational awareness, critical to both preparing for and responding to an incident. The addition of communications specialists within the TfL Control Centres to lead on delivery of real time updates to the public in event of an incident indicates a positive focus on the importance of this for both effective direction and reassurance.
- 8.38. In the event of a terrorist attack, TfL's Surface command structure works closely with that of the MPS (who retain primacy) to advise on road closures, redirection of buses and public messaging. TfL, LU, along with NR and ARL will act according to the JESIP principles, which drive Control Centre activity and ensure the transport system adopts the same language as the emergency services.
- 8.39. The BTP Force Control Room covering London sits physically adjacent to the LUCC. Staff from both have unrestricted access between their respective control rooms and I have been assured of sound interoperability between the LU Senior Operations Officers and the BTP Senior Duty Officers. The LUCC also contains representatives from NR (via the National Operations Centre – London) and the Control Centre for ARL has recently co-located in the same premises. This is positive and allows for closer collaboration and information sharing, both in terms of the daily delivery of services and in the event of a major incident.
- 8.40. The Network Management Control Centre, while housed in the same building as the LUCC, is located on a different floor. TfL have work underway to assess the relative benefits (including maximising situational awareness and information sharing, particularly in the event of an incident involving different modes of transport) against risks, costs, deliverability and other potential issues associated with co-location. This detailed assessment of a complex set of considerations is welcome and will provide crucial evidence to underpin a decision in due course.

Funding

- 8.41. The DfT methodology for categorising levels of security risk underpins the extent of protective measures at individual rail stations across Great Britain. Meaning there is a risk that the current review of security regulations for light rail operators including the LU deploys an inappropriate method based upon the national rail network considerations. This would be unfortunate as I have been assured that improved outcomes may be possible at lower cost, which the adopted

methodology may preclude. The risk faced by London stations both collectively and individually is likely to differ somewhat to that facing stations elsewhere thus a national framework may lack sufficient flex to account for the unique considerations of the London context.

- 8.42. Whatever the model ultimately agreed, it should be sufficiently flexible in terms of requirements and outcomes to meet London's needs. Moreover, **appropriate resources must be made available to TfL by the DfT to resource all necessary protective provisions suggested by both the current and any future methodology** (R112).

Collaboration

- 8.43. Collaboration between TfL and the MPS, BTP and the Security Service is good – the working relationships and interdependencies between respective control rooms are sound testimony to this, evidencing the necessary collaborative approach to preparedness and response. TfL are also now a standing member of the Security Review Committee (SRC, see chapter 13) which allows them to be regularly briefed on the nature of the terrorist threat and in turn to share their own intelligence and concerns. This is important in terms of developing shared security priorities, particularly given the potential level of interest in London's transport system as a target for terrorism.
- 8.44. There is, however, always scope to strengthen relationships, particularly with CT Policing which is crucial to effective management of insider threat. Security specialists within TfL 'triage' information received about colleagues and where this concerns staff working on the rail and Underground network, there is a formalised process in place with the police and Security Service to share information. **It would be beneficial to extend this information sharing process to cover all aspects of transport and TfL should discuss feasibility with the MPS** (R113).
- 8.45. I have heard that TfL staff in frontline roles are not all mandated to wear body-worn video. I consider this to be an important element both of preparedness (including the potential for it to deter would-be malign actors from targeting the transport system) and of protecting staff themselves. **I therefore recommend that all TfL frontline staff wear a body-worn camera as a core part of their uniform (I recognise that this will require consultation with staff representatives)** (R114).
- 8.46. Following a major incident which necessitates closure of roads and rail services, the primary aim within TfL is ensuring the safety of customers and staff and supporting the emergency services. TfL plays a vital role in getting things moving again – although this aim can be at odds with an understandable police desire for road or station closures to remain in place to facilitate forensic examination and evidence gathering. However, given the risks of displacing very large numbers of people and potentially creating crowds which in themselves can represent a target, it is important that roads and stations do not remain closed for a period of time beyond that which is absolutely necessary.

- 8.47. Changes to road layouts, including the introduction of dedicated cycle lanes and Low Traffic Neighbourhoods, need to be implemented in such a way that physical barriers can be collapsed on approach of emergency vehicles. **TfL and local authorities must continue to design Low Traffic Neighbourhoods and other road calming and safety measures with the needs of emergency service vehicles in mind – for example, I have heard about speed bumps capable of slowing general traffic but which can be navigated at speed by emergency vehicles. This should be kept under frequent review. Future planning of the road network should routinely consider and, where appropriate, use the opportunity to introduce additional protective security measures** (R115).

Training and exercising

- 8.48. As with the emergency services and more widely across sectors, pandemic related lockdowns have impacted on the ability of transport providers to assure, test and exercise frontline staff. Wider issues are explored in chapter 14 but some considerations specific to the sector are set out below.
- 8.49. Customer facing staff make up a substantial proportion of those working for London's transport providers. They have a key role to play in communicating with the public and safely managing flows of people in the event of a terror attack and must be equipped to do so effectively and confidently. Training programmes are adapted for the transport environment and draw on products designed by the National Counter Terrorism Security Office (NaCTSO) and CPNI (including ACT and SCaN, see Figure 8) - this is welcome and ensures consistency in messaging and learning across all those with a role to play in preparedness, regardless of service or sector.
- 8.50. However, the content of ACT and SCaN could be made even more relevant for transport staff with a little further tailoring. This seems sensible and **NaCTSO and CPNI should review their material to ensure it is clear why, for example, particular behaviours might be problematic from a transport perspective and should be reported** (R116). Scope for limited local adaptations is likely to also be beneficial for users of the training across other sectors.
- 8.51. Until very recently, all SCaN modules required delivery by accredited CTAs, which placed inevitable limits on scheduling. CPNI have, however, recently developed a version of the SCaN For All Staff module which organisations can now download and run themselves using in-house trainers and facilities. This should allow TfL more flexibility in ensuring staff receive this part of the wider SCaN package and afford the opportunity to embed it within core learning and development for frontline and transport enforcement colleagues.
- 8.52. After the terrorist attacks on the LU in July 2005, packs of First Aid materials were deployed to locations around the Underground network, in conjunction with the LAS, to enable more effective treatment of serious injuries. **Transport providers in London should review if any further action is required to ensure policy and practice surrounding use of these First**

Aid materials remains current and in line with the guidance recently issued by NaCTSO (R117).

- 8.53. Moreover, a Rapid Response First Aid (RRFA) capability has been piloted by NR outside London to support transport staff to respond to major incidents prior to the emergency services arriving. **TfL may wish to consider whether the RRFA pilot offers lessons of relevance to the London environment with respect to deployment and use of the First Aid packs already in use (R118).**
- 8.54. Drivers on trains and buses play key roles in passenger communication. Announcements and live broadcasts can be made from the Control Centre to bus drivers across the system or on individual routes, who can similarly call back into the Control Centre if necessary. In a reactive emergency situation TfL are reliant on bus and train operators to pass information onto passengers: it is important therefore that those staff are appropriately trained in delivering live public communications of this nature.
- 8.55. It is not, of course, only customer facing staff who require regular training and refresh. Those adopting Command roles in the event of a major incident require both tactical and strategic skills so I was pleased to hear that following a recent review of emergency management capability, NR are introducing a training programme to upskill staff who adopt those positions. TfL similarly has a programme to train, exercise and update staff in Command roles. While the content will need to be specific to different operational environments, **transport providers should work together (and with academic partners and the emergency services where appropriate, as set out below) to identify learning opportunities and ensure shared understanding in the event of being involved in any response (R119).**
- 8.56. NR's planned investment in a bespoke training facility at Cranfield University (already recognised as a centre of excellence in rail accident investigation and the wider protection of critical national infrastructure) is welcome. This will allow rail and partner agencies to develop and practice a joint response to a terror attack targeting or otherwise directly affecting the rail network. This partnership with academic expertise is welcome.
- 8.57. Experience and learning generated from LU use of the 'Hydra' facilities within the BTP's training centre over the past decade should inform future programmes. The value of the immersive, interactive training simulations afforded by Hydra facilities cannot be overstated and they are widely used across the emergency services and others involved in responding to terror attacks and other major incidents. In presenting a created emergency scenario via video, audio and written material, Hydra facilities simulate a setting requiring participants to take decisions and actions in response, triggering immediate simulated consequences to inform subsequent decisions and ultimately facilitate learning.
- 8.58. Finally, as set out in chapter 4, Project Servator is a crucial part of policing tactics to disrupt and deter criminal activity and hostile reconnaissance. Used by the MPS and BTP, it is deployed across transport settings and should continue to be so.

9. THE RIVER THAMES

- 9.1. Running right the way through London, the River Thames represents one of the capital's major transport arteries, moving cargo and people for commercial, leisure and work purposes every day. The Port of London, which runs between Teddington Lock and the North Sea, is the largest port in the UK⁸⁸ and while the majority of its major operations now happen downstream beyond the capital, several significant terminals and facilities remain within the boundaries of the city.
- 9.2. The banks of the River feature many of the capital's most renowned, high-profile and iconic landmarks, including the Palace of Westminster and Big Ben, the Tower of London, Tower Bridge, and the London Eye. The security services are housed in buildings facing the River, as is the US Embassy, and both banks are home to a substantial amount of development for residential, retail and business purposes, as sites alongside the water are in continued demand. As such, they play host to significant numbers of people 24/7, and the River plays a significant role in facilitating much of London's daily activity.
- 9.3. And with any river, of course, there are bridges. Those spanning the River Thames are a critical part of London's transport infrastructure – when they are compromised in any way, there are significant consequences for traffic and pedestrians who rely on their availability. Closures will substantially impact flow through the capital and risk creating crowds of people at either end.
- 9.4. Not only do its banks therefore hold many potential draws for terrorist activity (see also chapter 2 on the wider dynamics of London in relation to the threat) the River itself can provide a means of transport for those seeking to carry out an attack. This is precisely what happened in Mumbai in 2008 when ten terrorists used speedboats to land in Mumbai Harbour. And, of course, three of the terrorist attacks mounted in London since my last report took place in the vicinity of the River, highlighting just how crucial it is that a capability to respond to this threat is adequately resourced and maintained. Finding the right balance, however, between facilitating leisure and commercial activity alongside ensuring the River is a hostile environment for malign actors is undoubtedly a challenge.
- 9.5. During Covid-19, traffic on the River reduced very significantly but as London has since begun to re-open, that has inevitably begun to change. Commuter vessels are beginning to use the River once again, in parallel with a rise in commercial cargo received from all around the globe and an uptick in use of the River for a range of leisure pursuits, with a re-opening of fixed and dynamic bars and nightclubs on vessels up and down its central sections. In total, over 400 events are held on the River every year, including sporting events, regattas and pageants, with parties of all kinds hosted on moored and sailing vessels and VIPs often featuring among the guests.

⁸⁸ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1001753/port0101.ods Department for Transport (accessed 22/11/21)

- 9.6. And use of the River is set to rise. Significant investment in travel infrastructure mean the River's piers (run by Transport for London, TfL) and services run by 'Uber Boat by Thames Clippers' are now able to cope with significantly higher numbers of people, in line with the ambition set out in the London Passenger Pier Strategy to double annual river usage to 20 million by 2035⁸⁹.
- 9.7. Maintaining security on the River Thames is already a substantial part of keeping London and Londoners safe and is a core consideration for preparedness, notably for the Metropolitan Police Service (MPS) Marine Policing Unit (MPU) and the Port of London Authority (PLA). It is only going to become more so in the coming years.
- 9.8. The MPU is responsible for waterborne policing of the River along the 47 miles between Hampton Court in the west and Dartford Creek in the east and 250 miles of inland waterways in between, alongside community policing of marinas and other waterside settings. Possessing an in-depth knowledge of the River and its communities, the MPU maintain good working relationships with other agencies who provide services to users, including the Royal National Lifeboat Institution, the UK Coastguard and the PLA and, in the event of an incident on or around the River, the London Fire Brigade (LFB) and the London Ambulance Service (LAS).
- 9.9. Supporting the wider MPS response to incidents and emergencies in or around London's waterways⁹⁰, the MPU's underwater and confined spaces search team (also skilled in carrying out rope-based operations at height) is a highly specialist and valuable asset, drawn on beyond the MPS by surrounding forces in a number of complex and high-profile investigations.
- 9.10. The MPU has invested significantly in its fleet which is highly specified (all are eco-friendly) and adaptable, allowing any waterborne response to be appropriately calibrated according to the nature of demand, scale and threat. Three of its 20 vessels are capable of carrying CT Specialist Firearms Officers (CTSFOs), allowing a specialist terrorist response to be deployed if necessary. A further vessel is itself equipped with a firearms function, facilitating a permanent firearms capability on the River – though this can only be realised with sufficient CT trained MPU crew.
- 9.11. It is important that this capability be maintained. Following wider cuts to CT Policing, the Mayor's Office for Policing & Crime (MOPAC) backfilled the CT MPU posts which were defunded, without which the function would be compromised. However, this is not a sustainable long-term position and **given the central function played by the River across London, the Home Office (HO) must ensure CT funding settlements allow the MPU function to be supported from core budgets** (R120).

⁸⁹ [London's Passenger Pier Strategy \(tfl.gov.uk\)](https://www.tfl.gov.uk) (accessed 18/11/21)

⁹⁰ Including those in the City of London, as the City of London Police (CoLP) do not maintain a separate marine function.

- 9.12. The Port of London is the primary partner working with the MPU on the River Thames. Its principle responsibility remains one of navigation, i.e. ensuring proper use of the River. It is concerned therefore with navigational safety, rather than security and the protection of River users. Thus, while the PLA operate a number of boats along the River and have the power, as the harbourmaster, to stop vessels, their principal focus relates to irregular or illegal use of the waterway and not security.
- 9.13. Having recommended in my 2016 review that the remit of the PLA be broadened, so as to give them a responsibility for security with related powers conferred to support such a more proactive role, I am disappointed that no progress has been made. **I recommend this issue be revisited so as to place a formal duty on the PLA (perhaps through the LRPG, see below) to play a role in maintaining and enhancing security along the River** (R121).
- 9.14. That said, I am pleased to note the London Resilience Forum (LRF, see chapter 13) now oversees a sub-group created to focus on resilience on the River Thames. This includes the emergency services and local authorities and is chaired by the PLA.

Providing protective security along the River Thames

- 9.15. Providing protective security along the River Thames remains principally the responsibility of the MPU. They engage with a wide range of partners to support this endeavour -such engagement is welcome and should continue. Its vessels offer a range of capabilities: four patrol boats are based at the MPU River pontoon for deployment for general duties, with a further two on patrol on the River at all times. The fleet includes two rigid-hulled inflatable boats (RHIBs) – these can be used in firearms incidents and are specifically designed to respond to terrorist incursion onto a vessel or to a vessel being crewed by an individual(s) with terrorist intent. This seems adequate but represents in my view the minimum level of response capability needed.
- 9.16. Daily spot patrols are undertaken in partnership with land-based armed response officers. Undertaken randomly across the 24-hour period, these are an important part of maintaining a visible presence on the River and a valuable threat detection capability. Complemented by a more focused programme of (random) weekly CT checks involving officers boarding vessels and searching for contraband (often accompanied by specialist sniffer dog teams), this seems to be a reasonably rigorous approach. However, patrols and checks should not be reduced below this level. I consider the current position to be the minimum necessary and **the current practice of one MPU boat permanently stationed at either end of the River with a third in the Government Security Zone should be maintained** (R122).
- 9.17. I have been assured that while the nature of the maritime space may add time to any police response to an incident on the River, a firearms capability is able to respond to a threat on or near the water within minutes. Officers crewing the land based armed response vehicles (ARVs) are maritime trained, meaning they are able to operate on water, although **the Mayor may wish to seek clarification from the MPS regarding response times in a range of**

scenarios in which the location of an incident varies in respect to the location of the RHIBs (R123).

- 9.18. In terms of maintenance and registration of River traffic, there is more to be done. The large entertainment vessels known as ‘party boats’ have now resumed operation along the River following pandemic related cessation. Representing possible targets in themselves given the large numbers of people they can hold in a confined space, their physical structures are important elements of protective security in terms of withstanding any attempt at incursion and maintaining the safety of passengers. Maintenance must be regular and evidenced via appropriate paperwork (see below).
- 9.19. The introduction of restricted areas on the River for specific events or periods of time (for example, New Year’s Eve celebrations) means any vessel seeking entry must be cleared through a risk assessment process, led by the MPU in partnership with the PLA. Where boats have previously been sanctioned for poor health and safety, they are likely to be refused entry – while this is reassuring in cases of known vessels, it would not necessarily prevent a vessel deserving of similar sanction but which has not previously come to the attention of either the MPU or the PLA from entering restricted, often busy parts of the River.
- 9.20. Moreover, the licencing process for such vessels seems insufficiently clear, and I have not been convinced that checks on the registration of privately owned vessels using the River are adequate. There are also no checks on the nature of claimed intent for use of the River and the veracity of navigation plans filed by would-be River users. **The Maritime & Coastguard Agency and Port of London Authority should collectively ensure vessels have appropriate maintenance documentation and are correctly licenced for their proposed use with regular checks made regarding purpose and navigation plans (R124).**
- 9.21. Uber Boat by Thames Clippers runs passenger services from 23 piers between Putney and Woolwich. Able to carry up to 400 people, these are, as mentioned above, becoming an increasingly important part of London’s transport network. The captain is often responsible for a number of duties alongside operating the service, including checking tickets and making public announcements.
- 9.22. As with the flight deck on commercial aircraft, access to wheelhouses must be physically restricted and **the Port of London Authority should issue an urgent Notes to Mariners to ensure the wheelhouse of all Uber Boats is restricted and appropriately secured (R125).**
- 9.23. Security related law enforcement operations take place on the River, including ‘Operation Kraken’. A national communications-based operation to tackle maritime border crime and the exploitation of coastlines and waterways by terrorists and serious criminals, this seeks to raise public awareness of suspicious activity at marinas, moorings and on water.
- 9.24. Given there are several marinas and docks along the River Thames, used by residents, visitors and commercial enterprises alike, and Covid-19 has seen rises in visitors to UK coastal regions as some eschew foreign travel for domestic breaks, **the HO should consider refreshing**

Operation Kraken in marine settings and public spaces along the River (R126). This would help raise in the minds of the public and those working and spending time in such environments the potential for terrorists to co-opt the water.

- 9.25. 'Operation Riverbed' is the name given to the response by the MPS for dealing with vessels of interest on the River, including those deemed openly hostile. Once called in, an ARV is despatched to the River where, as above, its officers will join an MPU crewed vessel.
- 9.26. If the incident is discovered to be terrorism, a further CT response will be actioned. Importantly, however, if no threat is discovered (for example, the incident may have been caused by an international vessel illegally entering the River having misunderstood entry rules) the Riverbed framework allows rapid de-escalation with specialist resources rapidly returned to land.
- 9.27. Operation Riverbed is, though, in its infancy – at time of writing it had been activated once. While I have been assured that aspects requiring amendment were identified and subsequently addressed following de-briefing, **the MPS should regularly test deployment of Operation Riverbed to maintain currency and the necessary skills across those who might be involved** (R127).
- 9.28. In terms of wider activity, I am pleased that Project Servator (see chapter 4) is deployed on the River. As on land, this police tactic aims to disrupt and deter terrorist activity, in parallel with providing a reassuring presence for the public. It forms an important part of policing engagement with River communities and the maritime environment as well as part of risk mitigation led by the LRPG (see below). **The MPS should consider more overt public communications regarding the use of Servator on the waterways to complement both its deterrence and reassurance purposes, considering piers, passenger vessels and marina environments** (R128).

Partnership working

- 9.29. Since my previous Review, much has been done to bring together those agencies with responsibility for the River and its communities, as well as those which respond to incidents and emergencies. The London Region Portal Group (LRPG) is chaired by the MPS, focuses specifically on safety and security and links into the sub-group of the London Resilience Forum which considers resilience more widely. This is a welcome framework to bring together different operational perspectives and guide River related security focused activity.
- 9.30. Inevitably, however, the interests of some key partners on the LRPG are led by commercial considerations rather than security. While this is understandable, it risks making it more difficult to implement necessary safety measures. Partnership is key to managing this risk and ensuring security on the River is adequately prioritised, and I was pleased to hear about a Memorandum of Understanding to which all partners are signed up. This aims to consider the various needs of each organisation relative to their individual priorities and I have been assured that the relationship between the MPU and the Harbourmaster is central. **Once the**

Memorandum is fully operational, the MPU should seek to assure the Mayor as to its efficacy with respect to ensuring that security is properly considered and managed across the LRPG (R129).

- 9.31. The LRPG Maritime Multi-Agency Threat and Risk Assessment (MATRA) process has identified a number of priority areas of risk related to hazards and threats which would have a significant impact on London, should they occur. While I am reassured that mitigation plans are comprehensive and informed by MATRAs of port groups from around the country, I remain concerned that some risks remain very high even after mitigation. **The LRPG MATRA should conduct a more comprehensive assessment of identified risks and develop detailed action plans as to how to reduce these to more acceptable levels: this should report to the Department for Transport and the Mayor of London by the end of 2022 (R130).**

10. SECURITY AT LONDON'S AIRPORTS

- 10.1. Airports and aircraft continue to represent high value targets for terrorists and while the UK has not seen a realised attempt for some years, this is arguably due at least in part to the strength of security in place across the industry. London, however, continues to face a heightened risk – particularly as it has a global reputation for connectivity and is served by two major airports sitting within its geographical boundaries, i.e. London Heathrow (LHR) and London City (LCY).
- 10.2. While the Covid-19 pandemic effectively rendered both airports virtually inactive for considerable periods of time, and business continues to be reduced as the country and the world slowly opens up for air travel, in usual times they handle very significant volumes of passengers. Both saw record numbers in 2019 - a total of 80.9 million people passed through LHR's five terminals⁹¹ with a further five million using the single terminal at LCY⁹².
- 10.3. Given their respective size and passenger volumes, each airport faces a number of unique security challenges although in many respects the issues they grapple with are very similar. The way both engage with the security agenda has developed significantly from when I undertook my previous review in 2016. I have heard from both LHR and LCY about swift responses when vulnerabilities associated with particular events have been identified, including provision of additional CCTV (which now operates on a 24/7 basis across both estates) and increased landside and airside perimeter patrols which have been enhanced through behavioural detection training. These of course bring wider benefits in terms of helping address the challenges posed by serious and organised criminal networks to safe and secure airport operations.

Policing London's airports

- 10.4. The Metropolitan Police Service (MPS) Aviation Command provides specialist protective security at both LHR and LCY (and supports wider crime detection, including theft and trafficking of goods and people). Armed firearms officers (AFOs) patrol across the airport, sometimes accompanied by trained dogs – collectively representing a strong visible deterrence. A number of Armed Response Vehicles (ARV's) are available for 24/7 deployment in case of incident, as is a CT Specialist Firearms capability.
- 10.5. Project Servator (see chapter 4) operates regularly across both airports (and the pandemic related hiatus of its deployment has now ended) and aviation policing have built up strong links with local neighbourhood policing in the boroughs within which LHR and LCY are

⁹¹ [Heathrow-Airport-Limited-31-Dec-2019.pdf](#) (accessed 27/10/10)

⁹² [London City Airport Passenger Statistics | LCY](#) (accessed 27/10/10)

located. This is important given the range of wider crime which takes place in airport settings, from theft (targeting airport commercial outlets as well as surrounding car parks, where high value vehicle theft is a concern) to operation of organised crime.

- 10.6. Local neighbourhood policing capabilities are also linked into the Safer Airports Teams. A function which is highly valued by both operators, these teams support the airports in dealing with a range of wider issues which can affect the safe running of the premises, including rough sleeping (a particular issue for LHR). The teams have good relationships with local charities and social services, who work in partnership with services funded directly by the airport operators and which support them in taking swift and appropriate action. That said, challenges remain particularly in terms of resourcing and, with respect to rough sleeping, the availability of suitable accommodation across London boroughs as housing remains in very high demand.
- 10.7. Officer tenure in the Aviation Command averages around eight years. This is positive as there is significant investment in the specialist training required to become familiar with the role and the specific considerations associated with ensuring security across landside and airside areas. I have been assured that continued high levels of interest in aviation policing roles from experienced officers will futureproof capabilities.
- 10.8. The lack of access for aviation policing, operating both within the airports and from external locations, to a secure facility which allows access to protected information and intelligence for appropriately cleared officers is to my mind a gap. Without access to such an environment, or to technology which would allow receipt of time-critical information in transit, those officers are largely reliant on in-person briefings where the sensitivity of material means it cannot be communicated via less secure means. Urgent information thus often cannot be passed on swiftly.
- 10.9. While the MPS' CT function, i.e. SO15 Command, have both the necessary access and a base at the airports, they are not co-located with the aviation policing function. This means they too are unable to communicate sensitive information quickly if a situation demanded it. **The MPS should seek to provide relevant equipment and access for aviation senior leadership to the necessary systems in situ at airports** (R131).

Funding airport security

- 10.10. Provision of aviation policing operates on a full cost recovery basis, meaning the airport operators wholly fund the MPS to provide the service. Until the pandemic reduced airport usage to practically zero, this 'user-pays' model worked well for LHR. For LCY, however, it has been a less effective model due to the balance, even in usual times, of airline use and passenger numbers (and associated revenue) set against the cost of the necessary policing functions to provide security across the entire airport footprint.
- 10.11. However, during the pandemic, global bans on all but very limited, essential foreign travel meant revenue from charges applied to airlines using the airports dropped overnight to

almost nothing (LHR's losses total £3.4bn since the start of the pandemic⁹³). Yet the need to provide some level of protective security remained, particularly at LHR which did not close throughout the period (LCY closed for some months).

- 10.12. While passenger numbers drive the extent of security to some extent, meaning provision can be flexed to a degree, the size of the airport footprint which requires policing is fixed. Meaning the fall in passenger numbers did not drive a commensurate fall in security costs, and airport operators were forced to step in to plug the gap.
- 10.13. While air travel has begun to increase as at least some parts of the world emerge from the worst of the pandemic, it is unlikely to return to pre-pandemic levels for several years⁹⁴ and the journey may not be linear. This raises a question regarding the current commercial model for provision of robust airport security. **In conjunction with airport operators and the MPS, the Department for Transport (DfT) should review and consider options for sustainable mitigations in the event of any future lengthy periods of time where airport usage must be drastically reduced** (R132).
- 10.14. Airport operators also bear costs associated with provision of emergency communications. The current voice and data communications network used by the emergency services across Great Britain, Airwave, was due to be replaced from 2017 with a new radio system, the Emergency Services Network (ESN). However, this has been significantly delayed and the ageing Airwave network remains in place with the plan for its replacement seemingly fraught with challenges. This is very frustrating, particularly given the increasing fragility of the Airwave system.
- 10.15. I explore the ESN in chapter 22 but it is relevant to note here that airport requirements must inform its design and user testing programme. While delivery leads across the Home Office (HO) and elsewhere have collaborated with airport representatives to ensure ESN coverage, the ongoing delay in roll out has meant that both LHR and LCY have continued to rely on the ageing Airwave system, with associated additional costs.
- 10.16. Moreover, there are some locations across the airport footprints with limited Airwave coverage, meaning temporary workarounds have had to be developed – on the sensible basis it is not cost effective to invest in more permanent solutions when the operating system is intended to become redundant. However, maintaining the temporary fix represents an additional financial burden at a time when both airports are already very considerably stretched.
- 10.17. There remain outstanding questions around technical requirements for the system which need to be addressed in advance of roll out. These include the extent of underground spaces (public and restricted) within which the new system must be effective, and wider operational issues associated with protecting crowded and, particularly with LHR, globally renowned premises. **The HO must ensure both LHR and LCY continue to be consulted to ensure the**

⁹³ [Heathrow-\(SP\)-Limited-Q3-2021-results-release-Final-Version.pdf](#) (accessed 29/10/21)

⁹⁴ Ibid.

design of the ESN will meet their needs and both must be part of subsequent user testing. Consideration also needs to be given to providing financial support to the airports to enable them to adopt ESN, and to the necessary period of double running with Airwave during the transition (R133).

- 10.18. The past few years have seen increasing numbers of airport-based protests, with airside incursions highlighting weaknesses in perimeter security (I have been assured this has since been strengthened). While treated as public order matters, aviation police officers will provide the initial response (and in some instances resolve the situation), which inevitably dilutes protective security until (where required) MPS public order resourcing arrives. Both airports should ensure that where AFOs are unusually deployed, those remaining are redistributed to maximise coverage. **Given the increasing frequency of protests within airport perimeters, the DfT should consider, as part of the review of the model for funding airport security which I recommend above, how this additional burden on airport operators could be resolved** (R134).
- 10.19. There is also the possibility that apparent protest activity may be cover for terrorist intent. Where genuine, protests can inadvertently create a target in themselves through delays and associated build-up of passengers. **Airport operators should be alive to both possibilities and ensure, through Risk Advisory Groups (see below) that they are linked into relevant intelligence and have mitigation strategies for protests in place** (R135).
- 10.20. The by-laws bestowing powers on airports to deploy sanctions against protestors who breach security on what is effectively private land are too lenient. And that the sentences following criminal prosecution for such breaches, where prosecution is able to be brought, are inadequate to deter future such activity. Setting aside the somewhat mixed nature of wider evidence around the deterrence effect of sanctions and sentencing, **civil and criminal legal frameworks must adequately reflect the severity of protest activity and trespass within airport perimeters in terms of the potential for public risk and harm: the Ministry of Justice (MoJ) should consider this issue in partnership with the airport operators** (R136).

Relationships with partners

- 10.21. I am reassured that the MPS aviation capability and airport operators work closely together with high levels of trust on both sides. Insight and expertise are shared and there is strong appetite for a collective understanding of the nature of the terrorist threat. The airports are clearly keen to ensure their security measures respond to changes in the threat and support the MPS in various trials to test how those changes can best be mitigated. Similarly, they have also led and funded trials themselves, with support from the MPS, to explore how security could be enhanced.
- 10.22. The MPS (including aviation and CT commands) belongs to the Risk Advisory Groups (which the Aviation Security Act requires airport operators to establish, alongside a Security Executive Group) which oversee the assessment and mitigation of security threats and the security provision for each airport. Senior airport operating personnel and representatives from the major airlines are also members. I am confident that this arrangement, managed through

Aviation Security Plans, represents oversight at an appropriate level and is sufficiently inclusive to ensure the necessary range of perspectives. That said, **the British Transport Police (BTP) are a notable exception and should become part of each airports Risk Advisory Group without delay** (R137).

- 10.23. The CCTV networks at both LHR and LCY are linked into the MPS central control room which enables the sharing of information in real time to support swift action in incident response. The CCTV in operation at both airports is manned 24/7 by operators trained in behavioural as well as physical markers of potential risk and threat, which is positive given the potential this allows for intervention. Similarly, those responsible for terminal and perimeter security patrols now undergo behavioural detection training, which is a welcome recognition of the developing evidence base in this area.
- 10.24. Both airports maintain a 24/7 drone detection capability (see chapter 22 for further detail on the threat from drones) which is both welcome and important, given the chaos caused over several days by a drone at London Gatwick airport in late 2018. The capability must as a minimum be maintained and updated when possible to reflect technological advancements.
- 10.25. Airport operators are keen to harness new technology to enhance security (including facial recognition) but have expressed frustration that lags in the necessary policy, ethical and legal parameters which must govern its use have held up their ability to exploit what may be possible. I am sympathetic to these frustrations though there are inevitably complex and important considerations at play which I discuss in more detail in chapter 22.
- 10.26. Both LHR and LCY have a significant interface with transport, including the London Underground and surface rail providers as well as local bus services. The British Transport Police (BTP) provide protective policing at London entry points to those services serving the airports which is reassuring, but consideration could be given to improving coordination between BTP and airport policing and security based at the airport end of routes. **BTP may wish to consider whether to provide armed protective security at the LHR and LCY transport hubs (in complement to armed security provided by the MPS in and around the terminals and wider airport premises). This is particularly important for the terminus points of non-stopping London – airport routes** (R138).
- 10.27. More broadly, there needs to be greater and more systematic engagement between the agencies responsible for security at airports. **A multi-agency ‘hub’ (which could be virtual to limit the need for abstraction from operational duties) attached to each airport would help strengthen working relationships between the airports, the MPS (aviation policing) and BTP, allow closer exposure to individual partner responsibilities and facilitate more widespread intelligence sharing** (R139). Intelligence sharing should be improved in both directions – for example, where the airports are able to share more intelligence with the BTP, it would enable them to better understand the airport operating context and any emerging vulnerabilities. Their inclusion in the Risk Advisory Groups would assist with this.

10.28. In response to the Manchester Arena Inquiry (MAI), airport operators are reviewing potential 'grey spaces' (see chapter 3) where ownership of security risk, as with spaces elsewhere across London, may be unclear. Once complete, findings will need to be considered by the work I recommend be led by City Hall (see chapter 8, paragraph 8.10).

A security focused culture

10.29. As with other sectors, ensuring staff who work in roles right across the airport, including retail and catering, adopt a security mindset, is crucial. They represent widespread 'eyes and ears' to complement official security, but the pandemic has meant huge churn in staff and where they are returning to roles, they will not immediately be 'match-fit' after many months away.

Airport operators should ensure that those staff they employ directly, as well as those employed by the various retail outlets across the sites, undertake the Action Counters Terrorism (ACT) Awareness e-learning package and appropriate See, Check and Notify (SCaN) modules (see Figure 8) (R140).

10.30. Developing and embedding a security culture includes ensuring that staff know how to report any concerns about colleagues – I was assured by both airports that simple, anonymous mechanisms exist to allow for this. **Providing appropriate feedback to staff regarding any action taken as a result of flagging concerns is important as it helps reinforce the importance of vigilance and reporting. This feedback loop is more mature at LHR, who should work with LCY to develop their processes** (R141).

10.31. Regular Servator patrols are, as elsewhere, an essential part of the disruption and deterrence of criminal activity, including terrorism, across the airports. They also (see chapter 4) provide an important public reassurance role and **Servator should be maintained at current levels of deployment across both LHR and LCY** (R142).

10.32. Finally, Border Force staffing at airports is running well below the levels necessary to avoid serious and regular queues in Immigration Halls. This not only brings its own security (and reputational) challenges but has on occasion led to armed police being deployed to manage public order issues arising from overcrowding, which risks distraction from normal patrol duties. This is extremely unsatisfactory, and **the HO needs to ensure that staffing levels are adequate at all times to deal with the flow of passengers** (R143).

11. VETTING AND SECURITY CLEARANCE

- 11.1. Standard employee vetting processes enable employers to check the background of a new hire or applicant and to verify the information they provide as part of the recruitment process (concerning, for example, their employment history, educational credentials, professional qualifications and criminal history). Vetting assists employers to identify any concerns about a potential employee which could mean they pose a liability or risk of some kind.
- 11.2. Where a role requires an individual to have access to government assets, including those relevant to national security, they will undergo a security clearance check at a level appropriate for the nature of the role and the information they will be privy to.
- 11.3. More extensive vetting and security clearance processes involve more detailed checks of an individual's circumstances, including exploration of personnel records, any social media activity and their financial position including assets, liabilities, income and expenditure.
- 11.4. In considering preparedness, vetting and security clearance are important for two principal reasons. Firstly, in terms of ensuring those working in protective security and CT activity more broadly are trustworthy and fit to operate in positions where public safety and national security interests are paramount. This includes being able to discharge community engagement and investigation responsibly and with the trust of the public. And secondly to ensure that channels of communication between different partners are facilitated so necessary information can be shared appropriately in the management and response to threat and risk.

Police vetting

- 11.5. Standards of police vetting are necessarily a matter of public confidence and are essential in maintaining the trust of members of the public. They are also important in preventing extremists and terrorists entering or continuing to serve within the police service.
- 11.6. Police vetting is very much in the public consciousness following the kidnap, rape and murder of a young woman, Sarah Everard, by a serving Metropolitan Police Service (MPS) officer in March 2021. Under the guise of an arrest, the perpetrator used his police credentials to facilitate his brutal crime and his actions have rightly brought much scrutiny of whether there were signs of the threat he posed which police processes could, and should, have picked up.
- 11.7. As a result, and as acknowledged by the MPS Commissioner, public trust in the MPS has been shaken. The case subsequently brought to light instances of behaviour exhibited by police officers elsewhere in the MPS and other forces which have intensified scrutiny. They are shining a spotlight on the adequacy of vetting processes and the way in which police forces, including the MPS, have responded to previous complaints from both the public and police colleagues about untoward behaviour of officers.

- 11.8. I do not wish to stray into the details of these cases as two independent reviews will be considering the issues they have surfaced. One, led by Baroness Casey of Blackstock, will examine the culture and standards of behaviour within the MPS and will assess to what extent current leadership, recruitment, vetting, training, communications and other processes effectively reinforce the standards which the public should expect. The other, led by the Home Office (HO), will be chaired by Dame Elish Angiolini and will focus on whether warning signs about the MPS officer who murdered Sarah Everard were missed and whether previous allegations about him were properly handled.
- 11.9. Nor do I wish to comment in detail on issues which Her Majesty's Inspectorate of Constabulary, Fire and Rescue Services (HMICFRS) will be revisiting following their previous instruction to all forces across England and Wales to retrospectively vet all officers and staff in accordance with 2006 guidelines. HMICFRS have also been commissioned by the Home Secretary to undertake a thematic inspection of vetting and counter-corruption procedures in policing across England and Wales.
- 11.10. Nevertheless, these issues are relevant to this review in terms of the MPS being able to lead, respond to and investigate terrorism and extremism with the integrity and professionalism that must underpin any policing model but particularly one which relies upon consent.
- 11.11. Current procedures mean police officers are vetted upon entry in accordance with national guidelines (to which all forces signed up to from 2006) and the subsequent code of practice issued by the College of Policing in 2017⁹⁵. Depending on role, clearance can last between three and ten years, at which point an individual should be re-vetted (and if they move role before vetting expiration, they should be re-vetted at that point). If an officer transfers from one force to another and has not undergone vetting in the past 12 months, guidance states the receiving force should instigate the process.
- 11.12. However, an HMICFRS inspection of the MPS in 2019⁹⁶ revealed that as of April that year, 37% of the overall workforce (comprising police officers, staff and Police Community Support Officers) did not hold up-to-date vetting status in accordance with the 2006 guidelines. By the end of 2021 this had been rectified for the majority of affected individuals, although 655 officers remained without current vetting status.
- 11.13. **I have been assured these outstanding cases were being processed by the MPS vetting team but the Mayor's Office for Policing & Crime (MOPAC) may wish to check on progress, perhaps at the end of September 2022 and keep the situation under review thereafter** (R144). I have also been assured that a process is now in place to ensure all officers submit vetting forms within three months of clearance expiry to prompt the renewal process: reassuringly, those who fail to do so will now have their access to MPS systems revoked.

⁹⁵ [Vetting Code of Practice \(publishing.service.gov.uk\)](https://publishing.service.gov.uk) (accessed 09/12/21)

⁹⁶ [Detailed Findings - Legitimacy - Metropolitan - PEEL Assessment 2018/19 - HMICFRS \(justiceinspectors.gov.uk\)](https://justiceinspectors.gov.uk) (accessed 10/12/21)

- 11.14. However, for many officers the renewal point will come ten years after their previous vetting was undertaken. A period of time over which much can change. And vetting is not, neither can it be, a completely failsafe process. It can only ever be an exercise in risk mitigation, being retrospective and dependent upon individual honesty.
- 11.15. The Hannan case exemplifies this. On both his application to the MPS and his vetting forms, Police Constable Benjamin Hannan was found to have lied about his past membership of National Action, a proscribed far-right group. While arguably a more thorough investigation, particularly of Hannan's online activity, might have revealed more about his past activity before his appointment to the MPS, the case highlights how dependent the vetting process is on an individual's honesty.
- 11.16. And there is also a duty upon officers to proactively report any significant changes in their personal circumstances in-between formal vetting processes, including changes in relationship status as well as living and financial circumstances. Performance reviews should also explore such changes but are equally dependent upon an individual volunteering the information.
- 11.17. There is no doubt that vetting and re-vetting are resource intensive processes. The current uplift in the number of police officers across the MPS, and demands of the associated recruitment process, adds to pressure on vetting. It is essential that recruitment and vetting services are properly resourced to handle the flow of new vetting applications in a timely fashion. However, **police resources should also allow for full renewal vetting checks of existing officers, which should be done routinely at least every three years** (R145).
- 11.18. I have heard about a pilot led by North Yorkshire Police in partnership with Police Crime Prevention Initiatives (PCPI, see chapter 7) which aims to complement the formal vetting process. It seeks to proactively deliver to the Professional Standards Department (PSD), on a monthly basis, new data about officers which could be relevant to vetting considerations. It will do this via matching individuals' details against the Police National Database (PND, set up following the Bichard Inquiry⁹⁷ into the 2002 Soham murders which identified a number of failures in police intelligence gathering and sharing).
- 11.19. Available to all UK police forces and selected law enforcement agencies, the PND allows these organisations to share intelligence and other information captured in local systems. Searching it, however, requires knowledge of how to navigate the system and an understanding of the relevant output or search results. While the PND is already used to support the vetting of police officers and staff, it is not drawn upon in a mandatory, automated or regular process: the pilot seeks to proactively test such an approach (in complement to the standard, manual reactive approach based largely upon a renewal date).
- 11.20. Over each month of the six-month pilot, an automated capability will be used to search regularly for new data. If results are found, PND analysts will review the new information and match officer details against the database. Where a match is confirmed, indicating that new information has been recorded about a serving police officer and the details meet pre-

⁹⁷ <https://dera.ioe.ac.uk/6394/1/report.pdf> (accessed 01/02/2022)

determined criteria (i.e. are relevant for vetting), they will be passed to the PSD for consideration.

