

<p>1 Friday, 2 February 2024</p> <p>2 (10.30 am)</p> <p>3 Preliminary Hearing</p> <p>4 THE CHAIR: Good morning. Thank you all for coming, those</p> <p>5 who are here in person and those who I dare say are out</p> <p>6 there in the ether somewhere. This is, I think, the</p> <p>7 sixth preliminary hearing in relation to this inquiry.</p> <p>8 This, like others, is dedicated to the essential, vital</p> <p>9 but largely unglamorous topic of case management.</p> <p>10 Yes, Ms Whitelaw.</p> <p>11 MS WHITELAW: Sir, as you know, I appear this morning with</p> <p>12 my learned friend Ms Pottle as counsel to the inquiry.</p> <p>13 Mr Mansfield King's Counsel and Mr Nicholls are here</p> <p>14 representing the family of Dawn Sturgess and also</p> <p>15 Charlie Rowley. Mr Watson King's Counsel and</p> <p>16 Mr Henderson appear on behalf of the Home Secretary and</p> <p>17 also a number of other government departments and</p> <p>18 agencies. Operation Verbasco, the joint police</p> <p>19 operation for this inquiry, made up of two police</p> <p>20 forces, the Metropolitan Police and the Thames Valley</p> <p>21 Police, who through SO15 and CTP South East are together</p> <p>22 responsible for Operation Verbasco, they are represented</p> <p>23 this morning by my learned friend Ms Giovannetti King's</p> <p>24 Counsel and Mr Moss.</p> <p>25 THE CHAIR: Thank you.</p> <p>Page 1</p>	<p>1 but for reference it is at tab 29.</p> <p>2 In summary, the public and media who are following</p> <p>3 this hearing remotely will do so by means of the delayed</p> <p>4 link, which is delayed by five minutes. Core</p> <p>5 participants and legal representatives who are following</p> <p>6 remotely have the other link, the live link.</p> <p>7 During the hearing members of the public and media</p> <p>8 who are present in the hearing room may not communicate</p> <p>9 with anyone outside the hearing room by phone, email,</p> <p>10 instant messaging or other electronic means. That is</p> <p>11 the effect of the protocol you have issued, sir.</p> <p>12 THE CHAIR: Yes.</p> <p>13 MS WHITELAW: The purpose of it, briefly, is to accommodate</p> <p>14 a situation where something is said which shouldn't have</p> <p>15 been said and we hope that doesn't happen; if it does</p> <p>16 we, will take the appropriate steps.</p> <p>17 THE CHAIR: It is designed for the protection of everybody,</p> <p>18 yes.</p> <p>19 MS WHITELAW: Indeed. And third, you have a bundle for this</p> <p>20 hearing. The central documents are our submissions and</p> <p>21 those of core participants, which are in section B, tabs</p> <p>22 4 to 11. Our submissions consist of our submissions</p> <p>23 dated 8 January 2024 at tab 4 and also a further note</p> <p>24 dated 29 January 2024 at tab 5, which we submitted</p> <p>25 having received submissions from core participants. The</p> <p>Page 3</p>
<p>1 MS WHITELAW: Mr Berry is here for the chief constable of</p> <p>2 Wiltshire Police. We have also received short</p> <p>3 submissions on behalf of the South West Ambulance</p> <p>4 Service NHS Foundation Trust, who have asked to be</p> <p>5 excused from this hearing, and also on behalf of the</p> <p>6 media.</p> <p>7 Sir, if I could begin with some housekeeping. First</p> <p>8 of all, as you have indicated, sir, this is a further</p> <p>9 open directions hearing in the inquiry. It is indeed</p> <p>10 the sixth directions hearing and the previous hearing</p> <p>11 took place on 6 September last year. Secondly, this is</p> <p>12 a hybrid hearing, so the advocates I have introduced are</p> <p>13 here in court but there are also some observers,</p> <p>14 including family members, who are on the remote link.</p> <p>15 There are in fact two links, as with previous</p> <p>16 preliminary hearings, one live link and one link that</p> <p>17 has a delay in it.</p> <p>18 If anyone who is on the link has any difficulties</p> <p>19 with following the proceedings, then please could they</p> <p>20 contact the inquiry team in the first instance, emailing</p> <p>21 Mr Smith, solicitor to the inquiry.</p> <p>22 Returning to the two different links, you, sir, have</p> <p>23 adopted a protocol on security measures for preliminary</p> <p>24 hearings. It has been published on the inquiry website</p> <p>25 and it is in the bundle. I don't ask you to turn it up</p> <p>Page 2</p>	<p>1 intention of the note was to provide useful focus for</p> <p>2 the oral hearing today, which we hope it has done.</p> <p>3 As with previous hearings, we do propose to publish</p> <p>4 the submissions on the inquiry website at the end of the</p> <p>5 hearing. If there is any objection to that taken by any</p> <p>6 core participant, then I invite them to raise that with</p> <p>7 you in the course of the hearing when they come to make</p> <p>8 their oral submissions.</p> <p>9 THE CHAIR: Yes.</p> <p>10 MS WHITELAW: For completeness, sir, you also have available</p> <p>11 to you in the bundle a range of submissions from</p> <p>12 previous hearings should they become relevant, as well</p> <p>13 as your previous rulings and directions.</p> <p>14 Fourthly, as we set out at paragraph 6 of our</p> <p>15 submissions at tab 4, we did make arrangements to</p> <p>16 conduct a further closed hearing following this hearing.</p> <p>17 However, we are pleased to say due both to the very</p> <p>18 detailed consideration given to the first restriction</p> <p>19 order applications and the continued cooperation and</p> <p>20 hard work of core participants, the restriction order</p> <p>21 process is progressing smoothly such that a closed</p> <p>22 hearing is not presently necessary.</p> <p>23 Finally, in terms of the housekeeping issues and the</p> <p>24 order of oral submissions this morning, I propose to</p> <p>25 address you briefly, first of all, in accordance with</p> <p>Page 4</p>

<p>1 the agenda item 1 -- the agenda is to be found at tab 1</p> <p>2 of the bundle -- I will deal with the ongoing</p> <p>3 restriction order exercise, providing an update since</p> <p>4 the last hearing in September and looking towards</p> <p>5 completion of the exercise, with the key juncture being</p> <p>6 the stage 2 disclosure in April.</p> <p>7 This is necessarily likely to touch upon agenda</p> <p>8 items 2 and 3, responses to previous directions and</p> <p>9 disclosure. I would then propose to invite submissions</p> <p>10 from core participants on those key issues before going</p> <p>11 on to address the other procedural matters, items 4 and</p> <p>12 6, so that is the anonymity, special measures</p> <p>13 applications, broadcasting and live links of substantive</p> <p>14 hearings and next hearings.</p> <p>15 THE CHAIR: 4, 5 and 6 is that?</p> <p>16 MS WITELAW: Yes.</p> <p>17 THE CHAIR: That seems sensible to me. Does anybody</p> <p>18 disagree?</p> <p>19 MR MANSFIELD: No.</p> <p>20 THE CHAIR: No.</p> <p>21 Submissions by MS WITELAW</p> <p>22 MS WITELAW: If I may start then with an update in terms of</p> <p>23 the restriction order exercise and related procedural</p> <p>24 matters. At the previous open hearing on 6 September</p> <p>25 last year Mr O'Connor King's Counsel informed you that</p> <p style="text-align: center;">Page 5</p>	<p>1 to consider those applications and, of course, rule on</p> <p>2 them.</p> <p>3 Lead or sample applications were made in advance of</p> <p>4 the September hearing, at which there was open debate</p> <p>5 regarding the principles to be applied to the</p> <p>6 restriction order applications, with submissions from</p> <p>7 core participants and from the media. The open hearing</p> <p>8 was followed by a series of closed hearings at which</p> <p>9 sample sets of documents were considered on</p> <p>10 a line-by-line, word-by-word basis, so that was it was</p> <p>11 not just the specific sensitivity being considered but</p> <p>12 its precise application on each occasion. The outcome</p> <p>13 of that process was both open and closed determinations</p> <p>14 from you, the open rulings to be found at tab 20 and on</p> <p>15 the inquiry website. The closed ruling, which, sir,</p> <p>16 records your determinations in closed schedules,</p> <p>17 self-evidently remains closed.</p> <p>18 As we stated in our submissions, and as you, sir,</p> <p>19 set out in the ruling, where restriction orders are</p> <p>20 approved, the relevant material will remain closed but</p> <p>21 you will be able to consider it and take account of it</p> <p>22 when reaching your conclusion on the terms of reference.</p> <p>23 THE CHAIR: That was the purpose, wasn't it, of converting</p> <p>24 the inquest into an inquiry, because had it remained</p> <p>25 an inquest, the coroner wouldn't have been able to</p> <p style="text-align: center;">Page 7</p>
<p>1 stage 1 of the disclosure exercise was essentially</p> <p>2 complete. Stage 1 is the process of His Majesty's</p> <p>3 Government and Operation Verbasco, together with others</p> <p>4 who hold fewer documents, including Wiltshire Police,</p> <p>5 Wiltshire Council and the South West Ambulance Service,</p> <p>6 providing to us, the inquiry legal team, potentially</p> <p>7 relevant documents for review and then our team</p> <p>8 indicating whether the documents are relevant or not</p> <p>9 relevant. In order to facilitate stage 2 of the</p> <p>10 disclosure process, that is the disclosure of documents</p> <p>11 to core participants, in particular the family, the</p> <p>12 relevant material has to be considered for sensitivities</p> <p>13 and restriction order applications made over identified</p> <p>14 sensitivities. You, sir, made directions for those</p> <p>15 applications in April 2023 and just for reference those</p> <p>16 directions are at tab 21 of the bundle.</p> <p>17 THE CHAIR: Yes.</p> <p>18 MS WITELAW: The process commenced in earnest at</p> <p>19 the September hearing. The restriction order process is</p> <p>20 a very considerable task, there are many thousands of</p> <p>21 documents in play, and given the acute sensitivities of</p> <p>22 this case, all need to be considered by a number of</p> <p>23 different government and counter-terrorism police</p> <p>24 departments and agencies so that the applications for</p> <p>25 restriction orders can be made, and then you, sir, need</p> <p style="text-align: center;">Page 6</p>	<p>1 consider anything that was covered by public interest</p> <p>2 immunity at all.</p> <p>3 MS WITELAW: No, it is excluded.</p> <p>4 THE CHAIR: Although it is half a loaf, at least I can</p> <p>5 consider it.</p> <p>6 MS WITELAW: Indeed. Where, sir, restriction order</p> <p>7 applications are not approved, the material will be</p> <p>8 disclosed in due course into open.</p> <p>9 THE CHAIR: Yes.</p> <p>10 MS WITELAW: So moving to progress since the ruling, as you</p> <p>11 know, sir, a very great deal of work has been undertaken</p> <p>12 by all involved since the last hearing. As we explained</p> <p>13 in our submissions at paragraph 14 at tab 4, we always</p> <p>14 envisage that the ruling on the first round of</p> <p>15 restriction order applications would subsequently assist</p> <p>16 in an efficient and streamlined process for preparing</p> <p>17 documents for future restriction order applications in</p> <p>18 the inquiry, albeit it is likely that one or more</p> <p>19 further restriction order application hearings may be</p> <p>20 necessary and that continues to be the case. The</p> <p>21 rolling restriction order process is now well underway</p> <p>22 with His Majesty's Government and Operation Verbasco</p> <p>23 each providing tranches of material for restriction</p> <p>24 order ruling. Operation Verbasco has provided two</p> <p>25 tranches of restriction order applications and both have</p> <p style="text-align: center;">Page 8</p>

<p>1 been considered by you and preliminary decisions have</p> <p>2 been promulgated. His Majesty's Government have</p> <p>3 provided applications for over half a dozen government</p> <p>4 agencies and departments. Preliminary decisions have</p> <p>5 been promulgated for four, with the remaining two to</p> <p>6 come in the next week.</p> <p>7 THE CHAIR: It is worth just making sure that I am in the</p> <p>8 same place as everybody else about this. The rolling</p> <p>9 restriction order procedure is absolutely crucial to</p> <p>10 getting the disclosure done according to the timetable</p> <p>11 which was set in April of last year and those who cannot</p> <p>12 be part of it need to know that it has been happening.</p> <p>13 What has been happening, as you have said, is that</p> <p>14 tranches of documents have been submitted to the</p> <p>15 inquiry's legal team with suggested redactions where</p> <p>16 appropriate and, as far as I can see at least, real</p> <p>17 effort has been made to use the sample rulings which</p> <p>18 I made in September of last year, or after September of</p> <p>19 last year, as a guide and what is then happening is that</p> <p>20 I am spending a day from time to time -- well, whenever</p> <p>21 it is necessary, going through those suggestions again,</p> <p>22 not just document by document but line by line. That is</p> <p>23 working. What I don't know, and what I am going to need</p> <p>24 help with, not necessarily from you but from others</p> <p>25 today, is how much more there is still to come.</p> <p style="text-align: center;">Page 9</p>	<p>1 THE CHAIR: March and April. Yes, okay.</p> <p>2 MS WHITELAW: The police report has been disclosed on the</p> <p>3 basis that a version footnoting underlying documents</p> <p>4 will be provided in due course as the restriction order</p> <p>5 process progresses and security considerations allow and</p> <p>6 a short supplementary report will be required to address</p> <p>7 any updating matters, but it was of course important to</p> <p>8 ensure that we could disclose as quickly as possible</p> <p>9 a version of it.</p> <p>10 THE CHAIR: Yes, absolutely.</p> <p>11 MS WHITELAW: We have already identified and are in the</p> <p>12 process of seeking stage 2 disclosure of other core</p> <p>13 material which we consider will be useful to core</p> <p>14 participants.</p> <p>15 The second issue that I wanted to address was the</p> <p>16 names ruling. As we explain in paragraph 11 of our</p> <p>17 submissions at tab 4 of the bundle, the first tranche of</p> <p>18 material for restriction order application that was</p> <p>19 received from His Majesty's Government on</p> <p>20 24 November 2023, it quickly became apparent from that</p> <p>21 that in order to rule on that first tranche, you, sir,</p> <p>22 would need to make a final ruling on the issue of names,</p> <p>23 which you had addressed in principle in your ruling of</p> <p>24 19 August.</p> <p>25 THE CHAIR: That is 22, isn't it?</p> <p style="text-align: center;">Page 11</p>
<p>1 MS WHITELAW: Yes. So, well, I am going to come back to the</p> <p>2 restriction orders in a moment and their very important</p> <p>3 impact on the timetable, but if I could just deal with</p> <p>4 three related matters relevant to items 2 and 3 of the</p> <p>5 agenda, which can conveniently be addressed now.</p> <p>6 THE CHAIR: Yes.</p> <p>7 MS WHITELAW: First of all, stage 2 disclosure. Sir, you</p> <p>8 have previously indicated that not all disclosure should</p> <p>9 await the end of the restriction order process and that</p> <p>10 there would be some documents that could be disclosed</p> <p>11 earlier.</p> <p>12 THE CHAIR: Absolutely.</p> <p>13 MS WHITELAW: We have kept this constantly in mind and are</p> <p>14 pleased to say we have been able to disclose to core</p> <p>15 participants since the last hearing items which start to</p> <p>16 explain the detailed narrative in this case. That is</p> <p>17 a compilation of CCTV with a duration of just over eight</p> <p>18 hours which was disclosed on 21 December 2023.</p> <p>19 THE CHAIR: Yes.</p> <p>20 MS WHITELAW: And a first iteration of the police report</p> <p>21 disclosed on 19 January 24.</p> <p>22 THE CHAIR: That is CCTV from both incidents, is it?</p> <p>23 MS WHITELAW: Yes.</p> <p>24 THE CHAIR: March and May?</p> <p>25 MS WHITELAW: Yes, that is a compilation.</p> <p style="text-align: center;">Page 10</p>	<p>1 MS WHITELAW: Yes.</p> <p>2 THE CHAIR: Yes.</p> <p>3 MS WHITELAW: Since our submissions and as indicated in our</p> <p>4 note, tab 5, paragraph 8, you made a provisional "minded</p> <p>5 to" ruling dated 9 January 2024, inviting objections</p> <p>6 within 14 days. Though we note the position of the</p> <p>7 media organisations in their submissions that they are</p> <p>8 concerned that the redaction of names may make documents</p> <p>9 more difficult to understand, no objections have been</p> <p>10 received for the ruling and we therefore invite you to</p> <p>11 finalise and confirm that ruling today.</p> <p>12 THE CHAIR: Yes, well, I shall ask each party present to</p> <p>13 deal with that separately.</p> <p>14 MS WHITELAW: Thank you.</p> <p>15 The third issue was with regard to witnesses and</p> <p>16 cipher list. The related tasks of preparing a highly</p> <p>17 provisional list of possible witnesses and the cipher</p> <p>18 list, the latter designed precisely to assist</p> <p>19 comprehension of the documents, has been ongoing for</p> <p>20 some time now. The cipher list extends considerably</p> <p>21 further than a provisional witness list and we confirm</p> <p>22 this because we know it has been a matter of concern for</p> <p>23 the family.</p> <p>24 THE CHAIR: They are two quite separate questions, surely,</p> <p>25 Ms Whitelaw. Who might be a witness is one thing;</p> <p style="text-align: center;">Page 12</p>

<p>1 understanding the documents by means of -- or at least</p> <p>2 improving the understanding of documents by means of</p> <p>3 ciphering is entirely separate.</p> <p>4 MS WHITELAW: Indeed.</p> <p>5 THE CHAIR: And the second is by no means restricted to the</p> <p>6 first. It must not be.</p> <p>7 MS WHITELAW: No, sir, and we confirm that. We have liaised</p> <p>8 with both His Majesty's Government and Operation</p> <p>9 Verbasco with regard to names for ciphering but a final</p> <p>10 unified cipher list is close to completion and this will</p> <p>11 then be available to all involved in the process of</p> <p>12 preparing the documents for stage 2 disclosure.</p> <p>13 THE CHAIR: You say close to completion, which is</p> <p>14 encouraging but a little unspecific. When is it going</p> <p>15 to be done?</p> <p>16 MS WHITELAW: I think an estimate will be in the next week</p> <p>17 or two.</p> <p>18 THE CHAIR: As quickly as that, right. Thank you.</p> <p>19 MS WHITELAW: We have been preparing a list of possible</p> <p>20 witnesses in parallel for efficiency as we review</p> <p>21 material. However, as I say, any such list must be</p> <p>22 highly provisional until stage 2 disclosure is made and</p> <p>23 core participants have a fully informed opportunity to</p> <p>24 make representations.</p> <p>25 THE CHAIR: It is not just your list, is it, it is theirs as</p> <p style="text-align: center;">Page 13</p>	<p>1 listening understands the difference between the topic</p> <p>2 of redaction of names and restriction orders in relation</p> <p>3 to names on documents, which you have mentioned, on the</p> <p>4 one hand, and the anonymity of witnesses on the other.</p> <p>5 They are entirely separate.</p> <p>6 MS WHITELAW: Yes.</p> <p>7 THE CHAIR: And quite different considerations apply to</p> <p>8 each. Once, between you, you have worked out who you</p> <p>9 would like to call as witnesses, if there is</p> <p>10 a suggestion that they would be at risk or that national</p> <p>11 security would be at risk if they were identified in the</p> <p>12 course of giving their evidence, then I will consider</p> <p>13 that. That is entirely separate and a much stiffer test</p> <p>14 than is applied when one is simply looking at documents</p> <p>15 and deciding whether everybody who, for example,</p> <p>16 everybody who has been copied into an email, needs to be</p> <p>17 identified.</p> <p>18 All right, thank you.</p> <p>19 MS WHITELAW: Thank you. We do remain in a position to</p> <p>20 indicate to core participants potential witnesses and we</p> <p>21 have had preliminary discussions with Wiltshire Police</p> <p>22 in particular about this. We intend to continue those</p> <p>23 discussions in our regular liaison with core</p> <p>24 participants but the cipher list remains a priority in</p> <p>25 order to facilitate restriction orders and stage 2</p> <p style="text-align: center;">Page 15</p>
<p>1 well, or might be.</p> <p>2 MS WHITELAW: That said we must, as I have also indicated,</p> <p>3 make efficient progress towards the hearings. We</p> <p>4 indicated in our original written submissions that we</p> <p>5 were proposing to indicate to His Majesty's Government,</p> <p>6 Operation Verbasco and Wiltshire Police witnesses we've</p> <p>7 identified whose evidence may be called or read in</p> <p>8 advance of this hearing in order to assist with the</p> <p>9 filing of lead first or sample applications for</p> <p>10 anonymity or special measures at the next hearing. The</p> <p>11 position moved on from this suggestion, as recorded in</p> <p>12 our note, which is at tab 5 and paragraph 11, since we</p> <p>13 understand that core participants are generally agreed</p> <p>14 it is better to put off the applications for anonymity</p> <p>15 and special measures in order to concentrate focus on</p> <p>16 the 19 April 2024 disclosure deadline, the date at</p> <p>17 which, sir, you had made a direction that documents need</p> <p>18 to be in their redacted form provided to the inquiry</p> <p>19 legal team.</p> <p>20 THE CHAIR: I have seen that and if I may say so it is clear</p> <p>21 that that is the consensus, and indeed there is no</p> <p>22 significant -- there is no voice at all raised</p> <p>23 otherwise, so I am happy to adopt that.</p> <p>24 I hope everybody who is listening, everybody in</p> <p>25 court will certainly know, but I hope everybody who is</p> <p style="text-align: center;">Page 14</p>	<p>1 disclosure.</p> <p>2 THE CHAIR: Right.</p> <p>3 MS WHITELAW: Returning then to the subject of restriction</p> <p>4 orders and disclosure, it is very encouraging that all</p> <p>5 involved consider that the date of 19 April 2024 set by</p> <p>6 you last year for the provision to the inquiry legal</p> <p>7 team of final redacted documents for onwards disclosure</p> <p>8 to core participants remains broadly achievable. It is</p> <p>9 imperative that this is the case to safeguard</p> <p>10 the October commencement and we invite you to direct</p> <p>11 that all involved must take practical steps to ensure</p> <p>12 that this is achieved. Your recent ruling on names is</p> <p>13 an example of this pragmatic and necessary approach.</p> <p>14 THE CHAIR: Yes, well, we will see what people say but as</p> <p>15 far as I am concerned, Ms Whitelaw, subject to</p> <p>16 persuasive argument to the contrary, that is an absolute</p> <p>17 priority. And I shall want to explore with everybody</p> <p>18 here how it is to be achieved, because the direction</p> <p>19 which was given nearly a year ago now was that the</p> <p>20 material must be by 19 April in a form, duly redacted</p> <p>21 where necessary, in which it can be sent on to the core</p> <p>22 participants. Before that can be done, you and I have</p> <p>23 got to deal with any further redaction applications and</p> <p>24 it is the timetable between now and then which will</p> <p>25 dictate whether 19 April can be held or not and, as far</p> <p style="text-align: center;">Page 16</p>