- 11.21. The pilot will also investigate the feasibility and legality of linking to, and automatically matching against, other (non-criminal) databases such as those used for residential address checks, or credit checks (which could identify, for example, officers who may be vulnerable due to undisclosed debt). There is clearly a balance to be struck between vetting considerations and disproportionate intrusiveness, and any system will only ever be as good as the data it relies upon. Nonetheless, as a means of both encouraging officers to proactively report changes in circumstance and ensuring vetting status is informed by related information recorded on the PND but not reported by an individual, the premise of this pilot is promising.
- 11.22. The force will, of course, need to be ready to handle any information returned by the pilot, and act accordingly where appropriate. But in the interests of ensuring a police force in which the public can have trust and confidence, vetted to a high standard on a far more regular basis than at present and via processes which do not place undue burden on PSDs, this pilot is a welcome step: **North Yorkshire Police should ensure a comprehensive evaluation of the pilot, including of any unintended consequences, and MOPAC and the MPS should follow progress carefully** (R146).
- 11.23. The fact that institutional knowledge said to have been held by different police forces about the behaviour and attitudes of the officer responsible for the murder of Sarah Everard was not formally accounted for and acted upon is an exceptional failing which must not be allowed to happen again. Where relevant knowledge and / or evidence is held about a police officer by colleagues, the process must allow for this to be identified and accounted for during re-vetting.
- 11.24. This means that alongside vetting, robust systems must be in place within the MPS (and other organisations with responsibilities for keeping Londoners' safe, including those which provide security services) to allow staff to report concerns about colleagues. **The MPS has implemented a 'Raising Concerns' policy which encourages police officers and staff to report worries about colleagues, although it is unclear how much it has been used and to what effect. Its level of usage and effectiveness with respect to encouraging concerns to be raised, alongside the nature of any subsequent action, should be regularly assessed by MOPAC** (R147).
- 11.25. PNC checks should be conducted not only on new entrants at the time of recruitment but on all existing police officers and police staff, on an annual basis. Currently, if an officer or member of staff sustains an arrest, charge, caution or conviction receiving a non-custodial sentence they are expected to disclose their police or police staff status in line with MPS policy. If they do not, it should be identified through intelligence checks conducted as part of the arrest procedure and details passed to the MPS (if they are not the arresting force).

- 11.26. It is possible, however, for an individual to subvert those checks through provision of false details, or for the arresting force to fail to inform the MPS. While the MPS conduct PNC audits to mitigate against this risk, once again this is not a failsafe process.
- 11.27. Checks of social media activity can be made only on open source material – and even here, such is the prolific nature of modern online life it is inevitably difficult to check the entirety of an individuals' activity. However, **open source searches of social media and other online activity by new recruits should continue to be routinely conducted. Such searches should also be carried out on a regular basis for existing officers and staff** (R148). Notwithstanding the point that if an individual actively tries to hide or obfuscate activity it is very hard to unearth it in a world of anonymity and closed spaces, the fact of routine checks may help deter engagement, or discourage those involved in untoward activity from applying for or remaining within the MPS.
- 11.28. Psychological assessments sit alongside the physical assessments (of fitness, hearing and vision) which comprise the annual medical check for officers who bear firearms. This is positive, and I have been assured that firearms officers are closely supervised and strongly supported by their management and wider command. They are actively encouraged to come forward with any concerns about their mental health in between annual assessments (which could trigger a surrender of their firearms licence for a period of time, as decided by Occupational Health and the Chief Firearms Officer).
- 11.29. However, this effectively relies upon self-policing and in light of recent cases (e.g. the officer who murdered Sarah Everard was an authorised firearms officer), **consideration should be given to whether the content, nature and frequency of the mandatory testing process for firearms officers should be reviewed** (R149).
- 11.30. Furthermore, **the MPS should seek to develop a means of developing integrity testing of police officers and staff, not only on an intelligence-led basis but also on a random basis** (R150). This would help build much needed reassurance that policing in London is conducted with honesty and ethics at its heart.
- 11.31. The vetting process must stand up to cultural sensitivities in terms of procedures and expectations. The questions and manner of investigation must allow for individuals from all backgrounds and cultures to feel comfortable in openly and honestly discussing matters of interest to the vetting process: any form of bias will ultimately affect the demographic make-up of the MPS force more widely.
- 11.32. Those living, working and visiting London must have sufficient confidence in the MPS to feel comfortable raising concerns and sharing information with police officers. An issue I return to throughout this report, it is absolutely crucial that communities and individuals feel comfortable sharing observations and information with the police which might indicate any risk of radicalisation or terrorist intent. Doubt about police integrity can only threaten this dynamic.

- 11.33. As such, **the Home Secretary should examine the circumstances in which Police Appeals Tribunals have over-turned decisions to dismiss officers following vetting failures, incidents of domestic violence and sexual offences, and consider whether the Tribunal process needs to be reformed** (R151).

Insider threats

- 11.34. People change over the course of their lives. Habits and behaviours, attitudes and beliefs, friends and associates can all shift. People can also, as discussed, deliberately hide those aspects of themselves which they fear might pose a barrier to passing recruitment and vetting processes, only for them to manifest some time later.
- 11.35. A dedicated anonymous hotline, managed through Crimestoppers with support from the MPS' PSD, provides an alternative mechanism to the Raising Concerns policy for police officers and staff to raise flags about colleagues. **MOPAC may wish to consider how this hotline has been used and for what purposes** (R152).
- 11.36. As part of promoting an open security culture, Transport for London (TfL) have also developed a system which supports staff to report concerns about the safety and security of spaces across the network, in addition to worries about behaviour exhibited by colleagues. This allows for anonymous reporting and I have been assured there has been some take-up, including by staff reporting views exhibited by colleagues which raised concerns in relation to potential extremist sympathies.
- 11.37. **TfL should ensure usage of the scheme is monitored and where concerns are raised with respect to CT, they should be regularly fed into the Executive Security Group** (R153) (see chapter 8). This Group should consider, where appropriate, ensuring the scheme allows some form of feedback to reassure those using it that their concerns are not being lost and action is being taken where necessary.
- 11.38. **Usage of the similar reporting mechanism in place at London's airports (see chapter 10) should also be regularly monitored** (R154).
- 11.39. TfL now undertake risk assessments to identify security critical roles across London's transport network, drawing on advice from the Centre for the Protection of National Infrastructure (CPNI) and the Department for Transport (DfT). This ensures vetting is undertaken in accordance with the nature of a specific role and in some instances has required staff to undertake enhanced vetting following a refreshed assessment of the role. There are obvious challenges if an individual fails that process, but I have been assured HR arrangements are in place for appropriate redeployment if necessary and note that enhanced vetting status is then attached to the role for future recruitment.

Information sharing

- 11.40. As I discuss throughout this report, sharing information regarding security and risk supports comprehensive and balanced decision making. This in turn enhances the ability of those

partners and agencies responsible to maximise preparedness for a terror attack targeting London.

- 11.41. There is more to do with respect to this. One part of the solution is ensuring those responsible for decision making are subject to vetting and security clearances at the appropriate level to enable the exchange of information. While I consider there is room to share more information at lower levels of classification (in line with the 'Dare to Share' principle), there will always be material which is sufficiently sensitive to mean it is only appropriate to share with more highly vetted individuals.
- 11.42. **Consideration should be given to whether those in charge of protective security across key partners, including local government and the transport network, as well as those managing security on behalf of London's business, entertainment and hospitality sectors, should have access to national security vetting in support of wider information sharing** (R155).
- 11.43. Aside from information returned through internal reporting schemes, organisations are largely reliant upon the MPS and security services proactively sharing information regarding those security threats which may be posed by staff in critical positions. However, it has been put to me that the extent of information provided often does little more than allow an individual to be identified: it is not sufficient to support formal disciplinary and / or dismissal proceedings should this be desirable in the interests of preparedness and protection. **The MPS should reconsider the level of detail it shares in such instances** (R156).

12. PREPARING FOR A CHEMICAL, BIOLOGICAL, RADIOLOGICAL OR NUCLEAR ATTACK

- 12.1. In Salisbury in March 2018, Russian military intelligence officers poisoned a former Russian military officer and double agent for the British intelligence services, and his daughter. Both spent several weeks in hospital in critical condition, as did an attending police officer, following their exposure to the nerve agent Novichok. While all survived, a woman in nearby Amesbury later died after spraying the substance onto her wrists from what she believed to be a bottle of perfume. The bottle in fact contained the nerve agent. The UK government believes it "*overwhelmingly likely*" the poisoning was ordered by Russian president, Vladimir Putin, i.e. a state-sponsored assassination.
- 12.2. What happened in Salisbury and Amesbury is not, of course, the first time that a weapons-grade substance has been used in a targeted attack on British soil. In 2006 Alexander Litvinenko, a British-naturalised Russian defector and former officer of the Russian Federal Security Service (FSB) fell ill and was hospitalised after poisoning by polonium-210; he died several weeks later. Subsequently, in 2016 a public inquiry concluded that Litvinenko's murder had been carried out by two Russian nationals who were "*probably*" acting under the direction of the FSB, with the approval of President Putin.
- 12.3. Both attacks targeted specific individuals. However, the consequences, particularly in the case of the Salisbury poisoning, were widespread and long-lasting. These cases highlight the potential for even quite unsophisticated chemical, biological, radiological or nuclear (CBRN) material to cause not only loss of life but widespread disruption across the broader environment and economy. Consequences are likely to have an effect beyond the immediate attack site, as the risk of further inadvertent transferral of hazardous material without very rigorous limitation and decontamination processes is significant.
- 12.4. The threat from CBRN weapons should therefore not be underestimated. While the risk of terrorists mounting an attack against London using sophisticated CBRN material is relatively small, such an attack has potential to cause very significant public chaos and fear, economic damage and, of course, injury (fatal and otherwise). In assessing London's preparedness for a terror attack, I have therefore reviewed the capital's capacity and capabilities deployable in the event of a CBRN attack.
- 12.5. As the inquest into the events in Salisbury and Amesbury is due to commence in 2022, it is important this review does not prejudice that process. Her Majesty's Inspectorate of Constabulary, Fire & Rescue Service (HMICFRS) are also concluding a recent inspection of police capacity and capability with respect to CBRN. This is due to report in 2022 - the

Metropolitan Police Service (MPS) was one of the forces in scope and likewise this review does not wish to pre-empt the Inspectorate's findings. The conclusions here are therefore largely general in nature.

- 12.6. My overall sense, however, is that should terrorists make use of CBRN related techniques to mount an attack against London, there would be very substantial implications in terms of containing damage so as to minimise harm. The very size of London and the scale and nature of its resident and transient population, including tourists from all corners of the globe, brings significant challenge to containment and I have concerns regarding how quickly the emergency services might become overwhelmed particularly in the event of multi-site deployment of a hazardous substance. Particularly for health services, large numbers of the 'worried well' arriving at hospitals unclear whether they have been exposed to hazardous material has potential to stretch resources even further.
- 12.7. While the scale of potential harm is perhaps less, there is also of course the possibility of acid, or other noxious substances, being harnessed at relatively low cost and with relative ease. As I noted in discussion of the threat (chapter 1) the number of attacks using acid as a weapon have risen in recent years. The relative accessibility of acid and similar harmful material with the capability of inflicting substantial and potentially life-changing injuries very quickly means the capacity for their deployment by those motivated by terrorist intent must be considered and planned for. My considerations with respect to preparing for and responding to a more traditionally conceived CBRN attack therefore apply as much to attacks perpetrated with lesser grade but still potentially very harmful substances, some of which are in household use.

Understanding and readiness

- 12.8. Since my previous review a series of international plots with a CBRN component, alongside the attack in Salisbury in 2018 prompted a programme of work led by the National CBRN Centre (which brings together the emergency services to protect and prepare the UK against the CBRN threat) which examined, in conjunction with CT Policing, the UK's capability to respond to this threat. This found levels of specialist capabilities to be good, with governance and operational structures ready to guide response, training in place to develop the necessary expertise, and levels of equipment at satisfactory levels.
- 12.9. A comprehensive police debriefing exercise post-Salisbury led to a series of actions against which progress is being monitored by the National Police Chiefs Council (NPCC) lead for CBRN. While this has fed into police guidance, including the MPS' revised guidance for responding to a terror attack, and has driven an uplift in MPS CBRN response capacity (including investment in trained officers and appropriate equipment), any **future such CBRN incident debriefs should be across government (central and local) and response agencies** (R157). The UK Health Security Agency⁹⁸ who, as the replacement for the now abolished Public

⁹⁸ The UKHSA – previously the National Institute for Health Protection – is the UK's lead agency for health security, providing intellectual, scientific and operational leadership domestically (at national and local levels) and internationally, to ensure the nation can respond quickly and at greater scale to deal with pandemics and other future threats.

Health England, presumably are intended to be crucial in planning how to minimise risk to public health, should play a central role.

- 12.10. I have heard from London's emergency services about the capabilities now in place to respond to a CBRN related incident in the capital. I am reassured as to the awareness of risk and impressed by the considerable amount of thought which has gone into planning and putting in place response capabilities across the MPS, London Ambulance Service (LAS) and London Fire Brigade (LFB), including a cadre of CBRN trained CT police investigators. Separate from response teams, their numbers have significantly increased in London to support appropriate and safe scene investigation and evidence collection. However, police officer adoption of CBRN responsibilities is entirely voluntary. **Reliance on goodwill to build and maintain CBRN officer capability in the MPS feels precarious and consideration should be given to how this provision can best be sustained** (R158).
- 12.11. Each emergency service maintains a 24/7 CBRN capability (including trained officers and appropriately equipped vehicles). National guidance (led by the National CBRN Centre) steers strategic and tactical delivery of this capability, founded on the RRR concept, i.e. REMOVE person from area, REMOVE outer clothing, REMOVE the substance. Staff from each service, together with members of the British Transport Police (BTP) and City of London Police (CoLP) are embedded in cross-service teams which helps assure a shared understanding and approach. This practice also applies when dealing with less sophisticated attacks using noxious substances such as acid.
- 12.12. The costs of decontamination can be very significant with substantial associated losses. Over 20 emergency service vehicles and their content, including fully equipped ambulances and multiple police vehicles were lost in the response to Salisbury and Amesbury due to assumed contamination. Testing vehicles as well as people and crime scenes would have overwhelmed the testing capacity – **the MPS, LAS and LFB should consider the potential scale of equipment loss in CBRN response and ensure mitigations are in place** (R159).
- 12.13. **Similarly, stocks of in-date personal protective equipment (PPE) must be maintained** (R160). Some hazardous materials degrade PPE more quickly than others and even where the process is slower, given that equipment cannot be bearably worn for longer than around two hours (particularly if air temperature is high), it is crucial that stocks of PPE must be sufficiently large and available in London to accommodate multiple de-robing processes. This will allow those involved in the response to a CBRN incident to safely exit and re-enter the contaminated scene equipped with fresh PPE as regularly as is necessary.
- 12.14. Accurate records must be kept in terms of who has accessed a suspected CBRN scene for any purpose, including to treat and remove the injured and for investigative and evidence collection purposes. This should extend to tracking vehicles used by those who have attended the scene. **As lead agency for a terror attack in London, the MPS should ensure all movements by those involved in a CBRN response are recorded on the Computer Aided Dispatch system** (R161).

- 12.15. Identification of material as rapidly as possible is crucial in shaping the response. Equipment held by the MPS is capable of identifying a wide range of substances at scene and trace detection kits are in place across 700 police response vehicles in the capital. In the event of a CBRN incident coinciding with a marauding terrorist attack (MTA), CT Specialist Firearms Officers would be deployed to the scene – trained to deliver a firearms response in a CBRN setting, this provides some reassurance in the event of a multi-faceted attack.
- 12.16. Corrosives decontamination kits enable frontline officers, likely to be the first on scene of a suspected CBRN incident, to implement immediate, albeit limited, mitigating action before the arrival of more extensive capabilities for trace detection and identification. Held by the MPS' SO15 Command (see chapter 4), these are deployable 24/7 and I have been assured that London is well served by this capability, with kit able to reach central London locations within 15 minutes. **This MPS capability must be maintained to at least the present level and be regularly refreshed to allow for the ever-diversifying nature of chemical and biological material** (R162).
- 12.17. Given that diversification, however, it is likely that in some instances confirmation of a substance will require laboratory-based assessment (as was the case with the Novichok used in Salisbury). The geographical distance between the UK's principal such laboratory and London means this could take some time – responsibility for facilitating this must be clear and there must be a process in place to expedite safe transport of a sample.
- 12.18. Once the substance is confirmed, information sharing processes must enable the detail to be passed swiftly to all those involved in managing the response, including the UK Health Security Agency and other members of the Strategic Coordinating Group (SCG, see chapter 13) which will form as soon as a major incident arises. It is likely that much of the detail will be highly classified, therefore it is incumbent upon the emergency services and others to retain sufficiently high levels of clearance among key senior decision makers (see chapter 11).
- 12.19. As much detail as appropriate should also be shared publicly to provide both reassurance and guidance. Different levels of security clearance held by relevant experts whose input is required to inform and guide the response (e.g. scientists) must not be allowed to hamper information sharing. I have been assured that challenges with this which were highlighted post-Salisbury have been addressed.

Equipment

- 12.20. The MPS operates a well-equipped facility focused on developing user-friendly technology to mitigate threats. Based on the latest research and evidence, this ensures a cutting-edge toolkit available to support the CBRN response in London. In terms of detection and identification of material, however, equipment is only as good as its 'library' of known or encountered substances. **The MPS must therefore continue to invest in the capability, to enable it to be on top of latest developments and intelligence regarding development and emergence of the harmful substances of the future** (R163).

- 12.21. Working closely with science and technology partners across government, academia, the private sector and international colleagues, capabilities offered by the MPS unit go well beyond substance detection and identification. Heavily involved in user and stress testing police kit including PPE and body armour, they bring a detailed understanding of real-world response settings to the development and harnessing of technologies. This is reassuring from the perspective of preparedness but, as above, must be maintained to ensure currency.
- 12.22. **There is scope for the threat mitigation technology unit to better link into and offer support to forces outside London and it should consider how best to do so** (R164). Regular two-way engagement would help maximise the wider value of this specialist capability but also allow a clear route into the MPS for intelligence which may arise outside the capital regarding emergence of as yet unknown hazardous substances.
- 12.23. The MPS operates three CBRN Specialist Assessment vehicles and a further Specialist Response vehicle, each crewed by four officers. **While I recognise the maintenance of this capability to be a costly endeavour, I consider it to be the minimum acceptable level for preparedness purposes and it should not be reduced** (R165). Even with this capability, in the event of a major multi-site attack the MPS would likely need to draw on mutual aid from London's neighbouring forces.
- 12.24. Following work with the MPS and LAS, the LFB now train a number of firefighters in the use of radiation monitors. This is a welcome additional capability in terms of ensuring the emergency services are well placed to identify threat at scene and calibrate the response accordingly.

Training and exercising

- 12.25. Testing and exercising processes are at least as important when it comes to responding to infrequent events as to regular demands. Individual and collective 'muscle memory' must be maintained and the emergency services should ensure this continues to be a priority.
- 12.26. I have been assured that joint training between the emergency services, in conjunction with the military who may be called upon to play a role in the event of a CBRN incident in the capital, is good. This takes place at both strategic and tactical level and following Salisbury, a quarterly assessment of command capabilities ensures this is regularly refreshed.
- 12.27. I was pleased to hear that during the response to Salisbury, a real time process for capturing lessons was put in place very early on. This is welcome as not only did it allow small fixes to be made as the response progressed, it maximised the chance of capturing aspects which may otherwise have been forgotten in the more traditional post-response approach. **Where not in place, London's emergency services should seek to make this standard practice in any response which progresses over several days or longer** – likely in the event of a CBRN incident but may also occur in other types of incident (R166).
- 12.28. **The London Resilience Forum (LRF) must ensure as a matter of priority that all potential Gold command leads have undergone the Multi-Agency Gold Incident Command (MAGIC) training** (R167), updated after Salisbury to ensure learning is reflected in current

tactical and strategic response leadership. Providing a legislative and practical framework for strategic level command in emergencies and major incidents of all kinds, this is fundamental in ensuring shared understanding and requisite skillsets across those who adopt the most senior role in any response (see chapter 14). **The response to Salisbury highlighted the critical importance of senior CT investigative support: this function should be included in relevant testing and exercising, and where it is not already, should feature in the MAGIC course** (R168).

- 12.29. In terms of frontline police responders, new recruits to the MPS are trained in the principles of Initial Operational Response (IOR) which now includes handling a CBRN incident. Short videos are in development for deployment onto the tablets used by officers on patrol to act as accessible prompts in support of response. **This is a welcome training and operational reinforcement tool and should be rolled out as soon as possible** (R169).
- 12.30. However, many will have had no real-world opportunity to put classroom learning into practice. This is particularly the case with CBRN given the relative infrequency of such incidents, coupled with wider officer churn and the reduction in face-to-face training caused by Covid-19. Pre-pandemic the MPS ran several large, multi-agency role-play exercises to explore readiness to respond to a CBRN terror attack in different settings across London. Complemented by a series of smaller tabletop exercises, this formed a comprehensive programme of testing and exercising and as the country emerges from the pandemic, consideration should be given to further CBRN focused in-situ events. These should involve new and early career recruits right the way through to those newly appointed to strategic command roles.
- 12.31. Given the number of experienced and trained MPS officers approaching retirement, succession planning is an important consideration in ensuring future capabilities are adequate in terms of CBRN response. **A London bespoke course to ensure resilience across the MPS rota of those trained to adopt command roles is currently being considered – this should be developed and rolled out, with thought given to involving the other emergency services as well as local authority leadership teams and health partners** (R170). The CBRN training and development for specialist CT responders within SO15 is maintained by specialist CBRN trainers within the command, working with the National CBRN Centre. This is a welcome partnership and input from those specialist trainers should be sought for any bespoke London course.

Public communications

- 12.32. Communications with the public are a critical part of any major incident response and experience throughout the Covid-19 pandemic has highlighted the importance of clarity in public messaging to facilitate desired behaviours. This is particularly the case in dealing with a suspected CBRN incident, where the balance of representing the nature and scale of threat against reassurance is complex. Recent training exercises suggest there is more work to be done in this regard.

- 12.33. A SCG plays a crucial role in terms of designing and facilitating public communications and timing in response to a CBRN incident is key. Messages must reach individuals exposed to a contaminated area extremely quickly to reduce the risk of people leaving a scene before it can be secured and decontamination processes put in place: where they are not already, **communications specialists must be involved in any SCG when convened to advise on messaging and ensure that knowledge of online and offline channels is current to maximise reach as quickly as possible** (R171).
- 12.34. Most notably, the UK's 'Run, Hide, Tell' public communications campaign, in place since 2015 in response to the terror attacks in Paris, is somewhat at odds with the need for individuals caught up in a CBRN incident to remain in place in case of decontamination requirements. I return to the issue of public communications more generally in chapter 22 but recommend that **the Government Communication Service should work with the emergency services and other experts to consider and test public messaging for use in the event of a CBRN incident** (R172).

13. PARTNERSHIP WORKING AND COLLABORATION

- 13.1. Any response to a terror attack or other major incident in London is underpinned by a whole series of processes and responsibilities, set out in guidance and protocols to which those with a part to play are effectively signatories. A comprehensive suite of forums and structures bring together those protocols, governed by both national and London specific principles - see Figure 13.
- 13.2. The need to respond to challenges wrought by the Covid-19 pandemic brought partners together in common purpose over an extended period of time. Indeed, the pandemic led many of London’s local authorities to expand their engagement networks with communities across their boroughs. Widely thought beneficial in terms of cementing relationships and furthering understanding of the role played by different partners, there is a common desire not to lose a renewed sense of togetherness and partnership working at all levels. A refreshed and inclusive testing and exercising programme will no doubt help facilitate this.

Figure 13: Frameworks and forums involved in preparing for and responding to a major incident

<p>Joint Emergency Services Interoperability Principles (JESIPs)</p> <p>Guiding the multi-agency approach taken by the emergency services in responding to major incidents, the JESIP framework seeks to improve joint working not just between those services but with all responding organisations. Its five key principles of i) co-location, ii) communication, iii) coordination, iv) jointly understanding risk, and v) shared situational awareness guide real-time response and underpin policies, procedures and training across all agencies.</p>
<p>Joint Operating Principles (JOPs) - responding to a Marauding Terrorist Attack (MTA):</p> <p>Substantially revised in 2019 following the terror attacks in London and Manchester in 2017, JOPs guide the emergency services response specifically to a marauding terrorist attack (MTA). Designed to ensure interoperability, they are underpinned by the JESIPs.</p>
<p>M/ETHANE</p> <p>M/ETHANE stands for Major incident declared, Exact location, Type of incident, Hazards present or suspected, Access – routes that are safe to use, Number, type, severity of casualties, Emergency services present and those required. Set out in the JESIPs, it is used by emergency services control rooms, as well as front-line responders and incident commanders, to guide the gathering and sharing of information. This facilitates a shared situational awareness within and across agencies (including via control rooms). For incidents below the major incident threshold, ‘METHANE’ becomes ‘ETHANE’.</p>
<p>London Resilience Forum (LRF)</p> <p>Chaired by London’s Deputy Mayor for Fire and Resilience, the LRF provides a means for agencies to collaborate at a pan-London level to plan for and respond to major incidents, and it provides a link between resilience at local and national levels. The LRF sets the strategy and objectives for a</p>

coalition of around 200 partner organisations from both the private and public sectors (known as the London Resilience Partnership) which are organised into a number of groups and sector panels.

London Emergency Services Liaison Panel (LESLP)

The LESLP includes representation from the Metropolitan Police Service (MPS), City of London Police (CoLP), British Transport Police (BTP), Environment Agency, London Ambulance Service (LAS), London Fire Brigade (LFB), HM Coastguard, the military, local authorities, the Port of London Authority, Transport for London and the voluntary sector. Roles and responsibilities of each partner are set out in the LESLP Major Incident Principles, which describe arrangements for operational and tactical coordination across the London Resilience Partnership. The Principles are complemented by the Partnership's Strategic Coordination Protocol (which describes strategic coordination arrangements for a multi-agency response).

London Resilience Group (LRG)

A central function, and with specific respect to preparedness (it has a number of different roles) the LRG supports the work of the London Resilience Partnership in preparing for and responding to emergencies. Hosted by the LFB, it is responsible for (among other things) publishing various emergency response documents on behalf of the Partnership, including the Strategic Coordination Protocol, Major Incident Principles and a range of capability and risk specific frameworks. This work is overseen by the LRF.

Strategic Coordinating Group (SCG)

An SCG is convened in the event of a major incident where response (including consequence management and recovery) requires strategic multi-agency coordination. Its members will include strategic representatives of the London Resilience Partnership, including the on-call London Local Authority Gold (a Chief Executive who will act on behalf of all London's local authorities affected by the incident). The SCG will coordinate the response at the strategic level to ensure shared situational awareness, sufficiency of support and resources and consideration of wider implications and impacts of the incident. It ensures that statutory obligations are met and will liaise with central government and other bodies as necessary.

Strategic Coordination Centre (SCC)

Set up of an SCC is triggered by the SCG if deemed necessary, to ensure that interaction between agencies can be established and maintained throughout the response to an incident. It co-locates SCG members and their support teams and once activated, is initially the responsibility of the MPS and LRG to set up and maintain.

Special Operations Room (SOR)

An MPS facility, the SOR provides a Command and Control capability to both coordinate day to day policing and manage major events and operations held in London, including the Notting Hill Carnival and the London Marathon. Planned and spontaneous demonstrations, state visits and other sporting events are also handled from here, with representatives from partner agencies regularly working from the SOR. The SOR may act as the SCC on occasion.

Security Review Committee (SRC)

The SRC is the national coordinating body for protective security (Protect) and links into Prevent, Pursue and Prepare as the other pillars of CONTEST, the governments counter-terrorism strategy. Meeting fortnightly, it brings together partners and agencies across the UK, including the MPS, regional and counter-terrorism policing, security services, LAS, LFB and the military. The SRC maintains an overview of the threat from international and domestic terrorism and extremism, including implications of changing geo-political contexts, and coordinates the national response. It

monitors the impact of terrorism and extremism, hate crime and policing responses on communities, assesses emerging tensions and coordinates national learning.

Extraordinary Security Review Committee (SRC(E))

The SRC(E) is triggered by a rise in the UK threat level, an imminent, actual or perceived terrorist attack in the UK, or a significant attack elsewhere in the world which targets UK citizens or otherwise impacts on the UK or its interests overseas (or has potential to do so). For London, the SRC(E) can deploy MPS resource to support a protective security operation in London and can recommend the same for elsewhere in the UK, although without executive authority. In such circumstances, the SRC(E) will liaise with the command team to oversee operations and will direct national and London protective security messaging.

Developing London's preparedness policy, forums and frameworks

- 13.3. The terror attacks perpetrated since my last review, alongside other major incidents such as the fire at Grenfell Tower in 2017, provide opportunity for significant scrutiny of the way in which the emergency services and partners responded both individually and collectively. Learning from that scrutiny must also be brought to the frameworks, policies and guidance which govern response processes, and updates issued to mitigate against similar future failings or areas of weakness. The Strategic Coordination Protocol and the LESLP Major Incident Procedure Manual have been refreshed on this basis – with the latter now known as the LESLP Major Incident Principles. While I explore progress more broadly in chapter 3, there are a number of specific observations which merit mention here.
- 13.4. My review of various incident debriefs produced by the MPS suggests evidence of a disconnect between the four elements of the governments' CT strategy, CONTEST. The attack at Fishmongers Hall in 2019 particularly highlighted a lack of joined up working across police and partners working within the Pursue, Prevent, Protect and Prepare strands. This drove a lack of clarity about which strand was leading on which element of response. **Policy and operational leads from all four CONTEST strands should ensure regular attendance at the SRC to ensure shared awareness and understanding of emerging issues and considerations with respect to the threat picture and related events** (R173).

Declaration of major incidents in London

- 13.5. The tragedy which unfolded at Grenfell Tower in 2017 highlights what can happen when the declaration of a major incident happens in a silo. Over the course of one hour, each of the three emergency services individually and independently declared a major incident - but failed to inform the other two blue light services. The local authority (Royal Borough of Kensington & Chelsea) was not informed for a further quarter of an hour. This meant the necessary coordinated joint response was not appreciated early enough, which the subsequent inquiry found led to a lack of shared understanding as to the nature and effect of the fire⁹⁹.
- 13.6. The revisions to the LESLP Major Incident Procedure Manual referred above, and related training, have sought to address these failings in the process of major incident declaration.

⁹⁹ See [GRENFELL TOWER INQUIRY: PHASE 1 REPORT OVERVIEW](#) (accessed 12/11/21)

However, the definition of a major incident continues to be focused on emergency services delivery rather than public impact, meaning there is a risk that aligning understanding with additional partner agencies will continue to be a challenge. The JESIPs define a major incident as: "An event or situation with a range of serious consequences which requires special arrangements to be implemented by one or more emergency responder agency". **The Cabinet Office should review the definition so that it explicitly reflects the impact on communities** (R174).

- 13.7. In the event of a declaration of any major incident, a system which ensures the Mayor is briefed quickly and authoritatively is important. A key voice in terms of liaison with the press and the public, the Mayor must be kept informed on an ongoing basis as the situation develops. The creation of a 24/7 City Operations unit, based within the Greater London Authority (GLA) with real-time links into the emergency services and other response partners across London is therefore welcome. The London Situational Awareness Team (LSAT), housed within this unit, delivers a monitoring, reporting, incident response and liaison function with respect to events and major incidents happening across the capital.
- 13.8. The Unit as a whole allows the Mayor to receive immediate and direct information rather than relying on partners to provide updates in the midst of an ongoing crisis. This capability should be maintained, although **consideration should be given to how it might more explicitly engage and link in with partners in the London Resilience Forum (LRF), including with respect to how notifications of major incidents are received and shared** (R175).
- 13.9. **There may be merit in co-locating the LSAT within the Special Operations Room to bring together London's situational awareness capabilities: the GLA Operations Unit and the MPS should explore whether this would bring added value. The Unit should also ensure it is able to dock into local emergency control centres which local authorities may set up in case of a major incident occurring within their borough** (R176).

Information sharing

- 13.10. London's new CT Operations Centre (CTOC) has now opened, although it will not be fully running until 2024/25, following the welcome decision by the Mayor and Home Secretary to commit resources to support its creation. The concept was developed following the terrorist attacks in 2017 and a subsequent Operational Improvement Review. An important part of London's wider preparedness capabilities, the CTOC is designed to adapt over time in response to the evolving nature of the threat.
- 13.11. Bringing together the London elements of CT Policing, the security agencies and other government agencies focused on tackling the threat from terrorism, the CTOC houses a cutting-edge operations suite with a state-of-the-art forensics' laboratory set to follow. Co-location of the respective agencies is already driving synergies and efficiencies, resulting in substantial operational benefits and the Centre should be complete, with all partners transferred, by 2024/25. **This should continue to remain a priority and the need for further requirements should be kept under review so operational improvements within CTOC can continue to be realised beyond 2025, and equipment kept up to date** (R177).

- 13.12. There are no doubt improvements required in partnership working and information sharing between different parts of the justice system (identified by Jonathan Hall QC¹⁰⁰, by the former Chief Coroner hearing the inquests following the terrorist attack at Fishmongers Hall in 2019¹⁰¹, and also by a range of internal reviews). The CTOC, alongside other improvements in the way HM Prisons and Probation (HMPPS) interact with the security services (see chapter 3), will help deliver these.
- 13.13. So, too, should the programme of activities being delivered by CT Policing (CTP) in response to these reviews. Due to complete in 2022, the programme, known as Operation Semper, includes new dedicated CTP offender management posts working to principles set out in a new Manual of Guidance. Focusing on multi-agency partnerships, this complements the work led by HMPPS and others and will be reinforced through CTOC. **Once in place, the HO should commission an independent review of Operation Semper to explore how the programme is operating to inform and drive further improvement** (R178).
- 13.14. However, while enormous steps in the right direction, these activities and the creation of CTOC do not, in my view, give sufficient regard to the role of partners outside of criminal justice: CT endeavours and preparedness considerations are not the sole preserve of the justice system. Terrorism offenders released from custody, alongside those convicted of other offences but who may have been radicalised while in custody, are managed by a range of partners in community settings and are subject to a range of services delivered by local authorities.
- 13.15. It has been put to me that local authorities, local policing and local Prevent delivery functions are not sufficiently informed when it comes to information regarding terrorist threat. The content of CT Local Profiles (CTLPs) is a case in point. Intended to be the means through which CTP shares with a local authority details of the terrorism threat in their borough, I have heard time and again how these are so bland as to be rendered useless.
- 13.16. They often seem to contain nothing more than that which is reported in the press and somewhat patronisingly assume that local authority Leaders, Mayors and Chief Executives have no knowledge of their areas. Moreover, it is not unheard of that the first time a local authority learns of a terrorist offender newly released from custody and residing within their area, it is from local communities, rather than partner agencies. **Recipients of CTLPs should be consulted by those preparing them as to what would be helpful and informative. CTP and others involved in their creation should seek to share as much as possible without prejudicing techniques or sources** (R179).
- 13.17. It is not unusual for Leaders/Mayors and Chief Executives of London's local authorities to receive information directly from CTP, sometimes in advance of the Basic Command Unit (BCU) Commander and local policing teams. This timely information is important for local government, but it must also be shared with local frontline police. Local CONTEST Boards address this to some degree as both CTP and local policing are represented.

¹⁰⁰ [Multi Agency Public Protection Arrangements review - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/424242/Multi-Agency-Public-Protection-Arrangements-review-2019-2020.pdf)

¹⁰¹ [Fishmongers -Hall-Inquests-PFD-Report-Final.pdf \(independent.gov.uk\)](https://www.independent.gov.uk/wp-content/uploads/2019/07/Fishmongers-Hall-Inquests-PFD-Report-Final.pdf) (accessed 14/11/21)

- 13.18. However, I consider it unhelpful that the senior police officers accountable for policing London's boroughs are not routinely privy to details of the terrorist threat or other developments within their command. This challenges the efficacy of partnership working as individuals have no standard expectation of who is aware of what. **Consideration needs to be given to ensuring that all BCU Commanders and all Borough Chief Executives are appropriately vetted to ensure there is no reluctance for them to be fully briefed on sensitive issues** (R180).
- 13.19. I recognise the challenges posed by levels of security clearance in terms of information sharing, but this should not be an insurmountable barrier to information exchange between justice agencies and other partners. While organisations should consider the minimum levels necessary to allow individuals in specific roles access to the right information, investing in higher levels of clearance is not the entire solution as in areas of high staff turnover, it would mean frequent reinvestment.
- 13.20. I am of the view that the Security Service should consider how to share more information, and to be more expansive in whom they consider a trusted partner within local authorities. This includes youth offending teams (YOTs) who, given the increasingly young age profile of those being drawn into terrorism and extremism related activity, need to be a critical part of community CT strategy and management.
- 13.21. Ultimately, sufficient information must be shared, whether through Multi-Agency Public Protection Arrangements (MAPPA) or other means, to enable action to be taken not just by criminal justice partners but by those responsible for delivery of services within the community. This includes housing, health, community activity and employment provision, alongside services focused on youth and vulnerable adults. Expecting GPs, for example, to share concerns about potential deterioration in the mental health of a patient who is also a convicted terrorist means the GP must be informed about the patients' conviction in the first place.
- 13.22. **The principle of 'Dare to Share' should be more extensively considered by those across the national security and criminal justice systems working to manage terrorists and those who pose a risk of terrorism** (R181). Data protection concerns are often used – erroneously – to justify a lack of information sharing. This is not acceptable in terms of managing public safety. It does not seem unreasonable to me that a senior role in partner organisations should confer some level of inherent trust where decision making has implications for public safety. If a manager of a Jobcentre Plus, for example, is unaware that a client is a convicted terrorist, they cannot ensure that roles involving driving large vehicles should not be made available.
- 13.23. **In the interests of supporting this and facilitating relationships, consideration should be given to accommodating a wider range of partners within CTOC, namely representation from Probation, Prevent operational delivery and London's local authorities to ensure wider interests are managed and to act as a conduit to community settings** (R182).

13.24. Finally, **the Local Authority Chief Executive (LACE) Forum, which brings together London's local authorities with the MPS, should be reinvigorated following its understandable dilution during the Covid-19 pandemic, and Chief Executives should ensure attendance** (R183). The Forum effectively acts as a security review meeting with Chief Executives and is called as and when needed to allow the MPS to provide threat updates and pass on any changes to policy and key learning. The MPS may wish to hold these according to a fixed schedule, e.g. quarterly, with others by exception if events demand.

14. TESTING AND EXERCISING

- 14.1. The value of regular and varied testing and exercising cannot be overstated in terms of preparedness for a terror attack. Irrespective of its origins and variations, the principle of *"What I hear, I forget. What I see, I remember. What I do, I understand"*¹⁰² encapsulates the importance of the 'doing', or the practice of those processes involved in emergency response. Regular exercising forms the proverbial 'muscle memory' which enables those responsible for leading and delivering the response in the chaos of an attack and its aftermath to do so capably and confidently.
- 14.2. And exercising with partner responders is critical: all must understand the role of others and the complementarity with their own responsibilities. Multi-agency testing and exercising programmes provide time and space for those whose day jobs require delivery largely within their organisation, but in the event of a major incident must work effectively with others across several agencies, to develop the relationships and knowledge to do so. Participation helps build the partnerships and mutual confidence on which successful operations depend, not just at the individual level but the organisational too, ensuring crisis response can withstand changes in personnel.
- 14.3. The Covid-19 pandemic understandably affected very significantly the ability to run live in-person exercising, although virtual exercising continued throughout to ensure skills remained as fresh as circumstances allowed. **All three emergency services must now focus on, where circumstances allow, reinstating face-to-face training, both to support new recruits and to refresh those skills and partnerships which long periods of remote working for many have diluted** (R184).
- 14.4. However, while the pandemic challenged the delivery of live testing and exercising, the virtual alternatives it forced should not be abandoned. The advantages of such sessions in terms of allowing much higher numbers of participants are significant, and future programmes should adopt a hybrid approach. While retaining crucial immersive live exercises (see Figure 14a), virtual exercises offer an efficient way to keep skills refreshed in the meantime.
- 14.5. I have been impressed by the extent of debriefing and the intra- and inter-agency learning in evidence across organisations I have spoken to with respect to the terror attacks perpetrated across the country since my last review (see also chapter 3 and 13). For example, I heard from the Metropolitan Police Service (MPS) how reflections following an exercise on the 19th March 2017 led to a change in approach which was operationalised a mere three days later in response to the attack on Westminster Bridge on the 22nd. That in turn led to further changes in practice deployed in the response to the attack at London Bridge in June.

¹⁰² Various attributed to (at least) Confucius, Xunzi (340 – 245 BC), Benjamin Franklin (1706 – 1790), Derek Williams (1966) and Dr Herb True (1978).

- 14.6. Reflecting growing awareness of the importance of safeguarding the health of frontline responders I was pleased to see that Occupational Health functions are now routinely part of the MPS response. Testing and exercising should reflect this and **the London Fire Brigade (LFB) and London Ambulance Service (LAS), as the MPS' partner blue light responders, should seek to explore a similar arrangement to involve Occupational Health in response, where not already in place** (R185).
- 14.7. Measures to address gaps and failings should be reflected in future testing scenarios to assure effectiveness at strategic, tactical and operational levels. But learning should not be limited to that generated by attacks in the UK. As such, I was pleased to see that the international CT Preparedness Network (CTPN)¹⁰³, initiated by the Mayor of London and supported by the London Resilience Partnership, ran two table-top strategic international exercises in conjunction with the United Nations Counter-Terrorism Centre (UNCTC) in 2021. These considered preparedness in relation firstly to the use of a biological weapon and secondly a chemical attack. **Outcomes relevant to London's preparedness and resilience should be built into future testing and exercising by the MPS and others responsible for developing these events** (R186).
- 14.8. London is relatively well-placed with respect to a number of the conclusions stemming from the CTPN exercises. Recent chemical, biological, radiological and nuclear (CBRN) testing have been run (see Figure 14a) and there are strong principles in place governing multi-agency response.
- 14.9. However, this must not lead to complacency. In particular, the findings regarding longer-term consequence management following attacks involving chemical or biological weapons should be carefully considered. **National public health capacity needs to be reviewed by government, not only in response to lessons from the Covid-19 pandemic but also in terms of the potential demands of a chemical or biological attack. The Mayor may wish to discuss London's resilience in this respect, alongside considerations regarding longer term humanitarian assistance, with the relevant health authorities and local authorities across the capital** (R187).
- 14.10. Moreover, **the MPS, LAS and LFB should consider undertaking a live exercise based on a scenario focused on use of a biological (rather than chemical) weapon, drawing on learning from the CTPN table-top exercise as well as recent experiences of responding to the pandemic** (R188). This should consider the range and scale of potential demand on public health capacity and involve local authority partners as well as those across the voluntary and community sector (VCS, see chapter 20) where appropriate).
- 14.11. The need to build knowledge and capabilities with respect to technology was also highlighted by the CTPN exercises. This includes the need for a counter drone strategy and capability – while I consider this in more detail in chapter 22, it merits acknowledgement in this context

¹⁰³ A collaboration network which studies the response of cities to terrorist attacks.

that a drone might well be the vector for a chemical or biological attack and should be considered accordingly in exercising.

- 14.12. Following the riots at Washington DC's Capitol Hill in January 2021, subsequent testing explored what a similar invasion of the Palace of Westminster would require in terms of response. This is an appropriate precautionary response and future exercises should be similarly informed by wider events.

A multi-agency delivery programme for testing and exercising

- 14.13. I am satisfied by the extent to which the MPS (along with the City of London Police, CoLP, and British Transport Police, BTP), the LAS and the LFB as first line responders in the event of a major incident undertake regular joint testing and exercising, guided by the protocols of LESLP and JESIP (chapter 13). Others such as the coastguard and local authorities are involved as appropriate.
- 14.14. I am, however, of the view that arrangements could be strengthened and recommend that **the Joint CT Testing and Exercising team being discussed among the emergency services should be progressed** (R189). A joint coordination function would help systematise a framework within which cycles of virtual and in-person training courses, tabletop exercises and live simulation exercises can be planned across the emergency services and their respective control rooms. This would also help mitigate the risk of training programmes ceasing when those responsible move to other roles.
- 14.15. The function might usefully report into the MPS CONTEST Board, which provides governance for development of CT exercises to ensure they remain aligned to the current threat. It should also seek to strengthen engagement with the voluntary and community sector who provide a range of services in response to all major incidents, including terrorism – they should in any event be more routinely included in testing and exercising programmes (see chapter 20).
- 14.16. Recognising the importance of local authorities to incident response, consideration should be given to engagement with those organisations (such as the Society of Local Authority Chief Executives, SOLACE) which offer professional development services for local government. Their input would help ensure suitability of content for those in local authorities with a direct role in responding to a terror attack, including local authority CT leads, Leaders and Chief Executives (Leaders and Chief Executives should also be attending MAGIC training, as below).
- 14.17. Similarly, the Security Industry Authority (SIA, see chapter 18) have an important role to play in ensuring security operatives and others working in security roles understand their responsibilities in terms of preparedness. Where they are not already, they should play a role in both virtual and live exercising and be involved in planning where appropriate to ensure scenarios offer suitable opportunity to test and develop security operative capabilities. I was pleased to hear about a recent suite of exercises led by the SIA (see Figure 14b) which brought preparedness considerations into night-time economy settings.

- 14.18. **There should be a clear mechanism for engaging the heads of London’s schools and other educational establishments in testing and exercising, and for inviting participation from organisations representing local communities and victim services** (R190) (although I recognise the capability of different agencies and organisations to manage the necessary abstractions for regular training will vary).
- 14.19. **For live exercises taking place in a venue (e.g. a transport hub or stadium, including football stadiums), the operator must be involved, and shared objectives developed to ensure their needs are met** (R191). The importance of partners understanding one another’s roles, incentives and priorities was identified in the Manchester Arena Inquiry and I was encouraged to hear this was explored in a series of London stadia-based exercises led by the MPS in late 2021.
- 14.20. Pre-exercise planning events examined how best to ensure partners can share information, including their respective response plans, to facilitate creation of one coordinated plan which met the needs and priorities of all involved. **Further exercises are planned by the MPS for 2022: following events at Wembley in the summer of 2021, these should include football stadia and public order policing** (R192) (see chapter 4).
- 14.21. **Any joint testing and exercising programme should also consider less conventional threats (for example, a cyber-attack on critical infrastructure)** (R193). Thought should also be given to testing response to a hybrid attack, for example where the initial target is cyber related to bring aspects of infrastructure to a halt and potentially hamper launch of emergency services, followed by a more traditional style of marauding terrorist attack (or vice versa).
- 14.22. In addition, the possibilities offered by emerging technology to increase the use of virtual reality scenarios should be explored. Tests and exercises using such techniques should never replace live exercises but, as with online training more broadly, they may offer a more financially viable option for regular refresher exercising in between.
- 14.23. I would also like to see more engagement with the government’s network of Chief Scientific Advisers (CSAs) in testing and exercising programmes. **Reflecting the specific and heightened risk from terrorism faced by the capital, the MPS may wish to consider appointing their own scientific adviser** (R194). This would help facilitate engagement with the wider network (in particular the CSAs for the National Police Chiefs Council, the Home Office and National Security) and support the force in understanding and applying lessons and evidence regarding countering terrorism as well as crime prevention more widely.
- 14.24. In any event, in some instances (for example an attack involving CBRN weapons), input from relevant CSAs will be necessary. They may not be a traditional partner in terms of multi-agency testing and exercising but making the most effective use of their expertise could be important in terms of the immediacy of a response. **The Joint CT Testing and Exercising team referred above would be an appropriate mechanism through which CSA engagement could be facilitated and if set up, it should seek to do so** (R195).

14.25. Testing and exercising must reflect the minor as well as the major. Widescale multi-agency exercises, whether live scenarios, tabletops or virtual events are crucial, but lower threshold practices must also form part of training programmes to focus on and embed the more minor changes in procedures highlighted by learning from bigger exercises and actual attacks. These must involve those liable to be involved at all levels of seniority and should take place more frequently than the larger, more resource intensive exercises. A parallel is with fire safety training that is usually mandatory for all staff and required to be refreshed on a regular basis.

Retaining currency of skills to respond to infrequent events

14.26. In part as a response to the need to maintain learning and skills throughout pandemic related lockdowns, there has been a demonstrable shift in the MPS from a focus on annually delivered CT training with interim but infrequent refresher sessions to an approach guided by 'little and often'. Facilitated by smaller events harnessing digital delivery, this capability must not be lost as face to face immersive training becomes possible once more: the approaches should be complementary. **CT response e-training packages should be made available to Basic Command Unit (BCU) Commanders (and locally-based officers) but also to partners more widely to ensure a greater awareness of risk, how it changes and what this means for the nature of response** (R196).

14.27. Enabling staff, particularly frontline officers, to take time away from the pressures of the day job is always a challenge. However, those pressures must not be allowed to obstruct attendance at training events. Moreover, proper attention must be paid to ensure it is the right people, at the right level, who attend the right exercises. Sometimes this will be those operating at the most senior level, elsewhere it will be frontline officers.

14.28. Category 1 responders (i.e. the emergency services, local authorities and NHS bodies) who may adopt strategic (gold) command for their organisation in response to a major incident or civil emergency, including a terror attack, are required to undergo Multi-Agency Gold Incident Command (MAGIC) training. Courses are linked into local resilience forums¹⁰⁴ so for London, the London Resilience Forum (LRF, chaired by the Deputy Mayor for Fire and Resilience) ensures representation across the necessary agencies.

14.29. It is, however, feasible that an individual who finds themselves in a gold command role for the first time in the event of a terror attack completed their MAGIC course some time previously. At that point, their training might feel light years away – certainly the reports from post-attack debriefs which I have examined highlight the risk posed by 'memory fade'. There is an obvious challenge in terms of training for infrequent events – the chance to embed learning may not come for some time. However, as above, developments in online training offer an efficient way to regularly refresh skills: **the MPS, LAS and LFB, and in partnership with the LRF, should develop and mandate attendance at refresher training for those on command rotas who may find themselves adopting formal gold command responsibilities** (R197).

¹⁰⁴ Introduced in 2004 in the Civil Contingencies Act to provide the means for those involved in emergency preparedness to collaborate at a local level.

14.30. This should extend to those in positions which may require them to chair a Strategic Coordinating Group (SCG) in the event of a major incident (see chapter 13). While Chairs are usually drawn from the lead responding emergency service initially, the Local Authority Chief Executive who happens to be on the on-call rota may also be drawn upon. The relatively imminent retirement of a significant number of Chief Executives (see chapter 7) makes this a pressing concern – chairing an SCG in a high-pressure crisis response mode requires particular skills. All those liable to be placed in such a position must receive appropriate training, ensuring whoever takes on this crucial leadership role is confident and capable to do so. This will be particularly important for those new into leadership roles whose previous experience has not been London based.

Supporting others to understand risk

14.31. In terms of wider preparedness, the opportunity to identify suspicious items and activity goes far beyond the police and police volunteers. Many services (including those provided by local authorities), utilities and private businesses access individual homes and other premises for many reasons.

14.32. As referred in paragraph 6.23 (chapter 6), the LFB have developed an online package to help firefighters recognise and report concerns across a range of safeguarding issues which they might come across when attending calls and routine safety checks. **Consideration should be given to developing a similar package for use by other agencies with cause to enter homes and wider premises – including the LAS and local authority departments with responsibility for external visits. This should be done in conjunction with the Centre for the Protection of National Infrastructure (CPNI) (R198).**

Figure 14a: multi-agency exercising

POLICE LED EXERCISES
Exercise Raptor
<p>Exercise Raptor, led by the MPS at London Heathrow (LHR) Airport during 2017 and 2018, live tested the response to a marauding terrorist attack (MTA) scenario involving firearms. The UK Border Force and military special forces participated alongside the MPS, LFB and LAS, overseen by a full Command structure and a Strategic Coordinating Group (SCG, see chapter 13).</p> <p>Learning from this exercise drove several changes to aviation response protocols, updates to MTA response guidance and further development of firearms training not just for police officers but for LFB and LAS responders.</p>
Exercise Gator
<p>A two-day live exercise in June 2019, Exercise Gator tested the operational response to a CBRN terrorist attack taking place on a Heathrow Express train at LHR Central station.</p> <p>Involving the MPS, LFB, LAS, BTP and airport staff, day one involved deployment of a full Special Operations Room (SOR, see chapter 13) with strategic and tactical commanders running the response.</p>

Day two involved a full SCG which brought in local authorities, public health and scientific advisors to complement the roles of the emergency services and the airport.

The exercise generated a substantial amount of new learning for responding to a CBRN attack in a complex environment, including practical considerations regarding the choice of Personal Protective Equipment (PPE) used by responders, the activation of Operation Plato response protocols in a CBRN incident, the implementation of training on the 'Remove, Remove, Remove' principle (see chapter 12) and considerations regarding public messaging.

Exercise Autumn Falls

Building on learning from Exercise Gator, in September 2019 Exercise Autumn Falls simulated a multi-site CBRN attack taking place in parallel at a shopping centre in London, an underground station and a stadium. A huge exercise involving over one thousand participants from the emergency services, local authorities and venues, Autumn Falls also involved role players to really stretch capability and capacity pan-London. A full SOR with command and control across the emergency services was set up to direct the response.

This exercise identified a need for different services and organisations to better understand one another's capabilities and protocols, and the roles of agencies providing scientific and health advice needed to be clarified and more clearly communicated. The nature of Autumn Falls highlighted the challenges associated with a multi-site attack, particularly around resourcing.

Exercise Matilda

As a complement to the live testing deployed through Exercises Gator and Autumn Falls, Exercise Matilda used a table-top methodology to test the learning from both with respect to a CBRN attack in the capital. Involving the MPS, LFB and LAS, the scenario comprised a chemical attack at a stadium. Participants were provided with text, image and video material over the course of the exercise, beginning with the initial response to a 999 call.

Importantly, and demonstrating the value of live multi-agency exercising, Exercise Matilda highlighted an increased level of co-operation between the services, and an improved understanding of one another's capabilities as compared to the previous exercises.

Other key learning included the importance of classification of casualties of a CBRN attack, the need for clear protocols to identify contamination and for better education of front-line officers on the specialist capabilities available to support them in responding to a CBRN attack.

- 14.33. Encouragingly, it is not only the emergency services who have taken a lead role in delivering multi-agency testing and exercising endeavours. I was pleased to hear about the Security Industry Authority (SIA) coordinated programme of emergency planning exercises which took place in venues across the country, including London, over the course of 2021. **The SIA should ensure that learning from these events is drawn together and disseminated across its membership** (R199).

Figure 14b: exercising in partnership with the private sector

Operation Sentry: The Cuckoo Club, London

The Cuckoo Club in central London hosted an exercise in late 2021 which was led by the SIA and involved representatives from across the security industry, Westminster City Council, the West End Security Group, the Princess Royal's Volunteer Corps¹⁰⁵, Inspirations Theatre Company, the Cuckoo Club and the MPS. This was one of a series of exercises developed by the SIA and delivered in partnership to test the preparedness of private security operatives to respond to a critical incident. A national programme, Operation Sentry was introduced to address a gap in testing and exercising for venues in the night-time economy.

A series of simulations involving actors tested responses across four scenarios: a mass stabbing, an MTA, a CBRN attack and a suspect package.

Operation Sentry aimed to strengthen the resilience of the venue and ensure those visiting the nightclub are kept safe, recognising the fact that security operatives and staff can be the first on scene in the event of an incident targeting a venue.

This represents a positive collaboration with the wider community responsible for keeping those enjoying and working in London's night-time economy safe. It also provided a direct means for staff to put into practice the learning taken from the online ACT Awareness and ACT-Security packages.

¹⁰⁵ An all-female voluntary organisation which deploys multi-faceted rapid response teams to support those civil and military authorities responding to major emergencies.

15. SUPPORTING THE SURVIVORS, THE BEREAVED AND THE WITNESSES TO TERROR

- 15.1. Survivors of terror attacks, including the injured and those otherwise witness to what took place, alongside those who so tragically lose loved ones, need a wide range of help, support and advice. This is spelt out by the Victims Commissioner for England and Wales, Dame Vera Baird QC: *“Terror attacks can have a profound and life-changing impact on victims and their families and victims can often have complex needs, which include long-term counselling and support. We need to make sure that when the TV cameras disappear, victims and survivors get the right support they need to rebuild their lives and recover from their injuries”*.¹⁰⁶
- 15.2. The recent report by ‘Survivors Against Terror’¹⁰⁷ has also highlighted how the presence of TV cameras and the wider media can, for some, compound the trauma suffered by those affected by an attack. While by no means the experience of all survivors and recognising the need for media coverage which is in the public interest, the research underpinning the report nevertheless flags the need for responsible reporting which remains sensitive to the needs of those involved.
- 15.3. At the time of the terrorist attacks perpetrated in London during 2017, support in general was largely fragmented, lacking clarity in terms of what was provided, by whom, to whom, and how. The situation has improved substantially since then, with welcome investment from central government (whose actions of course take effect across the country as well as within London) and the London Mayor’s Office enabling organisations operating within the capital to build and extend their specialist capabilities.

At a national level

- 15.4. In 2017, the cross-government Victims of Terrorism Unit (VTU) was created. Based in the Home Office (HO) this was set up principally in response to the terrorist attack which targeted a popular holiday resort near Sousse in Tunisia in 2015. Thirty of the 38 people who lost their lives were British, as were many of the survivors and other witnesses to the attack. On returning to Britain they, alongside those left bereaved, found no single point of contact to help them navigate their needs. In the absence of wrap-around support, many fell through the gaps.

¹⁰⁶ [Further £500,000 to support victims of terrorism - GOV.UK \(www.gov.uk\)](https://www.gov.uk) (accessed 03/11/21)

¹⁰⁷ [Microsoft Word - Media Report 21st Sept.docx \(survivorsagainstterror.org.uk\)](https://survivorsagainstterror.org.uk) (accessed 15/11/21)

- 15.5. Now, in the event of a terror attack, the VTU acts to resource and ensure support services provided by government, public bodies, and other organisations are coordinated and deployed in an effective and timely way. Capable of immediate deployment with a 24/7 on call rota, the unit works closely with police Family Liaison Officers, impacted local authorities and other government departments as necessary, and with the Foreign, Commonwealth and Development Office (FCDO) in the event of an overseas attack.
- 15.6. Providing support with handling the media (particularly welcome given the report from Survivors Against Terror) and advice on accessing support services, as well as how to apply for financial compensation, the VTU website¹⁰⁸ acts as a single repository of information for victims of terrorism. This covers those affected by terror attacks in the UK, including witnesses and first responders, those returning to the UK following an attack overseas and those affected by historic attacks.
- 15.7. This government capability, dedicated to identifying and responding to the needs of victims of terrorism, is a vast improvement on the position five years ago and has helped raise the profile and visibility of individuals who often have very complex needs.
- 15.8. The £500,000 of funding announced by the HO in 2020¹⁰⁹, awarded to four support organisations to help victims of terrorism cope with and recover from the impact and consequences of terrorist attacks, is similarly welcome. However, the services this has enabled (see Figure 15) must not be allowed to peter out if that funding ends. **The HO needs to ensure these resources are maintained both for existing victims of past attacks and for victims of any future attacks. They should also consider how access to these resources might be facilitated and managed for victims of other sorts of mass casualty attacks motivated by, for example, desire to further an incel-inspired cause** (see chapter 1) (R200).

Figure 15: Specialist support services for victims of terrorism

The VTU currently funds four complementary services, to deliver a range of support based on feedback from victims about what they need. These organisations have agreed a 'Victim and Survivor Pathway' through their four services, which explains what support can be provided by each, and at what stage in the support journey. The services also support first responders to terrorist attacks, in welcome recognition of the trauma endured by those performing critical, high-pressure and extremely challenging roles.

Victim Support¹¹⁰ operate a 24/7 Contact Centre to provide consistent, easily accessible support. They perform a 'Terror Incident Needs Assessment' (TINA) to ensure an individual is provided with the most appropriate support for their circumstances, following which they are referred through the Pathway to access one or more of the services below as appropriate. Importantly, the victim owns

¹⁰⁸ [Support for Victims of Terrorism – Information on where to seek advice and assistance following a terrorist attack. \(campaign.gov.uk\)](https://campaign.gov.uk) (accessed 10//01/22)

¹⁰⁹ [Further £500,000 to support victims of terrorism - GOV.UK \(www.gov.uk\)](https://www.gov.uk) (accessed 03/11/21)

¹¹⁰ [Terrorism - Victim Support](https://www.victim-support.org.uk) (accessed 03/11/21)

their TINA and take it with them throughout their support journey, negating the need to repeat what they have been through each time they engage with a new service.

Cruse Bereavement Care¹¹¹ provide advice and guidance to those bereaved through terrorism who are not eligible for support by the Homicide Service, and to others wishing to support someone through bereavement. Support is delivered via a telephone and online service handled through their network of over 80 branches, including five across London. The organisation also works in collaboration with a range of businesses and partner organisations to advise on supporting bereaved people at work and in school settings.

Survivors of Terrorism Support Service¹¹² at the South London & Maudsley NHS Foundation Trust offers a range of support options depending on individual need. These can include clinical assessment and onward referral for psychological treatments, alongside a screening and outreach service and individuals can self-refer or be referred by a relevant professional.

The Peace Foundation¹¹³ facilitates a long-term peer support network for victims of terrorism. In facilitating a series of events and specialised interventions, the Foundation brings together people who have experienced terrorism so they can support one another. This includes provision of help particularly around inquests, commemorations, memorials and anniversaries of events, all of which can be very traumatic for all survivors of terrorism.

- 15.9. A review of the support provided to victims is currently underway, supported by independent research into the lived experiences of victims and survivors of terrorism. Due to complete in Autumn 2022, this will offer a key opportunity to improve the support available in line with user needs.

Support in London

- 15.10. In the aftermath of the 2017 attacks in London, services for the injured, the bereaved, the witnesses and wider families and friends took time to mobilise, where they mobilised at all. I have heard how the support for many was inadequate or inaccessible – with all the risks for coping and healing that failures here bring.
- 15.11. I have, however, been reassured that lessons have been learnt and the renewed emphasis on creating and making available services for victims of terrorism, from those needed in the immediate aftermath to others required in the longer term, has generated welcome and evident improvements. Following the attack at Fishmongers Hall in 2019, I understand the approach to have worked substantially more smoothly with clear public communications swiftly issued to clarify the support available for those involved and how to access it.
- 15.12. The London Victim & Witness Service (LVWS, delivered by Victim Support) was set up in 2019 through the Mayor's Office for Policing and Crime (MOPAC). A very welcome provision, this brings together five key areas of support for victims of, and witnesses to, all types of crime in

¹¹¹ [Major disasters or terrorist attacks - Cruse Bereavement Support](#) (accessed 03/11/21)

¹¹² [Survivors of Terrorism Support Service \(slam.nhs.uk\)](#) (accessed 03/11/21)

¹¹³ [Victims of Terrorism Support - The Foundation For Peace \(peace-foundation.org.uk\)](#) (accessed 03/11/21)

London¹¹⁴ via a single integrated service. Providing information and advice regarding the justice process, as well as signposting to therapeutic services (see Figure 15), the LVWS also facilitate links with the National Homicide Service (provided by Victim Support and funded by the Ministry of Justice, MoJ).

- 15.13. As a single portal through which victims of terrorism in London can be supported, the LVWS reduces barriers to accessing services. Through the TINA (see Figure 15) the need for individuals affected by terror to retell, and relive, what they have been through at every juncture is eliminated. That said, the homepage for the website does not clearly signpost services for those affected specifically by terrorism, which feels to be a missed opportunity. **The LVWS should consider adding a link to address this** (R201).
- 15.14. For those participating in any court process, the service provides advice and guidance to help users know what to expect and to prepare accordingly. This, however, ceases when the trial begins – from this point, an individual is passed onto a different service meaning they inevitably end up having to retell once again what has happened to them. This does not feel satisfactory to me: **MOPAC and the MoJ should consider the feasibility of building on the LVWS to provide an end-to-end support service for those affected by terrorism in London** (R202).
- 15.15. While the LVWS is currently meeting demand, it has been put to me that this is largely due to lower than expected levels of referrals from the Metropolitan Police Service (MPS). However, this is not entirely unexpected – any service such as this will take time to bed in with partners and the periods of lockdown necessitated by the Covid-19 pandemic saw falls in overall crime rates. As crime rates climb to more usual levels and awareness of the service rises, it is likely that demand on the LVWS will rise in parallel.
- 15.16. The funding model for many of the terrorism trauma services in London with which the LVWS works in partnership operates on an annual cycle. This is causing trained advisers to leave roles after eight or nine months for positions elsewhere, concerned that funding will not be secured to allow them to remain in post. This is inefficient, likely to be disruptive for service users and exacerbates the above risk of a failure to meet demand, particularly in the event of a very major terrorist attack. **MOPAC should consider the feasibility of guaranteeing for a longer minimum period the funding it provides to LVWS partnered terrorism trauma services** (R203).

Survivor Reception Centres

- 15.17. In the event of a terrorist attack (and any other major incident) the MPS, supported by the relevant local authority and voluntary sector organisations (see chapter 20) will set up at least one Survivor Reception Centre (SuRC). In the event of a multi-site attack, more than one may be required. Providing short-term shelter, first-aid and other forms of humanitarian assistance for survivors not requiring hospital treatment, SuRCs also act as a central point for

¹¹⁴ [London VWS About LVWS](#) (accessed 04/11/21)

communications to survivors, their family and friends, as well as facilitate initial interviewing (where appropriate) of potential witnesses.

- 15.18. An MPS Bronze (operational) Commander is responsible for siting the SuRC – which can be set up in any venue big enough to handle potentially large numbers of people, at a safe distance from the scene but close enough for people to reach it easily. While ideal, pre-arranging appropriate venues to act as a SuRC is difficult as the location of a terror attack is unknown until it happens.
- 15.19. For publicly owned venues, this presents less of a challenge as the local authority will be directly involved in setting up the SuRC so can identify and access suitable nearby sites. However, private enterprises where space could be made available to accommodate a SuRC (including, for example, shopping malls, stadia and larger supermarkets) may be harder to access. **Contact details of owners and operators of such private venues should be made swiftly available to the Bronze Commander and local authority representatives responsible for setting up and managing the SuRC (R204).**
- 15.20. In 2017 the Mayor of London appointed the first Victims Commissioner for the capital. This is a welcome and important role and **when convened, a Strategic Coordinating Group (SCG) should ensure the Victims Commissioner is always notified of the location of a SuRC immediately it is confirmed to facilitate their involvement if appropriate and desirable (R205).**
- 15.21. To complement a SuRC, a Family and Friends Reception Centre (FFRC) may also be required to accommodate and provide practical and emotional support, away from the glare of the media, to relatives and friends of those caught up in an attack. Once again run by the MPS with support from the local authority, the FFRC supports the collection of details of missing persons, facilitates the reunion of friends and family with survivors and witnesses where appropriate, or otherwise provides information regarding hospital transfer.
- 15.22. It is paramount that information exchange between the SuRC, the FFRC, the Casualty Bureau (see below) and the London Ambulance Service (LAS, who are solely responsible for categorising casualties and declaring the deceased) is swift and accurate, to ensure up-to-date information can be passed to the families and friends of those affected as quickly as possible.

The Casualty Bureau

- 15.23. Following a terrorist attack, the MPS will consider whether to set up a Casualty Bureau (CB). Integral to the process of identifying the deceased, if activated the CB receives calls from individuals worried about family members and friends who they are unable to reach. **It is important that the CB becomes fully operational as soon as possible, and the setting up of telephone lines and publicly issuing the number to call must be prioritised. That number must be issued to all mainstream media outlets and added to the public social media accounts of all emergency services (R206).**

- 15.24. From the calls it receives, the CB records details about missing persons which it collates with information received from officers despatched to the scene, the SuRC(s), FFRC, hospitals and mortuaries. This enables information on survivors, casualties and the deceased to be fast-tracked back to the CB to facilitate matching with reported missing persons as quickly as possible.
- 15.25. Having examined outputs from police debriefs undertaken following the terror attacks in London since my previous Review, it seems to me there is more to be done to ensure MPS officers across all ranks and roles fully understand the function and purpose of the CB and the basis on which one is set up. I was pleased to see creation of the MPS 'Sub Bronze Hospital' liaison role, responsible for liaising between the hospital and the Bronze Hospital Coordinator who, as part of the response to a major incident with multiple casualties, is located in the Special Operations Room (SOR, see chapter 13) and responsible for coordinating the police response to all designated hospitals.
- 15.26. These arrangements should strengthen processes to swiftly identify and reconcile persons reported missing, and to collate data from casualties and witnesses to enable investigative teams to conduct triage and prioritisation assessments. Coverage of the capability and the importance of these Hospital roles in police response should be explicitly covered in future training.
- 15.27. The Major Incident Public Portal (MIPP) has also created a welcome electronic capability to not only capture information from the public (see chapter 3) but ensure details regarding missing persons and casualties can be swiftly exchanged between police officers involved in response, the (Sub) Bronze Hospital Coordinator and liaison and the Casualty Bureau. **The MPS must ensure all officers who may be involved in response are familiar with the mechanisms of MIPP and how to upload / access information held on the system** (R207).

16. PROTECTING LONDON'S EDUCATIONAL ESTABLISHMENTS

- 16.1. In my previous review I drew attention to the importance of security and terrorism preparedness in schools. The need for this remains. While schools, colleges and universities have, thankfully, largely not been a focus for terrorists in London or elsewhere in the UK, across the world they have increasingly become so.
- 16.2. Motivated in many cases by violent ideologies, in others by personal grievances (although those do not exclude engagement with extremist positions), the outcome of an attack on a school, or any sort of educational establishment is ultimately the same: injury, often fatal, and extreme trauma. It should be noted that the current position in the UK is that where there is no identifiable underpinning ideology, a violent school based attack is not an act of terrorism as it is not considered designed to advance a political, ideological, or religious cause, or inherently motivated by such. However, the impact would be the same and I have not excluded 'non-ideological' attacks from my consideration.
- 16.3. In terms of preparedness I am firmly of the view that London's educational establishments, which number over 3,000 (including University College London, the largest university in the UK by total enrolments¹¹⁵), must be supported and guided to take steps to protect students and staff. Internationally, attacks which have targeted such establishments showcase the harm that can be caused, irrespective of motivation. In May 2021, for example, a school in the city of Kazan in Russia was targeted by a former student (who killed nine and injured a further 23) and later that year, a student at Perm State University (also in Russia) killed six people and left over 40 injured.
- 16.4. Individuals who have expressed desire to engage in acts of mass violence against their educational institution are referred to the Prevent programme and given the same consideration for support as those who have expressed affiliation with a distinct terrorist group and / or ideology. It seems right, therefore, to consider implications for preparedness across London's places of education.
- 16.5. The Manchester Arena attack in 2017 prompted greater awareness of the need for protective security by both the Department for Education and schools themselves. The fact that so many young people tragically lost their lives had a significant impact on the sector and raised awareness of the danger of unprotected spaces such as those surrounding many schools. While the level of risk to educational establishments is relatively low, there is now more overt recognition of the chance they could be targeted, resulting in significant impacts.

¹¹⁵ [Where do HE students study? | HESA](#) (accessed 10/02/21)

Supporting schools and other educational establishments to prepare

- 16.6. Following the bombing of Manchester Arena, the Department for Education (DfE) engaged extensively to support the schools impacted by the attack. This process highlighted a strong desire for guidance and protocols to help educational establishments more widely manage their response in case of a terrorist incident or other violent incursion prompting a series of CT focused additions to the School and College Security Guidance. A wide-ranging series of guidance documents and checklists, these were published by the DfE in 2019¹¹⁶.
- 16.7. The material represents a comprehensive suite of security considerations to both inform implementation of protective measures and guide response in the event of an incident. Positioned as a complement to wider education safeguarding policies to ensure the health, safety and well-being of students and staff, I was particularly pleased, having proposed something similar in 2016, to see included suggestion that a nominated person should lead in security matters, sitting alongside the designated safeguarding lead.
- 16.8. I was similarly pleased to see it account for invacuation as well as evacuation procedures to reflect different threat scenarios. A number of templates and checklists guide considerations around both processes, alongside several other responsibilities (including risk assessment and how to instigate and manage a lockdown of the premises).
- 16.9. The decentralised education environment means not only are academies largely free to set their own approaches and curriculum, being free from much central (DfE) direction, establishments which remain under local authority control also operate at arms-length from the centre. I have been assured, however, that irrespective of a school's operating status, the guidance has been widely welcomed by establishments across the state sector. **Response and take-up across the independent sector is less clear and the DfE should undertake to ensure those schools are aware of the guidance and encourage them to draw upon it** (R208).
- 16.10. Because the guidance is issued on a non-statutory footing, adoption and adherence is neither mandated nor binding. It might therefore be difficult to hold any establishment to account, irrespective of its operating status, if it chooses not to take up the measures. However, I am clear that this guidance should be seen in a wider context of health and safety which provides a statutory framework and a broader legal duty. Adherence to the guidance arguably helps demonstrate compliance, meaning a failure to do so may lead to prosecution.
- 16.11. As discussed in the dedicated chapter on training and exercising, the importance of regular practice cannot be overstated: **in partnership with City Hall, the DfE should remind schools of the importance of invacuation and evacuation drills alongside more traditional health and safety practices such as those for fire** (R209).
- 16.12. As two years have passed since the guidance was introduced, and in context of the proposed Protect Duty, it seems appropriate for the DfE to now review the impact and effect of the

¹¹⁶ [School and college security - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/guidance/school-and-college-security) (accessed 26/10/21)

guidance: what works well, what requires improvement or is not being used and why, and do gaps or concerns remain. **The DfE should commission independent research to evaluate the School and College Security guidance and its use across the sector. This should include local authority run schools, academies and faith schools as well as further education colleges and universities** (R210).

Embedding CT into education

- 16.13. Since my last Review, the DfE has created a CT Protect & Prepare Security Team, dedicated to supporting the education sector to effectively prepare for and respond to an incident which impacts upon it. With links to wider government CT capabilities and expertise to inform its work and advice, this is a welcome development in ensuring security is mainstreamed across the education sector.
- 16.14. The department has also created a central response capability, convened in the event of a CT incident. This enables the DfE to receive relevant operational reporting from partners to inform messaging to the sector and in turn provides a mechanism whereby they are able to inform the response of sector considerations.
- 16.15. Schools will require support and advice to understand and manage implications of the Protect Duty and Publicly Accessible Locations (PALs, see chapter 3). The nature and scale of their future responsibilities under the Duty are likely to vary depending on, among other considerations, their location and specifics of their estate. As in other sectors, it is likely that current priorities (and budgets) focus on ensuring premises are Covid-secure and supporting staff and pupils after the challenges of teaching and learning during periods of lockdown. **The DfE should ensure any policy and guidance with respect to the Protect Duty and PALs is informed by ongoing dialogue and consultation with the sector** (R211).

London considerations

- 16.16. A number of organisations work closely with and advise places of worship across the capital with respect to protective security (see chapter 19). **Recognising that London contains a number of faith schools, the DfE may wish to draw on expertise within those organisations as it looks to develop advice for schools across London once the Protect Duty comes into force** (R212).
- 16.17. The DfE has had in place for some years a Risk Protection Arrangement (RPA) which offers public sector schools an alternative to commercial insurance to protect against losses from unforeseen events. The security component allows schools to invest in mitigation measures to reduce the potential impact of losses, on the basis of advice from experts in designing out crime and emergency response planning. This is welcome support for London's schools, of whom over 900 (35% of those eligible) have signed up for the scheme¹¹⁷.

¹¹⁷ Figures accurate at time of writing.

- 16.18. A number of additional educational settings operate in the capital. These include full-time home school environments for individual children as well as supplementary schools, often for larger groups. Run from a variety of premises, from home settings to more formal classroom premises, participation in supplementary provision is in addition to that at a registered school. Where participation amounts to fewer than 18 hours per week, the provider is not required to register as an independent school. Unlike registered schools, they are therefore not subject to statutory requirements. Neither are they subject to Ofsted monitoring, either of taught content or suitability (including the security) of the premises.
- 16.19. Moreover, these settings do not need to register with Ofsted on the General Childcare Register: where settings are providing tutoring or coaching in school study support, sports, performing arts, arts and crafts or religious, cultural or language studies, registration is voluntary. This is problematic in terms of ensuring the protection of what in some instances can amount to quite large numbers of children. **The DfE should consider whether the 18-hour exemption is appropriate or whether it should be reduced** (R213).
- 16.20. In terms of full-time home-schooling, a recent survey¹¹⁸ by the Association of Directors of Children's Services (ADCS) reported a substantial rise (of 34%) in the cumulative number of parents across England choosing to home school, driven largely by concerns related to Covid-19. **These home-schooled children must not be allowed to slip under the radar and local authorities across London's boroughs should be adequately funded to establish a programme of home visits to ensure suitability of both education provided and the environment within which it is delivered** (R214). This should include identifying any signs that a young person might be subject to radicalising influence from others or may be self-radicalising while not under supervision in the home environment (and see recommendation 91 in paragraph 7.47, chapter 7 with respect to the definition of harm in this context).
- 16.21. Finally, and while more directly associated with the Prevent pillar of the governments CONTEST strategy, there is more the Metropolitan Police Service (MPS) could do to support schools. Building positive relationships with the police from an early age, in supportive, constructive and safe settings, has potential to support wider safeguarding and mitigate the threat of being drawn into extremism and terrorism, as well as other types of serious crime, in future years.
- 16.22. Early engagement is critical given the increasingly young age profile of those linked to, and sometimes convicted of, such offences. Regular engagement through school can also help tackle a perception that the police role is focused solely on enforcement, shoring up more positive relationships between the police and their communities of the future.
- 16.23. **Every primary and secondary school should have a named police liaison officer. Each of the 12 MPS Basic Command Unit (BCU) Commanders should draw up a liaison plan for each borough in their area, in partnership with the local authority. This should expressly**

¹¹⁸ [ADCS EHE Survey 2021 Report FINAL.pdf](#) (accessed 01/12/21)

include CT considerations and set out arrangements for clear join up with CT experts within the MPS (R215).

17. LONDON'S BUSINESSES AND THE CULTURAL SECTOR

- 17.1. The million businesses – both large and small – registered in the capital are part of the lifeblood of London. At the start of 2021¹¹⁹ they represented nearly a fifth of all those registered throughout the UK. If the capital is to be adequately prepared for a terrorist attack, those businesses have a key role to play in keeping people safe. However, not surprisingly there is a wide diversity in approach to and levels of proactivity adopted by businesses in security preparedness.
- 17.2. Responsible for the safety of those they employ and serve, without question businesses need to play a role in preparedness and most are keen to do so. But many lack knowledge and, particularly as they focus on recouping losses sustained throughout the Covid-19 pandemic, the resource to invest in associated measures.
- 17.3. And it is not solely physical preparedness which must be considered. Protecting soft perimeters is important yet many would not consider, for example, that in designing their online presence they must take care not to inadvertently facilitate hostile reconnaissance of their offline premises. Balancing understandable commercial priorities against security is a challenge particularly for smaller businesses, highlighting the need for freely available advice and material (discussed later in this chapter).
- 17.4. And in the event of a terrorist attack, affected businesses can suffer very significant losses. Resulting not just from direct damage but from the effects of the response which must be deployed. Customer facing businesses located within an area cordoned off for a period of time following an attack, firstly to enable the response and secondly to support subsequent investigation, will be liable to substantial loss of trade.
- 17.5. This was a significant issue following the attack at London Bridge and Borough Market in 2017: over 150 businesses were estimated to have been affected by the incident itself and / or the consequent police cordon in place to facilitate the investigation. Only around one in ten of those businesses were insured to cover their losses. **HM Treasury (HMT) and the Home Office (HO) should work with the insurance industry to ensure that business continuity insurance sufficiently protects businesses from second order disruptive effects of a terrorist attack. This will need to consider the potential implications of the forthcoming Protect Duty** (R216).