<p>1 as I am concerned at least, it is going to be held.</p> <p>2 MS WHITELAW: You are one step ahead of me and I am just</p> <p>3 coming now to that issue of the timetable.</p> <p>4 In our note, we referred to caveats that have been</p> <p>5 raised at paragraphs 2 and 3 of His Majesty's</p> <p>6 Government's written submissions.</p> <p>7 THE CHAIR: Let me turn that up.</p> <p>8 MS WHITELAW: That is at tab 7 of the bundle.</p> <p>9 THE CHAIR: Yes.</p> <p>10 MS WHITELAW: As I say, it was paragraphs 2 and 3. We</p> <p>11 invite His Majesty's Government to address firstly the</p> <p>12 nature and quantity of the outstanding material that</p> <p>13 His Majesty's Government considers will not be available</p> <p>14 for stage 2 disclosure by 19 April, and that is</p> <p>15 referenced halfway down paragraph 2 of those</p> <p>16 submissions.</p> <p>17 THE CHAIR: This is material which they say that it is of</p> <p>18 a kind which, at least in the view of the author of the</p> <p>19 document, will not have any material impact on any core</p> <p>20 participant's preparation for the hearing and will not</p> <p>21 put the hearing date at risk.</p> <p>22 So that is what we are talking about.</p> <p>23 Do we know what it is?</p> <p>24 MS WHITELAW: I would like to invite Mr Watson King's</p> <p>25 Counsel in due course to address precisely what that</p> <p style="text-align: center;">Page 17</p>	<p>1 shortly after 19 April.</p> <p>2 THE CHAIR: Yes, now the police report, which I have only</p> <p>3 seen this morning and have glanced at, will undoubtedly,</p> <p>4 one would have thought, provide a really instructive</p> <p>5 introduction -- not introduction, a really instructive</p> <p>6 excursus into events. It shows redactions which have</p> <p>7 been made, doesn't it?</p> <p>8 Does the addition of the footnotes in the supporting</p> <p>9 documents which you have just mentioned is still to</p> <p>10 come, will that affect the redactions which are shown or</p> <p>11 not?</p> <p>12 MS WHITELAW: I would invite Verbasco and His Majesty's</p> <p>13 Government to address that point.</p> <p>14 THE CHAIR: Yes. I think everybody needs to know that.</p> <p>15 I can understand that there may well have to be some</p> <p>16 redactions to the police report but I need to know</p> <p>17 whether it will be affected by the addition to it of the</p> <p>18 supporting documents and the footnotes to which you have</p> <p>19 just referred.</p> <p>20 Thank you.</p> <p>21 MS WHITELAW: Thank you. A fourth point, which is in</p> <p>22 addition to our note, is we also invite His Majesty's</p> <p>23 Government to make clear any actions which they expect</p> <p>24 to be outstanding at the 19 April 2024 juncture.</p> <p>25 THE CHAIR: Yes.</p> <p style="text-align: center;">Page 19</p>
<p>1 outstanding material refers to, so there can be no</p> <p>2 doubt.</p> <p>3 THE CHAIR: Understood.</p> <p>4 MS WHITELAW: That is the first point. The second point is</p> <p>5 we invite confirmation that its restriction order</p> <p>6 applications as part of the current process will address</p> <p>7 not only the sensitive content of His Majesty's</p> <p>8 Government's documents that have been disclosed and</p> <p>9 deemed relevant, but also the content of similar</p> <p>10 Operation Verbasco documents.</p> <p>11 We understood this to be the effect of footnote 1 to</p> <p>12 the submissions but ask for confirmation. To explain</p> <p>13 that briefly, His Majesty's Government and Operation</p> <p>14 Verbasco made separate lead restriction order</p> <p>15 applications addressing their own sensitivities. There</p> <p>16 was a small amount of overlap, but each needs to</p> <p>17 consider the others' material and whether they need to</p> <p>18 make their own restriction order application over the</p> <p>19 other core participants' material.</p> <p>20 That is the second point we asked to be addressed.</p> <p>21 The third is we have also asked for confirmation of</p> <p>22 His Majesty's Government's position regarding the timing</p> <p>23 of disclosure of the full version of the police report,</p> <p>24 that is with the footnotes and underlying documents, and</p> <p>25 in particular, any reason why that may not be possible</p> <p style="text-align: center;">Page 18</p>	<p>1 MS WHITELAW: In addition to addressing those matters which</p> <p>2 I have just explained, sir, we indicated in our note</p> <p>3 that we will, as part of regular liaison with the team</p> <p>4 for His Majesty's Government, to ensure the efficient</p> <p>5 progress of the inquiry seek further detail as to the</p> <p>6 proposed timing and content of the remaining restriction</p> <p>7 order applications, with the intention of ensuring that</p> <p>8 the 19 April 2024 deadline is met. You, sir, may wish</p> <p>9 to consider setting a timetable with regard to that</p> <p>10 point.</p> <p>11 THE CHAIR: That is the point I made just a few moments ago,</p> <p>12 before you dealt with the police report, and it is</p> <p>13 critical to holding the 19 April, but I am sure</p> <p>14 everybody has considered it and I will hear what people</p> <p>15 say.</p> <p>16 MS WHITELAW: I should say that Operation Verbasco has</p> <p>17 provided us with indications of a route map of this sort</p> <p>18 for their material and we will also be liaising with</p> <p>19 Operation Verbasco in parallel with His Majesty's</p> <p>20 Government to ensure their planning incorporates</p> <p>21 His Majesty's Government's review of their material and</p> <p>22 theirs of His Majesty's Government's.</p> <p>23 Sir, we don't invite this level of detail now</p> <p>24 because it is likely to involve sensitivities and the</p> <p>25 liaison between a number of departments, but you may</p> <p style="text-align: center;">Page 20</p>

<p>1 wish to make a direction to ensure such detail is</p> <p>2 provided.</p> <p>3 THE CHAIR: Yes, I see.</p> <p>4 MS WHITELAW: If I could just briefly address two further</p> <p>5 matters relating to the restriction order process and</p> <p>6 disclosure before inviting core participants to respond.</p> <p>7 The first is international material. To explain the</p> <p>8 background here, Operation Verbasco possess a quantity</p> <p>9 of material which includes information derived from</p> <p>10 international partners. According to the terms under</p> <p>11 which such information is shared, Operation Verbasco</p> <p>12 must obtain permission from their international partners</p> <p>13 before such material is disclosed and permission remains</p> <p>14 outstanding in respect of some of the material. In our</p> <p>15 submissions dated 4 August 2023, which is at tab 12, we</p> <p>16 explained that the relevance review of international</p> <p>17 material was being addressed separately from the bulk of</p> <p>18 Operation Verbasco material, which had been reviewed by</p> <p>19 20 June 23. Due to the need to conduct a review of the</p> <p>20 international material as efficiently as possible rather</p> <p>21 than in a piecemeal way, the inquiry legal team asked</p> <p>22 Operation Verbasco to provide all international material</p> <p>23 in one tranche. By way of update, on 14 September 2023,</p> <p>24 Operation Verbasco provided us with a closed written</p> <p>25 update regarding that material. In their submissions</p> <p style="text-align: center;">Page 21</p>	<p>1 further on that.</p> <p>2 The second and final matter I wish to address was</p> <p>3 the March hearing date. As specified in your directions</p> <p>4 of 3 April last year, the core purpose of the hearing on</p> <p>5 15 March 2024 would be to determine outstanding issues</p> <p>6 arising from the rolling restriction order process now</p> <p>7 underway. That remains the intended purpose of the</p> <p>8 hearing. We will keep under review the need for an open</p> <p>9 hearing and a closed hearing. It may be that only one</p> <p>10 or the other is required.</p> <p>11 To address a concern raised at paragraph 6(a) of</p> <p>12 His Majesty's Government's submissions, which are at</p> <p>13 tab 7, it is intended that the majority of such issues</p> <p>14 will be resolve in the course of the current paper</p> <p>15 exercise. We anticipate there will only be a limited</p> <p>16 number of novel or difficult issues that will need to be</p> <p>17 dealt with by way of oral submissions at the March</p> <p>18 hearing or hearings.</p> <p>19 THE CHAIR: If there are any, that is when they will be</p> <p>20 dealt with, is it? Right.</p> <p>21 MS WHITELAW: Those are our submissions on the substantial</p> <p>22 agenda items and I propose to come back to the remaining</p> <p>23 items after you have heard from core participants on the</p> <p>24 matters I have addressed so far.</p> <p>25 THE CHAIR: That is sensible, Ms Whitelaw. Thank you very</p> <p style="text-align: center;">Page 23</p>
<p>1 for this hearing at tab 6, the family expressed concern</p> <p>2 that the delayed disclosure of the international</p> <p>3 material would not provide them with sufficient time to</p> <p>4 properly prepare for the evidence hearings. The family</p> <p>5 therefore asked for a gist of the written correspondence</p> <p>6 referred to above, and I can confirm that we received</p> <p>7 a gist from Operation Verbasco on 31 January, just</p> <p>8 a couple of days ago, in response to the request from</p> <p>9 the family and we will be providing this shortly to core</p> <p>10 participants shortly after the hearing.</p> <p>11 THE CHAIR: Have others here seen that yet?</p> <p>12 MS WHITELAW: I don't believe so, and I believe at the</p> <p>13 moment it is securely held, so that is why we need to --</p> <p>14 THE CHAIR: All right, but the gist for which Mr Mansfield</p> <p>15 has asked is on its way?</p> <p>16 MS WHITELAW: It is held by the inquiry legal team now, so</p> <p>17 it will be -- but in a secure location --</p> <p>18 THE CHAIR: I understand that it may have to be handled in</p> <p>19 a particular way but is it on its way?</p> <p>20 MS WHITELAW: Yes, absolutely.</p> <p>21 THE CHAIR: Right.</p> <p>22 MS WHITELAW: And Operation Verbasco has also made ready</p> <p>23 a bundle of the international material which has been</p> <p>24 gathered for the inquiry legal team's review and I am</p> <p>25 sure Ms Giovannetti King's Counsel will address you</p> <p style="text-align: center;">Page 22</p>	<p>1 much indeed.</p> <p>2 Mr Mansfield, I will give you the option. Do you</p> <p>3 want to hear from the government first or do you want to</p> <p>4 go first?</p> <p>5 MR MANSFIELD: If I may, yes, please.</p> <p>6 THE CHAIR: Mr Watson.</p> <p>7 Submissions by MR WATSON</p> <p>8 MR WATSON: Sir, on behalf of His Majesty Government,</p> <p>9 addressing of course first the restriction order</p> <p>10 applications, could I begin by emphasising that all</p> <p>11 government departments and agencies recognise the</p> <p>12 importance of completing the exercise which underpins</p> <p>13 stage 2 disclosure and as expeditiously as possible. As</p> <p>14 you are well aware and your team is well aware, the</p> <p>15 restriction order application process is well underway</p> <p>16 and it is fair to say that it is nearing completion.</p> <p>17 Applications have been made and are still being made on</p> <p>18 a rolling basis. You and your team know exactly what</p> <p>19 those applications require of HMG, sir, and that</p> <p>20 an enormous amount of painstaking work has to go into</p> <p>21 each one before they are put before you. As indeed your</p> <p>22 own team's submissions recognise, HMG is working hard at</p> <p>23 what is a time-consuming and detailed process and, of</p> <p>24 course, the government recognises that any ruling by</p> <p>25 you, sir, on the applications itself involves a very</p> <p style="text-align: center;">Page 24</p>