¹¹⁹ [Business population estimates for the UK and regions 2021: statistical release \(HTML\) - GOV.UK \(www.gov.uk\)](#) accessed 24/11/21

Building security across London's cultural sector

- 17.6. Similarly, London's hugely diverse and vibrant hospitality, entertainment, arts and culture sectors form some of the principal drivers of the capital's global status. Home to some of the world's most renowned large venues, events, productions, collections and exhibitions, London also houses many smaller, independent contributors to these sectors, which operate not just in the centre of the city but across all of London's boroughs.
- 17.7. These hundreds of theatres, cinemas, nightclubs, museums and exhibition spaces regularly host significant numbers of people in their venues and entry to many often necessitates navigating lengthy queues. This means that the pavements and publicly accessible locations (PALs) surrounding venues can become very crowded, exacerbated by the need to check not just people and bags but in some instances Covid-19 vaccination status.
- 17.8. Operators are concerned about how to keep customers safe but are hampered by financial constraints in what continues to be a relatively fragile recovery in the sector from the effects of the pandemic. It has also been put to me that where venues have sought to create external protective security measures, they have experienced difficulty securing planning permission from the relevant local authority, who must of course take into account the needs of other users of public spaces.
- 17.9. **Planning permission considerations should guide, not prevent, the design and implementation of measures to keep the public safe: The Department for Digital, Culture, Media & Sport (DCMS) and the HO should work with the sector to identify shared goals and agree solutions, in partnership with City Hall, relevant local authority Leaders and Chief Executives** (R217).
- 17.10. Collaboration across the sector should be encouraged. Many theatres, cinemas and other venues particularly in central locations sit cheek by jowl, creating shared interests in protecting customers in spaces outside each. The cinema sector operates a security working group which includes all the major operators in London, with good links into policing.
- 17.11. The National Counter Terrorism Security Office (NaCTSO) provide briefing and resources (notably through the Action Counters Terrorism (ACT) and See, Check and Notify (SCaN) material, see Figure 8, which it developed in partnership with the Centre for the Protection of National Infrastructure, CPNI) which the group has shared with its members. **While the cinema security working group maintains links with their counterparts in theatre, a more formal arrangement may be beneficial, allowing regular information sharing and the development of shared security assets** (R218).
- 17.12. Similarly, the Heads of Security Forum, operating for the past six years, brings together security leads from across various industry bodies representing London's major visitor and other cultural attractions. The forum benefits from input from the HO, CT Policing (CTP) and the Metropolitan Police Service (MPS) to ensure advice is current and best practice in security is shared widely. **The Mayor may wish to seek assurance from the Heads of Security**

Forum that all relevant industry bodies are included, irrespective of whether they have a dedicated security lead. And that smaller, independent outlets and operators are represented – it is not solely London’s central venues at risk (R219) (see chapter 2).

- 17.13. It was put to me that the London Culture Forum (LCF) could be more effective at ensuring those operating across the arts and cultural sector are sufficiently security aware and take protective security seriously. **The DCMS and HO should work with the LCF to facilitate liaison with security focused forums: they may wish to consider hosting a series of security focused round tables with the sector (and others across the wider business community** (R220). This should be undertaken in partnership with City Hall – the Mayoral reach into smaller and grass roots organisations who may not be signed up to wider forums offers substantial potential for understanding concerns and vulnerabilities and disseminating consistent advice in response.

Providing security advice and training to businesses

- 17.14. There is significant desire for advice and support across London’s business community to help keep staff, customers and premises safe. And of course, protective security measures designed to mitigate against the risk of a terrorist attack can offer other benefits linked to reducing more prolific crime such as shoplifting, anti-social behaviour and violence which can have very detrimental impacts on businesses.
- 17.15. The ACT Awareness and SCaN training are rightly highly regarded and provide a strong grounding in security considerations. Like their predecessors (Projects Argus and Griffin), they are freely available which is key to take-up especially among smaller, cash-strapped businesses. Much of the SCaN material focuses on helping businesses and organisations to consider security efficiently through making the most of existing resources – this is welcome particularly at the current time with the risk that pandemic related concerns and costs take precedence.
- 17.16. The majority of the SCaN package must currently be delivered by specialist CT Security Advisers or CT Protect Officers (CTSAs and CTPOs, see chapter 4). It is important therefore that sufficient and appropriate resource is available to meet increasing demand.
- 17.17. A number of stand-alone SCaN products cover specific elements of security (for example, Security Minded Communications) and the material aimed both at all staff (SCaN for All) and dedicated security managers should continue to be made widely available. Moreover, the Recognising Terrorist Threats' guide¹²⁰, produced by CPNI in collaboration with ACT, provides useful information for security professionals to improve recognition of critical indicators of attack methodologies. Early recognition of a threat and an understanding of the associated methodology allow a timelier response and will potentially reduce casualties and save lives – **the Security Industry Authority (SIA) might consider raising awareness of this CPNI material focused on security professionals across its membership** (R221).

¹²⁰ <https://www.cpni.gov.uk/blog/physical-security/recognising-terrorist-threats>

- 17.18. I was pleased to hear that the HO have funded CPNI to develop additional publicity and marketing for SCaN – this should consider opportunities to raise awareness across London’s business focused resources such as the London Business Hub (see below) as well as those focused on the Protect Duty when it comes into force.
- 17.19. A short, focused and accessible suite of fundamental principles to help businesses improve and maintain efficient and proportionate protective security measures, including with respect to business as usual processes, is set out in the ‘Passport to Good Security’ guide produced by CPNI. Aimed at senior executives in larger organisations, this seeks to assist in identifying, assessing and mitigating those threats which an organisation may face alongside terrorism (e.g. commercial espionage, extortion, theft including of intellectual property and fraud).
- 17.20. Developing a wider security mindset in non-security professional leaders is crucial if a security culture is to be embedded throughout an organisation and preparedness for terrorism bolstered. The passports should form a standard part of induction material for appropriate executives across London’s business community, although there are costs associated with production. The HO may wish to consider bolstering the funding it has provided to CPNI to support marketing of SCaN to also uplift production of the passports (arguably they align with the aim of wider publicity).
- 17.21. CPNI have also developed, in partnership with CTP, more specific guidance aimed at larger organisations (which typically employ dedicated security managers) that focuses on how to respond to a marauding terrorist attack (MTA), supported by a training course. This will soon be supplemented with a new course for security control room personnel, applicable to larger venues such as shopping centres and stadia: this is a positive addition to the suite of CPNI materials and the MPS’ cadre of Security Coordinators (SecCo’s, see chapter 4) and CTSA’s will need to ensure they draw this to the attention of the venues across the capital to whom they provide security advice.
- 17.22. As and when the Protect Duty (see chapter 3) comes into force it must be accompanied by clear messaging regarding the definition of a PAL and the nature of responsibilities for those it will bring in scope. Guidance will need to set out how businesses could comply without incurring disproportionate cost.
- 17.23. The welcome partnership between the HO and Pool Re¹²¹ to develop an information sharing platform to help businesses improve their resilience to terrorism will offer a mechanism to share guidance. It will also offer a means to highlight CPNI’s SCaN training and associated stand-alone products. Reassuringly, CPNI are working with the HO and CTP to develop this signposting content, alongside building a more ambitious ‘Digital CPNI’ offer to broaden reach. This should help increase capacity for their highly regarded one-to-many training and

¹²¹ Pool Re enable the UK insurance market to underwrite terrorism risk to commercial property. The organisation produces a series of sector-focused risk reports and has given extensive consideration to the implication of the Protect Duty for business.

digital learning, allowing more across the business community to benefit and helping raise awareness of risk and mitigating action.

- 17.24. For many businesses and organisations, the threat from cyber-attacks with malware, data breaches and associated ransom demands is regarded as a priority. In welcome recognition of these concerns, the Mayor's Office for Crime and Policing (MOPAC) are setting up a London Cyber Resilience Centre to support small and medium enterprises (SMEs) understand the risks and how to protect themselves. And it is not inconceivable that a terrorist may seek to use cyber methods to destabilise an environment, system or organisation, or hamper response to a subsequent planned physical attack.
- 17.25. Given London's heightened status in terms of potential targets (see chapter 2) it is important that businesses understand how these risks have potential to interact, and how that interaction may subsequently affect their ability to manage other risks. They are encouraged to engage with protective security measures and associated training and the National Cyber Security Centre (NCSC) offers guidance and resources regarding cyber protective measures: there would be merit in a joint CPNI-NCSC product which explains potential links between threats from cyber actors and aspiring terrorists who share motivations or may seek to amplify one another's acts.
- 17.26. The online London Business Hub¹²², used by City Hall to broadcast training opportunities and advice to SMEs operating across the capital, also provides information and guidance regarding cyber-attacks. This could offer a useful vehicle through which to draw attention to CT considerations more widely: **City Hall should discuss with CPNI the possibility of augmenting the content of the London Business Hub website accordingly** (R222). There may also be value in linking to ACT Awareness and any future joint CPNI – NCSC material.
- 17.27. Engagement by CTAs and CTPOs with individual businesses and representative forums is welcome and should continue. However, as I raise elsewhere, I am concerned about demand on this relatively limited resource, which is already stretched - particularly as delivery of some of the SCan training currently depends on CTSA capacity.
- 17.28. Training cannot wholly replace CTSA bespoke advice which considers individual circumstances. Pavement security is a good example – guidance from CTAs is instrumental in ensuring businesses who wish to invest in street furniture to protect their outside spaces do so appropriately, paying due regard to all relevant considerations. As I have recommended in chapter 4, the MPS should consider how to increase the size of the CTSA cadre deployable across the capital.
- 17.29. CPNI have released a version of SCan for All which can be built into businesses' existing security awareness training and delivered using in house trainers where available¹²³. Complete with facilitator notes and a knowledge check for organisations, venues and event organisers,

¹²² [Home - London Business Hub](#)

¹²³ Available on the [Highfield Learning website](#) and as a standalone video on the CPNI website: <https://www.cpni.gov.uk/scan-all-staff>

this is very welcome as it will help reduce demand on CTAs. As above, however, it should not necessarily be considered a replacement for their bespoke advice, particularly in relation to operation of public spaces, venues and events.

- 17.30. Principles of behavioural science also have much to offer the successful implementation of target 'hardening', including via communications. **Through the London Business Hub and BIDs, City Hall should seek to encourage businesses to use the guidance offered by CPNI (and also as part of SCan) regarding signage on and content of websites, and in public messaging (i.e. Security Minded Communications)** (R223). This highlights how to consider protective security when, for example, a business or venue wishes to create a virtual tour of their building floorplan and facilities, to avoid inadvertently facilitating hostile reconnaissance for those with malign intent.

Information sharing – seeing business as a partner in preparedness and response

- 17.31. I have repeatedly stressed throughout this review the importance of information sharing by CTP and the business community is no exception to this. It has been put to me that terrorist threat and risk related information received by business leaders across London is often so generic as to serve little operational purpose, and where it is more useful, it tends to be a result of personal relationships. This is disappointing as it seems little has changed in this respect since my previous review in 2016. There continues to be a layer of perceived secrecy about risk related information which the business community feel neither supports nor energises them to consider additional layers of security.
- 17.32. The Cross-Sector Safety, Security and Communications (CSSC) London partnership was intended to provide swift messaging from law enforcement to representatives of a wide range of business sectors, including following terrorist attacks in the capital and elsewhere. Messages are cascaded to individual businesses signed up to representative organisations, including the Federation for Small Businesses. However, the content remains too general to be of value to recipients and it is unfortunate that there has been so little progress since my earlier review on creating a mechanism that is quick and responsive to business needs and where the message content is properly shaped by the business requirements of the recipients.
- 17.33. I recognise the work which has taken place to develop more business focused training materials (as above) but the need goes further than this. Businesses and organisations, particularly those representing, or located in or near likely high-value targets, require a more detailed and live understanding of how threats and vulnerabilities change, ideally with some regard to sector and geographical location across the capital.
- 17.34. The MPS' Protective Security Operations (PSO) led 'Shield' app, freely available and designed to provide terrorism-related information and protective security advice to the London business community, provides one solution, and is capable of issuing geographically specific alerts which is welcome. However, as an opt-in solution, it necessarily depends on awareness and sign-up. The advent of other, more locally focused security awareness apps (see Fig. 16 on the Victoria Business Improvement District, BID) means there is also a risk that information is

communicated via different apps at different times in different ways. In an emergency situation it is crucial that any information, advice and direction issued is consistent.

- 17.35. I am aware of a desire to replace the London specific Shield app with a national alternative, currently in development. While I am in favour of businesses across the country benefitting from this, if the replacement programme goes ahead it will be crucial to enable a geographically specific function to respond to live incidents.
- 17.36. It has been put to me that the range of forums which represent different parts of London's business community are attempting to advise and help their members deploy appropriate protective security. However, this is likely to have led to a wide variety in approach and messaging.
- 17.37. **The London CONTEST Board, the business sub-group of the London Resilience Forum (LRF) and bodies that represent businesses in London should work together to consider how information shared by government, law enforcement and the security services could be made more relevant, consistent and actionable for those managing security across London's business community. The starting point should be to agree a specification of what is needed and how it could be most effectively disseminated. This should be used by the Mayor to ensure appropriate mechanisms are put in place with the support of the business community** (R224).
- 17.38. Similarly, in the event of responding to a terrorist attack, there is scope for more detailed and timely updates to businesses located in the vicinity, particularly those delivering services to large numbers of customers. When security managers and others are briefed, it is often in parallel with the press which does not support rapid action to aid response and where necessary ramp up security and protect the public. The 'Shield' app has the capability for this but as above, depends upon businesses having signed up.
- 17.39. For example, following the attack at Fishmongers Hall in 2019, nearby London Bridge station was closed. As the attack took place an hour or so before the evening rush hour, this meant significant numbers of people quickly built up outside the station. With little information passed to station management about likely closure time, it was difficult to keep passengers informed and thus manage and disperse crowds – which of course in themselves represented a potential target. **While their proactive engagement with local businesses is generally good in the event of a terrorist attack, the MPS should consider how to better inform those running large-scale services and operations to inform real-time decision-making more widely** (R225).
- 17.40. Consideration should also be given to ensuring senior security staff, certainly in London's larger organisations and businesses, are appropriately vetted to ensure there is no reluctance to brief them on sensitive issues, either in general or in the event of a terrorist attack.
- 17.41. The City Security Council (CSC), established by City of London Approved Contractor Scheme (ACS, see chapter 18) security providers in collaboration with the City of London Police (CoLP),

has implemented a number of recent initiatives to highlight security measures adopted across the Square Mile. Public demonstrations of security industry capacity and capability, including visible patrols of crowded spaces alongside engagement events to advise and support individuals around personal safety, linked up with Project Servator (see chapter 4 for details). This is a good way to complement the public reassurance and criminal deterrence intent of Servator and to facilitate relationships between business, including the private security industry, and the police, so important in facilitating information exchange and reporting of suspicious activity.

Business Improvement Districts

- 17.42. Almost 70 Business Improvement Districts (BIDs) operate across London, encompassing all sectors and all sizes of organisation and business, including micro businesses in emerging sectors. Funded by a levy commensurate with the size of an organisation, BIDs are business led partnerships which work with local authorities to deliver additional services to local businesses. Safety and security measures are a priority for many, and the structure provided by a BID allows for collective planning which recognises the nuances of the local area, population and infrastructure.
- 17.43. However, the links between BIDs and their respective local authorities, the MPS and other security partners, including NaCTS0, are variable. **Where BIDs exist within the boroughs under their command, Basic Command Unit (BCU) Commanders should ensure local policing (including CT Policing) is engaged and regularly represented. Similarly, local authority Leaders and Chief Executives should ensure they are plugged into BIDs within their area** (R226). Both police and local government are well placed to share relevant security and risk information with the BID and, in return, to receive information from the ground about local concerns and issues.
- 17.44. I have been impressed with the inclusivity and activity of the Victoria BID (and understand others across the capital, such as those covering the iconic and populous West End under the auspices of the West End Security Group operate in a similar fashion). BID levies generate a revenue stream which can be invested back into the local area – for example, in Victoria, protective security measures are being considered for implementation in 2022-23.

Figure 16: Illustrating the role and value of a BID

The Victoria BID: proactive, inclusive and security conscious

Operating context

1. A well-established BID dating back to 2010, it links into both the local authority and the MPS and brings together an increasing number of businesses operating in an area of the capital which has seen significant redevelopment over recent years.
2. Victoria contains one of London's major transport hubs (Victoria Station) and is a mix of private residences, government buildings and a range of businesses with office and customer facing premises.

3. Based on its experience, the Victoria BID supported the set-up of the Victoria Westminster BID in 2018 and subsequently the Whitehall BID in 2021. This reflects the fact that collectively they are home to some of London's biggest tourist attractions including Buckingham Palace, Westminster Abbey, the Houses of Parliament and Westminster Cathedral, so in addition to workers, the wider area attracts very large numbers of tourists. All three BIDs are covered and managed by the same Security and Business Resilience function, which allows for consistency of engagement and messaging.

BID-led activity

4. Taking account of the wide range of local environmental, risk and demographic factors, the BID proactively raises security matters across the local business community.
5. It shares protective security advice and real time alerts regarding emerging major incidents (and what is not deemed to be such) to over 250 businesses signed up to its bespoke Emergency Notification app.
6. Benefiting from a data sharing arrangement with the MPS and the National Cyber Security Centre (NCSC), it receives feeds from the MPS control room covering the area. This allows signed-up businesses to respond in a timely manner to events which might impact their operations, staff and customers (for example, an alert was issued in November 2021 when the Joint Terrorism Analysis Centre – JTAC - raised the terrorist threat level).
7. Following workshops with businesses to better understand knowledge and needs in terms of responding to alerts, the app contains advice regarding specific incidents so in the event of a marauding terrorist attack (MTA), or a bomb threat, for example, users know the initial appropriate steps to take.

17.45. BIDs are also a valuable mechanism to facilitate and complement the national security training packages such as those developed by CPNI and NaCTSO. The Victoria BID hosts regular security training events (including tabletop exercises) for its members, drawing on ACT and SCaN materials, alongside more specific events focused on particular aspects such as communications. This is very welcome. However, given the role of businesses following a major incident such as a terrorist attack, adding to this with a local testing and exercising programme, such as that regularly engaged in by the emergency services and category 1 responders (see chapter 14), would confer additional preparedness skills. **The MPS should consider with BID partners the feasibility of their inclusion in local level exercising** (R227).

17.46. It has been put to me that more comprehensive information sharing with BIDs from the MPS' CTAs and CT Protect Officers regarding risk and threat changes, and greater clarity on what then can be shared with local businesses, would strengthen the function still further. **The MPS should work with BID security leads to explore whether higher levels of security clearance would facilitate more comprehensive information sharing** (R228).

- 17.47. In undertaking this Review, I was fortunate to hear from the New York Police Department (NYPD). Operating similar outreach as the MPS and London BIDs, the NYPD actively encourage local businesses to report concerns if they witness suspicious behaviour by customers, members of the public or among their own staff. In turn the NYPD operate a feedback process meaning that, where appropriate, any action taken as a result of a business reporting a concern is fed back to them. This is an important part of ensuring a two-way relationship: **where feedback regarding reported concerns is not already happening across London, I strongly encourage the MPS to work with local BIDs to achieve such cooperation** (R229).
- 17.48. Similarly, relationships between the business sector and the CT community would also be strengthened through increased engagement with the Prevent programme. The Prevent Duty imposes no specific requirements on employers, who make few referrals to the programme. However, they are well placed to spot, for example, concerning behaviour among employees, including the espousal of extremist views and rhetoric. **The HO should consider issuing specific guidance to the business sector to encourage Prevent referrals, including guidance on what managers might look out for** (R230). This would help form and maintain two-way relationships.

Pavement hospitality

- 17.49. Many businesses across the hospitality sector introduced outdoor seating to enable them to continue operating a limited service during the Covid-19 pandemic. This is likely to continue at least in some form during reasonable weather. And means the areas that businesses and others responsible for pavements and pedestrianised areas need to consider from a security perspective will have expanded. Pavement socialising, which of course is not new, can create crowds in public spaces, particularly where several adjacent outlets operate in this way, and this potentially risks creating targets for hostile vehicle and other types of terrorist attack.
- 17.50. A pavement licence is required to operate outside. However, while security considerations are encouraged, a local authority can grant a licence without requiring a business to take active measures to protect its customers and staff outside. In London, a series of very welcome CT conditions have been designed by the Mayor, in partnership with the MPS' CTsAs to which local authorities can choose to sign up to apply when granting licences.
- 17.51. Conditions include requirements for all staff to complete the ACT e-learning package and for any CCTV to be in full working order. While over half of London's 32 local authorities have adopted these conditions as part of their pavement licencing, it is unfortunate that not all have done so: **boroughs who have not may wish to consider implementing the conditions developed for pavement licencing** (R231).
- 17.52. To help prepare London's businesses to begin operating again following pandemic related lockdowns, a High Street Reopening Coordination Group was set up and co-chaired by London's Night Czar, the Deputy Mayor for Policing and Crime and the Chief Executive of the London Borough of Hounslow.

17.53. CT Policing were an integral partner and I was pleased to hear that protective security was a primary consideration with participating businesses benefiting from a number of no-cost events and communications designed to promote CT awareness. Uptake was high and it was put to me that engagement had prompted businesses to consider protective security measures in a way they had not previously done. While now wound down, the focus of this group could usefully inform the operation of London's BIDs in terms of promoting the importance and value of security awareness to their memberships and providing accessible and practical support to do so.

18. THE SECURITY INDUSTRY

- 18.1. Individuals employed as security operatives, alongside the body responsible for issuing their licences and for regulating the private security industry, i.e. the Security Industry Authority (SIA), are an important part of London's preparedness landscape. They therefore warrant specific consideration, particularly in light of findings from the initial stage of the Inquiry¹²⁴ following the bombing of Manchester Arena in 2017.
- 18.2. The SIA manages the compulsory licencing of individuals undertaking specified security activities (including CCTV operation in some circumstances). It also runs the Approved Contractor Scheme (ACS), a voluntary quality assurance scheme for providers of private security services. As the regulator of the private security industry, the SIA additionally performs a number of inspection and enforcement activities.
- 18.3. Over 90,000 SIA-licenced security operatives were working in London at the end of 2020¹²⁵, i.e. nearly three times the number of police officers in the capital. As a result, and as I noted in my 2016 Review, there is therefore a large body of people who could potentially play a significant role in both the prevention of and the response to a terrorist attack. Conceivably they might be the first on scene and where uniformed, may become a focus for members of the public caught up in an attack and seeking guidance and protection.
- 18.4. As a minimum, therefore, SIA-licenced security operatives must be trained in terrorism awareness and basic response. Awareness of terror risk, including the spotting of suspicious behaviours, is part of the training required before an individual can apply for an SIA licence and as noted in the Manchester Arena Inquiry, the content of this training has changed since 2017. It now includes a greater proportion and better quality of CT related content, which is welcome.
- 18.5. And the SIA's recent qualification review means that, from April 2021, all Security Guard and Door Supervision licence holders are now required to present evidence of a current First Aid certificate. From October 2021, all such operatives renewing their licences are similarly required to demonstrate the same up-to-date capability – this is reassuring in terms of immediate response.
- 18.6. The Covid-19 pandemic, however, has had a major impact on security work. Many of those previously in the industry did not return to the sector once venues and workplaces began to re-open following lockdowns. They have instead opted for alternative work with more regular hours, better working conditions, permanent contracts and often higher rates of pay.

¹²⁴ [Manchester Arena Inquiry - Volume 1: Security for the Arena \(publishing.service.gov.uk\)](#) (accessed 22/11/21)

¹²⁵ [FOI release overview: Number of SIA licensed operatives by region - GOV.UK \(www.gov.uk\)](#) (accessed 22/11/21)

- 18.7. As a result, many event organisers and venue operators have been struggling to secure qualified security staff. This is particularly true within the night-time economy (nightclubs, by definition, operate unsociable hours and door services often require being outside in all weathers). Working conditions are to a large extent, however, dictated by the demands of the sectors that require security guarding. And given the financial position of many businesses following significant losses incurred during the pandemic, a wholesale increase in standard rates of pay seems unlikely.
- 18.8. More overtly positioning security roles as the first rung of a career in professional security services, with associated training, qualifications and earning potential set out, might incentivise individuals to enter the sector. Encouragingly, the SIA is working with others across the industry to develop career pathway maps intended for launch in 2022 – these should clearly set out opportunities for progression.

Licencing and training

- 18.9. The attack on Manchester Arena in 2017 highlighted that conditions attached to licences to operate events and venues are not sufficiently rigorous in terms of security requirements. When event and venue operators across London apply for licences, it should be a condition of issue that SIA-regulated security is engaged, where this is appropriate to the size of the event and / or venue.
- 18.10. Moreover, as security licences can only be issued to those aged 18 years and over, those aged under 18 should not be employed in roles which involve activities specified as requiring a qualified licence holder. As the inquiry into the Manchester Arena bombing identified, the security business tends to employ many young people aged under 18 – they are cheaper to secure and often looking for short-term, transient work. While in itself not an issue, they must not be asked to take on responsibilities they are not licenced to undertake, which points to the need for a strengthened enforcement regime.
- 18.11. Specified activities requiring a licence include screening individuals wishing to enter a venue, searching individuals and property (e.g. bags), crime deterrence and detection, responding to incidents involving unwanted behaviour, removing individuals from a venue or area, and monitoring CCTV footage. However, with respect to CCTV, a licence is only required by operators working under contract for provision of security services - the requirement does not currently apply to in-house operators. It is therefore reassuring that the SIA, in conjunction with the Home Office (HO), is undertaking research to explore development of licensing for in-house operatives (as recommended by the Manchester Arena Inquiry).
- 18.12. The forthcoming Protect Duty will significantly increase the number of places (i.e. Publicly Accessible Locations, PALs) in scope for security measures. This may give rise to demands for increased CCTV coverage as one mechanism of meeting the expectations the Duty will likely place on owners and operators of PALs. In light of this, this SIA/HO research is particularly welcome. While any future expectations of in-house operatives must be proportionate so as not to overwhelm sole traders operating one CCTV camera, linking in with training

requirements (see below) will help support those who monitor footage to identify hostile reconnaissance and suspicious behaviour.

- 18.13. The Inquiry also recommended that consideration be given to requiring contractors who perform security work which may include a CT element to be licensed. This feels a sensible way in which to strengthen provision and I have been assured that the SIA, in partnership with the HO, are exploring whether the introduction of business licensing in this fashion would result in improved CT outcomes.
- 18.14. The SIA have good relationships with, and are well informed by, the National Counter Terrorism Security Office (NaCTSO). The dynamic is further facilitated by an SIA embed within NaCTSO which ensures real-time access to the latest CT guidance and allows for the needs of the security industry to be understood and considered when products are developed. However, I consider there to be scope for a greater regional level approach to ensure those needs are translated at local levels. **Pan-London, Protective Security leads in the Metropolitan Police Service (MPS) and licensing leads within local authorities should be more formally linked into the SIA to help facilitate effective information sharing and mechanisms of communication with qualified SIA operatives working across the capital** (R232).
- 18.15. NaCTSO's Action Counters Terrorism (ACT) Awareness e-learning forms part the CT module in the compulsory training course which must be passed to achieve the licence-linked qualification necessary to apply for an SIA licence. In partnership with NaCTSO and the Centre for the Protection of National Infrastructure (CPNI) the SIA has also recently launched ACT Security (see Figure 8). This complements the ACT Awareness material through the provision of up-to-date CT knowledge specifically targeting security operatives, supporting the industry to prepare for and respond to terrorist incidents whilst on duty.
- 18.16. Security operatives are now required to pass an assessment on this content not only in order to gain a licence but to renew a licence. This is welcome as it ensures a skills' refresh for those seeking to remain within the industry. Acknowledging the self-employed status of many security operatives, meaning they will probably be personally funding their own training as well as the cost of licence applications and renewals, the fact that ACT products are freely available means there should be no barrier to completion. **City Hall, in conjunction with the HO and the SIA, may wish to consider requiring larger companies to demonstrate that all their operatives have as a minimum undertaken this training, as part of their adherence to the new Protect Duty** (R233).

Partnerships and enforcement

- 18.17. While there is no central overarching trade association through which the SIA can communicate with licenced private security operatives and companies, it is able to broadcast information to individual operatives through an online portal and does so regularly. The ACT app is also an efficient mechanism for disseminating messages, although of course this depends upon it being downloaded: **individuals should be encouraged to download the**

ACT app when initially applying for an SIA licence and at renewal (R234).

- 18.18. The City Security Council (CSC, see paragraph 17.41 in chapter 17) provides assistance whenever there is a major incident, crisis or significant event that takes place within London's Square Mile (the City). The CSC, in partnership with the City of London Police (CoLP), have developed a two-way messaging system with companies providing security services for businesses operating within the City. This enables alerts to be distributed quickly and allows companies to report where their assets are in the event of an incident, including the numbers of people in any building for which they are responsible. **The SIA should work with the CSC and MPS to extend this messaging system to as many ACS security providers operating across London as possible (R235).**
- 18.19. Recognising their potential role as partners in improving London's preparedness, the opportunity for appropriate SIA licenced operatives to be involved in live CT testing exercises would be welcome. This represents an important complement to desk-based learning, so I was encouraged to learn that, with support from the West End Security Group, the MPS and Westminster City Council, the SIA led a CT exercise ('Operation Sentry') in late 2021 (see chapter 14). This is reassuring with respect to recognising the role of licensed security operatives and venues in the event of a terrorist attack and demonstrated the importance of an established, rehearsed plan in place to guide response.
- 18.20. As discussed in detail in chapter 14, participation of venue operators and staff in multi-agency exercising is key to enhancing preparedness. **The MPS and SIA should consider whether there is scope to stage a programme of exercises which focuses specifically on the role of security operatives in a range of settings. This should adopt a 'train-the-trainer' approach to enable representatives of private security companies to attend and take their learning back to inform the way their organisation supports and trains its staff with respect to CT considerations (R236).**
- 18.21. The SIA are a small organisation with a wide responsibility, operating without a great deal of supporting infrastructure. This inevitably means inspection activity on the ground is limited, although the importance of the function cannot be overstated. With only around 50 people nationally able to conduct inspection and over 90,000 licenced security operatives working in London alone, the capability feels inadequate.
- 18.22. Heavily reliant on information from others including members of the public to inform them of potential breaches, **the SIA should consider working with the MPS and local authority licensing leads across sectors to highlight how community-based partners could support their inspection and enforcement role. In parallel, the HO should support the SIA to take a more pro-active role in terms of inspection and enforcement activity (R237).**
- 18.23. Recent approval by the SIA Board of a refreshed Compliance, Supervision and Enforcement strategy is a positive step forward in enhancing the organisation's role in this space. The strategy seeks to significantly increase proactive inspection activity at venues and locations considered to pose the highest level of potential threat, risk and harm. Supported by an

enhanced approach to intelligence gathering and analysis, including the creation of intelligence products intended to ensure that resources focus on where the greatest impact on harm reduction and improved public safety can be achieved, the SIA should ensure the police and other partners are engaged to facilitate effective information sharing and avoid duplication of activity.

- 18.24. Core to SIA licencing and renewal activity are checks on applicant criminal history. The SIA do not, however have free, regular access to the Police National Computer (PNC) to facilitate such checks. For applicants living in England or Wales, a standard disclosure request will be made to the Disclosure and Barring Service (DBS) who undertake a PNC check as part of their response. However, this is time consuming and means the SIA are unable themselves to carry out proactive spot checks and checks in advance of inspections.
- 18.25. Over the three-year licence period, it is therefore difficult for the SIA to gather much detail about those on its books, even where they receive information about suspicious behaviour which might warrant a licence withdrawal. Access to the PNC is managed by the HO via a Memorandum Trading Account (MTA): **the HO should consider incorporating the SIA into the MTA structure and creating affordable access to support and enhance their enforcement responsibilities** (R238).
- 18.26. Furthermore, **the SIA could consider requiring enhanced DBS checks in some cases** (R239). While this would require legislation to allow the SIA access to enhanced disclosure information, the additional details, beyond those held on the PNC, would offer wider insight where available and relevant to an individual's suitability to take up particular security roles. **There should be a mechanism to allow CT Policing and the security service to access the SIA database to check whether SOIs are licenced operatives or have applied for a licence** (R240).

19. PROTECTING AND WORKING WITH LONDON'S FAITH AND BELIEF SECTOR

- 19.1. London is one of the most diverse and varied cities in the world, not only in terms of race and ethnicity, but also in terms of religion and faith. For many people, practising their faith or belief is an integral part of their daily life. While soon to be updated with 2021 data, the 2011 Census showed 70% of Londoners considered themselves affiliated to a particular religion¹²⁶.
- 19.2. At that time, London was the most diverse region in the country in terms of religion and belief – a position unlikely to have changed in the past decade. While 48% of the capital's population in 2011 identified themselves as Christian, over a fifth identified with an alternative religion (followed by the West Midlands where just over one in ten identified with a religion other than Christianity). London had the highest proportion of Muslims (12%) and the highest proportion of other religions including Buddhist, Hindu and Jewish (though the largest Sikh population at that time was in the West Midlands).
- 19.3. The extent and diversity of faith within London means there is an incredibly wide network of associated places of worship and other related organisations across the capital, many of which have been a part of their local community for a long time. Others regularly continue to be established, often in buildings that are not purpose built. Their trusted position in communities means they can be uniquely placed to reach groups who might, for a variety of reasons, not routinely engage with authorities, and places of worship and other community spaces frequently act as neighbourhood hubs. They offer social connection, advice and support in both usual times and following major incidents such as terrorist attacks¹²⁷, when they often take a lead role in condemning atrocities and organising public vigils.
- 19.4. Meaning faith leaders, along with other community figures, can have an important role to play in the event of a terror attack. With their reach into local communities, they are well placed to understand reactions and fears which terrorism can provoke, to present these swiftly and authoritatively to those leading the response, and to help reassure communities, calm emerging tensions and manage risk of subsequent copycat or retaliatory attacks. Thus, local policing teams, alongside local authority representatives, must engage effectively with the faith sector in each London Borough.
- 19.5. I recognise that the reality of challenging budgets and mounting responsibilities can mean non-statutory activity of this sort ends up being de-prioritised. And too often, frequent

¹²⁶ [Religion in England and Wales 2011 - Office for National Statistics \(ons.gov.uk\)](https://ons.gov.uk) (accessed 13/12/21)

¹²⁷ [Faith-Belief-and-Belonging-Briefing-Paper.pdf \(faithbeliefforum.org\)](https://faithbeliefforum.org) (accessed 13/12/21)

changes in personnel can undermine still further the maintenance of effective relationships. However, community engagement can represent an 'invest to save' strategy and should not be allowed to be diluted. **When police contacts move on, where possible their successors should be introduced to primary contacts across the faith and belief sector as part of the handover** (R241).

- 19.6. Moreover, the Covid-19 pandemic demonstrated how whole communities can be served by the faith sector, irrespective of whether they belong to a congregation or not and this should be properly recognised in wider protocols around humanitarian assistance. London's places of worship acted as distribution centres for food and medical supplies, as vaccination centres, and simply as places for the public, particularly the lonely and vulnerable, to visit and interact with others. They offered valuable and trusted mechanisms through which information could be disseminated and, particularly importantly, reached parts of communities that were otherwise not being vaccinated against the virus.
- 19.7. While there is no doubt that extremists co-opted the pandemic to sow division, exacerbate grievances and spread hatred and misinformation which often directly targeted religious minorities and places of worship, the work of faith institutions across the capital sought to counter this activity. For example, the London Boroughs Faiths Network (LBFN), which works to bring together faith and wider community practitioners together with public sector agencies, initiated weekly meetings with local Borough Faith Forums during the pandemic. Providing an opportunity for faith-based volunteers to meet elected members and officials from local authorities, this facilitated information sharing and collective planning, about pandemic activities but also broader community issues such as the arrival of Afghan refugees.
- 19.8. Now taking place every three weeks, this is a good example of partnership working at ground level, demonstrating the value of bringing together different sectors. While not focused on terror preparedness per se, the structures and partnerships engendered by this type of endeavour can help shore up security related activity and response. Similarly, the Countering Violent Extremism (CVE) team in the Mayor's Office for Policing and Crime (MOPAC) sustained significant liaison with a wide range of groups across London's communities, faith-based and otherwise, throughout the pandemic. This was impressive and in the interests of strengthening the relationships upon which effective preparedness and resilience depend, it is important these are not lost.

Places of worship: protective security funding schemes

- 19.9. As above, the diversity of London's communities means the city is host to very many different places of worship. Simply by virtue of what they stand for, these places of peace and sanctuary, across all faiths, continue to represent targets for terrorists. The attack outside Finsbury Park Mosque in 2017, and many across the world before and since¹²⁸, demonstrate a continued focus on places of worship, and worshippers, by those intent on causing harm in the name of violent extremist and terrorist ideology.

¹²⁸ E.g. in the past five years, high profile attacks have been mounted against mosques, synagogues and churches across the United States, Germany, New Zealand and Sri Lanka.

- 19.10. While many places of worship across Europe deploy armed guards to help protect congregations, this is unlikely to become a feature in the UK given our predominantly unarmed police force. This means attention must be paid to alternative ways to ensure worshippers across London's hundreds, if not thousands, of places of worship are protected. Since my previous Review, the CVE Team has undertaken a substantial amount of welcome work to support places of worship across the capital to consider safety and security. And the idea behind the government's places of worship protective security funding scheme, established in 2016 as part of the hate crime action plan, is also welcome.
- 19.11. Intended to reduce the risk and impact of hate crime targeting these institutions, and associated faith community centres, the government committed a total of £2.4 million over the first three years of operation (£800,000 available each year). Following the attacks in Christchurch, New Zealand, in 2019 which targeted two mosques and claimed the lives of 51 people and injured a further 40, the fund was doubled to £1.6 million for allocation in 2019/20. It was doubled again the following year, making £3.2 million available in 2020/21 and uplifted slightly for 2021/22, to £3.5 million.
- 19.12. If successful, an applicant can receive up to a maximum of £56,000 to implement up to three separate protective security measures (such as CCTV cameras, fencing, railings, gates, locks and intruder alarms).
- 19.13. In addition, and following the events in Christchurch, the government committed to launching a separate £5 million fund to provide security training to those working and volunteering in places of worship. This is intended to complement the provision of hard security measures.
- 19.14. The protective security scheme is open to applicants from all faiths apart from the Jewish community (they are supported separately via the Jewish Community Protective Security Grant. This is administered by the Community Security Trust (CST), a charity which seeks to protect British Jews from antisemitism and related threats and monitors levels of antisemitism across the UK). Eligibility for the security training scheme has yet to be finalised.
- 19.15. However, despite the laudable intentions several aspects of the government's provision are disappointing. Firstly, I question the adequacy of the sums committed to date to support installation of protective security measures for the many thousands of places of worship who may require them across England and Wales. Indeed, one London borough pointed out that they could have utilised the entirety of the fund given the number and nature of institutions located in their area alone. The fact that the scheme has been under-utilised to date (see paragraph 19.17) is not, to my mind, because of a lack of need but due to challenges associated with securing funding (as set out below). **The Home Office (HO) should consider setting aside significantly more resource for the protective security scheme and raising the maximum available to individual applicants. The scope should also expand to cover the cost of maintaining any measures installed** (R242).
- 19.16. Secondly, I have heard from a variety of representatives that the process of application is complex and unwieldy. Earlier problems with eligibility and bureaucracy have improved

somewhat but continue to exert a legacy impact and have put some organisations off applying. Still more have little, if any, idea it even exists. The application process remains overly bureaucratic and difficult to navigate, and the requirement to evidence that either a place of worship or the local area have been a target for hate crime excludes, unjustly in my view, some organisations from applying at all. This risks leaving them exposed, particularly where faith institutions in surrounding areas have secured funding to enhance security.

- 19.17. These challenges are, to my mind, borne out in the number of applications. Since 2016, the scheme has received just 1,050 eligible applications from Places of Worship and associated faith community centres across England and Wales. Fewer than one quarter (23%, 241 applications - of which 47 were London based) were successful, and the average grant allocated amounted to £33,000. Equating to 59% of the cap of £56,000 per application, this is substantially lower than the maximum available. In total, approximately £5.1 million has been allocated which is some way short of the £7.2 million made available over the five years to 2020/21 (allocations have not yet been awarded for the sixth year of operation, i.e. 2021/22).
- 19.18. The annual application window is also prohibitively short, amounting to just a few weeks, which is likely to compound the challenges of application. **The HO should mount a targeted communications campaign to raise awareness of the protective security scheme well in advance of the next application window opening, and the window should be extended. The MOPAC CVE Team and the Faith Sector Panel of the London Resilience Forum should be engaged in order to maximise reach into London's communities** (R243).
- 19.19. Unfortunately, despite its announcement almost three years ago, the government's promised fund to deliver safety and security training for places of worship has not yet materialised. This is disappointing. **As and when the training fund is launched, lessons must be learnt from the protective security funding scheme: eligibility criteria should be inclusive, the process must be straightforward, and the HO must embark on a targeted awareness raising campaign. It should utilise national and London-based faith and community networks to maximise reach into communities who may otherwise remain unsighted** (R244).

Security focused training for places of worship

- 19.20. While the promised government scheme is not yet available, throughout this review I have been made aware of a number of impressive initiatives led by faith groups themselves, intended to offer inclusive advice and training both within and across different faith communities. Moreover, MOPAC has undertaken valuable work in collaborating with such initiatives (including with the CST and Faith Associates, FA) to provide free advice to faith and belief groups across London in the absence of such from central government. **The MOPAC collaboration with faith-led initiatives to advise the sector should continue, in conjunction with the Metropolitan Police Service (MPS) specialist CT Security Advisers where appropriate** (R245).
- 19.21. The CST has played a significant role for very many years in helping Jewish communal organisations and venues prepare crisis management plans in readiness for major incidents

including terrorism. The charity also shares its security knowledge and experience with groups outside the Jewish community which may be vulnerable to violent extremism or hate crime. Following requests from other faith groups for advice on how to protect their places of worship following the terrorist attacks in Christchurch and Sri Lanka in 2019 which targeted, respectively, Muslims attending prayers and Christians attending Easter church services, it developed its freely available 'Security Advice for Everyone' programme (see Figure 17).

Figure 17: The Community Security Trust offer

CRISIS MANAGEMENT PLANNING (for other Jewish organisations)

The CST's detailed crisis management plan sets out process, governance and partnerships to be followed in the event of a terrorist attack or other major incident. In summary this suggests:

1. A Strategic Management Team coordinates delivery of processes.
2. Accordance with appropriate Jewish communal leadership structures is built in.
3. The CST's 24-hour national security control room is engaged.
4. All activity is undertaken in close conjunction with local police and local authorities.
5. That volunteer psychological first aiders are deployed who, under the guidance of a trauma psychologist offer and provide psychological first aid to those directly and indirectly affected by an incident in its immediate aftermath. Material to help volunteers prepare and understand medium to longer term impacts of those caught up in significant trauma are publicly available on the CST website.

These components are highlighted to any Jewish organisation seeking support from the CST to prepare their own local crisis management plan.

SECURITY ADVICE FOR EVERYONE (SAFE)

SAFE is based on CST's many years of experience actively protecting British Jews and seeks to use this to benefit all British faith and minority communities.

Comprising a series of free, one-hour webinars focused on different aspects of security and security management, the programme is aimed at any community which feels vulnerable to hate crime and violent extremism. This includes people who regularly attend or manage a place of worship, as well as community leaders more widely.

Since launching in 2019, SAFE has responded to several hundred requests from faith communities across London, benefiting around a thousand PLACES OF WORSHIP across the capital. In addition to its webinar programme, the CST also delivers a series of security talks and, in partnership with the Mayor's Office for Crime and Policing (MOPAC) operates a quarterly schedule of free events.

- 19.22. The well-established Mosque Security programme developed by FA provides resources, materials and training to help leaders of mosques and other Islamic institutions keep their premises and congregations safe. Its incident management guide, originally developed in response to the attempted terrorist bombings of mosques in the West Midlands in 2013¹²⁹ (whose perpetrator was also responsible for the murder of a local man), was aimed at congregations of all faiths and places of worship across the country. FA updated their material

¹²⁹ <https://www.bbc.co.uk/news/uk-england-birmingham-24675040>

following the Christchurch attacks in 2019, and the guide now discusses risk management more widely. It sets out the need to build a response plan in case of major incident, to establish, train and exercise response teams, and what to consider in terms of communication during and following an incident which targets or otherwise affects a place of worship and its congregation.

- 19.23. While a national organisation (with a significant international footprint), FA are well linked into City Hall and have collaborated several times (including on an event for over 300 London Mosque leaders held within three days of the Christchurch attacks, perpetrated just a few weeks before Ramadan). They are also well connected to London's many mosques (alongside wider Islamic centres and madrassahs, and other faith establishments). With a deep understanding of the nature of London's communities, FA are well placed to consider how protective security and resilience advice for places of worship may require nuanced tailoring to address the specific dynamics at play in the capital.
- 19.24. The work of the CST and FA are just two examples of faith organisations who produce resources to help places of worship and other community venues keep their users safe and secure. The sector contains a huge amount knowledge and experience and, crucially, has reach into the myriad of local communities across London.
- 19.25. The Centre for the Protection of National Infrastructure (CPNI) has also published guidance which is intended specifically to support places of worship and other faith establishments to stay safe and secure - for example, by deploying 'security-minded communications' when publishing information about their venues and activities. This is a valuable resource, which is freely available online. However, it is not clear that most places of worship across London are necessarily aware it exists. **The Faith Sector Panel and other networks with reach across faith leaders should promote the focused CPNI material to increase awareness amongst those places of worship who might find it useful** (R246).
- 19.26. **The safety and security training scheme for places of worship to which the HO has committed funding should be developed in conjunction with faith organisations experienced in advising places of worship on security matters** (R247). It should ultimately deliver a tailored package of training and practical advice which balances the needs of differing communities and is readily accessible to all. Encouraging security to be taken seriously and for proportionate measures to be taken without creating alarm or threatening the open and welcoming premise of places of worship (the CST mantra of '*welcome a stranger, but make sure that stranger isn't coming to harm you*' is apposite) must be the end goal.

Drawing the faith sector into preparedness and incident response

- 19.27. In line with its wider purpose, and prompted by the attacks across London in 2017, the LBFN has developed and piloted a 'Safe, Secure and Resilient' (SRR) course. This brought together faith and community leaders and practitioners across London to enable them to work together in the event of a major incident and support the wider response. It sought to showcase for those not traditionally involved what to do, who to contact, what messaging to send out to communities, and how to both work together and with those leading the response (in

partnership with the London Resilience Group, the Corporation of London, the MPS and local authority emergency planners).

- 19.28. Widely acknowledged across participants to have raised their awareness of risk, of how to keep people and buildings safe, secure and prepared for emergencies, and of what to do in the event of a major incident, the planned roll out of this training offers opportunity to bring partners across the faith and community sector together with statutory and other bodies who lead preparedness and response.
- 19.29. **The potential for faith organisations to play a key role in any multi-agency response to a major incident must be more formally recognised** (R248) – as I have set out, their place among communities confers reach, credibility and nuance to an extent which public agencies can only achieve with difficulty. Representatives should be involved in testing and exercising programmes which bring together the emergency services and other responders, and their role with respect to community engagement and messaging recognised in response frameworks. Regular out-of-incident engagement with both local and CT Police, local authority emergency planners and others across the sector will help establish relationships, mutual trust and familiarity.
- 19.30. The LBFN also act as the Training & Exercising Lead for the Faith Sector Panel which (along with a number of other focused panels) supports the London Resilience Forum (LRF, see chapter 13). **The LRF should consider how best to support the Faith Sector Panel and LBFN in rolling out its training to faith and community organisations across London, and MOPACs CVE Team may wish to consider using its networks to promote and maximise take-up** (R249).
- 19.31. It was put to me that additional support received by the Faith Sector Panel during the pandemic was instrumental in increasing its cohesion and capabilities to support communities. **The Faith Sector Panel should be strengthened and provided with dedicated resources from City Hall to support it taking an explicit role in the formal protocols which govern response to major incidents, including terrorist attacks where, as I have discussed, faith and community leaders have a significant role to play. Similar arrangements need to be replicated at borough and sub-regional level** (R250).
- 19.32. Vigils, often drawing crowds of several hundred, are increasingly part of the public response to major incidents. The Greater London Authority (GLA) plays a central role in organising such events and in recent months alone, several have been held in London in response to the murders of a number of young women, and to honour the many who have lost their life attempting to cross the English Channel trying to reach the UK from France. An opportunity for people to come together in grief, to show support and to demonstrate unity and solidarity, vigils should be properly organised, managed and supported. **The faith sector could play a valuable role in supporting vigils and the MPS should work in partnership with the Faith Sector Panel to consider how the sector could, where they wish to, be facilitated to do so** (R251).

19.33. Finally, as part of this review, I heard about a multi-faith neighbourhood watch team, created by a group of local leaders from different faiths in Coventry and prompted after they had identified a shared desire to consider not just the safety and security of their own places of worship but also those of each other's. The team patrols central Coventry and provides additional security at one another's institutions when large events are held. The group secured agreement from local police to set up under the banner of Neighbourhood Watch, making this the first such scheme for places of worship in the UK. **The Faith Sector Panel, in partnership with the MPS, may wish to encourage the creation of similar multi-faith Neighbourhood Watch teams for places of worship within London Boroughs** (R252).

20. THE ROLE OF THE VOLUNTARY AND COMMUNITY SECTOR

- 20.1. London is home to a huge mix of nationalities, cultures and communities (see chapter 2) which greatly enriches life in the capital. While terrorists seek to exploit diversity, to divide communities and set individuals and groups against one other, in the event of an attack there is real opportunity for London and Londoners to come together in unity and support.
- 20.2. It is very important that the emergency services and other category one responders, including local authorities, work closely with civil society organisations and trusted community leaders (including from faith and belief-based organisations, see chapter 19). This has two main purposes: firstly, to reassure, communicate and help manage risk of reprisal and copycat attacks; and secondly, to utilise their significant reach into communities across the capital to harness public desire to support both the response to a terrorist attack and the process of recovery.
- 20.3. This demands strong relationships not only between responders and the communities they serve (as I have noted throughout this report) but with organisations operating in the voluntary and community sector (VCS). And London is fortunate in its access to well-established charitable and voluntary organisations which play a key role in the immediate and ongoing aftermath of a major incident including a terrorist attack.
- 20.4. While these organisations have different purposes, at their core is humanitarian assistance that places victims at the centre of activity. This alone means they have a unique and a crucial role in preparedness and response to terrorism. However, this is true in respect of all emergencies - indeed, most of the issues discussed in this chapter apply to any incident which demands a crisis response.
- 20.5. Some parts of the VCS have a formal role to play and receive government funding to deliver a range of services (for example, Victim Support, see chapter 15). Others, such as the National Emergencies Trust (NET) and the London Emergencies Trust (LET) coordinate efforts to raise and distribute public and other charitable donations, making it straightforward for victims to apply for awards quickly and efficiently.
- 20.6. Organisations such as Hands On London bring volunteers together with opportunities both to support community projects across London and to contribute to response to a major incident. Different again, London Funders brings together and coordinates investment in civil society from funders across sectors, including in response to major incidents of all kinds including terrorist attacks, the Grenfell Tower fire and the (first year of) the Covid-19 pandemic.

- 20.7. Others, such as the British Red Cross (BRC), act in an auxiliary role, working alongside local authorities to deliver humanitarian support in a wide range of scenarios. Then there are the many hundreds, if not thousands, of grassroots organisations operating at hyper-local level in all of London's boroughs to serve the needs of particular communities and those in need.
- 20.8. There can be no doubt as to the desire of the public to donate their time and skills to support emergency response. And, often, to offer financial assistance. Throughout the initial and ongoing response to the Covid-19 pandemic, the VCS has mobilised armies of both professionals and volunteers at all levels to address need across London and indeed the country. They are a force to be reckoned with – but as responses to crises experienced during 2017 demonstrated (including the terror attacks and the fire at Grenfell Tower), independent humanitarian effort in an emergency, whilst well intentioned, can lead to some confusing experience both for organisations involved and affected individuals.
- 20.9. Learning from those responses drove the formation of the VCS Emergencies Partnership (VCSEP), a coalition of around 250 voluntary and community groups and larger regional and national charities across England. Co-chaired by the BRC and the National Association for Voluntary and Community Action, the VCSEP has made the case for increased collaboration between government and the VCS in an emergency, and for improved coordination within the VCS to better reach and support communities most impacted. There remains scope to improve both within London.
- 20.10. The National Emergencies Trust (NET) is a significant addition to the sector arising from learning following those responses to crises in 2017. In the immediate aftermath of a national emergency, the NET seeks to launch a fundraising appeal and provide a transparent, coordinated distribution of monies raised. They can do this via financial gifts to those affected, and as grants to local or national charities who offer support to survivors and their loved ones. Responsive not only to major incidents, the NET's Coronavirus Appeal (launched in March 2020) has raised around £100 million at the time of writing. This has since been distributed to over 14,000 charities and groups working to provide a myriad of practical and other support to those affected by the pandemic and in need of help.
- 20.11. The work of the VCSEP (and the LET and NET) is welcome and important. It has showcased the value of collaboration and advance planning as well as the need for constructive structures which ensure expectations and roles are clear. More formal protocols governing the role of the VCS in London would be beneficial in terms of integrating the sector into preparedness. I was therefore pleased to note these are being considered by the Voluntary Sector Panel (VSP, see paragraph 20.14) and encourage adoption of the outcomes in due course. (The VSP is one of a number of groups and sector panels which comprise the London Resilience Partnership, LRP, which reports into the London Resilience Forum, LRF, see chapter 13).

Involving the voluntary and community sector in preparedness

- 20.12. The Emergency Preparedness guidance issued by the Cabinet Office¹³⁰ states that category one responders (those at the core of the response to most emergencies, i.e. the emergency services, local authorities and NHS bodies) should “*have regard*” to the contribution of the voluntary sector in emergency response and associated preparedness. It also notes that where the sector is included in local planning arrangements the overall response will be more effective, suggesting that consideration should be given to how the VCS can be involved at every stage of preparedness, including in training and exercising. This is worthy, but unfortunately rather unclear.
- 20.13. It is now a decade since that guidance was published, and it is my view that work remains to be done to recognise and better plan for the role of the VCS in any multi-agency response in London. As the VCSEP point out in their response to the 2021/2022 review of the National Resilience Strategy and the Civil Contingencies Act 2004¹³¹, the sector should not be seen as simply filling the gaps left by formal structures and statutory response organisations but be considered a vital part of a whole-of-society response to a major incident.
- 20.14. The VSP is a crucial mechanism through which nominated organisations with a remit for emergency response in London are harnessed (including the BRC, Cruse Bereavement Care, St John Ambulance and Faith Forums for London, among several others¹³²). Representatives from the panel (along with counterparts from the Faith and Belief Sector Panel) regularly attend and play a key role in Strategic Coordinating Groups (SCG, see chapter 13), convened in the event of a major incident where response (including consequence management and recovery) requires strategic multi-agency coordination.
- 20.15. This is reassuring and a marker of an important strengthening of the role of the VCS in preparedness and response, with clearer and formalised links with statutory authorities and agencies. I have been assured that the VSP is routinely involved in the multi-agency planning, testing and exercising of emergency response in the capital (see chapter 14), as explicitly guided in the capabilities document which promotes and raises awareness of the VCS contribution within London¹³³. This involvement would need to be recognised by the Joint CT Testing and Exercising team which I have recommended be set up (see chapter 14), to further strengthen partnerships and help ensure a pan-London, comprehensive testing and exercising programme is appropriately planned, prioritised and resourced.
- 20.16. It has, though, been put to me that scope exists to cast the net more widely with respect to drawing in very local networks and organisations when appropriate. It is important that the non-uniform nature of London’s VCS, which comprises a huge variety of organisations, is recognised: some are large, well-funded and operate pan-London, others are small and

¹³⁰ [Chapter-14-role-of-voluntary-sector-amends-10112011.pdf \(publishing.service.gov.uk\)](#) (accessed 14/12/21)

¹³¹ [National+Resilience+Strategy+A+Partnership+response+to+the+call+for+evidence.pdf.pdf \(squarespace.com\)](#) (accessed 14/12/21)

¹³² [LFB Letter \(london.gov.uk\)](#) (accessed 14/12/21)

¹³³ Ibid.

operate from hand-to-mouth with a much more locally focused borough, or even sub-borough, remit.

- 20.17. Many of the latter may not be known to City Hall, or even to the VSP or VCSEP, because they receive no central funding and operate within a narrow sphere. Yet they will have a significant role to play should a terrorist attack take place within their locus, perhaps trusted at a local level to an extent which larger organisations with no local presence are not.
- 20.18. Knowledge of the pan-London and borough level VCS landscape must be broadened. This would more effectively harness the capabilities of organisations beyond those who are officially part of the VSP (and strengthen links between those who are). **City Hall should provide the VSP with enhanced resources for a dedicated secretariat function** (R253). This would support building knowledge of and links into the VCS, including grassroots organisations across the capital, alongside strengthening partnerships with the emergency services and local authorities across all 32 London boroughs, plus the City of London. Local boroughs may additionally wish to consider whether similar resources are needed in their area.
- 20.19. Moreover, the Chair of the VSP should be formally recognised in protocols and chosen by the VCS. This role should be funded so the Chair's day job or own organisation does not suffer for their wider role. **City Hall should consider how best to fund the role, and the Chair of the VSP should automatically be included in emergency response forums and oversight bodies including SCGs when convened** (R254).
- 20.20. It has been put to me that **mapping the many and varied skills, capabilities and wider links held within the VCS would be a useful exercise in support of wider preparedness, at both pan-London and borough level. This exercise should be a priority for a strengthened VSP secretariat** (R255).
- 20.21. It has also been suggested that effective partnerships between the VCS and statutory organisations often rely upon individuals. Meaning there is a risk that without formal structures around them, partnerships may weaken and potentially disintegrate altogether with changes to personnel. A properly-funded VSP secretariat could arguably systematise information sharing, acting as a single point of contact to withstand staff changes in both the VCS and statutory organisations.
- 20.22. Finally, it is important that where the sector has been involved in incident response, it must be involved in debriefs and any wider lessons learned exercises. Wider collective knowledge of its role and actions alongside its own learning must not be lost. The LET, London Funders and NET have led a series of reviews exploring what worked well in funds distribution and where the challenges lay following the Grenfell Tower Fire in 2017, the terrorist attacks of that year and more recently the Covid-19 pandemic. **The LRF should work with the VSP and emergency services to ensure the findings from these reviews (led by the LET, London Funders and NET) help steer the development of future working practices and cross-sector preparedness considerations** (R256).

Harnessing offers of public help

- 20.23. Following any major incident, the generosity of Londoners across all communities is evident from the flood of offers from individuals and organisations seeking to give both their time and donations in kind to support the response effort. Harnessing such help is critically important in the immediate aftermath of a terrorist attack and beyond, but it requires significant coordination to ensure donations are appropriate and useable and offers of other forms of assistance are efficiently and effectively taken up.
- 20.24. It is important to plan in advance for offers of time and donations, including financial and other items which might be required by those directly affected by an attack. It is clear that unless there are very specific items needed, cash donations to nominated organisations whose role is to coordinate, collect and distribute financial aid are more effective in terms of supporting those who have been seriously injured or otherwise affected, and those who have been bereaved.
- 20.25. Not only do these organisations have swift and efficient mechanisms to disperse financial support, they are a 'safe' route for public donation, i.e. assurances are in place that the money will reach those it is intended to support. Their expertise also ensures that recipients of funds do not subsequently find themselves ineligible for state support as a result of receiving charitable gifts.
- 20.26. Following my previous Review, I am pleased the LET is now established as the primary distribution vehicle for charitable funds raised on behalf of those affected by its partners at the BRC and, in future, the National Emergencies Trust, in response to terror attacks and other major incidents in the capital. In practice the LET takes the initiative to activate in the event of an incident (alongside NET and London Funders) and alerts City Hall that it is doing so. This independence and agility is welcome and should continue: **City Hall may wish to consider safeguarding the arrangement whereby LET self-activate in response to a crisis through a memorandum of understanding** (R257).
- 20.27. Ensuring clarity and transparency for members of the public wishing to make donations is also important. The process must be straightforward, and arrangements be in place to swiftly stand up widespread advertising across mainstream online and offline channels. **Where convened, an SCG should work with the Mayor's Office and the LET to ensure clarity of content in communications regarding public donations and swift, multi-media presentation** (R258).
- 20.28. Similarly, in the aftermath of a terrorist attack the VCS can be overwhelmed by a flood of volunteers seeking to support the response. Individuals are often channelled to the sector via local authorities: where would-be volunteers are untrained and not appropriately checked as suitable, the desire to help risks being counter-productive. It can create a significant challenge for VCS organisations that risks distracting them from more immediately deploying their capabilities to support the response.
- 20.29. The BRC approach of building a list of 'community reserve volunteers' who are deployed according to two criteria seems sensible: i) they are always supervised by a BRC member of

staff or regular volunteer, and ii) they are not placed in one-on-one scenarios with anyone affected by an emergency. Not only does this enable volunteers to be deployed quickly and with confidence, any particular skills relevant to responding to a major incident can be identified in advance, allowing more nuanced deployment.

- 20.30. They can also be provided with advance training. And any army of volunteers, however, well trained or otherwise, requires a leadership and management cadre – ideally one which operates at borough level to support localised response efforts. **City Hall and the LRF may wish to consider how the VCS might be supported to identify and train such a volunteer management team, across London’s boroughs and key organisations. They should engage with the BRC who have such an arrangement in place for the community reserve volunteers** (R259).
- 20.31. Such arrangements, of course, will not prevent members of the public not pre-registered with any particular organisation from volunteering in the moment. **The LRF should work with City Hall to develop a website (with promotion across social media platforms stood up immediately when required) to advise those wishing to help or donate gifts and other items following an incident. This should be separate from any managed by the LET and other organisations coordinating financial aid, and from those intended for use by individuals directly affected by an attack.** (R260)
- 20.32. The helpline number should feature clearly in all response related public communications. Deployable immediately following an attack, these should advise spontaneous would-be volunteers how they can help, where they should go (almost certainly not to the scene of the incident) and be clear they may not necessarily be called upon in the immediate aftermath.

Information sharing

- 20.33. Information sharing (a common theme throughout this Review) is no less relevant when considering the role of the VCS in preparedness. Those affected by terrorism must be able to access charitable funds and service provision with the minimum of fuss: they should not have to provide proof of identity and of their experiences repeatedly as they navigate incalculable trauma and distress.
- 20.34. It was put to me that the VCS has struggled to access some of the data provided to public bodies involved in responding to a terrorist attack. This means individuals they support are often likely to have to repeat what has happened to them to enable organisations to carry out their humanitarian role effectively. The data sharing project led by the LRP is a positive and ambitious initiative which aims to resolve this long-standing issue, but in the meantime **the Terror Incident Needs Assessment (TINA) developed by Victim Support (see chapter 15) should be made available across key VCS partners where it is completed in advance of humanitarian assistance being offered** (R261).
- 20.35. Reluctance from the NHS to confirm to charitable partners that someone has received hospital treatment, and for how long, can complicate the process by which the LET is able to make charitable gifts to those affected by terrorism. **The LRPs data sharing project should**

consider how to recognise that the LET and other organisations can receive and handle sensitive personal data in accordance with necessary legislation, and reassure statutory bodies that those data can be passed to charitable organisations to facilitate specific actions such as making charitable gifts (R262).

- 20.36. The importance of mental health support was impressed upon me by all those representatives of the VCS who participated in this Review. Some elements of the model followed in response to the Grenfell Tower fire, which involved a dedicated Humanitarian Aspects Group, were considered to have worked well. The VCS specialists worked in partnership with local authority social workers and NHS mental health teams, with appropriate information sharing enabling them to swiftly offer support through local case workers. While there are no doubt lessons to be learned from how this approach worked in practice, **the LRF and VSP should consider a formal agreement to guide similar partnership working with respect to provision of mental health support in response to future major incidents** (R263).
- 20.37. Throughout the pandemic, the VCSEP has gathered, analysed and shared national level data from hundreds of charities on individuals they have supported. Working with a wide range of national and local level charities, this supported efforts to deliver food and other forms of assistance to those in need. In the event of a terror attack in London, this type of cross-sector endeavour would help ensure individuals do not fall through gaps and reduce risk of duplication of service provision.
- 20.38. I have been assured that the pan-London response to the pandemic has facilitated a strengthening of such coordination across the capital through the Funders, Communities and Voluntary Sector sub-group of the SCG convened to guide and oversee London's response to Covid-19. The sub-group includes representation from the wider voluntary sector, and it is important that the partnerships and relationships which will have formed and strengthened as a result of the pandemic focused endeavours are not allowed to dissipate but remain in place to reinforce a city-wide approach to preparedness and response to terrorism or other major emergencies.
- 20.39. Finally, the strategic, tactical and operational learning which the emergency services and other responders take from any major incident, including terrorism, is invaluable in enhancing future preparedness. **Key lessons from incident response debriefs should routinely be shared with approved VCS partners, via a strengthened VSP, where this does not already take place** (R264).

21. COMMUNICATIONS

- 21.1. Swift, clear communications between the emergency services and other agencies involved in responding to a terrorist attack (or any major incident) are essential. Similarly, communications from those leading the response to inform the public, businesses operating in the affected area (including operators of transport hubs) and the media (including online outlets) must be equally swift and clear, and set out what if any action to take. In the immediate chaos and trauma of a terrorist attack, effective communications save lives.
- 21.2. Strong and clear pre-emptive public communications are equally as important. They are a key part of preparedness, and, if regularly reinforced as part of daily life, can help prevent a successful attack through helping members of the public know what to look for and how to report suspicious items and activity. Furthermore, in the event of an attack which was not able to be prevented, prior advice and communications can help reduce its impact by raising awareness among the public about what to do and how to protect themselves should they be affected.
- 21.3. The importance of clear, unambiguous public communication has been thrown into very sharp relief by the Covid-19 pandemic. Public health depended (and continues to do so) on widespread understanding of the threat posed by the virus, the actions everyone was expected to take to keep themselves and others safe, and the raft of changing restrictions and laws with which the public was required to comply. If communications did not issue quickly enough, if content was not sufficiently clear and in sync with other official advice, the overarching messages risked becoming lost and misunderstood, with all the subsequent risk to behavioural compliance and threat to public health which that posed.

Police communications

- 21.4. As the emergency service with responsibility for communicating a terrorist incident requiring a coordinated multi-agency response, the police (both the Metropolitan Police Service, MPS, and City of London Police, CoLP) have a very significant responsibility. Once the decision has been made to respond to an incident as an act of terrorism (acknowledging this is not always a straightforward decision), it is crucial that public communications immediately clarify as much as possible to assuage likely public fears and manage the risk of reprisal attacks.
- 21.5. Public engagement and reassurance is a key element, meaning there is a key role for stakeholders with reach into local communities, including those with responsibility for discharging Prevent functions (see chapter 7). Those responsible for leading public communications, both within the MPS and the communications sub-group of the London Resilience Forum (LRF, see chapter 13) should, where possible, engage very swiftly key stakeholders and community leads when developing and issuing content in high profile, crisis scenarios. Central government communications functions should be engaged although primary responsibility should remain with London focused partners.

The role of social media

- 21.6. The UK is a digitally literate population, with social media a widespread part of life for the vast majority. Data suggests that in early 2021, 92% of the UK population aged 16 years and over personally used a smartphone¹³⁴, rising to 96% in London¹³⁵. And almost three-quarters (73%) of Londoners with a smartphone used the device to access social media sites and apps including Facebook, Twitter, LinkedIn and Instagram¹³⁶.
- 21.7. While most social media users use Facebook and / or Instagram, the former is often the main social media account among older adults. Younger people tend to be more varied in the sites and apps they use (with Snapchat, Reddit, TikTok and Twitch commonly featuring alongside Instagram and Facebook)¹³⁷. Twitter reportedly has almost 16.5 million users in the UK¹³⁸, representing around one quarter of the population.
- 21.8. Social media platforms therefore enable communications with many millions of people in a very efficient manner and should be utilised to communicate with the public in the event of an attack. While the MPS were relatively slow to issue information via social media channels following the attacks in the capital in 2017, they have improved their capabilities in this space. This enhanced capability is welcome and should be maintained, with the modes used regularly updated to ensure communications issue to the most current, popular platforms.
- 21.9. **Those responsible for issuing public content via police accounts must be suitably trained and enabled to do so swiftly** (R265). While accuracy in communications is paramount, speed is also crucial in both proactively alerting the public to an unfolding crisis and responding to debunk unfounded rumours and disinformation. The need to navigate multiple layers of clearance in such circumstances is unhelpful.
- 21.10. The ease with which inaccurate information can emerge as a major incident unfolds and become very widely shared online in a very short space of time must be recognised by the emergency services. It risks not only inducing unnecessary panic but inciting behaviour which may inhibit delivery of the emergency response. **The Government Communications Service (GCS) and the Department for Digital, Culture, Media and Sport (DCMS) should consider with communications teams in the MPS, London Ambulance Service (LAS) and London Fire Brigade (LFB) as well as City Hall how best to identify and counter misinformation and disinformation circulating in real time during and following an incident** (R266).
- 21.11. Outside of crisis communications, CT Policing (CTP) has invested in its social media presence in order to target content of specific campaigns towards residents of more heavily populated

¹³⁴ [Main Technology Tracker 2021 data tables \(ofcom.org.uk\)](https://www.ofcom.gov.uk/consult/condocs/main-tech-tracker-2021/main-tech-tracker-2021-tables/) (table 37, accessed 19/12/21)

¹³⁵ Ibid. (table 37, accessed 19/12/21).

¹³⁶ [Main Technology Tracker 2021 data tables \(ofcom.org.uk\)](https://www.ofcom.gov.uk/consult/condocs/main-tech-tracker-2021/main-tech-tracker-2021-tables/) (table 42, accessed 19/12/21)

¹³⁷ https://www.ofcom.gov.uk/data/assets/pdf_file/0025/217834/adults-media-use-and-attitudes-report-2020-21.pdf (accessed 19/12/21)

¹³⁸ <https://www.omnicoreagency.com/twitter-statistics/> (accessed 19/12/21)

parts of the country (i.e. those which are more likely to be at risk from terrorism). Intended to reinforce general messaging regarding public safety and reporting of suspicious behaviour (see below), this is a positive development and should equally continue to be resourced. **The MPS should consider the potential for more nuanced 'out-of-incident' social media messaging to Londoners, where such geo-targeting is possible, to complement other communication campaigns** (R267).

- 21.12. In London, a number of local Safer Neighbourhoods Teams now have their own Twitter accounts to enable them to communicate with local communities, build relationships and boost public confidence in and awareness of policing activity in their area. While, as above, the reach of Twitter is not as great as other platforms, this is positive and will support, in the event of a terror attack, distribution of locally relevant content, reassurance and guidance. **BCU Commanders should ensure all Safer Neighbourhood Teams are similarly equipped with Twitter accounts where not already to facilitate rapid re-tweeting of MPS and local authority communications in an emergency** (R268).
- 21.13. Use of social media has also been used to positive effect in the immediate response to a terror attack. For example, the Facebook page now operated by the MPS allows individuals to report that they are safe, reducing the number of calls into the Casualty Bureau (see chapter 15) from concerned friends and family members – where they themselves have Facebook accounts which they can check for updates. Recognising the range of social media likely to be used by different sectors of London's population, however, it is important for online communications to be issued across a range of platforms to maximise reach. And offline communications remain equally as important to ensure those without accounts receive accurate and timely messaging.

Communicating with the public about terrorism

- 21.14. The Covid-19 pandemic has, as I have highlighted throughout this report, given rise to a number of challenges from a preparedness perspective and continues to do so. Although London, like the rest of the country and indeed the world continues to grapple with the pandemic, as society opens up (admittedly on a non-linear trajectory in response to evolving strains of the virus) there is a need to re-establish habits of vigilance – across the general public as well as those whose role involves some element of security provision (see chapter 18).
- 21.15. The CT-focused public campaigns of 'See It. Say It. Sorted.' and 'Run, Hide, Tell' (see Figure 18) should certainly continue to operate. However, **the GCS, in partnership with the National Counter Terrorism Security Office (NaCTSO) and the Centre for the Protection of National Infrastructure (CPNI) should consider expanding communications strategy to encompass themes beyond the reporting of suspicious items or activity and of protective action in the event of an attack** (R269). Explicit, widespread, proactive public messaging which empowers communities of all kinds to understand basic principles of radicalisation and grooming, and supports those vulnerable to such influences, should become an additional focus.

Figure 18: 'See It. Say it. Sorted.' and 'Run, Hide, Tell'.



'See It. Say It. Sorted.' aims to prevent a terrorist attack taking place. A nationwide campaign, it launched in 2016 to encourage train passengers (including on the London Underground) and station visitors to report unusual items and behaviour.

Deployed through a range of posters on trains and around stations, via social media and other advertising channels alongside regular public announcements, the campaign aims to encourage the public to help keep themselves and others safe by reporting anything unusual, or suspicious.

They are directed to raise concerns with rail staff or a police officer, to text British Transport Police or to call a freephone number to report any unusual items or activity across the network.



'Run, Hide, Tell' was launched by the UK National Police Chiefs' Council in 2015 following the marauding terrorist attacks in Paris that year.

Communicated via a short Stay Safe film and accompanying leaflet for pre-emptive education, the guidance aims to help anyone caught up in such an attack to protect themselves.

It is also issued by the police in the event of an attack, via their social media channels.

21.16. While both these campaigns have existed for a number of years, there is limited evidence on public cut through and the extent to which either has affected understanding of the risk of terrorist attacks or impacted on protective behaviours adopted by the public.

- 21.17. However, I am pleased to note that recent research¹³⁹ has sought to fill this gap. Findings suggest that 'See It. Say It. Sorted' is effective in encouraging the public to report suspicious behaviour in train stations to a member of rail staff or a police officer, as directed via the campaign. The study also found, however, that a majority of respondents would consider flagging concerns to staff working in station cafes and retail outlets.
- 21.18. I have been assured that station retail staff are provided with a CT briefing as part of induction into their role (based on the National Counter Terrorism Security Office (NaCTSO) 'HOT' principles¹⁴⁰, i.e. is an unattended item 'Hidden', 'Obviously Suspicious' or 'Typical'). This supports them in identifying potentially suspicious items, and like station staff they are also provided with the 'WHAT' framework (see chapter 8) to help them assess possibly risky behaviours and gather relevant information.
- 21.19. **Station retail staff should also be encouraged to undertake the ACT – Awareness training (see Figure 8) and be provided with specific guidance on how to respond to reports from the public of suspicious items and activity. Network Rail and Transport for London (TfL) should ensure all outlets operating within (underground and overground) station premises are appropriately equipped to enable staff to both proactively identify and rapidly respond to reports from the public of suspicious behaviour (R270).**
- 21.20. Moreover, while 'See It. Say It. Sorted.' is used widely across London's rail network (encompassing underground and overground trains, the Docklands Light Railway and the tram system), it is less visible across the bus and coach network (limited to a presence in the larger bus and interchange hubs). Meaning those Londoners who make most, if not all, of their journeys by bus will have limited if any exposure to the campaign.
- 21.21. This should be remedied - the campaign is an important part of creating and maintaining a wider culture of vigilance across the travelling public and as such, is a valuable part of London's protective security toolkit. **The Department for Transport (DfT) should work with TfL to ensure 'See It. Say It. Sorted.' features across the bus and coach network (including on buses and in bus shelters) in a similar fashion to the rail network (R271).** It will need to reflect an alternative mechanism for reporting concerns as the bus network, unlike the rail network, is not policed by the British Transport Police but falls within the MPS remit.
- 21.22. **TfL may also wish to consider promoting the campaign in the regular emails it issues to customers which provide updates regarding the current status of the transport system across the capital (R272).**

¹³⁹ Pearce, J.M., Parker, D., Lindekilde, L., Bouhana, N. & Rogers, M.B (2020). Encouraging public reporting of suspicious behaviour on rail networks, *Policing and Society*, 30:7, 835-853, DOI: [10.1080/10439463.2019.1607340](https://doi.org/10.1080/10439463.2019.1607340) and summarised in Rogers, M.B., Pearce, J.M., Parker, D. & Lindekilde, L. (2021). Communicating Effectively with the Public about Terrorism in Crowded Places. *CREST Security Review*, Issue 11.

¹⁴⁰ [HOT Poster NaCTSO \(publishing.service.gov.uk\)](https://publishing.service.gov.uk) (accessed 10/01/22)

- 21.23. Research has demonstrated the importance of public understanding of the relationship between suspicious behaviours such as hostile reconnaissance and attack planning¹⁴¹. Compared with more overt criminal activity such as pickpocketing or car theft, there is likely to be more uncertainty regarding behaviours which may not – to a lay person – seem suspicious and indicative of criminal intent.
- 21.24. And such uncertainty can act as a barrier to reporting. Future iterations of CT communications campaigns designed to encourage public reporting should overtly set out examples of what constitutes suspicious behaviours and why, to help reduce uncertainty. The benefits of reporting particular behaviours should be more clearly articulated – wider evidence suggests this is key particularly in public communications regarding extreme events¹⁴².
- 21.25. There is a gulf between lay understanding and official expectations of what should be done in various circumstances. In particular, the general public remain confused by the official terrorist threat levels, devised and issued by the Joint Terrorism Analysis Centre (JTAC, see chapter 1). Most people are largely unclear on what the different levels mean for them in terms of their own choices and behaviours and what they should look out for more widely. **The Home Office (HO) may wish to explore understanding of threat levels further, in partnership with JTAC, and use findings to inform future iterations of national public communications regarding threat (R273).**
- 21.26. There have also been recent efforts to understand the impact of ‘Run, Hide, Tell’, which is a campaign designed to prepare people in advance of an attack so that those affected are already familiar with what their immediate actions should be. Research indicates that reassuringly, the guidance does not – contrary to one school of thought – increase the perceived risk of terrorism among the public and raise anxieties. Rather, it strengthens public trust in the preparedness of the security services to respond to terrorism, and in the perceived quality of police advice for keeping people safe during an attack¹⁴³.
- 21.27. The campaign was found to both encourage protective behaviours (running to find somewhere to hide) and to discourage intention to engage in risky behaviours (such as searching for a companion or calling someone who may be caught up in an attack and hiding). However, research also demonstrated high levels of intent among participants to call the police once they found somewhere to hide - which under certain circumstances might risk giving away their position. As the research notes, the ‘Run, Hide, Tell’ messaging could be

¹⁴¹ Pearce, J.M., Parker, D., Lindekilde, L., Bouhana, N. & Rogers, M.B (2020). Encouraging public reporting of suspicious behaviour on rail networks, *Policing and Society*, 30:7, 835-853, DOI: [10.1080/10439463.2019.1607340](https://doi.org/10.1080/10439463.2019.1607340) and summarised in Rogers, M.B., Pearce, J.M., Parker, D. & Lindekilde, L. (2021). Communicating Effectively with the Public about Terrorism in Crowded Places. *CREST Security Review*, Issue 11.

¹⁴² Pearce, J.M., Lindekilde, L., Parker, D. & Rogers, M.B. (2019). Communicating with the public about marauding terrorist firearms attacks: Results from a Survey Experiment on Factors Influencing Intention to “Run, Hide, Tell” in the United Kingdom and Denmark. *Risk Analysis*, 39(8), 1675 – 1694 and summarised in Rogers, M.B., Pearce, J.M., Parker, D. & Lindekilde, L. (2021). Communicating Effectively with the Public about Terrorism in Crowded Places. *CREST Security Review*, Issue 11.

¹⁴³ Ibid.

clearer with regard to the need to avoid making calls once hidden, unless certain it would not alert the perpetrator(s).