<p>1 intensive exercise. We have though, of course, the</p> <p>2 benefit now of your ruling of 3 November on the sample</p> <p>3 documents and therefore a clearer sense of where the</p> <p>4 open and closed divide lies.</p> <p>5 That has permitted of course a certain narrowing of</p> <p>6 the issues, although it is inevitable that each document</p> <p>7 still requires line-by-line review and, of course, it is</p> <p>8 inevitable that there remains the possibility of new</p> <p>9 issues, or variations of existing issues arising on any</p> <p>10 document that has not yet been examined.</p> <p>11 On any view, sir, it is an exercise for which there</p> <p>12 is no shortcut and it is an exercise which ultimately</p> <p>13 seeks to protect the interests, of course, of national</p> <p>14 security and the public interest generally.</p> <p>15 I hope that none of those preliminary observations,</p> <p>16 sir, are controversial, but with them in mind, could I</p> <p>17 just turn then, please, to the counsel to the inquiry's</p> <p>18 further note and, in particular, the questions,</p> <p>19 paragraph 6(1), (2) and (3).</p> <p>20 6(1), and obviously canvassed again this morning by</p> <p>21 Ms Whitelaw:</p> <p>22 "Further detail as to the nature and quantity of the</p> <p>23 outstanding material that HMG considers will not be</p> <p>24 available for stage 2."</p> <p>25 Can I address that head on, sir.</p> <p style="text-align: center;">Page 25</p>	<p>1 ourselves on 19 April. We could, of course, have simply</p> <p>2 erred on the side of optimism and said all would be well</p> <p>3 and hope that it would be, but that wouldn't have been</p> <p>4 doing any service to you, sir, and we know that you</p> <p>5 expect from us to tell you exactly where we are and if</p> <p>6 there is going to be an issue, what it is going to be.</p> <p>7 But I do hope that I can explain also something of the</p> <p>8 caveats and these explain why we present this on the</p> <p>9 basis that, at a minimum, the vast majority will be</p> <p>10 ready. The caveats.</p> <p>11 Firstly, and of course it is obvious, we can only</p> <p>12 speak to the documents that we already know about. We</p> <p>13 are referring to the known universe of documents, if you</p> <p>14 like, that we have in our sights that require review.</p> <p>15 That is not an idle observation and without intending to</p> <p>16 put anyone on the spot, this week Wiltshire Police</p> <p>17 provided us with their material that is to be reviewed.</p> <p>18 No criticism of them for that. That is now in the</p> <p>19 pipeline. We don't anticipate on a quick review of that</p> <p>20 material that is going to interrupt the deadline or</p> <p>21 affect it, but if there is other material that we don't</p> <p>22 yet know about which is brought to our attention, then</p> <p>23 of course we are going to have to deal with it --</p> <p>24 THE CHAIR: You must know, Mr Watson, surely, or at least</p> <p>25 you are likely to know, surely, what the possibilities</p> <p style="text-align: center;">Page 27</p>
<p>1 The reference in our written submissions to "the</p> <p>2 vast majority of documents being available" reflected</p> <p>3 our best assessment, candidly given, as to what would</p> <p>4 have been reached by 19 April, which at the time of</p> <p>5 drafting was of course 13 weeks away, but I emphasise,</p> <p>6 and I don't think I could emphasise this enough, it is</p> <p>7 not that HMG knew then or knows now that there is</p> <p>8 a specific category of material that is simply not going</p> <p>9 to be ready. It is not that, sir. It is rather that</p> <p>10 experience has shown that even with appropriate</p> <p>11 resourcing properly deployed and all our team working</p> <p>12 efficiently and diligently, there is the risk of some</p> <p>13 slippage and in part that is due to matters that may be</p> <p>14 outside of our control.</p> <p>15 THE CHAIR: Unforeseen slippage, is it, Mr Watson? It is</p> <p>16 not meant to be derogatory that, such things do happen.</p> <p>17 MR WATSON: I am going to come to explain I hope more</p> <p>18 precisely what those potential issues are.</p> <p>19 THE CHAIR: Please.</p> <p>20 MR WATSON: Slippage though, I should emphasise, is not</p> <p>21 inevitable and of course since our submissions were</p> <p>22 drafted, we have had CTI's further note and that has</p> <p>23 given comfort, I should add, in a couple of respects</p> <p>24 that I am going to come back to, but the vast majority</p> <p>25 was, as I say, a candid assessment of where we saw</p> <p style="text-align: center;">Page 26</p>	<p>1 are. You cannot, of course, rule out somebody who</p> <p>2 nobody has thought of before suddenly arriving with</p> <p>3 a briefcase with documents in it, but that aside you</p> <p>4 must know --</p> <p>5 MR WATSON: I think I put it more firmly than that, sir. We</p> <p>6 are relying on an assumption that we know the universe</p> <p>7 of documents that we are dealing with. Even within</p> <p>8 that, I should add, there are aspects of what will be</p> <p>9 required of us that are not known because even if you</p> <p>10 know the number of documents you are dealing with, the</p> <p>11 extent to which those documents are going to raise</p> <p>12 issues that you have to address in a restriction order</p> <p>13 application is only known when you actually start to go</p> <p>14 through, as you very well know, sir, line by line the</p> <p>15 documents. So even if you are presented with a schedule</p> <p>16 that says there are only 100 documents, one of those</p> <p>17 documents could be incredibly problematic and cause a</p> <p>18 series of issues. 99 of them might be fine; equally,</p> <p>19 the balance could be the other way.</p> <p>20 There are unknowns --</p> <p>21 THE CHAIR: It is new sources and unexpected novel material,</p> <p>22 is that it?</p> <p>23 MR WATSON: That is right. It is the Rumsfeld known</p> <p>24 unknowns and then the unknown unknowns.</p> <p>25 That is the first. The second and third caveats are</p> <p style="text-align: center;">Page 28</p>

<p>1 these, and we have had some comfort on this, I should</p> <p>2 emphasise, is the second caveat, the extent of the</p> <p>3 materials to be considered at the hearing in March.</p> <p>4 We recognise and greatly appreciate that in fact the</p> <p>5 vast majority of the applications are being resolved on</p> <p>6 the papers, and we of course have an opportunity then to</p> <p>7 review those and to determine whether there are any</p> <p>8 aspects that we think properly we should be bringing to</p> <p>9 your attention by way of oral submissions. But of</p> <p>10 course the more that is dealt with on paper in advance</p> <p>11 of March, the less that we have at that kind of</p> <p>12 cliff-hanger edge towards the end of the process. So we</p> <p>13 have taken some encouragement from that indication,</p> <p>14 which is extremely helpful if I may say so, sir.</p> <p>15 The third caveat in our submissions was of course</p> <p>16 the extent of other demands placed on HMG departments in</p> <p>17 the meantime, and of course there it is also helpful to</p> <p>18 understand that in fact the anonymity and other</p> <p>19 applications will follow the stage 2 disclosure. So it</p> <p>20 is not quite to say this is all we are dealing with,</p> <p>21 because, as you know, sir, there are various pieces of</p> <p>22 work being done on the rule 9 processes as well, there</p> <p>23 are other issues being considered in parallel at the</p> <p>24 same time, but the fewer there are of those, the more</p> <p>25 efficiently we can focus our resources on the specific</p> <p style="text-align: center;">Page 29</p>	<p>1 reason why that may not be possible shortly after</p> <p>2 19 April.</p> <p>3 Short answer again to that is no. The slightly</p> <p>4 longer answer, and this just refers to the same caveats</p> <p>5 that I have identified already, we are assuming that the</p> <p>6 final footnoted version will refer only to material that</p> <p>7 has already been identified as relevant, ie it falls</p> <p>8 within, as I have described it, our known universe of</p> <p>9 documents, and therefore it is going to be considered,</p> <p>10 and in some instances already has been considered, as</p> <p>11 part of the existing process.</p> <p>12 THE CHAIR: Yes. I mean, although it is a theoretical</p> <p>13 possibility, the chances of something turning up from</p> <p>14 a hitherto unknown source at this stage which has to go</p> <p>15 into the police report must be fairly small, mustn't it?</p> <p>16 MR WATSON: One would hope so.</p> <p>17 THE CHAIR: One certainly would.</p> <p>18 MR WATSON: Obviously as the process goes on, we have</p> <p>19 a greater confidence that we can meet the deadline.</p> <p>20 THE CHAIR: That is that.</p> <p>21 MR WATSON: Could I just explain on the police documents,</p> <p>22 this is of course material that originates from HMG but</p> <p>23 was in the police's possession. The point that you</p> <p>24 raised, or rather your team raised in their initial</p> <p>25 submissions, was could we not, if you like, expedite</p> <p style="text-align: center;">Page 31</p>
<p>1 disclosure exercise and stage 2 of course being the</p> <p>2 priority.</p> <p>3 So those I hope are the first, second and third</p> <p>4 caveats that I think properly, sir, must inform any</p> <p>5 assessment we give as to how we anticipate this playing</p> <p>6 out.</p> <p>7 Could I then please turn to 6(2) and (3), which are</p> <p>8 the further ILT questions in their further note. 6(2)</p> <p>9 was:</p> <p>10 "Confirmation that HMG's other applications as part</p> <p>11 of the current process will address not only HMG</p> <p>12 documents deemed relevant but also the content of ..."</p> <p>13 And the short answer to that is yes. I am going to</p> <p>14 return to the police documents because I know there was</p> <p>15 a question raised and I can understand from</p> <p>16 an outsider's point of view, ie those not directly</p> <p>17 involved in the process, there is a question raised, why</p> <p>18 can't you deal with the police documents that have</p> <p>19 already been subject to a sample review by you, sir.</p> <p>20 I am going to come back to that if I may. But the short</p> <p>21 answer is yes, it is all within, as I say, the known</p> <p>22 universe of documents that we are dealing with.</p> <p>23 6(3), position regarding the timing of the</p> <p>24 disclosure of the full version of the police report, ie</p> <p>25 footnotes underlying documents. In particular, any</p> <p style="text-align: center;">Page 30</p>	<p>1 those documents which had already been subject to your</p> <p>2 review on a sample basis so that of course then they</p> <p>3 could come to the front of the queue. Could I just</p> <p>4 explain a bit more about why in practice that is not</p> <p>5 going to work, and also I think it might assist just to</p> <p>6 give some flesh to the bones of the process that</p> <p>7 underlies these restriction order applications.</p> <p>8 THE CHAIR: Right.</p> <p>9 MR WATSON: As I have said, the restriction order</p> <p>10 applications are well under way and nearing completion.</p> <p>11 The making of the application, of course, sir, is the</p> <p>12 final part of a long process in terms of making the</p> <p>13 application. The series of internal steps that are</p> <p>14 involved requires each of the relevant government</p> <p>15 departments to review the materials, to identify if any</p> <p>16 part of the document risks harm to a public interest in</p> <p>17 the event of open disclosure. Those client responses</p> <p>18 are then collated and reviewed and, of course, subject</p> <p>19 to careful scrutiny as against each other and as against</p> <p>20 now the existing rulings that you have made, and there</p> <p>21 is in practice some and sometimes considerable to and</p> <p>22 fro internally with respect to those applications to</p> <p>23 ensure that they are properly refined before they make</p> <p>24 it to you, sir. You will anticipate, and I understand</p> <p>25 from what you have said already this morning that you</p> <p style="text-align: center;">Page 32</p>