- 21.28. This study suggested further considerations for future iterations of public communications in the CT space. In particular, there may be less need than is commonly assumed to include extensive reassurance that marauding terrorist attacks are rare and the police are well prepared to respond. Assumptions of public panic are suggested to be empirically inaccurate – meaning space in communications material could be more effectively used for providing more detailed, actionable guidance with a clear rationale¹⁴⁴.
- 21.29. Elsewhere, research has compared the efficacy of ‘Run, Hide, Tell’ to the ‘Run, Hide, Fight’ message¹⁴⁵. Reference to ‘fight’ as a last resort is consistent with the US approach and has been adopted elsewhere, including in Norway following the two sequential terrorist attacks in 2011 in Norway, which killed 77 people and injured hundreds more. The second of these, where the perpetrator opened fire against summer camp participants, showed that it is not always possible to avoid confrontation and to hide.
- 21.30. Critics of ‘Run, Hide, Tell’ have argued that it risks discouraging people from taking action that could minimize casualties. Critics of ‘Run, Hide, Fight’, on the other hand, suggest it risks encouraging behaviour that acts against the protective elements of running and hiding. While research showed that both messages were likely to have a positive effect on intended protective behaviours among those shown the campaigns (compared to intent of those who were not), the latter approach was, importantly, not found to encourage unwanted risky behaviours.
- 21.31. ‘Run, Hide, Tell’ however, reportedly increased the risk of passivity in situations where more pro-active reactions might be beneficial. **Development and testing of additional messaging on what to do where it is not possible to avoid confrontation would be beneficial: NaCTSO should work with the CPNI and the GCS to explore this (R274).**
- 21.32. Finally, the premise of ‘Run, Hide, Tell’ is also somewhat at odds with the need for individuals caught up in an incident where chemical, biological, radiological or nuclear (CBRN) weapons have been deployed to remain in place in case of decontamination requirements. As I recommend in chapter 12, this conflict should be remedied with alternative additional public messaging developed and tested.
- 21.33. Exposure to ‘See It. Say It. Sorted’ and ‘Run, Hide, Tell’ in London largely depends on use of public transport and familiarity with wider CT training and guidance. There is likely to be

¹⁴⁴ Ibid.

¹⁴⁵ Lindekilde, L., Pearce, J., Parker, D. & Rogers, B. (2021). “Run, Hide, Tell” or “Run, Hide, Fight”? The impact of diverse public guidance about marauding terrorist firearms attacks on behavioral intentions during a scenario-based experiment in the United Kingdom and Denmark. *International Journal of Disaster Risk Reduction*, 60(15), 1-9 and summarised in Rogers, M.B., Pearce, J.M., Parker, D. & Lindekilde, L. (2021). *Communicating Effectively with the Public about Terrorism in Crowded Places*. CREST Security Review, Issue 11.

scope, therefore, to extend awareness, similar to that promoted to businesses via the MPS's 'Shield' app (see chapter 17): **City Hall should explore the feasibility of developing a free to download app for Londoners and visitors, similar to that developed by the MPS and others (including the Victoria Business Improvement District, see chapter 17), to provide accessible and easily updated security related guidance** (R275). This would help demonstrate a wider commitment to strengthening a culture of resilience across the capital.

- 21.34. **Consideration should also be given to rolling out the 'See It. Say It. Sorted' and 'Run, Hide, Tell' campaigns in other high footfall publicly accessible locations (PALs) such as shopping centres, where it is not already present** (R276).

Post-attack communications

- 21.35. Public communications in the aftermath of an attack are a crucial part of the wider response in seeking to inform, reassure and mitigate risk of retaliatory attack. Accurate information regarding what happened, who was responsible, how the emergency services and other category one responders dealt with the attack, and the scale of injury and any loss of life must be issued swiftly.
- 21.36. Official communications will inevitably have to do battle with the wealth of misinformation, disinformation and hate-speech which commonly circulate in the aftermath of any terrorist attack¹⁴⁶. This develops and spreads rapidly and **the HO should encourage social media platforms to have a clear communication plan in place to deal with misinformation, disinformation and hate-speech following an attack** (R277).
- 21.37. This requires platforms to be clear about the accuracy or otherwise of content. As the lead responder in the case of a terrorist attack in London, the police (MPS and / or CoLP) must make an authoritative statement and issue it to platforms as soon as possible, with subsequent updates where necessary, to allow them to disentangle likely misinformation and disinformation from truthful reporting and take appropriate action. **The HO should encourage social media platforms to provide current, single points of contact to the police to facilitate swift information sharing in the event of an attack** (R278).
- 21.38. There is of course a balance to be struck between the speed of information issued by authorities and accuracy. However, in the interests of limiting the likely proliferation of inaccurate content in the absence of official messaging from trusted agencies, **following a terrorist attack in London the Mayor, in partnership with the MPS, should continue to issue an initial response across key social media platforms in addition to mainstream offline news outlets. Regular updates should follow to provide both public reassurance and, where appropriate, details of any investigation as information comes to light** (R279).

¹⁴⁶ [GNET-Report-Fogging-And-Flooding-Countering-Extremist-MisDisinformation-After-Terror-Attacks.pdf \(gnet-research.org\)](https://www.gnet-research.org/reports/gnet-report-fogging-and-flooding-countering-extremist-misdisinformation-after-terror-attacks.pdf) (accessed 20/12/21)

22. HARNESSING SCIENCE AND TECHNOLOGY

- 22.1. The five years since my previous review have seen huge leaps forward in terms of technology in all walks of life. These, of course, are not confined to use for public good: those with malign intent are equally capable of understanding and harnessing the possibilities brought by technology to cause harm. It is therefore incumbent on all those responsible for keeping London and Londoners safe to do so with an open mind as to how protection and preparedness can be enhanced through the understanding and adoption of new developments.
- 22.2. That said, deployment of new technology to mitigate risk of terrorist attack and manage the aftermath must be done with careful consideration of associated frameworks and guidance. It is not unusual for technological development to outpace that of the policy, ethical and legal parameters which must govern its use. Similarly, public understanding and acceptance are likely to lag behind what has become available and feasible. This is particularly the case when there are perceived risks around infringement of civil liberties, which I discuss further with respect to automated facial recognition technology below. Open and accessible public debate is crucial, but it must be well-informed and current so as not to hold back appropriate and effective use of emerging technologies to enhance safety.
- 22.3. More broadly, government should seek to move more quickly to facilitate use of new and approved technology. For example, I have heard about counter-drone measures which London's airports have now been in a position to trial for some years (expedited following the drone sightings close to the runway at Gatwick in late 2018 which caused over 1,000 flights to be cancelled and affected more than 140,000 passengers). Appropriate and updated policy and guidance to facilitate their use, however, remain absent.

Emergency Services Communications

- 22.4. While technology has moved forward rapidly, I am disappointed the same cannot be said for development and delivery of the long-awaited replacement for Airwave, the reliable but aging radio communications system upon which emergency services across the country continue to rely. Implementation of the 4G Emergency Services Network (ESN) has been dogged by delays and far from all users transitioning by 2020, as I was assured during my previous Review, at the time of writing the intention is for the transfer process in London to begin, allegedly, in early 2025. Seeing will be believing. As a result, the Home Office (HO), who are responsible for the

ESN programme, have extended the Airwave contract to cover the delay¹⁴⁷. This continues to incur very substantial costs.

- 22.5. The terror attacks perpetrated in London since my last review have, however, allowed for further understanding of the functionality which ESN should seek to provide. The delay to the roll out thus provides opportunity for this necessary functionality to be built in. The inquest into the attack at London Bridge in 2017 noted that parallel transmission of urgent messages by multiple responders were unable to be heard. A likely scenario in the event of a multi-site attack, I endorse the Chief Coroner's recommendation that the ESN should seek to address this via a mechanism to enable urgent assistance messages transmitted simultaneously to be isolated, recorded and listened to by emergency service control room staff so the information is not lost¹⁴⁸. **The HO should ensure the infrastructure suppliers of ESN build into the software the capability to isolate and retain urgent messages transmitted in parallel** (R280).
- 22.6. While ESN offers a number of advantages over Airwave, particularly around sharing data and imagery, the overriding function must be voice capability. All three emergency services have impressed upon me the paramount importance of clear and immediate voice communication in responding to any major incident - multiple channels must be accessible simultaneously. Data in these circumstances is useful but not more important than critical real time two-way voice communications, particularly in firearms operations – indeed, if necessary, data can be delivered via alternative means. **The minimum viable product must therefore be no less operable than Airwave in terms of voice communications and unless the HO, in conjunction with the provider, can provide a cast-iron guarantee of this then no switch to the new ESN should be contemplated** (R281).
- 22.7. There are some concerns about the availability of the 4G network in some parts of London, particularly for in-building locations, and while the system is intended to be operable on the London Underground (LU) and initial testing returned positive results, subsequent testing must include not only all LU lines but other deep tunnels which run underneath London, such as the Blackwall Tunnel and parts of the High Speed rail line out of St Pancras station, along with the under surface spaces at the airports.
- 22.8. As I recommended previously, **Airwave must not be switched off in London until ESN has been comprehensively tested by all three emergency services (particularly the Metropolitan Police Service, MPS, who make up a majority of users), the British Transport Police (BTP) and Transport for London (TfL). The ESN must meet their varying operational requirements on a day to day basis and at times of peak demand. It should be tested extensively in incident response and time must be allowed to collect detailed feedback and make necessary adjustments, which is likely to require an extensive period**

¹⁴⁷ Following consultation, in October 2021 the Competition and Markets Authority launched a market investigation into the supply of the Airwave network: [Mobile radio network services - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/news/competition-and-markets-authority-launches-market-investigation-into-airwave) (accessed 08/11/21).

¹⁴⁸ [Microsoft Word - Determinations - individual personal narratives FINAL.docx \(independent.gov.uk\)](#) (MC16, p.41, accessed 08/11/21).

of dual running. It must be tested in a wide variety of locations (R282), including at London's airports, across the entire LU (as above) and within buildings at the very edges of cells. Assurance processes must cover capability to cope with the very heavy demand likely in responding to a major incident in the capital.

- 22.9. The resilience of the service must similarly be assured, to demonstrate system capability for rapid recovery from any fault or unexpected event. As the ESN will be using the 4G network, it is important that any general overload of this network does not impinge on the effectiveness of the ESN. At present, the Airwave network can be supplemented through use of mobile telephones if necessary. However, the ESN will be using the same network as mobile telephones, so potentially a network problem will affect both. **The HO must ensure alternative fallback mechanisms are available in the event of any limitation of the ESN** (R283).
- 22.10. While not related to communications between the emergency services, the widespread flooding experienced across London in 2021 prompted a very high number of 999 calls from the public requesting an emergency services response. Demand was such that British Telecom (BT) were unable to cope, prompting them to issue a holding message to callers. This highlights a capacity issue which may equally become a problem in the event of a very major terrorist attack: **BT should review the resources available to support the 999 service and consider how they can respond effectively to sudden surges in the number of calls** (R284).

A Public Alerting System

- 22.11. Emergency alerts in the event of a major incident can be crucial in helping the public adopt behaviours to help them stay safe. I explore public communications campaigns in chapter 21 but here, consider specific real-time public warning capabilities. Technology has been available for many years which enables threat alerts to be issued to all mobile phones located within a defined geographical area (without the need for owners to opt-in).
- 22.12. As I pointed out in my previous Review, multiple countries use such location-based public warning systems to encourage the public to take action to keep safe in the face of a range of threats including those of an environmental nature (e.g. flooding, storms) as well as terrorism. One such system was trialled by the Cabinet Office (CO) in 2013 and in April 2014 it was reported to have worked well and been well-received.
- 22.13. Nevertheless, despite evidence overseas that such systems have been effective in saving lives, little happened for seven years despite it being raised repeatedly in Parliament. Following further trials, the Government has now decided that an alert scheme based on the cell broadcast (CB) technology used for flood alerts by the Environment Agency should be rolled out nationwide. This progress, albeit rather long-delayed, is very welcome.
- 22.14. However, I have concerns regarding the use of CB technology as a multi-hazard alerting capability. In reaching this conclusion, I have benefited considerably in my considerations of this aspect of preparedness from the expertise of the former National Director of Australia's

'Emergency Alert Program'¹⁴⁹. He pointed out that while CB offers significant public safety benefits in case of hazards such as floods, in the case of, for example, a marauding terrorist attack, it in fact runs counter to widely publicised communications campaign directing people to 'Run-Hide-Tell'.

- 22.15. A CB system triggers a loud alarm that cannot be silenced until the mobile phone user acknowledges it by selecting 'Dismiss' and it sounds regardless of the device being in 'silent' mode. For anyone hiding from an attacker, the alert will create a very real and significant risk of their location being revealed. Indeed, lessons learnt following the terrorist massacre on the Norwegian island of Utøya in 2011 led the UK National Police Chiefs' Council to explicitly clarify that 'Hide' in 'Run-Hide-Tell' means: *"It's better to hide than to confront. Remember to turn your phone to silent and turn off vibrate."* For the police to use the CB system in case of a terror attack would therefore contradict their own public safety advice.
- 22.16. 'Location-based SMS' (LBSMS) offers an additional mechanism for public alerts which, unlike CB, does not override mobile settings. The alert can thus be silenced in advance in accordance with 'Run-Hide-Tell'. A hybrid platform, whereby the emergency services can choose between CB and LBSMS, is possible and indeed France, The Netherlands, and Australia plan to upgrade to hybrid systems in 2022.
- 22.17. I accept the benefits of CB for wide-area alerting in case of floods and storms, which are likely to be greater than the risk of compromising anyone in hiding should they have any need to do so at the time an alert sounds. However, it is not an acceptable mechanism for use during a terrorist attack where to do so risks putting people in hiding in avoidable danger. **The Cabinet Office should take advantage of learning from international use of public warning systems and as part of the next phase of the alerting trial, move to develop hybrid functionality to build an optimal system for all types of major incident affecting public safety. This should also consider how to alert those for whom English is not a first language and, recognising that places of worship may represent a target for terrorists (see chapter 19), how to ensure those attending places of prayer have a rapid means of receiving real-time information** (R285).

CCTV

- 22.18. Comprehensive CCTV coverage of London's public spaces provides both an intrinsic part of protective security and a primary line of enquiry in police investigation. While it does not replace the benefits conferred by human eyes and ears in terms of real-time identification of suspicious activity and subsequent alert or action, it is an important complement and in some instances, cameras are able to provide live feeds onto portable devices used by police patrols. CCTV very significantly broadens the scope of monitoring and is a primary deterrence tactic, not just of terrorist activity but criminal and anti-social behaviour more widely.
- 22.19. Having also noted the importance of effective and comprehensive CCTV networks in my previous Review, I am concerned by the suggestion put to me that local authorities across the

¹⁴⁹ Michael Hallows, previously Emergency Services Commissioner (Victoria, Australia).

capital have since disinvested in CCTV networks as they seek to respond to funding shortfalls. Given that terrorist attacks in London have not been confined to central locations, this represents a significant risk to effective security and enquiry (see chapter 7).

- 22.20. Need for this is further heightened in light of the inquest into the terrorist attack at Manchester Arena in 2017, which has identified several lessons regarding the coverage and operation of CCTV. The very significant role played by the blind spot in which the perpetrator was able to remain unnoticed in advance of his attack is highlighted by the finding that had it been addressed, it is likely the attack would have been disrupted, deterred or, at the least, fewer people killed and injured¹⁵⁰.
- 22.21. It is, however, not possible to take mitigating action against blind spots without knowledge of where they are. And installing additional cameras is not in itself sufficient - monitoring of footage by trained individuals is crucial otherwise the technology is arguably rendered pointless for anything other than after-the-fact identification.
- 22.22. With the advent of the Protect Duty (see chapter 3) in mind, **local authorities and the MPS, in partnership with local business owners (including via Business Improvement Districts where they exist) should work together to map blind spots and take appropriate action to ensure the provision, management and monitoring of CCTV across public spaces is comprehensive and coherent. Where possible, privately owned cameras should feed into monitored networks** (R286)– security must be understood as, and seen to be, a concern of and responsibility for the community as a whole.
- 22.23. For some outer London boroughs, additional cameras installed in support of the recent extension of the Ultra-Low Emission Zone (ULEZ) offer further opportunity for efficient multi-purpose monitoring. A comprehensive data sharing agreement already allows the MPS to access metadata generated by TfL's Congestion Charge, Low Emission Zone, Ultra-Low Emission Zone and Journey Time monitoring cameras. I was pleased to hear that work is progressing to add the additional ULEZ cameras into this agreement.
- 22.24. Access to metadata generated from the current suite of cameras allows the MPS to make post-hoc requests for specific images when the need arises. A number of the cameras are being replaced and TfL and the MPS have taken this opportunity to develop a welcome amendment to the data sharing agreement to allow the MPS direct access to real-time images in high crime areas. **Consideration should be given to extending this real-time MPS access to those TfL cameras monitoring areas which contain targets likely to be considered high-value from a terrorist perspective** (R287).
- 22.25. More generally, publicly owned CCTV networks should be able to cooperate. This means CCTV operatives of different organisations should be able to access, and be trained in monitoring, a range of feeds including those from local authorities and TfL, where data sharing legislation permits. The MPS Government Security Zone (GSZ) Information Room, for example, ingests

¹⁵⁰ [Closed Circuit Television monitoring – Manchester Arena Inquiry](#) (accessed 08/11/21)

feed from CCTV which monitors the GSZ footprint in the City of Westminster. Monitored on a 24/7 basis using trained police officers and staff, the capability is designed to automatically receive input from additional cameras set up within the zone.

Automated Facial Recognition

22.26. Automated facial recognition (AFR) technology has been in use for some years. Deployed via e-gates at UK borders, to facilitate image 'tagging' on social media websites and, more recently, as a means of authentication for digital devices, it has been trialled by police with the aim of identifying suspects and preventing crime at large events through comparison of individuals' facial features in real time with images held on a 'watch list'.

22.27. Trialling has been led by South Wales Police (SWP) who are the national police lead on AFR. Between 2017 and 2019, the force deployed the technology at a variety of large public events, and the MPS also conducted several trials between 2016 and 2018. Use of AFR is not without controversy and both forces had their trials independently reviewed¹⁵¹. While aiding a number of arrests, use of the technology available at that time raised several concerns:

- It generated a high number of false matches and studies suggested a racial and gender bias in the way matches were generated. This meant the faces of black and Asian people, and women, were more likely to be incorrectly matched with those on watchlists¹⁵².
- The legal and oversight framework was weak with inadequate legislation governing use of AFR and heavy reliance on the user (i.e. the police) self-regulating.
- Because AFR scans the faces of all those passing through the public space it is monitoring, many argued this represents a disproportionate encroachment on privacy rights of innocent members of the public.

22.28. Current AFR technology has significantly improved since those trials. It is now capable of operating with very minimal bias and of handling, with high levels of accuracy, poor quality images as well as instances where faces are partially covered.

22.29. Nevertheless, the development of the technology continues to outpace considerations governing its use and the purposes for which it can legitimately be deployed. Regulatory and legislative frameworks which appropriately and adequately balance public good with ethical and privacy concerns remain weak or lacking. In terms of privacy, the adoption of AFR by SWP has been successfully challenged with the Court of Appeal ruling in 2020 that use of the technology was unlawful¹⁵³. The claimants appeal was allowed on three out of the five grounds raised.

¹⁵¹ See [Police use of live facial recognition technology: Challenges and concerns \(parliament.uk\)](https://www.parliament.uk/publications/2020/08/08) (accessed 09/11/21)

¹⁵² [ethical issues arising from the police use of live facial recognition \(publishing.service.gov.uk\)](https://www.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/874447/ethical-issues-arising-from-the-police-use-of-live-facial-recognition.pdf) (accessed 09/11/21)

¹⁵³ <https://www.judiciary.uk/wp-content/uploads/2020/08/R-Bridges-v-CC-South-Wales-ors-Judgment.pdf> (accessed 20/01/22)

- 22.30. I am persuaded of the potential value of AFR in terms of preparedness for a terrorist attack – certainly its capacity to scan millions of images in real time means it has potential to augment human capabilities at significant pace and scale. The ability to automatically scan very large crowds amassing in public spaces and at large events across London to identify any persons known to represent a terrorist threat could be a valuable part of the wider protective security toolkit in terms of informing those whose job it is to keep the public safe. It has potential, too, for managing risk through identifying individuals present where they should not be, for example airside in an airport without authorisation. Here, the lack of a match against a database of cleared individuals would raise the flag.
- 22.31. And I have heard about its value in wider crime prevention, for example in helping businesses drive down instances of shoplifting and pickpocketing through the use of watch lists of known offenders. When such an individual enters a premise, following a positive automatic match to a watchlist (and in most instances a subsequent check by a human moderator), an alert is issued to staff to allow them to focus security accordingly and I have heard powerful accounts of the value of this in discouraging crime.
- 22.32. Importantly, it reduces the need for staff to challenge someone attempting to leave with stolen goods which can create situations that quickly escalate. In actively making themselves visible to a potential offender before they attempt to commit an offence, staff can effectively deter the behaviour.
- 22.33. Use of AI in such contexts is compliant with data protection legislation (and passes the ‘substantial public interest’ test) and I have been assured that accuracy rates are around 98% or higher.
- 22.34. I acknowledge that AFR is not a panacea. It will not, for example, pick up the would-be terrorist in a public crowd who is not behaving out of the ordinary and is hitherto unknown to authorities (unless, as above, they are somewhere they shouldn’t be). And where I do consider it to have potential, that is dependent on the technology being accurate, free from bias (and trusted to be so), and subject to appropriate legislation and independent regulation.
- 22.35. As the UK’s Information Commissioner has recently pointed out¹⁵⁴, building public trust and confidence in the way personal information is used is crucial so the potential benefits offered by AFR, including for law enforcement purposes, can be realised. Research¹⁵⁵ suggests that while public awareness of AFR technology is high, knowledge about it is low, particularly with respect to its limitations, and that support for police use of AFR depends upon appropriate safeguards being in place.
- 22.36. The lack of publicly available data regarding accuracy rates, bias and the basis for inclusion on watch lists is unhelpful in terms of facilitating full and frank debate about whether and how

¹⁵⁴ [ico-opinion-the-use-of-lfr-in-public-places-20210618.pdf](#) (accessed 09/11/21)

¹⁵⁵ [Beyond face value: public attitudes to facial recognition technology | Ada Lovelace Institute](#) (accessed 09/11/21)

the potential of AFR could and should be harnessed. From a law enforcement and preparedness perspective, there are tremendous potential benefits for AFR data to be combined with data from other sources, such as drones, CCTV and Automatic Number Plate Recognition (ANPR) systems. This must also be considered in a transparent way so that potential gains to public protection and security can be set against the possibility of heightened risks to privacy.

- 22.37. Ultimately, the use of AFR must be fair, necessary and proportionate and I share concerns expressed by others, including the Information Commissioner, regarding the potential for its use to progress unfettered by sufficient regard to the nature of the public good set against privacy, consent and governance. However, as I have set out, I am of the view that it has potential to significantly augment the way in which the public is kept safe.
- 22.38. AFR technology, alongside others, will continue to develop at pace. It would be wrong if the ability of those trying to prevent harm to the public is inhibited by a public debate that is ill-informed or out-of-date. It is therefore incumbent on the police and other agencies to work closely with the regulatory authorities to counter misinformation and to explain the importance of various measures in terms of improving preparedness.
- 22.39. **Any use of AFR by the MPS must be overseen by an Ethics Panel and there must be review mechanisms in place** (R288) to ensure any implementation and operational issues are identified and reconciled as quickly as possible, with mitigations in place to manage the risk of unintended consequences.

Drones and counter-drone capabilities

- 22.40. Unmanned aerial vehicles (UAVs) - or drones - are navigated by a GPS tracking system and can be remotely controlled to fly anywhere within a specific radius. Increasingly adopted for personal and recreational reasons, they are also being adopted for agricultural purposes, commercial filming and by the emergency services in some limited situations (including supporting searches for missing persons and crime investigation).
- 22.41. There is no doubt that as the technology develops, use of drones will increase substantially in the coming years. In 2018, PWC estimated that by 2030, 76,000 drones could be operating across UK skies¹⁵⁶, carrying goods and people in addition to performing routine photographic, monitoring and assessment duties across a wide range of sectors.
- 22.42. Of course, drone technology is not deployed and developed only by law abiding users for legal purposes. Drones have been used for some years to drop contraband into prisons, and the sighting of a drone at London Gatwick airport in late 2018 caused several days of chaos and security related concerns.
- 22.43. And as the world becomes more technologically advanced, so do terrorist organisations and their supporters. Drones have been employed by terrorists for some time, including by Daesh

¹⁵⁶ [Drones-impact-on-the-UK-economy-FINAL.pdf \(pwc.co.uk\)](#) (accessed 09/11/21)

in Syria and Iraq for offensive as well as for information-gathering purposes. Indeed, in November 2021 an exploding drone was aimed (likely by militia forces) at the Iraqi prime minister's house. While it failed to harm him, the case highlights how drones can be deployed for harmful purposes.

- 22.44. And while the threat to London should not be inflated, it is equally important to recognise the capabilities of terrorist groups to overcome the relatively low barriers to entry for understanding, procuring and harnessing drones for malign intent. And while, for example, the likelihood of a terrorist attack involving drone dispersal of chemical or biological agents in a crowded location is unlikely, its consequences would be very severe indeed.
- 22.45. In terms of the threat to London, the city's air space is heavily restricted – although in itself this does not of course prevent use of a drone for terrorist purpose. This gives rise to my recommendation in paragraph 22.47 below. Legislation in place since 2019 makes it illegal to operate a drone within a five km radius of an airport: given the locations of London Heathrow (LHR) and City (LCY) airports, this means large swathes of the capital are covered and extension from the previous one km radius is welcome. That said, airports must still retain counter-drone capabilities and acknowledging the chaos previously caused at Gatwick, as indicated in chapter 10, LHR and LCY should ensure such functions are in place and properly resourced.
- 22.46. A permanent geo-fence is in place around the GSZ. This restricts drones from flying above and into this particularly sensitive area of the city which is likely to be considered a high-value target by malign actors. However, said actors are adept at finding ways around obstacles created by law enforcement and the MPS must ensure the geo-fence keeps pace with drone manufacture so it remains capable of withstanding incursion from the different types of device available.
- 22.47. **It is therefore crucial that London's small but expert counter-drone capability, set up in the MPS following what happened at Gatwick, is at the very least maintained. This must be available on a 24/7 basis** (R289). Originally CT focused (it is housed in Protective Security Operations, PSO, see chapter 4), the remit of the function has since widened to support countering the use of drones against prisons. While I welcome such cross-cutting functionality, this must not dilute its original CT capabilities: the unit must be resourced to handle CT and other concerns and able to respond swiftly to diversification in the nature and type of drones available which may require amended counter-technology in response.
- 22.48. The MPS is exploring what London's future counter-drone capability should look like, recognising that use of drones, and the threat they represent, will continue to rise. The approach is reassuringly forward-thinking. It includes how best to counter multi-swarms of drones, as well as how to identify and safely deactivate a drone with a suspect payload, recognising the diversity of drones that are available on the open market.
- 22.49. In response to a major incident, while currently limited in terms of substantial load bearing capabilities, drones offer a less costly alternative to helicopters (see chapter 4) in terms of

bringing (some) equipment to the scene and recording evidence. Deployed more quickly and to more inaccessible locations, they also represent a more environmentally sound option for use in London. As such, **the MPS should consider investing further in its drone capability with respect to supporting the response to a terrorist attack, in complement to its counter-drone activities** (R290).

- 22.50. I have considered the threat posed by drones to London's very extensive transport network, particularly its surface components. While there are arguably much easier ways for terrorists to attack the transport system, the use of drones for hostile reconnaissance of the network to facilitate such an attack, for example, is not outside the bounds of possibility. Similarly, as elsewhere there remains the potential for a drone to deliver an improvised explosive device or some form of hazardous weapon on or close to a major transport hub.
- 22.51. In response, Transport for London (TfL) have produced a security guidance note which is being developed into training material for delivery across the organisation. This will focus on the need to differentiate between a drone being used legitimately and one that is not. Where this cannot be determined, staff will be guided to assess risk based on how the drone is being used. If sufficient concern is raised, the police will be informed, people will be moved away from the area and adjustments to train services to prevent more people arriving will be instigated.
- 22.52. While welcome, this does not constitute in my view as comprehensive a counter-drone strategy as the threat demands. As recommended in chapter 8, I encourage TfL to work with the MPS capability on how risk is identified and categorised and consider how a drone subsequently identified as hostile could be neutralised more rapidly than the current strategy would seem to facilitate. An explicit counter-drone strategy should be developed.
- 22.53. The Air Traffic Management and Unmanned Aircraft Act (2021) both lowered the threshold for police action with respect to unlawful use of drones and brought in new police powers allowing, among other things, for the seizure of drones (particularly important for any device carrying an illegal or harmful payload). From a preparedness perspective, however, it has been put to me that while welcome, such legislative changes are only a part of the picture.
- 22.54. Significantly, there remain challenges in securing details of drone owners which complicates the process of identifying and sanctioning illegal operators. While required to register details as part of the purchase process and to enable activation upon receipt, those details are held in the country of drone manufacture – which for the majority of devices is China. Access to those data is therefore likely to be fraught with complexity. Instead, **the Department for Transport (DfT) should urgently consider legislation requiring users and owners to register their drones in the UK with heavy fines for those found to be owning or controlling unregistered drones** (R291).
- 22.55. I also have some practical concerns regarding maintenance and any expansion of the MPS' counter-drone capability without a dedicated Emergency Services radio frequency within which to do so. Allocated by Ofcom, bandwidths are rented at cost to various users including

media networks. **The HO, in conjunction with the DfT, should work with Ofcom to explore options for a dedicated frequency to facilitate drone use by the emergency services in response to major incidents including terrorist attacks. They should also seek to engage with the Civil Aviation Authority (CAA) to secure dedicated airspace across London for drone operation** (R292).

Other developments and considerations

- 22.56. It is not just technology which has developed very significantly since my review of London's preparedness in 2016. I am pleased that greater attention to, and investment in, behavioural science is helping to evidence products and strategies which are key to preparedness. The 'Action Counters Terrorism' (ACT) public awareness campaign (see Figure 8), for example, was underpinned by evidence regarding factors which encourage people to report something they have seen or heard which could be a sign of radicalisation or otherwise related to terrorism.
- 22.57. There has also been an increase in the extent to which the governments scientific functions, through the network of Chief Scientific Advisers (CSAs), are linked into and advising development of CT capabilities. This is very welcome, and I would like to see this group more directly brought into incident response testing and exercising activity (as recommended in chapter 14).
- 22.58. Rigorous trial and evaluation both of emerging technological capabilities and how they can best be practically harnessed by those working to prevent and respond to terrorism is important. The government bodies coordinating and delivering research, technology and wider capability development (e.g. the National Security Technology and Innovation Exchange and the HO Science Advisory Council) should ensure transparency in pilots and trials and make available outcome and other related data to properly inform debate. **Representatives from the emergency services should be engaged in trials of emerging technological capabilities where appropriate to provide a user perspective** (R293).
- 22.59. Developments in availability and processing capabilities will increasingly enable much more data to be available, including in real-time during crises. Physical spaces are increasingly monitored by cameras, automatic sensors measure environmental concerns such as air quality, movements of people and vehicles are tracked – and the Internet of Things connects, or will connect, much of the resulting data. Machine learning techniques increasingly allow rapid integration and analysis of these data, identifying patterns and outliers which can be modelled to create scenarios and outcomes for incident testing and exercise purposes, allowing participants to see the consequences of their actions and evaluate alternative responses.
- 22.60. And as much as emerging 'hard' technologies themselves, such as drones, offer opportunity for public good, they will equally continue to prove attractive to terrorists and others who harbour criminal intent. The harnessing of such technologies in real-time with a more traditional dynamic terror attack risks overwhelming law enforcement and London's response capabilities. **The CSA for National Policing should seek to commission a programme of research to explore how developments in science and technology may be harnessed to counter the risk from terrorism, consider the human behavioural interaction (from the**

perspectives of the general public and front line responders) and improve response to the prevention and mitigation of major incidents (R294).

APPENDIX A: RECOMMENDATIONS

2022

While I have made a large number of recommendations, most of these should, in my view, be relatively straightforward for the relevant bodies to take forward. Many are simply proposing modest improvements on arrangements that are already in place. They do not alter my overall finding that very substantial progress with respect to London's preparedness has been made in the years since my previous review.

Note: numbers in parentheses indicate the paragraph in the main body of the report in which the recommendation is presented.

Recommendation 1: To ensure that these issues identified throughout my recommendations are taken forward, the Mayor should prepare a report for scrutiny by the London Assembly and for wider debate. This should be completed within one year, and again at suitable intervals thereafter, to examine the progress that has been made on all of the recommendations which I have made in this 2022 report. (Foreword: 26)

Recommendation 2: From a protection and preparedness perspective, the potential for women, and by extension women only spaces, to be violently targeted by an individual seeking to further an incel-inspired cause, should be assessed. Those who own and manage such spaces should consider seeking CT advice regarding protective measures. (1.16)

Recommendation 3: The MPS should consider more actively promoting the iREPORTit app and piloting a desk-top version, or consider developing a complementary website, to broaden accessibility. (1.30)

Recommendation 4: The MPS should develop pre-prepared public communications setting out the MIPP capability to ensure the swiftest possible issue in the event of a future attack. (3.13)

Recommendation 5: The Mayor may wish to ask MOPAC, the LFB and the LAS to ensure that the content of training and exercising with respect to zoning is kept under continuous review. (3.25)

Recommendation 6: Funding should be identified, and work begun as soon as possible. Given the national significance of some of the bridges in question, it is appropriate that central government step up in support. The Cabinet Office and HM Treasury should work with City Hall to rapidly identify and allocate adequate funding to allow the necessary works replacing temporary with permanent structures to begin. (3.29)

Recommendation 7: Funding should be prioritised to undertake the work (estimated at approximately £3 million) in recognition of the iconic nature of the area, its location on the edge of the Government Security Zone and the fact it regularly draws large crowds of people. Given the national significance and use of Trafalgar Square, it is reasonable to expect central government to

assist here: Cabinet Office and HM Treasury should work with City Hall to identify the required funding and commence the work. (3.31)

Recommendation 8: There is therefore a strong case for reviving the use of Parliamentary Sessional Orders, refreshing and updating their legal focus so they can better respond flexibly to sudden changes in risk and threat and be enforced effectively. (3.32)

Recommendation 9: Members of the London CONTEST Board must ensure appropriate representation from their organisation, so as to support full consideration of the community management of terrorist risk offenders whether related to their offending or otherwise (e.g. housing provision). (3.43)

Recommendation 10: Funding to complete the remaining two-thirds must be ring-fenced and the Ministry of Justice (MoJ) and HO should confirm this position, particularly given the ever-increasing diversification of the threat and its heightened nature in London. (3.44)

Recommendation 11: As part of security planning for events in London, CCTV blind spots across venues and surrounding area should be explicitly identified in advance and mitigations set out for how those areas will be monitored and protected. Plans should not be agreed unless this detail is clear. (3.50)

Recommendation 12: Security plans for events in venues across London should not be agreed without confirmation that all staff, irrespective of employer, who are responsible for any aspect of those plans, have been appropriately trained. (3.55)

Recommendation 13: There needs to be an uplift to the monies made available to the MPS by the Home Office to support training more CTAs. (3.57)

Recommendation 14: The HO should work to pass the necessary legislation to enact key principles of the Protect Duty as soon as the parliamentary timetable allows. Associated resources must be made available to support partners in implementing their responsibilities under the Duty. (3.61)

Recommendation 15: Advice regarding how a venue might flag security on its website should be a core part of CT police guidance. (3.65)

Recommendation 16: CPNI may wish to consider whether there is scope for supplementary material tailored for use by specific groups. For example, for customer-facing staff in specific types of settings where considerations may differ depending on role. (3.72)

Recommendation 17: Given the importance of protecting grey spaces, as showcased by the attack at Manchester Arena, MOPAC should ensure an annual report on progress is published. (3.75)

Recommendation 18: Namely that timely public communications must take place in parallel, led by senior politicians in conjunction with senior police and military leaders, to explain, reassure and give confidence to Londoners and its visitors as to the purpose and role of military officers they may see on their streets. (4.16)

Recommendation 19: There should be more joint firearms training involving the MPS, the CoLP and BTP. The London Fire Brigade (LFB) and London Ambulance Service (LAS) should continue to be engaged, to ensure all first responders are aware of what to expect and how to work within and support a firearms response. (4.19)

Recommendation 20: In order to minimise ARV response times, the MPS should continue to monitor and review where ARVs are based in response to new information and changing environments. (4.21)

Recommendation 21: The Mayor may wish to seek assurance that, when ARVs are redeployed, the distribution of those remaining is automatically reassessed so as to best align their availability with the greatest areas of risk. (4.22)

Recommendation 22: The Mayor's Office for Crime & Policing (MOPAC) and the MPS should consider re-running this survey of firearms officers now the armed uplift is complete to understand the extent to which these issues are still felt to be current. (4.29)

Recommendation 23: The Home Office (HO) should ensure that when making resources available for additional police officers this is accompanied by resources to ensure that necessary support facilities increase in parallel. (4.34)

Recommendation 24: A long-term national policing plan is needed which identifies the capabilities (in terms of police officers, including specialisms, and support functions, such as digital forensics and analytics) that are needed up until 2030, and how these resources are to be delivered. (4.35)

Recommendation 25: The HO, College of Policing and the National Police Chiefs Council (NPCC) should consider urgently the best way to increase the number of trained detectives across policing in England and Wales to ensure CT policing capabilities are adequately resourced. (4.38)

Recommendation 26: The MPS and NaCTSO should consider how to increase the number of CTAs and future-proof this high value asset through resilient succession planning. (4.40)

Recommendation 27: The MPS should consider how to bolster officer retention – research to better understand the drivers of departure among those who leave after only a few years may help inform this. (4.43)

Recommendation 28: The MPS should look at how it might allow ex-officers to re-enter the rank they left, but with a fast track promotion route available which recognises transferrable skills accrued outside the service. (4.44)

Recommendation 29: The MPS should consider bolstering the NDES function to ensure the ever-changing threat posed by digital capabilities can be appropriately understood, and that those same capabilities can be harnessed for investigative and protective purposes. The piloting of cloud-based secure data storage solutions should be expedited. (4.46)

Recommendation 30: Recent restructures within the MPS reduced the number of police Prevent leads and consideration should be given to reversing this decision. (4.47)

Recommendation 31: I have seen evidence of a shared approach to policy, training and wider learning across the separate Prepare and Protect Commands but the resilience of the approach needs strengthening to withstand the departure of specific individuals. (4.49)

Recommendation 32: The MPS should ensure its programme of testing and exercising – whether via table-top, role play or a combination – includes scenarios which require public order issues to be considered in parallel with a terror attack. (4.52)

Recommendation 33: The HO should consider how it can in future fully fund the NICC to ensure London is properly protected without reducing other resources for the capital. (4.54)

Recommendation 34: The National Police Chiefs Council (NPCC) should urgently seek a resolution with regional forces to identify and allow appropriate officers to transfer into CTP and allow the function to grow. (4.57)

Recommendation 35: In order to achieve the most from CT settlements I therefore recommend that the HO consider: i) allowing more flex in the way in which the MPS' CT function is able to discharge its budget, particularly with respect to efficiency measures, and ii) that future CT policing settlements are agreed with accompanying clarity on the likely parameters within which subsequent annual allocations will be made. (4.60)

Recommendation 36: The number of officers trained and equipped with Tasers should be kept under review by the MPS to ensure numbers remain on track and keep pace with the changing nature of threats. (4.65)

Recommendation 37: Statistics on Taser use by London's police should, however, continue to be published by MOPAC to ensure public scrutiny and accountability. (4.68)

Recommendation 38: The BTP and CoLP should seek to explore the feasibility of procuring the same body-worn camera as the MPS when their respective contracts are up for renewal. The cameras worn by AFOs are different again and MPS, BTP and CoLP procurement should collaborate in advance of the first contract to come up for renewal to explore options to allow the same make of camera to be procured, allowing (in time) for real-time downloading of footage. (4.69)

Recommendation 39: Four years on from implementation of the new BCU model, it would be sensible for MOPAC to assess whether the expected benefits as set out in the business case have been realised. Views of local authorities and community partners should be taken into account and ways to strengthen partnership working identified and acted upon. (4.76)

Recommendation 40: The MPS should consider a minimum three-year tenure for BCU Commanders and look at how it might better protect those taking up the posts from being moved into other roles prematurely. (4.77)

Recommendation 41: This may of course reflect a breakdown between CTP and BCU Commanders and the MPS should look at information flows between these roles to ensure it is two-way and both are informed about local issues. (4.78)

Recommendation 42: City Hall should consider whether there is more it could offer in terms of linking up those communities and sharing related information with local police leads. (4.83)

Recommendation 43: These trauma packs are a welcome addition to the preparedness landscape and MOPAC should consider, in conjunction with local authorities, how to support wider provision across London boroughs. (4.102)

Recommendation 44: I recommend that the Mayor should from time to time seek assurances from the MPS on the adequacy of these law enforcement data sharing arrangements. (4.106)

Recommendation 45: The Mayor may wish to seek assurance from the DHSC that should a major terrorist attack be carried out in London, the contingency measures in place to treat casualties in the

context of current nationwide demands on the NHS, including across acute care capabilities, are realistic. (5.10)

Recommendation 46: There is no longer a forum which regularly brings together the chiefs of the three emergency services. The emergency services may wish to work together to address this. And while the LAS meets regularly with the London Mayor, to my mind there would be value in similar engagement with the Deputy Mayors responsible for Policing and Crime, and for Fire and Resilience - the LAS should consider this with City Hall. (5.14)

Recommendation 47: The LAS, LFB and MPS should collectively reassure themselves that relevant guidance and training is sufficiently clear and understood by those likely to be first on scene of any terrorist attack. (5.15)

Recommendation 48: The DHSC should look to review the LAS settlement accordingly, with respect to HART capability. (5.19)

Recommendation 49: The LAS should ensure CBRN refresher training takes place where it has not yet done so as soon as is practically possible. (5.23)

Recommendation 50: The LAS should consider providing similar input on their MTA response to senior LFB commander courses. (5.25)

Recommendation 51: Reflecting the consistent level of heightened risk and threat in London, all three sources of uplift should be baselined into LAS funding: NHS England should look to facilitate this for future funding LAS settlements. (5.27)

Recommendation 52: The method of channelling the LAS funding through one ICS on behalf of the rest of London should be reviewed and the option to retain allocation via NHS England (London Region) should be considered. (5.30)

Recommendation 53: The CTAs should work with the DHSC to ensure this is covered in training materials and guidance for those working in primary care settings. (5.32)

Recommendation 54: The HO should reinstate funding for Prevent leads across all NHS England regions – this would safeguard the London function from staff changes. Alternatively, they may wish to consider creating wider regional CONTEST Coordinator roles, responsible for considering all aspects of CT as relevant for provision and delivery of health services. (5.35)

Recommendation 55: The DHSC should do more to encourage this, clarifying the grounds under which data can and should be shared or volunteered without patient consent. In turn, the police, local authorities and other statutory partners should do more to clarify why the data is needed, i.e. for Prevent case management purposes. (5.37)

Recommendation 56: This gap in provision must be reviewed urgently by the DHSC: the current cliff edge whereby support is abruptly removed when a young person passes a particular chronological age that may bear no relationship to their emotional age should be addressed. (5.42)

Recommendation 57: This advice regarding fire alerts should be shared with partners including local authorities, the MPS and the Security Industry Authority (SIA, see chapter 18) to ensure it features in wider guidance to businesses, personnel responsible for evacuation protocols and others working in the security industry. (6.3)

Recommendation 58: In the interests of protecting Londoners and maximising the capabilities available through the LFB, it is important the arrangements regarding the mainstreaming of Level 2 duties are allowed to proceed as agreed. (6.12)

Recommendation 59: To avoid duplication and conflicting guidance and ensure efficiencies where possible, the LFB chaired working group must link into the national CBRN capabilities led by the NFCC and CT Policing (through the National Police Chiefs Council (NPCC)).(6.15)

Recommendation 60: Effective response to the use of acid should be understood beyond the FRS, who should ensure their guidance continues to be disseminated to emergency service partners and those involved in treating victims across the capital. (6.16)

Recommendation 61: The resulting guidance regarding the LFB response to a waterborne attack will require assurance. This programme should be prioritised. (6.17)

Recommendation 62: Training materials must be regularly refreshed to account for changes in the threat and evidence regarding the nature of visible risk factors, and firefighters should undergo refresher training. (6.23)

Recommendation 63: As such, the HO and City Hall should ensure funding is ringfenced to maintain the DIM capability as a minimum and ideally to expand it, as the need to harness cutting edge technology to detect and identify substances will only ever increase. (6.27)

Recommendation 64: Finally, while I have seen no evidence that allocating the funding for LFB CT functions via the CT policing budget is problematic, it would be preferable if it were direct. (6.29)

Recommendation 65: Succession planning must ensure that those coming into senior local authority roles are rapidly inducted into their responsibilities in the event of an emergency or terrorist incident. They must be provided with appropriate training and involved in an (ideally live) exercise with partners as soon as possible. (7.7)

Recommendation 66: Designed to support continuous improvement, alongside assuring capability and readiness, self-assessment against the Resilience Standards is recommended every three years as a minimum and the Mayor may wish to satisfy himself that this is taking place within all boroughs. (7.10)

Recommendation 67: London Councils should arrange for these guiding documents and principles, including the CONOPS, to be reviewed to ensure they remain current after the Covid-19 pandemic. (7.12)

Recommendation 68: The LAPs current review of local authority emergency planning, in support of future policy and strategy, should complete as soon as possible. (7.13)

Recommendation 69: DLUHC should review the RED resources and consider how emergency and resilience planning work led by different government departments could be better coordinated. (7.13)

Recommendation 70: I heard from one authority whose local borough resilience forum had facilitated ACT Awareness training (see Figure 8) across all departments engaged in preparedness and response: this is good practice and should be adopted across all London's local authorities. (7.14)

Recommendation 71: Those authorities who have not yet done similar should work with the LRF to consider where effective partnerships might be built at a sub-regional, but supra-borough, level. (7.15)

Recommendation 72: I strongly recommend that all London's local authorities routinely participate in the PAIE, ideally at senior level. (7.17)

Recommendation 73: All local authorities should participate in the annual Exercise Safer City, including Chief Executives and Leaders/Mayors. (7.19)

Recommendation 74: The Home Office (HO) and City Hall should work with CPNI to produce a framework of options to help local authorities understand what should be considered with respect to the Protect Duty. (7.21)

Recommendation 75: London Councils, the HO and City Hall may wish to consider collaborating on such a Protect Duty adherence regime. (7.22)

Recommendation 76: The Department for Levelling Up, Housing and Communities (DLUHC) should work with City Hall to ensure all boroughs are able to invest in adequate, up to date CCTV coverage. (7.23)

Recommendation 77: A special team of CT Security Advisers (CTSAs) should be made available to support local authorities in this function and consideration should be given to making completion of the ACT Awareness e-learning a condition of pavement licences (as well as other licenses). (7.24)

Recommendation 78: However, ensuring project briefs specify proportionate consideration of protective security upfront would help ensure safety by design, particularly for projects which will ultimately contain a PAL. This should be a requirement laid down by the National Planning Policy Framework issued by the DLUHC and supported by the Planning Inspectorate. (7.26)

Recommendation 79: The Protect By Design initiative should be piloted in London as soon as practicably possible, with robust evaluation in place to inform a subsequent decision regarding roll out nationwide. (7.28)

Recommendation 80: Local authorities should ensure the emergency services are appraised of planning applications regarding new developments and reconfigurations of existing buildings, both externally and internally, to support their response in the event of a terror attack. Planning departments should take the views of the emergency services into account when considering applications. (7.29)

Recommendation 81: Local authorities should ensure that where such detailed building plans are required, for example in licencing applications, they are submitted on a closed basis with careful consideration of what necessarily must be made publicly available. Full access should be limited to appropriately cleared individuals. (7.30)

Recommendation 82: However, reflecting the raised nature of risk from terrorism across the capital (see chapter 1), the HO should ensure every London Borough receives some degree of direct funding for their Prevent work and it would not be sensible for the HO to reduce the support it provides to London in future funding rounds. (7.33)

Recommendation 83: This support for Prevent should be made on a three-year rolling basis. (7.34)

Recommendation 84: Local authority staff should receive ACT training relevant to their role. (7.36)

Recommendation 85: They [Safer Schools Officers] should be a priority for all Basic Command Unit (BCU) Commanders. (7.39)

Recommendation 86: Local authorities should foster strong links between schools and other educational establishments, including colleges and universities, in their areas so information and learning on issues including CT can be shared. (7.39)

Recommendation 87: All BCU's should have a lead officer on Prevent who routinely attends all local authority led Prevent meetings. (7.40)

Recommendation 88: The Department for Education (DfE) should bring forward proposals as to how such establishments can be subject to some form of regulatory control and inspection to ensure any risk of them being co-opted by those seeking to radicalise young people can be identified and mitigated. The knowledge and intelligence available to individual local authorities should be used to support these arrangements. (7.41)

Recommendation 89: HM Prisons and Probation, alongside the security service, should ensure local authorities are included as standard in pre-release arrangements for terrorist offenders and those considered a terrorist risk, along with local Prevent leads. (7.43)

Recommendation 90: Where a returning fighter is permitted to return to a family home, there is a potential risk of the radicalisation of any children also resident. The Ministry of Justice (MoJ) should provide guidance and training to support the judiciary in applying the law consistently in this area. (7.46)

Recommendation 91: The DfE should also review the legislation on child protection to consider whether the definition of 'significant harm' is fit for purpose in terms of the risk of radicalisation. (7.47)

Recommendation 92: MOPAC and the MPS should consider involving local authorities in the appointment of Borough Commanders. (7.49)

Recommendation 93: I encourage all BCU Commanders across London to look to this [Fig. 9 – Police engagement in Croydon] as an example of best practice in community engagement and to consider similar where appropriate. (7.51)

Recommendation 94: Local police should discuss with local authorities the individuals they are considering appointing to IAGs and should implement a separate IAG for young people to improve engagement in a way which empowers rather than alienates youth communities. (7.54)

Recommendation 95: At least once a year, BCU Commanders, Leaders/Mayors and Chief Executives should review one another's engagement plans so community developments can be assessed and key leaders within communities identified. I am clear that relationships with different community and faith leaders must be regularly refreshed to ensure those leaders remain current, credible representatives and are seen as trusted voices to support messaging from the local authority and other partners. (7.57)

Recommendation 96: The DLUHC, in conjunction with the Department for Education (DfE) should consider directing additional funding to local authorities to enable youth provision to be strengthened

in the most stressed areas, and local authorities in turn should work closely with youth communities to understand how best to deploy any additional funds. (7.61)

Recommendation 97: Ward councillors are often well appraised of those community leaders and figureheads who have strong links into different communities and should be consulted when the local authority seeks to refresh those relationships. (7.66)

Recommendation 98: Where local police Safer Neighbourhood Teams exist, they should ensure they are linked into local councillors. (7.67)

Recommendation 99: TfL and NR should consider developing a counter-drone strategy. (8.7)

Recommendation 100: City Hall should coordinate a programme identifying where further protective measures are needed (or where temporary structures need to be made permanent) around the transport infrastructure, so responsibility for funding can be determined. This should consider findings from the review of potential 'grey spaces' being undertaken by London's airports. (8.10)

Recommendation 101: TfL must treat this as a priority to ensure the remaining stations secure enhanced remote response capabilities in due course (where they are proven to offer benefit). (8.15)

Recommendation 102: Introduction of the voluntary security standards for bus and coach operators being developed by the DfT should be expedited. Consideration should be given to making these the basis for subsequent regulatory standards. (8.17)

Recommendation 103: As passenger volumes continue to rise following the pandemic, all customer facing staff should be given refresher training or otherwise have their competence in this regard assured. This must be prioritised and the DfT should ensure that current financial restrictions, particularly on TfL, do not preclude this. (8.19)

Recommendation 104: The Home Office and the MPS should ensure that Prevent policy and operational leads are aware of TfL's 'insider threat' procedures and TfL must flag concerns where appropriate, perhaps through the Security Review Committee. (8.23)

Recommendation 105: TfL's procedures supporting staff to raise concerns about colleagues should be highlighted in induction training and actively promoted in staff communications. (8.24)

Recommendation 106: While I accept that some of these CCTV blind spots will afford less opportunity for harm than others, they should be eradicated where practical and cost-effective to do so. If this is not possible, their location should be factored into the design of staff security checks and patrols. (8.26)

Recommendation 107: The LO operator (Arriva Rail London, ARL) should also consider reversing its policy that CCTV footage cannot be reviewed by LO station staff. (8.27)

Recommendation 108: Not all modes of rail within TfL provide direct CCTV feeds to the BTP Control Room: this is a missed opportunity in terms of enhancing capabilities in the event of incident response and should be reviewed by the BTP, TfL and City Hall. Rectifying the situation should be a priority for future financial investment. (8.28)

Recommendation 109: While LU has a programme to upgrade the rolling stock to incorporate CCTV where it is absent, this is subject to funding: the situation should be resolved, and the programme accelerated as soon as possible. (8.29)

Recommendation 110: TfL and NR should ensure linkage with BTP's work on innovative use of CCTV and any pilot must be subject to robust evaluation to ensure that inappropriate biases are avoided. (8.30)

Recommendation 111: Bus operating companies should be encouraged to enable CCTV feeds from within their buses to at least be viewable by TfL's Control Centre and thus be available to the police in real time if necessary. (8.31)

Recommendation 112: Appropriate resources must be made available to TfL by the DfT to resource all necessary protective provisions suggested by both the current and any future methodology. (8.42)

Recommendation 113: It would be beneficial to extend this information sharing process to cover all aspects of transport and TfL should discuss feasibility with the MPS. (8.44)

Recommendation 114: I therefore recommend that all TfL frontline staff wear a body-worn camera as a core part of their uniform (I recognise that this will require consultation with staff representatives). (8.45)

Recommendation 115: TfL and local authorities must continue to design Low Traffic Neighbourhoods and other road calming and safety measures with the needs of emergency service vehicles in mind – for example, I have heard about speed bumps capable of slowing general traffic but which can be navigated at speed by emergency vehicles. This should be kept under frequent review. Future planning of the road network should routinely consider and, where appropriate, use the opportunity to introduce additional protective security measures. (8.47)

Recommendation 116: NaCTSO and CPNI should review their material to ensure it is clear why, for example, particular behaviours might be problematic from a transport perspective and should be reported. (8.50)

Recommendation 117: Transport providers in London should review if any further action is required to ensure policy and practice surrounding use of these First Aid materials remains current and in line with the guidance recently issued by NaCTSO. (8.52)

Recommendation 118: TfL may wish to consider whether the RRFA pilot offers lessons of relevance to the London environment with respect to deployment and use of the First Aid packs already in use. (8.53)

Recommendation 119: Transport providers should work together (and with academic partners and the emergency services where appropriate) to identify learning opportunities and ensure shared understanding in the event of being involved in any response. (8.55)

Recommendation 120: Given the central function played by the River across London, the Home Office (HO) must ensure CT funding settlements allow the MPU function to be supported from core budgets. (9.11)

Recommendation 121: I recommend this issue be revisited so as to place a formal duty on the PLA (perhaps through the LRPG) to play a role in maintaining and enhancing security along the River. (9.13)

Recommendation 122: The current practice of one MPU boat permanently stationed at either end of the River with a third in the Government Security Zone should be maintained. (9.16)

Recommendation 123: The Mayor may wish to seek clarification from the MPS regarding response times in a range of scenarios in which the location of an incident varies in respect to the location of the RHIBs. (9.17)

Recommendation 124: The Maritime & Coastguard Agency and Port of London Authority should collectively ensure vessels have appropriate maintenance documentation and are correctly licenced for their proposed use with regular checks made regarding purpose and navigation plans. (9.20)

Recommendation 125: The Port of London Authority should issue an urgent Notes to Mariners to ensure the wheelhouse of all Uber Boats is restricted and appropriately secured. (9.22)

Recommendation 126: The HO should consider refreshing Operation Kraken in marine settings and public spaces along the River. (9.24)

Recommendation 127: the MPS should regularly test deployment of Operation Riverbed to maintain currency and the necessary skills across those who might be involved. (9.27)

Recommendation 128: The MPS should consider more overt public communications regarding the use of Servator on the waterways to complement both its deterrence and reassurance purposes, considering piers, passenger vessels and marina environments. (9.28)

Recommendation 129: Once the Memorandum is fully operational, the MPU should seek to assure the Mayor as to its efficacy with respect to ensuring that security is properly considered and managed across the LRPG. (9.30)

Recommendation 130: The LRPG MATRA should conduct a more comprehensive assessment of identified risks and develop detailed action plans as to how to reduce these to more acceptable levels: this should report to the Department for Transport and the Mayor of London by the end of 2022. (9.31)

Recommendation 131: The MPS should seek to provide relevant equipment and access for aviation senior leadership to the necessary systems in situ at airports. (10.9)

Recommendation 132: In conjunction with airport operators and the MPS, the Department for Transport (DfT) should review and consider options for sustainable mitigations in the event of any future lengthy periods of time where airport usage must be drastically reduced. (10.13)

Recommendation 133: The HO must ensure both LHR and LCY continue to be consulted to ensure the design of the ESN will meet their needs and both must be part of subsequent user testing. Consideration also needs to be given to providing financial support to the airports to enable them to adopt ESN, and to the necessary period of double running with Airwave during the transition. (10.17)

Recommendation 134: Given the increasing frequency of protests within airport perimeters, the DfT should consider, as part of the review of the model for funding airport security which I recommend above, how this additional burden on airport operators could be resolved. (10.18)

Recommendation 135: Airport operators should be alive to both possibilities and ensure, through Risk Advisory Groups (see below) that they are linked into relevant intelligence and have mitigation strategies for protests in place. (10.19)

Recommendation 136: Civil and criminal legal frameworks must adequately reflect the severity of protest activity and trespass within airport perimeters in terms of the potential for public risk and harm: the Ministry of Justice (MoJ) should consider this issue in partnership with the airport operators. (10.20)

Recommendation 137: The British Transport Police (BTP) are a notable exception and should become part of each airports Risk Advisory Group without delay. (10.22)

Recommendation 138: BTP may wish to consider whether to provide armed protective security at the LHR and LCY transport hubs (in complement to armed security provided by the MPS in and around the terminals and wider airport premises). This is particularly important for the terminus points of non-stopping London – airport routes. (10.26)

Recommendation 139: A multi-agency 'hub' (which could be virtual to limit the need for abstraction from operational duties) attached to each airport would help strengthen working relationships between the airports, the MPS (aviation policing) and BTP, allow closer exposure to individual partner responsibilities and facilitate more widespread intelligence sharing. (10.27)

Recommendation 140: Airport operators should ensure that those staff they employ directly, as well as those employed by the various retail outlets across the sites, undertake the Action Counters Terrorism (ACT) Awareness e-learning package and appropriate See, Check and Notify (SCaN) modules. (10.29)

Recommendation 141: Providing appropriate feedback to staff regarding any action taken as a result of flagging concerns is important as it helps reinforce the importance of vigilance and reporting. This feedback loop is more mature at LHR, who should work with LCY to develop their processes. (10.30)

Recommendation 142: Servator should be maintained at current levels of deployment across both LHR and LCY. (10.31)

Recommendation 143: The HO needs to ensure that staffing levels are adequate at all times to deal with the flow of passengers. (10.32)

Recommendation 144: I have been assured these outstanding cases were being processed by the MPS vetting team but the Mayor's Office for Policing & Crime (MOPAC) may wish to check on progress, perhaps at the end of September 2022 and keep the situation under review thereafter. (11.13)

Recommendation 145: Police resources should also allow for full renewal vetting checks of existing officers, which should be done routinely at least every three years. (11.17)

Recommendation 146: North Yorkshire Police should ensure a comprehensive evaluation of the pilot, including of any unintended consequences, and MOPAC and the MPS should follow progress carefully. (11.22)

Recommendation 147: The MPS has implemented a 'Raising Concerns' policy which encourages police officers and staff to report worries about colleagues, although it is unclear how much it has been used and to what effect. Its level of usage and effectiveness with respect to encouraging concerns to be raised, alongside the nature of any subsequent action, should be regularly assessed by MOPAC. (11.24)

Recommendation 148: Open source searches of social media and other online activity by new recruits should continue to be routinely conducted. Such searches should also be carried out on a regular basis for existing officers and staff. (11.27)

Recommendation 149: Consideration should be given to whether the content, nature and frequency of the mandatory testing process for firearms officers should be reviewed. (11.29)

Recommendation 150: The MPS should seek to develop a means of developing integrity testing of police officers and staff, not only on an intelligence-led basis but also on a random basis. (11.30)

Recommendation 151: The Home Secretary should examine the circumstances in which Police Appeals Tribunals have over-turned decisions to dismiss officers following vetting failures, incidents of domestic violence and sexual offences, and consider whether the Tribunal process needs to be reformed. (11.33)

Recommendation 152: MOPAC may wish to consider how this hotline has been used and for what purposes. (11.35)

Recommendation 153: TfL should ensure usage of the scheme [for staff to report concerns about security of spaces across the network] is monitored and where concerns are raised with respect to CT, they should be regularly fed into the Executive Security Group. (11.37)

Recommendation 154: Usage of the similar reporting mechanism in place at London's airports should also be regularly monitored. (11.38)

Recommendation 155: Consideration should be given to whether those in charge of protective security across key partners, including local government and the transport network, as well as those managing security on behalf of London's business, entertainment and hospitality sectors, should have access to national security vetting in support of wider information sharing. (11.42)

Recommendation 156: The MPS should reconsider the level of detail [regarding potential security threats posed by staff in other organisations] it shares in such instances. (11.43)

Recommendation 157: CBRN incident debriefs should be across government (central and local) and response agencies. (12.9)

Recommendation 158: Reliance on goodwill to build and maintain CBRN officer capability in the MPS feels precarious and consideration should be given to how this provision can best be sustained. (12.10)

Recommendation 159: The MPS, LAS and LFB should consider the potential scale of equipment loss in CBRN response and ensure mitigations are in place. (12.12)

Recommendation 160: Stocks of in-date personal protective equipment (PPE) must be maintained. (12.13)

Recommendation 161: As lead agency for a terror attack in London, the MPS should ensure all movements by those involved in a CBRN response are recorded on the Computer Aided Dispatch system. (12.14)

Recommendation 162: This MPS capability [corrosives decontamination kits] must be maintained to at least the present level and be regularly refreshed to allow for the ever-diversifying nature of chemical and biological material. (12.16)

Recommendation 163: The MPS must therefore continue to invest in the capability, to enable it to be on top of latest developments and intelligence regarding development and emergence of the harmful substances of the future. (12.20)

Recommendation 164: There is scope for the threat mitigation technology unit to better link into and offer support to forces outside London and it should consider how best to do so. (12.22)

Recommendation 165: While I recognise the maintenance of this [MPS CBRN specialist] capability to be a costly endeavour, I consider it to be the minimum acceptable level for preparedness purposes and it should not be reduced. (12.23)

Recommendation 166: Where not in place, London's emergency services should seek to make this [real time process for capturing lessons] standard practice in any response which progresses over several days or longer. (12.27)

Recommendation 167: The London Resilience Forum (LRF) must ensure as a matter of priority that all potential Gold command leads have undergone the Multi-Agency Gold Incident Command (MAGIC) training. (12.28)

Recommendation 168: The response to Salisbury highlighted the critical importance of senior CT investigative support: this function should be included in relevant testing and exercising, and where it is not already, should feature in the MAGIC course. (12.28)

Recommendation 169: This [principles of Initial Operational Response deployable onto tablets used by patrolling officers] is a welcome training and operational reinforcement tool and should be rolled out as soon as possible. (12.29)

Recommendation 170: A London bespoke course to ensure resilience across the MPS rota of those trained to adopt command roles is currently being considered – this should be developed and rolled out, with thought given to involving the other emergency services as well as local authority leadership teams and health partners. (12.31)

Recommendation 171: Communications specialists must be involved in any SCG when convened to advise on [CBRN incident] messaging and ensure that knowledge of online and offline channels is current to maximise reach as quickly as possible. (12.33)

Recommendation 172: The Government Communication Service should work with the emergency services and other experts to consider and test public messaging for use in the event of a CBRN incident. (12.34)

Recommendation 173: Policy and operational leads from all four CONTEST strands should ensure regular attendance at the SRC to ensure shared awareness and understanding of emerging issues and considerations with respect to the threat picture and related events. (13.4)

Recommendation 174: The Cabinet Office should review the definition so that it explicitly reflects the impact on communities. (13.6)

Recommendation 175: Consideration should be given to how it [City Operations unit in the GLA] might more explicitly engage and link in with partners in the London Resilience Forum (LRF), including with respect to how notifications of major incidents are received and shared. (13.8)

Recommendation 176: There may be merit in co-locating the LSAT within the Special Operations Room to bring together London's situational awareness capabilities: the GLA Operations Unit and the MPS should explore whether this would bring added value. The Unit should also ensure it is able to dock into local emergency control centres which local authorities may set up in case of a major incident occurring within their borough. (13.9)

Recommendation 177: This should continue to remain a priority and the need for further requirements should be kept under review so operational improvements within CTOC can continue to be realised beyond 2025, and equipment kept up to date. (13.11)

Recommendation 178: Once in place, the HO should commission an independent review of Operation Semper to explore how the programme is operating to inform and drive further improvement. (13.13)

Recommendation 179: Recipients of CTLPs should be consulted by those preparing them as to what would be helpful and informative. CTP and others involved in their creation should seek to share as much as possible without prejudicing techniques or sources. (13.16)

Recommendation 180: Consideration needs to be given to ensuring that all BCU Commanders and all Borough Chief Executives are appropriately vetted to ensure there is no reluctance for them to be fully briefed on sensitive issues. (13.18)

Recommendation 181: The principle of 'Dare to Share' should be more extensively considered by those across the national security and criminal justice systems working to manage terrorists and those who pose a risk of terrorism. (13.22)

Recommendation 182: In the interests of supporting this [the management of terrorists and those who pose a risk of terrorism] and facilitating relationships, consideration should be given to accommodating a wider range of partners within CTOC, namely representation from Prevent operational delivery and London's local authorities to ensure wider interests are managed and to act as a conduit to community settings. (13.23)

Recommendation 183: The Local Authority Chief Executive (LACE) Forum, which brings together London's local authorities with the MPS, should be reinvigorated following its understandable dilution during the Covid-19 pandemic, and Chief Executives should ensure attendance. (13.24)

Recommendation 184: All three emergency services must now focus on, where circumstances allow, reinstating face-to-face training, both to support new recruits and to refresh those skills and partnerships which long periods of remote working for many have diluted. (14.3)

Recommendation 185: The London Fire Brigade (LFB) and London Ambulance Service (LAS), as the MPS' partner blue light responders, should seek to explore a similar arrangement to involve Occupational Health in response, where not already in place. (14.6)

Recommendation 186: Outcomes [from the jointly run CTPN and UNCTC exercises] relevant to London's preparedness and resilience should be built into future testing and exercising by the MPS and others responsible for developing these events. (14.7)

Recommendation 187: National public health capacity needs to be reviewed by government, not only in response to lessons from the Covid-19 pandemic but also in terms of the potential demands of a chemical or biological attack. The Mayor may wish to discuss London's resilience in this respect, alongside considerations regarding longer term humanitarian assistance, with the relevant health authorities and local authorities across the capital. (14.9)

Recommendation 188: The MPS, LAS and LFB should consider undertaking a live exercise based on a scenario focused on use of a biological (rather than chemical) weapon, drawing on learning from the CTPN table-top exercise as well as recent experiences of responding to the pandemic. (14.10)

Recommendation 189: The Joint CT Testing and Exercising team being discussed among the emergency services should be progressed. (14.14)

Recommendation 190: There should be a clear mechanism for engaging the heads of London's schools and other educational establishments in testing and exercising, and for inviting participation from organisations representing local communities and victim services. (14.18)

Recommendation 191: For live exercises taking place in a venue (e.g. a transport hub or stadium, including football stadiums), the operator must be involved, and shared objectives developed to ensure their needs are met. (14.19)

Recommendation 192: Further exercises are planned by the MPS for 2022: following events at Wembley in the summer of 2021, these should include football stadia and public order policing. (14.20)

Recommendation 193: Any joint testing and exercising programme should also consider less conventional threats (for example, a cyber-attack on critical infrastructure). (14.21)

Recommendation 194: Reflecting the specific and heightened risk from terrorism faced by the capital, the MPS may wish to consider appointing their own scientific adviser. (14.23)

Recommendation 195: The Joint CT Testing and Exercising team referred above would be an appropriate mechanism through which CSA engagement could be facilitated and if set up, it should seek to do so. (14.24)

Recommendation 196: CT response e-training packages should be made available to Basic Command Unit (BCU) Commanders (and locally-based officers) but also to partners more widely to ensure a greater awareness of risk, how it changes and what this means for the nature of response. (14.26)

Recommendation 197: The MPS, LAS and LFB, and in partnership with the LRF, should develop and mandate attendance at refresher training for those on command rotas who may find themselves adopting formal gold command responsibilities. (14.29)

Recommendation 198: Consideration should be given to developing a similar package [to that devised by the LFB to help firefighters recognise and report safeguarding concerns] for use by other agencies with cause to enter homes and wider premises – including the LAS and local authority departments with responsibility for external visits. This should be done in conjunction with the Centre for the Protection of National Infrastructure (CPNI). (14.32)

Recommendation 199: The SIA should ensure that learning from these [emergency planning] events is drawn together and disseminated across its membership. (14.33)

Recommendation 200: The HO needs to ensure these resources are maintained both for existing victims of past attacks and for victims of any future attacks. They should also consider how access to these resources might be facilitated and managed for victims of other sorts of mass casualty attacks motivated by, for example, desire to further an incel-inspired cause. (15.8)

Recommendation 201: The LVWS should consider adding a link to address this [on its website, to signpost services for victims of terrorism]. (15.13)

Recommendation 202: MOPAC and the MoJ should consider the feasibility of building on the LVWS to provide an end-to-end support service for those affected by terrorism in London. (15.14)

Recommendation 203: MOPAC should consider the feasibility of guaranteeing for a longer minimum period the funding it provides to LVWS partnered terrorism trauma services. (15.16)

Recommendation 204: Contact details of owners and operators of such private venues should be made swiftly available to the Bronze Commander and local authority representatives responsible for setting up and managing the SuRC. (15.19)

Recommendation 205: When convened, a Strategic Coordinating Group (SCG) should ensure the Victims Commissioner is always notified of the location of a SuRC immediately it is confirmed to facilitate their involvement if appropriate and desirable. (15.20)

Recommendation 206: It is important that the CB becomes fully operational as soon as possible, and the setting up of telephone lines and publicly issuing the number to call must be prioritised. That number must be issued to all mainstream media outlets and added to the public social media accounts of all emergency services. (15.23)

Recommendation 207: The MPS must ensure all officers who may be involved in response are familiar with the mechanisms of MIPP and how to upload / access information held on the system. (15.27)

Recommendation 208: Response and take-up [of the School and College Security guidance] across the independent sector is less clear and the DfE should undertake to ensure those schools are aware of the guidance and encourage them to draw upon it. (16.9)

Recommendation 209: In partnership with City Hall, the DfE should remind schools of the importance of invacuation and evacuation drills alongside more traditional health and safety practices such as those for fire. (16.11)

Recommendation 210: The DfE should commission independent research to evaluate the School and College Security guidance and its use across the sector. This should include local authority run schools, academies and faith schools as well as further education colleges and universities. (16.12)

Recommendation 211: The DfE should ensure any policy and guidance with respect to the Protect Duty and PALs is informed by ongoing dialogue and consultation with the sector. (16.15)

Recommendation 212: Recognising that London contains a number of faith schools, the DfE may wish to draw on expertise within those organisations as it looks to develop advice for schools across London once the Protect Duty comes into force. (16.16)

Recommendation 213: The DfE should consider whether the 18-hour exemption is appropriate or whether it should be reduced. (16.19)

Recommendation 214: These home-schooled children must not be allowed to slip under the radar and local authorities across London's boroughs should be adequately funded to establish a programme of home visits to ensure suitability of both education provided and the environment within which it is delivered. (16.20)

Recommendation 215: Every primary and secondary school should have a named police liaison officer. Each of the 12 MPS Basic Command Unit (BCU) Commanders should draw up a liaison plan for each borough in their area, in partnership with the local authority. This should expressly include CT considerations and set out arrangements for clear join up with CT experts within the MPS. (16.23)

Recommendation 216: HM Treasury (HMT) and the Home Office (HO) should work with the insurance industry to ensure that business continuity insurance sufficiently protects businesses from second order disruptive effects of a terrorist attack. This will need to consider the potential implications of the forthcoming Protect Duty. (17.5)

Recommendation 217: Planning permission considerations should guide, not prevent, the design and implementation of measures to keep the public safe: The Department for Digital, Culture, Media & Sport (DCMS) and the HO should work with the sector to identify shared goals and agree solutions, in partnership with City Hall, relevant local authority Leaders and Chief Executives. (17.9)

Recommendation 218: While the cinema security working group maintains links with their counterparts in theatre, a more formal arrangement may be beneficial, allowing regular information sharing and the development of shared security assets. (17.11)

Recommendation 219: The Mayor may wish to seek assurance from the Heads of Security Forum that all relevant industry bodies are included, irrespective of whether they have a dedicated security lead. And that smaller, independent outlets and operators are represented. (17.12)

Recommendation 220: The DCMS and HO should work with the LCF to facilitate liaison with security focused forums: they may wish to consider hosting a series of security focused round tables with the sector (and others across the wider business community). (17.13)

Recommendation 221: The Security Industry Authority (SIA) might consider raising awareness of this CPNI material focused on security professionals across its membership. (17.17)

Recommendation 222: City Hall should discuss with CPNI the possibility of augmenting the content of the London Business Hub website accordingly. (17.26)

Recommendation 223: Through the London Business Hub and BIDs, City Hall should seek to encourage businesses to use the guidance offered by CPNI (and also as part of SCA^N) regarding signage on and content of websites, and in public messaging (i.e. Security Minded Communications). (17.30)

Recommendation 224: The London CONTEST Board, the business sub-group of the London Resilience Forum (LRF) and bodies that represent businesses in London should work together to consider how information shared by government, law enforcement and the security services could be made more relevant, consistent and actionable for those managing security across London's business community. The starting point should be to agree a specification of what is needed and how it could be most effectively disseminated. This should be used by the Mayor to ensure appropriate mechanisms are put in place with the support of the business community. (17.37)

Recommendation 225: While their proactive engagement with local businesses is generally good in the event of a terrorist attack, the MPS should consider how to better inform those running large-scale services and operations to inform real-time decision-making more widely. (17.39)

Recommendation 226: Where BIDs exist within the boroughs under their command, Basic Command Unit (BCU) Commanders should ensure local policing (including CT Policing) is engaged and regularly represented. Similarly, local authority Leaders and Chief Executives should ensure they are plugged into BIDs within their area. (17.43)

Recommendation 227: The MPS should consider with BID partners the feasibility of their inclusion in local level exercising. (17.45)

Recommendation 228: The MPS should work with BID security leads to explore whether higher levels of security clearance would facilitate more comprehensive information sharing. (17.46)

Recommendation 229: Where feedback regarding reported concerns is not already happening across London, I strongly encourage the MPS to work with local BIDs to achieve such cooperation. (17.47)

Recommendation 230: The HO should consider issuing specific guidance to the business sector to encourage Prevent referrals, including guidance on what managers might look out for. (17.48)

Recommendation 231: Boroughs who have not may wish to consider implementing the conditions developed for pavement licencing. (17.51)

Recommendation 232: Pan-London, Protective Security leads in the Metropolitan Police Service (MPS) and licensing leads within local authorities should be more formally linked into the SIA to help facilitate effective information sharing and mechanisms of communication with qualified SIA operatives working across the capital. (18.14)

Recommendation 233: City Hall, in conjunction with the HO and the SIA, may wish to consider requiring larger companies to demonstrate that all their operatives have as a minimum undertaken this training, as part of their adherence to the new Protect Duty. (18.16)

Recommendation 234: Individuals should be encouraged to download the ACT app when initially applying for an SIA licence and at renewal. (18.17)

Recommendation 235: The SIA should work with the CSC and MPS to extend this messaging system to as many ACS security providers operating across London as possible. (18.18)

Recommendation 236: The MPS and SIA should consider whether there is scope to stage a programme of exercises which focuses specifically on the role of security operatives in a range of settings. This should adopt a 'train-the-trainer' approach to enable representatives of private security companies to attend and take their learning back to inform the way their organisation supports and trains its staff with respect to CT considerations. (18.20)

Recommendation 237: The SIA should consider working with the MPS and local authority licensing leads across sectors to highlight how community-based partners could support their inspection and enforcement role. In parallel, the HO should support the SIA to take a more pro-active role in terms of inspection and enforcement activity. (18.22)

Recommendation 238: The HO should consider incorporating the SIA into the MTA structure and creating affordable access to support and enhance their enforcement responsibilities. (18.25)

Recommendation 239: The SIA could consider requiring enhanced DBS checks in some cases. (18.26)

Recommendation 240: There should be a mechanism to allow CT Policing and the security service to access the SIA database to check whether SOIs are licenced operatives or have applied for a licence. (18.26)

Recommendation 241: When police contacts move on, where possible their successors should be introduced to primary contacts across the faith and belief sector as part of the handover. (19.5)

Recommendation 242: The Home Office (HO) should consider setting aside significantly more resource for the protective security scheme and raising the maximum available to individual applicants. The scope should also expand to cover the cost of maintaining any measures installed. (19.15)

Recommendation 243: The HO should mount a targeted communications campaign to raise awareness of the protective security scheme well in advance of the next application window opening, and the window should be extended. The MOPAC CVE Team and the Faith Sector Panel of the London Resilience Forum should be engaged in order to maximise reach into London's communities. (19.18)

Recommendation 244: As and when the training fund is launched, lessons must be learnt from the protective security funding scheme: eligibility criteria should be inclusive, the process must be straightforward, and the HO must embark on a targeted awareness raising campaign. It should utilise national and London-based faith and community networks to maximise reach into communities who may otherwise remain unsighted. (19.19)

Recommendation 245: The MOPAC collaboration with faith-led initiatives to advise the sector should continue, in conjunction with the Metropolitan Police Service (MPS) specialist CT Security Advisers where appropriate. (19.20)

Recommendation 246: The Faith Sector Panel and other networks with reach across faith leaders should promote the focused CPNI material to increase awareness amongst those places of worship who might find it useful. (19.25)

Recommendation 247: The safety and security training scheme for places of worship to which the HO has committed funding should be developed in conjunction with faith organisations experienced in advising places of worship on security matters. (19.26)

Recommendation 248: The potential for faith organisations to play a key role in any multi-agency response to a major incident must be more formally recognised. (19.29)

Recommendation 249: The LRF should consider how best to support the Faith Sector Panel and LBFN in rolling out its training to faith and community organisations across London, and MOPACs CVE Team may wish to consider using its networks to promote and maximise take-up. (19.30)

Recommendation 250: The Faith Sector Panel should be strengthened and provided with dedicated resources from City Hall to support it taking an explicit role in the formal protocols which govern response to major incidents, including terrorist attacks where, as I have discussed, faith and community leaders have a significant role to play. Similar arrangements need to be replicated at borough and sub-regional level. (19.31)

Recommendation 251: The faith sector could play a valuable role in supporting vigils and the MPS should work in partnership with the Faith Sector Panel to consider how the sector could, where they wish to, be facilitated to do so. (19.32)

Recommendation 252: The Faith Sector Panel, in partnership with the MPS, may wish to encourage the creation of similar multi-faith Neighbourhood Watch teams for places of worship within London Boroughs. (19.33)

Recommendation 253: City Hall should provide the VSP with enhanced resources for a dedicated secretariat function. (20.18)

Recommendation 254: City Hall should consider how best to fund the role, and the Chair of the VSP should automatically be included in emergency response forums and oversight bodies including SCGs when convened. (20.19)

Recommendation 255: Mapping the many and varied skills, capabilities and wider links held within the VCS would be a useful exercise in support of wider preparedness, at both pan-London and borough level. This exercise should be a priority for a strengthened VSP secretariat. (20.20)

Recommendation 256: The LRF should work with the VSP and emergency services to ensure the findings from these reviews (led by the LET, London Funders and NET) help steer the development of future working practices and cross-sector preparedness considerations. (20.22)

Recommendation 257: City Hall may wish to consider safeguarding the arrangement whereby LET self-activate in response to a crisis through a memorandum of understanding. (20.26)

Recommendation 258: The LRF should work with City Hall and the LET to ensure clarity of content in communications regarding public donations and swift, multi-media presentation. (20.27)

Recommendation 259: City Hall and the LRF may wish to consider how the VCS might be supported to identify and train such a volunteer management team, across London's boroughs and key organisations. They should engage with the BRC who have such an arrangement in place for the community reserve volunteers. (20.30)

Recommendation 260: The LRF should work with City Hall to develop a website (with promotion across social media platforms stood up immediately when required) to advise those wishing to help or donate gifts and other items following an incident. This should be separate from any managed by the LET and other organisations coordinating financial aid, and from those intended for use by individuals directly affected by an attack. (20.31)

Recommendation 261: The Terror Incident Needs Assessment (TINA) developed by Victim Support (see chapter 15) should be made available across key VCS partners where it is completed in advance of humanitarian assistance being offered. (20.34)

Recommendation 262: The LRPs data sharing project should consider how to recognise that the LET and other organisations can receive and handle sensitive personal data in accordance with necessary legislation, and reassure statutory bodies that those data can be passed to charitable organisations to facilitate specific actions such as making charitable gifts. (20.35)