<p>1 appreciate that we have been anxious to ensure that the</p> <p>2 applications that are made are made mindful of what you</p> <p>3 have already ruled and sensitive to that. So with that</p> <p>4 in mind, those HMG applications that are yet to come, in</p> <p>5 fact, are already a long way down that process,</p> <p>6 ie client departments have already given their views on</p> <p>7 the relevant material, they are in the process of being</p> <p>8 collated and there is that to-ing and fro-ing, and the</p> <p>9 police documents --</p> <p>10 THE CHAIR: Go on.</p> <p>11 MR WATSON: The police documents are in that process, so in</p> <p>12 many instances we already have some client responses.</p> <p>13 I think it may even be the case, but I don't want to</p> <p>14 commit to the detail of this, but it may well be in</p> <p>15 every instance we have had some client department</p> <p>16 response to the police documents. So they are in train,</p> <p>17 but what was not going to be, with the greatest of</p> <p>18 respect, sensible was to isolate them from the process,</p> <p>19 take them out of turn, put them to the front of the</p> <p>20 queue, if you like, and consider them separately,</p> <p>21 because we already have some responses, there are</p> <p>22 enormous schedules being generated, as you know, and</p> <p>23 then refined. They are in train and they are on their</p> <p>24 way.</p> <p>25 So I hope that that explains more fully why it is</p> <p style="text-align: center;">Page 33</p>	<p>1 basis, an assessment or a ruling, not always but on some</p> <p>2 occasions, and in any event, quite properly, sir, if</p> <p>3 there are matters that we consider we have not explained</p> <p>4 fully and actually require further elucidation, we have</p> <p>5 to give consideration to that and the clients have to</p> <p>6 review that. So a ruling that comes back, it is not</p> <p>7 simply in practice, yes or no. It is often yes, no, or</p> <p>8 maybe or if I hear more on this, perhaps.</p> <p>9 So that process is also ongoing. As you have heard</p> <p>10 already, we have started to have some of those come back</p> <p>11 to us, some of the rulings. In some instances we have</p> <p>12 been given, for example, two weeks to respond to</p> <p>13 specific questions that have been made in them, and so</p> <p>14 we are trying to factor, and we are trying, we are</p> <p>15 factoring, into these processes, that to-ing and</p> <p>16 fro-ing, if you like, as well. And that obviously, the</p> <p>17 resource, if you like, has to be managed at our end,</p> <p>18 normally by I should say the solicitors of the</p> <p>19 Government Legal Department, as to where it is best</p> <p>20 deployed, do we have, for example, a restriction order</p> <p>21 application that looks relatively straightforward in</p> <p>22 terms of how it will play out that should be put to the</p> <p>23 back of the queue, so that instead focus can be directed</p> <p>24 towards a ruling that has come back where there is</p> <p>25 a more significant issue.</p> <p style="text-align: center;">Page 35</p>
<p>1 that what looked like a very sound, and I could well</p> <p>2 understand the basis upon which it was proposed, in fact</p> <p>3 would at this stage only prove disruptive to what is</p> <p>4 now, I hesitate to suggest, a relatively efficient</p> <p>5 process of providing these applications and getting them</p> <p>6 to you.</p> <p>7 THE CHAIR: That is the answer to the why not promote the</p> <p>8 Verbasco document.</p> <p>9 MR WATSON: Precisely, because they are already in train.</p> <p>10 THE CHAIR: I've got that.</p> <p>11 MR WATSON: Thank you. I should say that that I think also</p> <p>12 should address head on the concern expressed on the part</p> <p>13 of the family that the applications with respect to</p> <p>14 police material will not be made after the 19 April</p> <p>15 deadline. That is not the case. We do anticipate that</p> <p>16 they will be made in time, of course, for the final</p> <p>17 resolution of the issues at the 15 March hearing. That</p> <p>18 is the process that we are working towards.</p> <p>19 I should also explain -- I recognise this is rather</p> <p>20 tedious but it is helpful, I think, to put some flesh on</p> <p>21 the bones of what is actually involved here.</p> <p>22 Of course the making of the application is not the</p> <p>23 end of the process. The application is made, sir, it</p> <p>24 goes to you obviously and for your team to review. We</p> <p>25 then receive, not always but often on a provisional</p> <p style="text-align: center;">Page 34</p>	<p>1 I explain all of that, I hope in some detail, in</p> <p>2 order to assist with giving some reassurance that we are</p> <p>3 all working incredibly hard to meet the 19 April</p> <p>4 deadline. The headline points are that we can assure</p> <p>5 you, sir, and other core participants that, at</p> <p>6 a minimum, the vast majority of stage 2 disclosure will</p> <p>7 be made on time and in accordance with your direction of</p> <p>8 last year. The prospect of there being any slippage at</p> <p>9 all has reduced in light of the further note from ILT</p> <p>10 and the reassurances that are given there, and it may</p> <p>11 well be, sir, there will be perfect compliance, as</p> <p>12 I know is expected of us, of any direction that you</p> <p>13 make, and we are obviously seeking to achieve that. We</p> <p>14 are though, and I hope it is clear from all that I have</p> <p>15 said, if and to the extent it transpires that we cannot</p> <p>16 perfectly meet that deadline and that existing</p> <p>17 direction, we cannot see that it will have any impact</p> <p>18 whatsoever given the nature of the issues that we are</p> <p>19 dealing with at that very end stage, that that will have</p> <p>20 any impact whatsoever on any core participant's ability</p> <p>21 to prepare for the hearing date in October.</p> <p>22 THE CHAIR: Right.</p> <p>23 MR WATSON: Could I just finally address should there be</p> <p>24 further directions made.</p> <p>25 I have sought to give an insight, I hope it is</p> <p style="text-align: center;">Page 36</p>

<p>1 helpful, as to what is required at our end, and I would 2 respectfully urge you, sir, to afford us a degree of 3 flex in how we approach these outstanding issues. It is 4 a question of managing resources, and of a very 5 different nature: a client expert resource on the one 6 hand, solicitor expertise on the other, counsel 7 resource, and actually different levels of counsel 8 resource; all of that has to be managed and is being 9 managed by the GLD solicitors, and I would respectfully 10 say expertly.</p> <p>11 It is not in fact, in my respectful submission, 12 going to assist if they are given bright lines within 13 the time period that we have to achieve what we all know 14 to be the end goal, which is stage 2 disclosure by 15 19 April. So, sir, I can understand the desire to step 16 into the fray and insist on deadlines for X, Y, Z, 17 I hope I have made clear that we are genuinely working 18 as hard as we can and that actually flexibility assists 19 us.</p> <p>20 As to a route map, as to where we go, there are in 21 fact I know very regular discussions that take place in 22 closed. We can of course give further information and 23 explain what we anticipate is coming down the pipeline, 24 but the reality is, sir, that some of it is actually 25 genuinely outside our control. Police documents come to</p> <p style="text-align: center;">Page 37</p>	<p>1 effectively, in which they can then be disclosed onwards 2 to other core participants, notably the family. There 3 would be a certain amount of processing which would have 4 to be done by the inquiry's team immediately after that 5 but that is not what is concerning me.</p> <p>6 What is hidden behind that is the question of what 7 volume of restriction order applications may come in 8 very late before 19 April. If an enormous quantity of 9 those arrives in the week before 19 April, you will not 10 have complied with this direction.</p> <p>11 MR WATSON: Of course, sir.</p> <p>12 THE CHAIR: As I am quite sure you understand.</p> <p>13 MR WATSON: And we wouldn't then blame you, sir. Of course 14 not.</p> <p>15 THE CHAIR: There is no point. The question is therefore, 16 in the assurances which you have been helpfully giving 17 me, is there built in the understanding that in order to 18 achieve a final set of -- not applications but concluded 19 redacted documents by 19 April, they have got to be 20 reaching the inquiry legal team in time for them and 21 indeed me to deal with them well before then.</p> <p>22 MR WATSON: I know the answer. I have been told it again. 23 The answer is yes. When I say all that I do about 24 19 April, it is having regard to what the direction is, 25 the content of it and what it means. We understand</p> <p style="text-align: center;">Page 39</p>
<p>1 us, we have to review them. Quite the nature and extent 2 of the issues that arise only often becomes apparent as 3 we go through the documents. So I would urge, if I may, 4 a respectful hands off to allow us to continue what we 5 are doing.</p> <p>6 THE CHAIR: That is persuasively put, Mr Watson. Let me 7 just ask a question.</p> <p>8 MR WATSON: Yes.</p> <p>9 THE CHAIR: I preface it by saying this: I am aware, as you 10 are, but there are others, especially the family, who 11 simply cannot be, of the way in which the rolling 12 restriction order procedure is going on.</p> <p>13 MR WATSON: Yes.</p> <p>14 THE CHAIR: And the restriction order applications are being 15 made in step-by-step tranches and they are receiving 16 attention first from my counsel and then, I am afraid, 17 also from me, literally week by week. That is going on 18 and I don't underestimate at all the amount of effort 19 and energy which is required of those who are behind you 20 and, for that matter, of you.</p> <p>21 But the question is this -- and, frankly, if that 22 were not happening, it simply couldn't operate at all. 23 But the question is this. The direction that I gave 24 nearly a year ago now was that by 19 April, there would 25 be available the final redacted documents in a form,</p> <p style="text-align: center;">Page 38</p>	<p>1 that, sir, there is no difference between us as to what 2 it means. We understand too what that means by way of 3 making applications before you and our having 4 an opportunity, if necessary, to further those 5 applications before you and then to implement the 6 decisions that --</p> <p>7 THE CHAIR: You have taken into account, is what you are 8 telling me, not only your own internal processing but 9 the fact that once the applications are received, they 10 have got to be dealt with by the team and I've got to 11 see them as well.</p> <p>12 MR WATSON: Absolutely.</p> <p>13 THE CHAIR: If you have taken that into account, that is as 14 much as I can ask. I will just say this, you and 15 Ms McGahey have been very tactfully making what I will 16 call the resources submission to me over the course of 17 the last two years now. If in the end this comes down 18 to resources, we have reached the point at which 19 additional ones are going to have to be provided.</p> <p>20 MR WATSON: I am very grateful you raise that because I did 21 want to make a very short point on it, if I may. We 22 obviously keep the issue of resources under very careful 23 review. It is important though to emphasise that this 24 is not a question simply of -- which I know you are not 25 suggesting, sir -- it is not a question of throwing more</p> <p style="text-align: center;">Page 40</p>