Recommendation 263: The LRF and VSP should consider a formal agreement to guide similar partnership working with respect to provision of mental health support in response to future major incidents. (20.36)

Recommendation 264: Key lessons from incident response debriefs should routinely be shared with approved VCS partners, via a strengthened VSP, where this does not already take place. (20.39)

Recommendation 265: Those responsible for issuing public content via police accounts must be suitably trained and enabled to do so swiftly. (21.9)

Recommendation 266: The Government Communications Service (GCS) and the Department for Digital, Culture, Media and Sport (DCMS) should consider with communications teams in the MPS, London Ambulance Service (LAS) and London Fire Brigade (LFB) as well as City Hall how best to identify and counter misinformation and disinformation circulating in real time during and following an incident. (21.10)

Recommendation 267: The MPS should consider the potential for more nuanced 'out-of-incident' social media messaging to Londoners, where such geo-targeting is possible, to complement other communication campaigns. (21.11)

Recommendation 268: BCU Commanders should ensure all Safer Neighbourhood Teams are similarly equipped with Twitter accounts where not already to facilitate rapid re-tweeting of MPS and local authority communications in an emergency. (21.12)

Recommendation 269: The GCS, in partnership with the National Counter Terrorism Security Office (NaCTSO) and the Centre for the Protection of National Infrastructure (CPNI) should consider expanding communications strategy to encompass themes beyond the reporting of suspicious items or activity and of protective action in the event of an attack. (21.15)

Recommendation 270: Station retail staff should also be encouraged to undertake the ACT – Awareness training (see Figure 8) and be provided with specific guidance on how to respond to reports from the public of suspicious items and activity. Network Rail and Transport for London (TfL) should ensure all outlets operating within (underground and overground) station premises are appropriately equipped to enable staff to both proactively identify and rapidly respond to reports from the public of suspicious behaviour. (21.19)

Recommendation 271: The Department for Transport (DfT) should work with TfL to ensure ‘See It. Say It. Sorted.’ features across the bus and coach network (including on buses and in bus shelters) in a similar fashion to the rail network. (21.21)

Recommendation 272: TfL may also wish to consider promoting the campaign in the regular emails it issues to customers which provide updates regarding the current status of the transport system across the capital. (21.22)

Recommendation 273: The Home Office (HO) may wish to explore understanding of threat levels further, in partnership with JTAC, and use findings to inform future iterations of national public communications regarding threat. (21.25)

Recommendation 274: Development and testing of additional messaging on what to do where it is not possible to avoid confrontation would be beneficial: NaCTSO should work with the CPNI and the GCS to explore this. (21.31)

Recommendation 275: City Hall should explore the feasibility of developing a free to download app for Londoners and visitors, similar to that developed by the MPS and others (including the Victoria Business Improvement District, see chapter 17), to provide accessible and easily updated security related guidance. (21.33)

Recommendation 276: Consideration should also be given to rolling out the ‘See It. Say It. Sorted’ and ‘Run, Hide, Tell’ campaigns in other high footfall publicly accessible locations (PALs) such as shopping centres, where it is not already present. (21.34)

Recommendation 277: The HO should encourage social media platforms to have a clear communication plan in place to deal with misinformation, disinformation and hate-speech following an attack. (21.36)

Recommendation 278: The HO should encourage social media platforms to provide current, single points of contact to the police to facilitate swift information sharing in the event of an attack. (21.37)

Recommendation 279: Following a terrorist attack in London the Mayor, in partnership with the MPS, should continue to issue an initial response across key social media platforms in addition to mainstream offline news outlets. Regular updates should follow to provide both public reassurance and, where appropriate, details of any investigation as information comes to light. (21.38)

Recommendation 280: The HO should ensure the infrastructure suppliers of ESN build into the software the capability to isolate and retain urgent messages transmitted in parallel. (22.5)

Recommendation 281: The minimum viable product must therefore be no less operable than Airwave in terms of voice communications and unless the HO, in conjunction with the provider, can provide a cast-iron guarantee of this then no switch to the new ESN should be contemplated. (22.6)

Recommendation 282: Airwave must not be switched off in London until ESN has been comprehensively tested by all three emergency services (particularly the Metropolitan Police Service, MPS, who make up a majority of users), the British Transport Police (BTP) and Transport for London (TfL). The ESN must meet their varying operational requirements on a day to day basis and at times of peak demand. It should be tested extensively in incident response and time must be allowed to collect detailed feedback and make necessary adjustments, which is likely to require an extensive period of dual running. It must be tested in a wide variety of locations. (22.8)

Recommendation 283: The HO must ensure alternative fallback mechanisms are available in the event of any limitation of the ESN. (22.9)

Recommendation 284: BT should review the resources available to support the 999 service and consider how they can respond effectively to sudden surges in the number of calls. (22.10)

Recommendation 285: The Cabinet Office should take advantage of learning from international use of public warning systems and as part of the next phase of the alerting trial, move to develop hybrid functionality to build an optimal system for all types of major incident affecting public safety. This should also consider how to alert those for whom English is not a first language and, recognising that places of worship may represent a target for terrorists, how to ensure those attending places of prayer have a rapid means of receiving real-time information. (22.17)

Recommendation 286: Local authorities and the MPS, in partnership with local business owners (including via Business Improvement Districts where they exist) should work together to map blind spots and take appropriate action to ensure the provision, management and monitoring of CCTV across public spaces is comprehensive and coherent. Where possible, privately owned cameras should feed into monitored networks. (22.22)

Recommendation 287: Consideration should be given to extending this real-time MPS access to those TfL cameras monitoring areas which contain targets likely to be considered high-value from a terrorist perspective. (22.24)

Recommendation 288: Any use of AFR by the MPS must be overseen by an Ethics Panel and there must be review mechanisms in place. (22.39)

Recommendation 289: It is therefore crucial that London's small but expert counter-drone capability, set up in the MPS following what happened at Gatwick, is at the very least maintained. This must be available on a 24/7 basis. (22.47)

Recommendation 290: The MPS should consider investing further in its drone capability with respect to supporting the response to a terrorist attack, in complement to its counter-drone activities. (22.49)

Recommendation 291: The Department for Transport (DfT) should urgently consider legislation requiring users and owners to register their drones in the UK with heavy fines for those found to be owning or controlling unregistered drones. (22.54)

Recommendation 292: The HO, in conjunction with the DfT, should work with Ofcom to explore options for a dedicated frequency to facilitate drone use by the emergency services in response to major incidents including terrorist attacks. They should also seek to engage with the Civil Aviation Authority (CAA) to secure dedicated airspace across London for drone operation. (22.55)

Recommendation 293: Representatives from the emergency services should be engaged in trials of emerging technological capabilities where appropriate to provide a user perspective. (22.58)

Recommendation 294: The CSA for National Policing should seek to commission a programme of research to explore how developments in science and technology may be harnessed to counter the risk from terrorism, consider the human behavioural interaction (from the perspectives of the general public and front line responders) and improve response to the prevention and mitigation of major incidents. (22.60)

APPENDIX B: TERMS OF REFERENCE

The review will have two parts:

1) A review of the London relevant recommendations from specified reports and the extent to which they have been acted on and implemented, and what gaps remain. Those specified reports are:

- a. Lord Harris Review;
- b. HMICFRS CT Prevent inspection;
- c. Jonathan Hall independent reviewer – MAPPA Review;
- d. Recent attacks in Streatham and Fishmonger’s Hall; and,
- e. Inquest reports into the 2017 attacks

This list is not exhaustive and it will be appropriate for the Reviewer to consider the learning that emanates from the Manchester arena attack.

2) A strategic, London-wide look at how the city is prepared to cope with a serious terrorist attack in London. It will look at the working relationships and cooperation between all of the agencies involved, ability to cope with the different scenarios and highlight gaps between agencies or shortages of expertise and resources and propose actions to address this.

Remit

In order to do this the Review will consider the capacity of organisations and groups, statutory and non-statutory, operating in London, to effectively respond to a diverse range of terrorist attack. This will include looking at their planning and exercise regimes.

APPENDIX C: MEETINGS AND SUBMISSIONS

In undertaking this review, I heard from a very wide range of people. Without their engagement and input this work would not have been possible and I am grateful for their participation. The following is a list of those individuals and organisations who contributed:

POLICING IN LONDON

Commissioner of the Metropolitan Police Service, Dame Cressida Dick DBE QPM	Commander Richard Smith, Specialist Operations, Counter Terrorism Command
Deputy Commissioner of the Metropolitan Police Service, Sir Stephen House QPM	Duncan King, Director of Resources, Counter Terrorism Policing
Assistant Commissioner Matt Jukes QPM, Specialist Operations	<i>In addition, officers from:</i>
Assistant Commissioner Neil Basu QPM, Strategic Command Course Director, College of Policing	Aviation Policing Command
Former Assistant Commissioner Sir Mark Rowley QPM, Specialist Operations,	Counter Terrorism Command (National Digital Exploitation Service; Prevent; Chemical, Biological, Radiological and Nuclear; Offender Management)
Assistant Commissioner Nick Ephgrave QPM, Frontline Policing	Counter Terrorism Policing HQ
Assistant Commissioner Louisa Rolfe OBE, Met Operations	Local Borough Commanders
Deputy Assistant Commissioner Dean Haydon, Specialist Operations, Senior National Coordinator	Marine Policing Unit
Deputy Assistant Commissioner Matt Twist, Specialist Operations	Protective Security Operations (Protect; Threat Mitigation Technologies; Testing and Exercising)
T/Deputy Assistant Commissioner Jane Connors, Met Operations, Covid-19 and Public order	Public Order Command (Prepare)
T/Deputy Assistant Commissioner Bas Javid, Professionalism, Professional Standards	Specialist Firearms Command
Commander Simon Dobinson, Specialist Operations, Security / Aviation Command	Ken Marsh, Chairman, Metropolitan Police Federation
Commander Kyle Gordon, Met Operations, Uniformed Operations	<i>City of London Police:</i>
Commander Catherine Roper, Professionalism, Head of Profession, Crime Prevention, Inclusion and Engagement	Commissioner of the City of London Police, Angela McLaren
	Former Commissioner of the City of London, Police Ian Dyson
	T/Commander David Evans
	T/Commander Clinton Blackburn
	T/Commander David Laws
	Service Delivery Director Chris Bell

Chief Operating and Finance Officer Cecilie Booth

NATIONAL POLICING

Martin Hewitt QPM, Chair, National Police Chiefs' Council

Chief Constable John Campbell QPM, National Police Chiefs Council, Chemical, Biological, Radiological and Nuclear Lead

Chief Constable Debbie Tedds, National Police Chiefs Council, Vetting Lead

Chief Constable/Chief Executive Officer of the Civil Nuclear Constabulary Simon Chesterman QPM, National Police Chiefs Council, Armed Policing

HM Inspector of Constabulary and HM Inspector of Fire & Rescue Services

Matt Parr CB, HMICFRS National Lead for Counter Terrorism

Chief Constable of the British Transport Police, Lucy D'Orsi QPM

Assistant Chief Constable Sean O'Callaghan, Network Policing and Specialist Capabilities, and Lead for Civil Contingencies

ASSOCIATION OF POLICE & CRIME COMMISSIONERS

Marc Jones, Chair and Police and Crime Commissioner for Lincolnshire

Susannah Hancock, Chief Executive

LONDON AMBULANCE SERVICE

Heather Lawrence OBE, Chair

Daniel Elkeles, Chief Executive Officer

Jason Hallahan, Emergency Planning and Resilience Officer

LONDON FIRE BRIGADE

Commissioner Andy Roe

Deputy Commissioner Richard Mills

Assistant Commissioner Jonathan Smith, Operational Resilience and Control

Deputy Assistant Commissioner Daniel Cartwright, Fire and Rescue Service National Resilience, Deputy Lead for Chemical, Biological, Radiological and Nuclear

Deputy Assistant Commissioner Patrick Goulbourne, Operational Resilience

Deputy Assistant Commissioner Joanne Smith, Control and Mobilising

Andy Dark, Fire Brigades Union

David Shek, Fire Brigades Union

TRANSPORT

Sir Peter Hendy, Chairman, Network Rail

Siwan Hayward, Director of Compliance, Policing, Operations and Security, Transport for London

Glynn Barton, Director of Network Management, Transport for London

Kevin Clack, Network Security Manager for London Underground, Transport for London

Monica Cooney, Head of Control Centre Operations, Transport for London

Richard Jones, Head of Network Delivery, Transport for London

Graham Naughton, Crime and Security Manager, Arriva Rail London

Gareth Powell, Managing Director of Surface Transport and Executive Sponsor for Security, Transport for London

John Strutton, Senior Manager for Crime Reduction and Operational Security, Transport for London

Alison Fitzgerald, Chief Operating Officer, London City Airport

Emma Gilthorpe, Chief Operating Officer, London Heathrow Airport

Nick Best, Head of Security Intelligence and Risk,
London Heathrow Airport
Jonathan Coen, Security Director, London Heathrow
Airport

LOCAL AND CITY GOVERNMENT

Rajesh Agrawal, Deputy Mayor for Business
Heidi Alexander, previous Deputy Mayor for
Transport
Sophie Linden, Deputy Mayor for Policing and
Crime
Justine Simons OBE, Deputy Mayor for Culture and
the Creative Industries
Fiona Twycross, Deputy Mayor for Fire and
Resilience & Chair, London Resilience Forum
Debbie Weekes-Bernard, Deputy Mayor for
Communities and Social Justice
Amy Lamé, Night Czar
Claire Waxman OBE, Victims Commissioner
John Biggs, Mayor of Tower Hamlets
Rokhsana Fiaz OBE, Mayor of Newham
Cllr Jas Athwal, Leader, Redbridge Council
John Barradell, Town Clerk and Chief Executive, City
of London
Alison Griffin, Chief Executive, London Councils
Niall Bolger, Chief Executive, Hounslow Council and
Chair, London Prevent Board
Cllr Elizabeth Campbell, Leader, Royal Borough of
Kensington and Chelsea Council
Carolyn Downs, Chief Executive, Brent Council
Georgia Gould, Chair of London Councils and
Leader, Camden Council
John Hetherington, Head of London Resilience
Stuart Love, Chief Executive, Westminster City
Council
Catherine McGuinness, Chair of the Policy &
Resources Committee, City of London Corporation

Cllr Teresa O'Neill, Leader, Bexley Council
Cllr Rachael Robathan, Leader of Westminster City
Council
Cllr Darren Rodwell, Leader, Barking and Dagenham
Council
James Thomson, Chair of the City of London Police
Authority Board and Common Councilman for the
Ward of Walbrook
Richard Woolford, Strategic Director of Security and
Counter Terrorism, City of London Corporation
Kim Wright, Chief Executive, Lewisham Council

LONDON ASSEMBLY POLICE & CRIME COMMITTEE

Susan Hall AM (Chair)
Caroline Russell AM (Deputy Chair)
Shaun Bailey AM
Len Duvall OBE AM
Caroline Pidgeon MBE AM

CENTRAL GOVERNMENT

Department for Education
Department for Health and Social Care
Home Office
Ministry of Defence
HM Prisons & Probation Service
NHS England (London)

BUSINESS ORGANISATIONS

Heather Baily QPM, Chair, Security Industry
Authority
Steve McCormick, Director for Licensing and
Standards, Security Industry Authority
Paul Fullwood, Director of Inspections and
Enforcement, Security Industry Authority
Julian Enoizi, Chief Executive, Pool Re

Chris Medhurst-Cocksworth, Head of Risk Management, Pool Re

Omar Abu-Rish, Operations and Analytics Manager, International Security, NBC Universal

Thomas Aitken, Vice President International Security, NBC Universal

Alan Brown Group Security Director at Tesco

Neil Catton, Managing Director CIS Security and Chair, City Security Council

Gareth Griffiths, Head of Security and Resilience, The Crown Estate

Robert Hall, Director of Strategy, Resilience First

Guy Huckle, Manager of Operational Resilience and Contingency Planning, Network Rail

Matt Maer DSO MBE, Director of Group Security and Resilience, Canary Wharf Group PLC

James Nattrass, Director of Incident Management & Operational Security, Network Rail

Tony Read, Head of Security, Merlin Entertainments

VOLUNTARY AND COMMUNITY SECTOR

James Banks, Chief Executive, London Funders

Caroline Birkett, Head of Service, Victim Support

Nicky Dias, Operations Manager, Cruse Bereavement Care

Vijay Jassal, Assistant Director Policy & Strategic Partnerships, National Emergencies Trust

Simon Lewis Head of Crisis Response Improvement, British Red Cross

Jon Meech, Chief Executive, Hands on London

Gerald Oppenheim, Chair, London Emergencies Trust and Chief Executive, Fundraising Regulator

Emma Spragg, Director for London, Health & Local Crisis Response, British Red Cross; Voluntary Sector Panel; Voluntary and Community Sector Emergencies Partnership

FAITH AND BELIEF SECTOR

Jane Baird, Deputy General Secretary (Administration & Resources), United Reformed Church

The Venerable Luke Miller, Archdeacon of London

Steve Miller, Convener, London Boroughs Faiths Network

Jonny Newton, Head of Government Relations & External Affairs, and colleagues, Community Security Trust

Shaukat Warraich, Chief Executive, Faith Associates

OTHER

Baroness Louise Casey of Blackstock, DBE, CB

Centre for the Protection of National Infrastructure

Speaker of the House of Commons, Sir Lindsay Hoyle

Alison Giles, Director of Security for Parliament Police Crime Prevention Initiatives

Professor Jordan Giddings, Founder and Director, Melioro Group Limited

Simon Gordon, Chairman and Founder, Facewatch

Jonathan Hall QC, Independent Reviewer of Terrorism Legislation

Wyatt Harding, Chief Executive, Milford Global

Steve Hill, Visiting Senior Research Fellow at King's College London and Global Head of Operational Resilience at Credit Suisse

MI5

New York Police Department: Intelligence and Counter Terrorism officials

Tony Porter OBE QPM, Chief Privacy Officer,
Corsight AI

Professor Paul Taylor, National Policing Chief
Scientific Adviser

Chris Tsikolis, Head of Security & Business
Resilience, Victoria, Victoria Westminster &
Whitehall Business Improvement Districts

Rob Watts, Chief Executive, Corsight AI

John Woodcock, Lord Walney

WRITTEN SUBMISSIONS

I was grateful to receive a number of written
submissions from a range of individuals and
organisations, including:

London Borough of Bexley

Royal Borough of Kensington and Chelsea Council

London Borough of Newham

Unmesh Desai AM on behalf of the London
Assembly Labour Group

Rachel Bradburne, National Association of Funeral
Directors

Tony Charge, President and Chairman, Australian
Risk Policy Institute and Global Risk Policy Network

David Cloake, Foresight Solutions

Jon F, The Trusted CCTV Improvement Project

Neville Hay, Brooklyn Associate Ltd

Stuart Hyde QPM, British Red Cross

Peter Joyce, Chief Executive, Inform Tech Plus

London Funders, the London Emergencies Trust and
the National Emergencies Trust

V.Rakstiņš, London resident

Nick Taylor, Chief Executive, Peace Foundation

MEETINGS

I also attended a number of other meetings,
including:

Security Review Committee

London CONTEST Board

APPENDIX D: RECOMMENDATIONS FROM 2016 REVIEW AND STATUS

Unless otherwise indicated, the below recommendations have been resolved or otherwise closed. Details of progress made one year after I published my 2016 review are available separately¹⁵⁷.

Recommendation 1: The Mayor should ask the Chair of the London Resilience Forum to consider how London's preparedness to deal with a major incident may be impacted by a majority of the three main 'blue light' emergency services workers living outside London.

Recommendation 2: The Mayor should consult the London boroughs and the Corporation of London on an alteration to the London Plan to formally identify the need for specialist emergency services worker housing as an important planning issue for London.

Recommendation 3: A full review of perimeter security at London City Airport should be conducted by the MPS and airport management.

Recommendation 4: The Civil Aviation Authority should, building on the work of the House of Lords review into the civil use of drones, ensure that the current legislation relating to the use of drones is suitable. Government should also explore technological options to improve the capacity to restrict drone use or disable them.

Recommendation 5: The Mayor should seek, nationally, assurances that the routine screening and searching of cars and freight entering the country is being significantly enhanced, with an uplift in land-based and sea-based border force coverage. In addition, the aerial surveillance capacity available to the Border Force, the National Crime Agency (NCA) and the police enabling them to monitor and control the border needs to be enhanced given that existing capacity is already fully utilised.

Recommendation 6: Joint intelligence hubs should be established between the NCA and MPS to tackle the illegal importation of firearms with regular reports to Ministers and to the Mayor's Office on the progress being made.

Recommendation 7: Consideration should be given to the appointment of a counter-terrorism adviser to the Mayor and Deputy Mayor for Policing and Crime.

Recommendation 8: The role of the Mayor in an attack needs to be more clearly considered by all partners.

Recommendation 9: The Cabinet Office should urgently update their guidance on COBR attendees to unequivocally include the Mayor in all meetings about incidents affecting, or potentially affecting, London.

¹⁵⁷ https://www.london.gov.uk/sites/default/files/progress_report_-_harris_review_into_londons_preparedness_to_respond_to_a_major_terrorist_incident.pdf

Recommendation 10: The Mayor and the Metropolitan Police Service should strongly resist any attempts by central government to move the counter-terrorism function and wider counter-terrorism policing network from the MPS to the NCA.

Recommendation 11: It is essential, in the EU exit negotiations, that UK policing is able to maintain the required international arrangements that currently work to keep us safe.

Recommendation 12: In all cases where terrorism is considered in the initial phase of an operation, and the counter-terrorism protocols are, or should have been, implemented, there should be a thorough review of the operation to ensure any lessons can be learnt.

Recommendation 13: In choosing how to allocate resources, the MPS must strike a reasonable balance between the intelligence picture and a sensible assessment of other tactics which terrorists might use and, above all, there should be a readiness to expect the unexpected.

Recommendation 14: When deploying the military, it is important that proper communication takes place with the public, led by senior politicians and police and military leaders, to provide reassurance and give confidence to Londoners and visitors to the city.

Recommendation 15: The Operation Temperer process should be fully tested during one of the regular counter-terrorism response exercises.

Recommendation 16: The military and police must keep under constant review, in the light of developing threat assessments, the level and availability of specialist troops used to confront or neutralise a terrorist threat.

Recommendation 17: A permanent armed policing presence should be maintained at the MOD headquarters on Whitehall. Any attempt to reduce this resource, with an expectation that the MPS will provide policing cover, should be accompanied by the appropriate transfer of funds.

Recommendation 18: The MPS should review the number of motorcycles and trained drivers available to ensure an adequate response is still available should the road network around an incident – as is likely – become heavily congested.

Recommendation 19: Consideration should be given to wider measures to increase the number of firearms instructors.

Recommendation 20: It should be ensured that the fullest use is made of all available providers of firearms training, such as the City of London Police and the MOD Police.

Recommendation 21: The Home Office and National Police Chief's Council should review firearms training to generate a national picture of capacity to see if further resources are needed, in the short-term.

Recommendation 22: The '30plus' scheme should be reintroduced to help to ensure that there is a pool of suitably qualified and experienced instructors and firearms officers maintained and enhanced within the Service.

Recommendation 23: Work to introduce a reservist programme has the potential to increase flexibility and resources at times of higher demand and should be explored thoroughly.

Recommendation 24: It is important that the MPS does not lose focus on improving the diversity – in terms of both gender and ethnicity – of the cadre of firearms officers.

Recommendation 25: While focusing on the recruitment of firearms officers the MPS needs to develop an appropriate retention strategy to reduce wastage levels of these officers.

Recommendation 26: If any recommendation about special payments to firearms officers is made by the Independent Police Remuneration Review Body, there must be a mechanism that ensures this does not add to existing funding pressures within the MPS. *This recommendation is not being taken forward.*

Recommendation 27: In future, the Home Office should fully fund the National and International Capital Cities Grant to ensure that London is properly protected and London's communities are not having to subsidise national functions. *The Mayor will continue to make the strongest case for fair funding for London in light of the Home Office's continued refusal to fully fund the National and International Capital Cities (NICC) grant.*

Recommendation 28: Action should be urgently taken to approve the new conductive energy device as a less lethal option for policing.

Recommendation 29: The Mayor and the Commissioner should give joint consideration to whether there is a case for equipping more, properly trained and supervised, officers with CEDs.

Recommendation 30: The Home Office should have a clear, light-touch, approach to agreeing funding that operational leaders believe is important in keeping the public safe.

Recommendation 31: A business case for these flexible barriers has previously been considered by the Home Office, but may be revisited. They should review this urgently and move to fund a solution. *This recommendation remains open.*

Recommendation 32: Consideration should also be given by the GLA and relevant local authorities to the wider installation of protective bollards in areas of vulnerability around London and to explore the case for retractable bollards in certain areas.

Recommendation 33: The MPS should learn from the mapping technology being developed by the BTP and introduce similar systems for major sites in London such as shopping centres, large entertainment venues and even museums and galleries.

Recommendation 34: The MPS should work with BTP, and others, to see how live CCTV streaming could be introduced to all parts of London where it might have value.

Recommendation 35: The MPS should, as quickly as possible, begin the implementation of Project Servator as part of the existing armed uplift programme in the Metropolitan Area, using the full range of tactics associated with the Project, and adhering to its principles and practice as closely as possible.

Recommendation 36: As the process of replacing the existing Airwave radio system continues, policing, and particularly the BTP, must be fully engaged and any concerns they have should be considered carefully. The Airwave network should not be switched off until it can be shown that the new ESN works adequately everywhere and, in particular, underground to the satisfaction of the MPS, the BTP and TfL.

Recommendation 37: Should the Home Office continue with plans to merge certain national policing functions, such as the MOD Police and the Civil and Nuclear Constabulary, they should undertake a full assessment of the benefits of bringing the MPS and BTP underground network together.

Recommendation 38: Following the COLP example, and in discussions with them about their learning from the process, the MPS should consider whether a contingent Anti-Terrorism Traffic Regulation Order would be valuable in other parts of the capital.

Recommendation 39: The Home Office should undertake a full assessment of the benefits of merging the MPS and the COLP, with the national financial and fraud functions moving to the National Crime Agency.

Recommendation 40: The COLP and MPS must work together to ensure that MPS officers who might be deployed into the City during an attack have a very good working knowledge of the area and the significant buildings which might become targets.

Recommendation 41: MOPAC should consider repeating the survey of firearms officers with MPS officers to ascertain whether the recent armed uplift, concerns about an MTFA, or further changes to the post-incident procedures have added to, or reduced, concerns.

Recommendation 42: I would urge the Home Secretary to sign off the guidance on IPCC investigations into deaths following police contact as soon as possible, and certainly by the end of the year.

Recommendation 43: Central to the statutory guidance to the IPCC – whether currently included in the draft or not – should be measures to speed up investigations, and the Home Office should consider additional resources to the IPCC if needed to deliver this.

Recommendation 44: The draft protocol that the IPCC have developed with the police specifically on responding to a major terrorist incident, should be agreed swiftly.

Recommendation 45: The IPCC must, at a senior and operational level, be fully involved in future full exercises of MTFA response.

Recommendation 46: There should be audio-recording of all command decisions taken by senior tactical and strategic leads in the command centres during an incident.

Recommendation 47: It is important that agreement is rapidly reached for the current co-responding pilot to be expanded to all London boroughs as quickly as training resources allow.

Recommendation 48: There should be no delay in implementing the new training for LFB personnel, and there should be a strategic approach to this training to ensure that the training is rolled out to those officers most likely to find themselves on the scene of an attack, based on assessments by the police and others, before other officers are trained subsequently.

Recommendation 49: It is important that agreement is reached as soon as possible between the fire service and the FBU to encourage all relevant fire officers to have the special training to enable them to crew Fire Rescue Units with the appropriate equipment so that they are able to respond to MTFAs. I would hope that this agreement could be reached by the end of this year.

Recommendation 50: The Home Office should give consideration to supporting the costs associated with LFB increased MTFA capability, or at least match-funding the provision with the LFB/Mayor.

Recommendation 51: The Mayer review into the London Fire Brigade should look at the number of FRUs and the possibility of an attendance standard for these specialist units. Reallocation of existing resources should be considered in order to provide this.

Recommendation 52: The Department of Health should examine how extra resources can be provided to the LAS to reflect the additional demands placed on it as being the provider of services to our capital city.

Recommendation 53: There should be four dedicated 24/7 Hazardous Area Response Teams in London and a similar number of Mass Casualty Vehicles. These should be strategically located around London.

Recommendation 54: Agreement on future MTFA funding for the LAS should be reached quickly, with the NHS adequately funding LAS' requirements.

Recommendation 55: The number of CBRN trained LAS staff should be reviewed with a view that it should return to the higher levels previously seen in London over the past few years.

Recommendation 56: The Home Office should review the provision of CBRN equipped response vehicles operated by the London Fire Brigade to ensure their numbers are sufficient.

Recommendation 57: Personal radiation monitors, which should be available to fire, ambulance and police personnel, should routinely be used.

Recommendation 58: A full testing and exercise programme should be developed to test the readiness of the LAS Control Room, including with no-notice exercises.

Recommendation 59: I would encourage the tri-service heads meetings to continue, with perhaps a greater focus on dealing with the attacks considered in this review, as well as the important matter of on-going collaboration.

Recommendation 60: The capacity of London's major trauma centres should be reviewed further in the light of the latest planning assumptions and, in any event, it would be helpful if this could be exercised thoroughly to ensure that the assumptions used are sufficiently robust.

Recommendation 61: There would be value in NHS England working closely with those countries' health agencies – for example France and Belgium – to ensure that lessons are learnt from their response and best practice can be shared.

Recommendation 62: There is a specific need to bolster community mental health services in London to support vulnerable people who might be at risk of radicalisation.

Recommendation 63: The Home Office should work with the Department of Health to ensure that the Prevent duty applies to GPs.

Recommendation 64: It is important that CCTV is also available on all underground and mainline trains, and options for ensuring a suitable system, enabling operational commanders to have access in the event of an emergency, should be explored.

Recommendation 65: It is my view, having listened to the advice of experts, that in every situation as much of the transport network should be kept running as possible.

Recommendation 66: TfL and the BTP should provide advice to passengers – based on discussions and decisions taken by the Strategic Coordination Group – that goes beyond just the provision of information.

Recommendation 67: TfL should work with taxi and private hire companies – including Uber – to ensure that drivers have a good level of awareness about how to prevent a terrorist attack through a clear understanding of what constitutes suspicious behaviour.

Recommendation 68: TfL should also work with the MPS to ensure that there are sufficient processes in place to prevent the use of taxis or licensed minicabs by would-be terrorists.

Recommendation 69: DCLG should ring-fence budgets for local resilience teams and introduce a small inspectorate, sitting either within the Cabinet Office or DCLG, to monitor performance. If central government will not introduce such a review mechanism, the London Resilience Forum should consider its role here. *This recommendation is not being taken forward.*

Recommendation 70: Local authorities should work with the London Resilience Forum to consider where effective partnerships might be built at a sub-regional, but supra-borough, level, ensuring that local knowledge and connections can be retained.

Recommendation 71: The police and security agencies should ensure that timely and detailed information about the threat – including changes in police and terrorist tactics – is provided to their local authority partners to enable effective resilience planning to take place.

Recommendation 72: Local authorities should be prioritising an effective functioning CCTV network for the detection and prevention of terrorist (or indeed other criminal) activity across the capital in the interests of public safety. The level and functionality of CCTV provision should be kept under review by the Mayor's Office. *This recommendation remains open and is likely to be affected by the Manchester Arena Inquiry and the Protect Duty consultation.*

Recommendation 73: There is a strong argument in favour of putting in place a stricter regime that ensures the River is a safer and more secure place and this should be considered.

Recommendation 74: I recommend that consideration should be given to widening the remit of the Port of London Authority to give them a formal interest in the security of the River.

Recommendation 75: There should be a comprehensive review of safety and security on the river, commissioned by the Mayor, to report by May 2017.

Recommendation 76: The London Resilience Forum should establish a sub-group of partners to consider resilience on the Thames.

Recommendation 77: The police and security services should consider producing a regular newsletter – perhaps once a fortnight – put together with business in order to ensure that it meets their needs, which can provide up to date, and specific, guidance. This can then be distributed to heads of security in businesses, business groups and placed online for others.

Recommendation 78: I recommend that the Mayor convenes a small group to take forward discussions about how further information can be provided to business.

Recommendation 79: Communication should be improved with security operatives, via the SIA. This includes both communications of the threat in advance, and effective communication during an attack. This should include single points of contact in the key organisations.

Recommendation 80: Effective training should be given to SIA licensed security operatives that goes beyond the Griffin and Argus training already conducted. There should be a tailored package available to all SIA licensed personnel.

Recommendation 81: As the menu of tactical options for responding to an MTFA or other terrorist attack are developed, there should be specific consideration given to the role that SIA licensed operatives can play.

Recommendation 82: Support should also be given to in-house security, assuming assurances can be gained about their security credentials.

Recommendation 83: A package of support, to extract the most value in the event of an attack, should exist for those security personnel working in sports stadia and airports.

Recommendation 84: NaCTSO should review the published guidance given to crowded places, including stadia, to ensure it is up to date with relevant police and potential terrorist tactics.

Recommendation 85: The London Resilience Forum business group, which currently exists, should be renewed with a broader spectrum of businesses and business groups added to it to ensure a genuine cross-section of London's business community. The Metropolitan Police should ensure that a senior officer acts as the point of contact with this group and takes responsibility for ensuring that the issues that arise from their discussions are properly pursued.

Recommendation 86: The MPS should work with faith and community leaders to ensure that the current Argus and Griffin training packages are appropriately tailored to their needs and ensure that adequate training is given.

Recommendation 87: The Mayor should build on the creation of the MPS Muslim Communities Forum and create a separate pan-London, multi-faith, reference group who can provide advice, guidance and, most importantly, a unified voice to London in the event of a terrorist attack of whatever kind.

Recommendation 88: Local police and local authority chief executives and leaders should annually review the membership of the police engagement groups to ensure that they comprise the right members, and that they are regularly refreshed.

Recommendation 89: Key members of the LRF, including the police, fire and ambulance services, along with the Mayor's office should work together with London's voluntary sector to ensure they are being used effectively and that the lines of communication are sufficient in the event of an attack or other emergency. When the response to an MTFA and other terror attacks is exercised, the role of the voluntary sector should be properly rehearsed.

Recommendation 90: In the event of a significant terrorist attack all those who are registered as victims or survivors should have access to a dedicated source of information and advice.

Recommendation 91: In the event of an incident that the Mayor determines is of sufficient severity, this London Emergencies Trust should be immediately stood up to become the official, but independent, vehicle to provide charitable support for those affected.

Recommendation 92: The London Resilience Forum should define, for all situations of civic emergency, which organisations are responsible for marshalling and directing volunteers, or dealing with those who might have the best intentions, but whose energy and time could be better directed elsewhere.

Recommendation 93: The College of Policing should consider whether it is currently devoting sufficient resources to the provision of MAGIC training, particularly when demand for the course is currently outstripping the ability to provide places.

Recommendation 94: There is a need to ensure that all front-line personnel are adequately trained to deal with the types of injury that might be seen in an MTFA.

Recommendation 95: The LRF should give consideration to how it can improve representation by faith groups, and of groups representing the interests of commuters and tourists.

Recommendation 96: It is important that TfL are not considered just an adjunct to the LESLP guidance process, rather, as it is rewritten they should be engaged with directly, rather than simply consulted following the publication of draft guidance.

Recommendation 97: There would be value in ensuring that the Deputy Mayor for Policing and Crime sits on the LRF, along with the Deputy Mayor for Fire and the Deputy Mayor for Transport.

Recommendation 98: The LRF should have a bigger role in ensuring that lessons are learnt following any incidents and that, with added political weight behind them, they are able to use the power of the Mayorality to ensure that agencies across London implement any changes required to improve preparedness.

Recommendation 99: Given the importance of communications during an incident, there should be consideration given to giving a place on the SCG to a representative of the telecoms and mobile phone network providers.

Recommendation 100: The work to develop specially trained chairs for the SCG should continue urgently, with agreement reached quickly on who they are and training and communication begun as soon as possible.

Recommendation 101: It is important that the process of creating a situational awareness tool for the SCG continues at speed, and that the tool is tested quickly and regularly to ensure that it is fit for purpose in the event of an incident.

Recommendation 102: Wherever the main operational decision making centre is located, there should be space for the Mayor or his representative to be present.

Recommendation 103: A subgroup of the LRF should be set up, comprising the MPS, LAS, LFB and others, to consider the future exercise programme.

Recommendation 104: There should be a clear role for the Mayor and the relevant Deputy Mayors in overseeing the exercises in London, and ensuring that remedial action to address lessons learnt is taken very quickly.

Recommendation 105: Simple lessons from Project Servator, such as clear instructions to all armed officers to engage with members of the public, the provision of public information leaflets and the use of basic behavioural detection should be embedded in the training of armed officers.

Recommendation 106: The regular PAS survey commissioned by MOPAC should be adapted to include specific questions on public perception of the threat and the public attitude to the measures being taken to counter the threat.

Recommendation 107: On the whole, and where reasonable, the MPS should aim to provide information quickly, even if corrections need to be made. This should go beyond the generic messages that are currently part of the prepared output.

Recommendation 108: In all major exercises the MPS Directorate of Media and Communications should have a central role, and, where possible, specific members of the media should be invited to participate.

Recommendation 109: Table-top media exercise sessions should continue, adequately resourced, and should involve both home affairs specialists and broadcast and print editors and sub-editors, along with representatives of social-media companies.

Recommendation 110: The Mayor should quickly work with the Cabinet Office to introduce a London-wide pilot of public alert technology.

Recommendation 111: The MPS should introduce sufficiently clear protocols on their own internal communications to ensure that information is disseminated effectively and speedily within the organisation. In particular, it is important that borough commanders are rapidly informed of relevant activity so that they can brief their local Members of Parliament, Assembly Members, and councillors. This process should be tested during exercises.

Recommendation 112: As the Home Office revise the CONTEST strategy, they should place effective communication and the provision of timely and detailed information to others at the heart of the strategy.

Recommendation 113: The Home Office should urgently look again at the total number of CTAs and CTAs that it funds around the country with a view to enhancing the resource.

Recommendation 114: The MPS should continue their aim to train one million people nationally, seeking to expand this in future years with explicit stretch targets set for London.

Recommendation 115: Consideration should be given to requiring that counter-terrorism advice be brought into the process of obtaining venue or event licences and that appropriate assurances are given about staff training. The Mayor, together with the police and London Councils should consider how this can be done.

Recommendation 116: There should be discussions with the insurance industry, so that businesses and venues are required to obtain and act on advice in return for lower premiums or making take-up

of advice and training compulsory for certain businesses or establishments. *This recommendation is not being taken forward.*

Recommendation 117: Short-form advice on CT matters for small and micro businesses should be signed off quickly, and then rolled out, including utilising local authority and neighbourhood policing networks.

Recommendation 118: The MPS should make use of the venue mapping work that is being led by the GLA to identify appropriate places to whom training should be offered.

Recommendation 119: Owners and operators of shopping centres and landside retail at airports should, as many do, make sure that basic Project Griffin training is given, possibly via in-house security managers, at regular enough intervals to cope with the high staff turnover that these businesses experience.

Recommendation 120: Engagement with relevant premises and communities should be routine whenever a terrorist attack takes place outside the UK in order to improve awareness and security, along with awareness of the risk of copycat attacks.

Recommendation 121: The Department for Education should build on the model of having a designated governor responsible for safeguarding and ensure that all schools in London appoint a governor responsible for ensuring security and terrorism preparedness. They should require all schools to have full preparedness plans in place, with requirements that they are tested. If the Department for Education do not consider this valuable nationally, the Mayor should ensure it is implemented in London's schools.

Recommendation 122: The Government should consider the case, with police, CPNI and others, for the introduction of a statutory obligation for resilience to be designed into new buildings.

Recommendation 123: A phased programme of assessing the resilience of existing buildings should be considered.

Recommendation 124: When discussions are taking place about increasing the opening hours of the Palace of Westminster in order to provide more access for tourists and enhanced commercial use during recess, the implications for counter-terrorism policing should be carefully considered and discussed with the relevant authorities.

Recommendation 125: The law should be changed to ensure that in every case where an individual with a firearms licence negligently allows a weapon to be lost or stolen, they have their licence removed permanently.

Recommendation 126: Consideration should be given to appointing a Mayoral Adviser on resilience.

Recommendation 127: The new Mayoral Adviser should be supported by a Chief Resilience Officer for London, who would report directly to the adviser and the Mayor.