<p>1 people at it. In fact, as this pyramid, if you like, we  2 get to the top of the pyramid, it is increasingly  3 important that whoever gets to the top knows what has  4 happened already, understands your rulings, has read  5 your rulings, has seen them applied across three other  6 government departments, so in actual fact at this  7 particular juncture, sir, resourcing is only going to  8 get us so far but it is under review, and we have take  9 on board all you have said, sir, but I can assure you in  10 fact the reality is this will not be disturbed by a  11 question of resourcing, it is more likely there is  12 a Rumsfeldian unknown unknown, and that's why, I am  13 afraid, we have to put the caveat.</p> <p>14 THE CHAIR: I understand that and there is not much anybody  15 can do about the genuinely unknown unknowns. What I am  16 concerned should get through to those who are not here,  17 some distance behind you, is that we have passed the  18 point where proper regard for the other commitments of  19 all those who are busy at this and lots of other things  20 to do with other world events, we are past the point at  21 which this can be managed entirely internally without  22 regard to the absolute imperative of meeting this  23 timetable.</p> <p>24 MR WATSON: I understand that, sir.</p> <p>25 THE CHAIR: I know you do, Mr Watson, but I am going to say</p> <p style="text-align: center;">Page 41</p>	<p>1 Submissions by MS GIOVANNETTI</p> <p>2 MS GIOVANNETTI: Only very briefly, I think. I will not  3 reiterate the careful detailed time-consuming process  4 this morning to the restriction order applications.</p> <p>5 Thank you very much. I hope everybody has seen from our  6 written submissions the approach we have adopted, which  7 is to make the applications in four tranches. I can  8 confirm, and I hope this will be reassuring to the  9 family, that we are on track to do that as planned. Two  10 have already been made, another one is due this month  11 and the final one early in March. The relevant  12 underlying documents from the police report are included  13 in those four tranches.</p> <p>14 THE CHAIR: Say that again, the --</p> <p>15 MS GIOVANNETTI: The relevant underlying documents to the  16 police report are included in those four tranches, as  17 are the HMG documents and indeed the Wiltshire Police  18 documents, so we think it is pretty comprehensive. The  19 only thing that is really outside our control is the  20 remaining responses to our requests on the international  21 material.</p> <p>22 I think, since Ms Whitelaw prepared her submissions,  23 in fact the open list has gone into the updated bundle  24 and is now in tab 8(a). I hadn't seen that either but  25 it has gone in. So that is now available and that</p> <p style="text-align: center;">Page 43</p>
<p>1 it again. The hearing is going to happen on 14 October.  2 In order for it to happen on 14 October, core  3 participants have got to have time to prepare properly  4 for it and that means meeting the date of 19 April,  5 which was given now nearly a year ago, and it will mean  6 timetabling between now and then. As with all case  7 timetabling, one works backwards. You start with the  8 hearing date and work backwards.</p> <p>9 MR WATSON: Of course, sir.</p> <p>10 THE CHAIR: Anyway, you have that, I know, but I wanted it  11 to get through loud and clear to those behind you.</p> <p>12 MR WATSON: I understand. I think all I can properly say on  13 their behalf is that the resourcing is under review and,  14 with the greatest of respect, I don't think it is  15 a resourcing issue --</p> <p>16 THE CHAIR: It may not be and if it isn't, the point doesn't  17 arise, but it will not be acceptable as an excuse.</p> <p>18 MR WATSON: No, of course, I understand.</p> <p>19 Unless I can assist further on the first part --</p> <p>20 THE CHAIR: I don't think so, Mr Watson, thank you very much  21 indeed.</p> <p>22 Ms Giovannetti, do you want to come in at this  23 stage?</p> <p>24</p> <p>25</p> <p style="text-align: center;">Page 42</p>	<p>1 confirms that we have had responses from 90 per cent of  2 international partners. Since we sent you our original  3 closed update, there has been a further response. We  4 are doing all we can to chase them, but we are  5 optimistic that everything should be in place for the  6 early March deadline.</p> <p>7 THE CHAIR: Right.</p> <p>8 MS GIOVANNETTI: Unless there was anything else you wanted  9 assistance from us on, sir --</p> <p>10 THE CHAIR: No. You have heard what I said to Mr Watson, it  11 applies equally to you.</p> <p>12 MS GIOVANNETTI: Absolutely, yes. Thank you.</p> <p>13 THE CHAIR: Thank you very much indeed. Mr Berry.</p> <p>14 Submissions by MR BERRY</p> <p>15 MR BERRY: Thank you, sir. Two issues on restriction  16 orders. First, of the Wiltshire Police documents that  17 were disclosed to you in stage 1, 82 were deemed  18 relevant by your legal team and all those documents are  19 being given anxious consideration not just by Wiltshire  20 Police but by others for sensitivity and, for our part,  21 we will be able to make our restriction order  22 applications ahead of the April deadline, bearing in  23 mind of course the stage of the process that takes  24 place --</p> <p>25 THE CHAIR: It is no good doing it on the 18th.</p> <p style="text-align: center;">Page 44</p>

<p>1 MR BERRY: Absolutely.</p> <p>2 Those 82 documents have recently been provided to</p> <p>3 Operation Verbasco and HMG so that they may give</p> <p>4 consideration to any sensitivities specific to their</p> <p>5 interests in those documents.</p> <p>6 And that leads to the second point, which is that by</p> <p>7 way of reciprocation Operation Verbasco has recently</p> <p>8 offered Wiltshire Police the opportunity to review their</p> <p>9 relevant documents to establish whether there are any</p> <p>10 areas of sensitivity relating to Wiltshire Police not</p> <p>11 covered by their own restriction order applications.</p> <p>12 THE CHAIR: Yes.</p> <p>13 MR BERRY: How soon we can do that depends on how quickly</p> <p>14 the documents are provided, how many documents there are</p> <p>15 and what is in the documents, and on those three things</p> <p>16 all we know is that the quantity of the documents is not</p> <p>17 insignificant, but I can of course assure you, sir, that</p> <p>18 when the documents arrive, the process of reviewing them</p> <p>19 will be given top priority, bearing in mind how firmly</p> <p>20 the April deadline has been expressed and, moreover,</p> <p>21 I am reasonably optimistic that there will be few, if</p> <p>22 any, Wiltshire Police specific sensitivities that have</p> <p>23 not already been picked up by the team of Operation</p> <p>24 Verbasco.</p> <p>25 THE CHAIR: That is what I was going to pick up. What are</p> <p style="text-align: center;">Page 45</p>	<p>1 may I approach it as you have yourself, namely starting</p> <p>2 at the end, and I had a very constructive, as you may be</p> <p>3 aware, discussion with Andrew O'Connor two days ago and</p> <p>4 it is interesting that in fact it was an approach that</p> <p>5 he was grappling with at the time, and it is perhaps</p> <p>6 an unusual way of approaching this, but one is already</p> <p>7 thinking about October as an effective date and being</p> <p>8 prepared for that. Working backwards, and dealing with</p> <p>9 what the family has to deal with, is that from April</p> <p>10 onwards, it is a six-month period in which the family</p> <p>11 have to make the preparations for the inquiry. Now,</p> <p>12 I am going to divide that up slightly, because once one</p> <p>13 gets -- for the moment I leave aside matters that appear</p> <p>14 to be achievable and hopefully they will be achievable,</p> <p>15 I leave those to one side, the ones that may have</p> <p>16 a caveat attached to them, for the moment -- however, at</p> <p>17 some stage after 19 April, we will receive the</p> <p>18 disclosure that is due.</p> <p>19 THE CHAIR: Yes. Not immediately but within a pretty short</p> <p>20 time.</p> <p>21 MR MANSFIELD: Yes, well that was going to be the first</p> <p>22 observation, that we are well aware it will not be the</p> <p>23 day after or even the week after and it might take up to</p> <p>24 a month before we get it all, but I say no more.</p> <p>25 THE CHAIR: I hope not.</p> <p style="text-align: center;">Page 47</p>
<p>1 the prospects of Wiltshire Police having grounds to ask</p> <p>2 for a restriction order when neither His Majesty's</p> <p>3 Government nor Operation Verbasco have done so.</p> <p>4 MR BERRY: In circumstances where CTP did an investigation</p> <p>5 and spoke obviously to a number of Wiltshire Police</p> <p>6 officers, there may be a sensitivity with respect to one</p> <p>7 of them that Operation Verbasco simply is not aware of,</p> <p>8 but I suspect that that is very unlikely, but of course</p> <p>9 we are obliged really to undertake the process, which we</p> <p>10 wouldn't be --</p> <p>11 THE CHAIR: You can identify the possible pinch points in</p> <p>12 advance, can't you?</p> <p>13 MR BERRY: We are doing that already. There is a very</p> <p>14 fertile line of communication between the two teams and</p> <p>15 we have been greatly assisted by Operation Verbasco</p> <p>16 throughout.</p> <p>17 THE CHAIR: Yes, I am sure.</p> <p>18 MR BERRY: Thank you, sir.</p> <p>19 THE CHAIR: Thank you very much, Mr Berry.</p> <p>20 Mr Mansfield.</p> <p>21 Submissions by MR MANSFIELD</p> <p>22 MR MANSFIELD: Yes, thank you.</p> <p>23 May we thank you, first of all, for the reassurances</p> <p>24 about the date and I don't, as it were, wish to</p> <p>25 re-emphasise that we put that at the start anyway. But</p> <p style="text-align: center;">Page 46</p>	<p>1 MR MANSFIELD: Given what is being said about resources and</p> <p>2 all the rest, may we say on that topic, we have</p> <p>3 earmarked that at a much earlier stage, suggesting that</p> <p>4 the government in fact provides sufficient resources.</p> <p>5 THE CHAIR: No, you need not worry about resources,</p> <p>6 Mr Mansfield. What you said in the past has been noted</p> <p>7 and understood but there are -- it is much more</p> <p>8 complicated --</p> <p>9 MR MANSFIELD: I appreciate --</p> <p>10 THE CHAIR: -- than simply numbers.</p> <p>11 MR MANSFIELD: Which is the reason why I am concerned for</p> <p>12 the family that we may not get the material, so that is</p> <p>13 one -- let's hope it is not a month, but that is one</p> <p>14 month knocked off the six. In that period we have to</p> <p>15 assimilate -- well, we don't know how much is actually</p> <p>16 going to be disclosed any more than we don't really know</p> <p>17 from my learned friend's observations about the nature</p> <p>18 and quantity of other material that is being, as it</p> <p>19 were, surveyed at the moment, we are no wiser as to the</p> <p>20 nature or the quantity of that material, so I leave that</p> <p>21 to one side. However, the main material, we still don't</p> <p>22 know. However, can I just for these purposes, and</p> <p>23 I assure you I don't intend to read any of it out, we</p> <p>24 have been provided with the CCTV, which is being</p> <p>25 examined and that occupies time and we are grateful for</p> <p style="text-align: center;">Page 48</p>

<p>1 having that.</p> <p>2 However, we have had the police report, as you know,</p> <p>3 and I have raised this with Mr O'Connor, so he knows, or</p> <p>4 he knew very roughly what I was going to say on this</p> <p>5 topic, but that report, if you have it before you, as</p> <p>6 I say I am not intending to read any of it out but I do</p> <p>7 ask that if you do have it, you could refer to</p> <p>8 a particular passage as an example of the problems that</p> <p>9 are going to face the family. In fact, it is the</p> <p>10 section headed "Target".</p> <p>11 THE CHAIR: Paragraph number?</p> <p>12 MR MANSFIELD: Paragraph 12, page 6. There are there 12,</p> <p>13 13, all the way through to 19, all those paragraphs.</p> <p>14 THE CHAIR: Sorry, 12 to what, to 19?</p> <p>15 MR MANSFIELD: Yes.</p> <p>16 THE CHAIR: Yes.</p> <p>17 MR MANSFIELD: The whole section on "the target" who it is</p> <p>18 obvious who it is.</p> <p>19 I don't know what opportunity you have had to study</p> <p>20 the detail, however I would ask that you look at that</p> <p>21 carefully because you see immediately, I hope I am not</p> <p>22 exaggerating it, there are some pretty astonishing</p> <p>23 observations in this section alone and if what is said</p> <p>24 in this section alone about the target, there is and</p> <p>25 must be very much more material, or absence of material,</p> <p style="text-align: center;">Page 49</p>	<p>1 than an open ruling.</p> <p>2 THE CHAIR: Yes, it will do.</p> <p>3 MR MANSFIELD: What I am leading to here is the issues that</p> <p>4 the family may want to raise, preventability being one</p> <p>5 of them, but there are many others and obviously I will</p> <p>6 exemplify what some of the others may be, to do with</p> <p>7 Novichok, movements, other parties and so on, the list</p> <p>8 is quite extensive already in terms of issues, but in</p> <p>9 terms of tying those issues in with material, we cannot</p> <p>10 do much more than look at the police report as it stands</p> <p>11 and hopefully there will be other documents being</p> <p>12 disclosed after April 19, which will assist.</p> <p>13 However, the point I am coming to is this, that the</p> <p>14 analysis of the material we get after the 19th is going</p> <p>15 to be fundamental to -- I am going to make a suggestion,</p> <p>16 if I may, I understand there is a hearing identified</p> <p>17 in May of this year, however that is -- I mention --</p> <p>18 THE CHAIR: May or March.</p> <p>19 MR MANSFIELD: That is very soon after April 19th. It may</p> <p>20 be possible to raise, as it were, the issues. The</p> <p>21 issues that are going to come up and need to be resolved</p> <p>22 before the inquiry itself, I am going to use headings</p> <p>23 that Mr O'Connor has used, "Sequencing", in what order</p> <p>24 is the inquiry going to, as it were, address the</p> <p>25 various -- is it going to be chronological, is it going</p> <p style="text-align: center;">Page 51</p>
<p>1 which is of significance in this particular inquiry.</p> <p>2 I am going to isolate the point that I have behind this,</p> <p>3 and that is the question and the issue of</p> <p>4 preventability. I take it no further. But it is</p> <p>5 obvious from those paragraphs there is going to be more.</p> <p>6 Now, I don't know whether the questions that are</p> <p>7 already arising on that section alone are answered in</p> <p>8 the further report. My understanding is that they</p> <p>9 probably are not going to be answered in the further</p> <p>10 report, although there will be footnotes and underlying</p> <p>11 documents which may be of assistance, but they will not</p> <p>12 address the fundamental points that we may have on that</p> <p>13 issue. There are many other issues. Once you read the</p> <p>14 report, you will see there are many others. For</p> <p>15 example, on the issue of redactions, there are 17 pages</p> <p>16 of redactions, not all of them total pages, although the</p> <p>17 further you go into the report, starting at page, for</p> <p>18 example -- it should be the same on yours, so that is</p> <p>19 page 53 onwards. There is nothing visible there, or the</p> <p>20 succeeding pages. All together 17 pages in which,</p> <p>21 again, if we can just say, there must be questions</p> <p>22 arising there and in relation to the open and closed</p> <p>23 divide, it would be of great help if we did have a gist.</p> <p>24 We don't have a gist of this material and, as</p> <p>25 I understand it, it relates to a closed ruling rather</p> <p style="text-align: center;">Page 50</p>	<p>1 to be themed, is it going to be putting the Amesbury</p> <p>2 incident first. The difficulties with that are the</p> <p>3 moment you begin down one path, you find that in fact it</p> <p>4 merges with a number of others that overlap other</p> <p>5 sections.</p> <p>6 So compartmentalisation is going to be extremely</p> <p>7 difficult and that is why we are going to need</p> <p>8 considerable time. We are very happy to adopt</p> <p>9 a suggestion that Mr O'Connor has made, namely that we</p> <p>10 sit down and do it together. So the most effective way</p> <p>11 of -- and of course that bears upon what witnesses are</p> <p>12 required, and we are interested to hear that witness</p> <p>13 statements are being sought at this moment. We are</p> <p>14 nowhere near being able to decide what witnesses may or</p> <p>15 may not be required until we see what the witness list</p> <p>16 is. The witness list bears upon sequencing and which</p> <p>17 order you are going to call them.</p> <p>18 So there is sequencing, witnesses, issues, which</p> <p>19 comes back to the open/closed divide because -- and as</p> <p>20 far as I know, the different inquiries have adopted</p> <p>21 different procedures here, where there is material that</p> <p>22 can only be dealt with in the closed section.</p> <p>23 That will require, at some early stage, before the</p> <p>24 inquiry even begins the first day, a protocol of some</p> <p>25 kind as to what issues can be heard in public and what</p> <p style="text-align: center;">Page 52</p>

<p>1 can't. What questions can be asked in public and what</p> <p>2 can't.</p> <p>3 So again, just trying to approach it practically</p> <p>4 speaking, one doesn't want a situation in which in the</p> <p>5 middle of a witness you ask a question to discover it</p> <p>6 cannot be answered, and many of these witnesses overlap</p> <p>7 Amesbury and Salisbury, so again, it cannot be</p> <p>8 compartmentalised. So the issue about what can be heard</p> <p>9 publicly and what cannot be heard, that also has to be</p> <p>10 at least canvassed in a round table forum prior to --</p> <p>11 and my suggestion is this. Would you kindly consider</p> <p>12 a hearing possibly mid June, end of June, in which the</p> <p>13 matters I have just raised are canvassed, in order that</p> <p>14 everybody knows as far as is possible, once we have had</p> <p>15 a chance to look at everything, to whittle it down</p> <p>16 because we can't do that much before then because we</p> <p>17 will have only got the material -- well, say the end</p> <p>18 of April --</p> <p>19 THE CHAIR: Understood.</p> <p>20 MR MANSFIELD: -- at the latest. I hope that is</p> <p>21 a practical suggestion in the hope that it can progress</p> <p>22 the inquiry itself.</p> <p>23 We are concerned about judgments being made about,</p> <p>24 well, there is more material but it will not impact on</p> <p>25 the family's preparation. We say that is all very well</p> <p style="text-align: center;">Page 53</p>	<p>1 I wouldn't be surprised if he is, frankly, it isn't</p> <p>2 really a question of resources. The shot across the</p> <p>3 bows in relation to resources was important but it may</p> <p>4 not be the principal target.</p> <p>5 MR MANSFIELD: No, it may not, I realise that could well be</p> <p>6 the case but whatever the real reason happens to be,</p> <p>7 notice must be given as soon as possible in order to get</p> <p>8 it rectified in the best and most efficient way, and so</p> <p>9 that the family are not placed in the sort of</p> <p>10 straitjacket which we are worried about, an evidential</p> <p>11 straitjacket dealing with the most important issues that</p> <p>12 will be facing the inquiry itself from day one, almost</p> <p>13 from day one, and all of this could be sorted, as it has</p> <p>14 so far -- there has been considerable collaboration, as</p> <p>15 you have noticed, and we would wish to continue that, so</p> <p>16 that we would want a meeting before any date which we</p> <p>17 have suggested, mid June to end of June, for a hearing</p> <p>18 which is substantive in the sense that it is dealing</p> <p>19 with the core material for the inquiry itself and we say</p> <p>20 that is very important for everybody to know exactly</p> <p>21 what the situation is.</p> <p>22 I don't know whether there is any other topic I can</p> <p>23 address because we have put most of it in written</p> <p>24 submissions.</p> <p>25 THE CHAIR: You have and, Mr Mansfield, understand</p> <p style="text-align: center;">Page 55</p>
<p>1 but if the party doing that regards a certain issue as</p> <p>2 being outside scope, therefore they are not going to</p> <p>3 worry about that, we may take a very different view</p> <p>4 about that.</p> <p>5 We made it very clear in our argument -- I won't</p> <p>6 read it out -- submissions, it is a paragraph in there</p> <p>7 which if I can just ask you to bear in mind, it is</p> <p>8 paragraph 16 on page 5. We give the reasons why, in</p> <p>9 relation to materials that are yet to be, as it were,</p> <p>10 examined in detail, arise out of the supplementary</p> <p>11 ruling. I don't read it out but you will have seen the</p> <p>12 basic rationale for not objecting, although it is</p> <p>13 a reluctance, is because of the ciphering and so on. So</p> <p>14 those are points that are quite readily made.</p> <p>15 So we would ask therefore that there should be</p> <p>16 absolutely no slippage. If there is a risk of slippage,</p> <p>17 then we would ask those who are responsible for looking</p> <p>18 at the material over which there may be slippage and</p> <p>19 over which we know, as I say, very little, give notice</p> <p>20 as soon as they recognise. For example, if</p> <p>21 His Majesty's Government are unable to provide extra</p> <p>22 resources and that is going to be the continuing</p> <p>23 refrain, if it is, one example, and I am glad you are</p> <p>24 shaking your head --</p> <p>25 THE CHAIR: Well, I think if Mr Watson is right, and</p> <p style="text-align: center;">Page 54</p>	<p>1 I absolutely accept how difficult it is when you are</p> <p>2 batting in the dark.</p> <p>3 MR MANSFIELD: Yes, we are.</p> <p>4 THE CHAIR: But it is a situation which has simply got to be</p> <p>5 coped with. Anyway, I have the submission, I am</p> <p>6 grateful, and you would like me to consider directing</p> <p>7 a hearing in mid June to consider effectively the issues</p> <p>8 of witnesses, sequencing, if you like, the topics to be</p> <p>9 addressed by the evidence --</p> <p>10 MR MANSFIELD: That's right.</p> <p>11 THE CHAIR: -- and also those issues which are inevitably</p> <p>12 going to be closed and those which do not need to be</p> <p>13 closed.</p> <p>14 MR MANSFIELD: Yes.</p> <p>15 THE CHAIR: Well, I understand that and the supplemental</p> <p>16 submission is that there should be a useful out of court</p> <p>17 consultation first between you and the inquiry legal</p> <p>18 team; whether I need to direct that or not, I am not</p> <p>19 sure but I would be very surprised if there was</p> <p>20 a difficulty about that.</p> <p>21 MR MANSFIELD: I don't think a direction is necessary.</p> <p>22 THE CHAIR: No.</p> <p>23 Well, I have that and if you get the stage 2</p> <p>24 disclosure, at the end of April/beginning of May, or</p> <p>25 thereabouts, and that is a hypothetical date -- I have</p> <p style="text-align: center;">Page 56</p>

<p>1 no authority for putting a date to it -- but if you get</p> <p>2 it then, you will have, won't you, four and a half</p> <p>3 months before 14 October?</p> <p>4 MR MANSFIELD: Yes, that is true. We accept that.</p> <p>5 I am trying to look at this practically of having to</p> <p>6 deal with it. In fact we have far less because between</p> <p>7 the April date, end or middle, and sitting round a table</p> <p>8 and having a hearing in which one is sorting out issues</p> <p>9 and witnesses, that is the effective period and it is</p> <p>10 very short.</p> <p>11 THE CHAIR: Well, no, because you have got the period</p> <p>12 between the supply of the disclosed material and this</p> <p>13 planning meeting, or planning hearing --</p> <p>14 MR MANSFIELD: Yes, it is going to be --</p> <p>15 THE CHAIR: -- to digest at least the bulk of the material.</p> <p>16 MR MANSFIELD: Because we don't know what the bulk is, but</p> <p>17 one can speculate, and I will not do that but --</p> <p>18 THE CHAIR: The issues in this inquiry, by comparison with</p> <p>19 many other inquiries, are comparatively limited. It is</p> <p>20 now this unfortunate lady came to die and what you have</p> <p>21 previously and conveniently described as preventability.</p> <p>22 Those are the issues.</p> <p>23 MR MANSFIELD: Well, may I say --</p> <p>24 THE CHAIR: Who did it, how did they do it and was it</p> <p>25 preventable.</p> <p style="text-align: center;">Page 57</p>	<p>1 THE CHAIR: Well, that is very helpful, Mr Mansfield. Thank</p> <p>2 you very much.</p> <p>3 Is there anything else you want to add?</p> <p>4 MR MANSFIELD: No, thank you. No.</p> <p>5 THE CHAIR: Thank you very much. Ms Whitelaw, do you want</p> <p>6 to come back?</p> <p>7 Further submissions by MS WHITELAW</p> <p>8 MS WHITELAW: Sir, only to say that of course we are</p> <p>9 liaising with all core participants to manage the</p> <p>10 efficient process of the inquiry and so we happily</p> <p>11 engage with the family on various issues so we can</p> <p>12 manage the processes and specifically ensure that the</p> <p>13 timetables that you have set are met.</p> <p>14 THE CHAIR: Yes.</p> <p>15 MS WHITELAW: Also, of course, we have had in mind and</p> <p>16 I have said that disclosure hasn't all awaited the end</p> <p>17 of the restriction order process and we have already</p> <p>18 identified, as I have said, further documents that we</p> <p>19 will provide as soon as we possibly can, so the more</p> <p>20 documents the family can have, the sooner, the better.</p> <p>21 THE CHAIR: Right, well, I am not going to say any more</p> <p>22 about the timetable at the moment, at any rate. Thank</p> <p>23 you very much.</p> <p>24 Do we move on to the arrangements for the hearing?</p> <p>25 MS WHITELAW: Sir, if I could address the remaining items</p> <p style="text-align: center;">Page 59</p>
<p>1 MR MANSFIELD: There are some other major issues as well</p> <p>2 that equate with those two. That is my concern, that in</p> <p>3 that period between April and a round table discussion</p> <p>4 and a hearing, to assimilate all of this, and the</p> <p>5 preventability argument and submission and issue is very</p> <p>6 broad indeed, which is why there is so much redaction in</p> <p>7 the police report.</p> <p>8 So leaving aside the preventability, the internal</p> <p>9 question -- can I raise one question, and that is the</p> <p>10 location of Novichok in Salisbury itself and the police</p> <p>11 report -- I am not going to read it out -- has in fact</p> <p>12 pinpointed some dimensions that were not known before.</p> <p>13 That is just on the preliminary police report. So the</p> <p>14 actual locations and deployment of Novichok, the nature</p> <p>15 of Novichok, the link between Salisbury and Amesbury, is</p> <p>16 again a separate topic.</p> <p>17 I am afraid I would wish that the two issues you</p> <p>18 highlighted were the main ones; unfortunately, they are</p> <p>19 not. There are about half a dozen that fall into that</p> <p>20 bracket. I have in fact notified Mr O'Connor of my</p> <p>21 thoughts as to what the major issues are going to be, so</p> <p>22 he is not, and nor are you, in the dark as to what we</p> <p>23 suggest they will be. I can't go further at the moment</p> <p>24 because I do not have the materials but I suggest there</p> <p>25 are much more serious issues to be debated as well.</p> <p style="text-align: center;">Page 58</p>	<p>1 then on the agenda, which I think I can take quite</p> <p>2 shortly. As I have said, I have dealt already, insofar</p> <p>3 as I need to, with item 2, which included the</p> <p>4 international material on the completion of the police</p> <p>5 report and item 3, disclosure.</p> <p>6 So then it moves to witnesses, anonymity and special</p> <p>7 measures. I will take this slightly out of order, 5 and</p> <p>8 4.</p> <p>9 Following consideration of the submissions from core</p> <p>10 participants, and as we indicated in our note, we</p> <p>11 endorse the proposal that applications for anonymity and</p> <p>12 other special measures are put off to a hearing after</p> <p>13 the completion of stage 2 disclosure.</p> <p>14 Sir, if you are minded to agree with this approach,</p> <p>15 we invite you to consider a date for such a hearing in</p> <p>16 your directions following this hearing. You have</p> <p>17 obviously heard submissions about a possible June date</p> <p>18 to consider other issues as well, so you will want to</p> <p>19 consider firstly the date that is suitable and we are</p> <p>20 looking at May/June --</p> <p>21 THE CHAIR: There is not much point looking at the anonymity</p> <p>22 of witnesses until you decide who the witnesses are</p> <p>23 going to be, so they go together, don't they?</p> <p>24 MS WHITELAW: Yes.</p> <p>25 Sir, that will be something for your directions</p> <p style="text-align: center;">Page 60</p>

<p>1 following the hearing.</p> <p>2 The other issue then was the streaming of</p> <p>3 substantive open hearings. We set out in our original</p> <p>4 submissions that section 18 of the Inquiries Act</p> <p>5 requires the chair to take such steps as he considers</p> <p>6 reasonable to secure that members of the public,</p> <p>7 including reporters, are able to attend the inquiry or</p> <p>8 view a simultaneous transmission of proceedings, or to</p> <p>9 obtain or view a record of evidence and documents given,</p> <p>10 produced or provided to the inquiry. No recording or</p> <p>11 broadcast of proceedings at an inquiry may be made</p> <p>12 except at the request of, or with the permission of, the</p> <p>13 chair in accordance with any terms on which permission</p> <p>14 is given, which must be consistent with any section 19</p> <p>15 restriction. Section 19 of the 2005 Act allows</p> <p>16 restrictions to be imposed on attendance at the inquiry</p> <p>17 or any part of the inquiry or on the disclosure of any</p> <p>18 evidence or documents given, produced or provided to the</p> <p>19 inquiry.</p> <p>20 In recent years it has become the routine for public</p> <p>21 inquiries to live-stream hearings to the public and</p> <p>22 common practice, for example in the presently</p> <p>23 ongoing Covid and Horizon inquiries, is to provide a</p> <p>24 real-time feed to core participants using a live webinar</p> <p>25 platform to which core participants are invited and also</p> <p style="text-align: center;">Page 61</p>	<p>1 available to core participants during those hearings.</p> <p>2 There do remain matters of detail to resolve which</p> <p>3 may necessitate closed submissions. We propose that we</p> <p>4 return to those matters at a later date but do make the</p> <p>5 following preliminary observations.</p> <p>6 Firstly, whilst any departure from live broadcasting</p> <p>7 (Inaudible) must be justified, given the nature and</p> <p>8 extent of the restriction orders being made in these</p> <p>9 proceedings, you, sir, may well conclude that a short</p> <p>10 delay of, say, five minutes is a sensible and practical</p> <p>11 default option.</p> <p>12 Secondly, if there is to be any sort of delay,</p> <p>13 practical arrangements similar to those contained in the</p> <p>14 inquiry's protocol and measures to prevent the</p> <p>15 disclosure of sensitive information during preliminary</p> <p>16 hearings will need to be considered.</p> <p>17 Thirdly, a lengthy default delay --</p> <p>18 Operation Verbasco proposes 15 minutes -- will need to</p> <p>19 be justified in evidence.</p> <p>20 Fourthly, exceptional applications, for example for</p> <p>21 the evidence of a witness not to be broadcast at all,</p> <p>22 will need to be considered on a case by case basis.</p> <p>23 Finally, at present, the next open preliminary</p> <p>24 hearing after today is currently listed for</p> <p>25 15 March 2024. In update to our original submissions,</p> <p style="text-align: center;">Page 63</p>
<p>1 to provide a delayed stream to a publicly accessible</p> <p>2 forum such as YouTube. Delays are usually between about</p> <p>3 three and five minutes long. Recordings of the</p> <p>4 proceedings are then made available on the inquiry's,</p> <p>5 usually later the same or the following day, together</p> <p>6 with transcripts, and the delay allows for any matters</p> <p>7 of sensitivity, for example inadvertent revelation of</p> <p>8 security sensitive matters, to be addressed before it is</p> <p>9 broadcast online, thereby entering the public domain.</p> <p>10 We invited core participants' submissions on the</p> <p>11 broadcasting and streaming of the substantive open</p> <p>12 hearings, and also the provision to core participants,</p> <p>13 in particular the family, of a live link during those</p> <p>14 hearings.</p> <p>15 We explained in our note that both of these are</p> <p>16 clearly desirable for reasons including the fundamental</p> <p>17 principle of open justice and the need for</p> <p>18 Dawn Sturgess' family to be able to follow proceedings</p> <p>19 in realtime and to be able to give instructions</p> <p>20 regarding the evidence both when the hearings are held</p> <p>21 in Salisbury and in London. No core participant has</p> <p>22 suggested that either should not be permitted. We</p> <p>23 therefore invite you rule at the level of principle,</p> <p>24 firstly, that the substantive hearings should be</p> <p>25 broadcast and, secondly, that live links should be made</p> <p style="text-align: center;">Page 62</p>	<p>1 we now propose, as I have said, that anonymity and</p> <p>2 special measures applications are put off and that the</p> <p>3 hearing is to deal with the final restriction order</p> <p>4 applications as necessary and that we keep under review</p> <p>5 whether an open and/or closed hearing is necessary.</p> <p>6 THE CHAIR: You must keep, must you not, for that period,</p> <p>7 mid March, the possibility of an open hearing if it is</p> <p>8 needed and, if there are restriction order controversies</p> <p>9 to be dealt with, then a closed hearing. Those will</p> <p>10 have to be done then.</p> <p>11 MS WHITE LAW: Yes, and while we have talked about April, of</p> <p>12 course core participants will want to have in mind that</p> <p>13 this hearing is the opportunity for final issues to be</p> <p>14 dealt with arising out of the restriction order</p> <p>15 applications. So that may assist those looking at route</p> <p>16 maps and timetabling, to have that in mind.</p> <p>17 THE CHAIR: Right.</p> <p>18 MS WHITE LAW: But, as I say, we intend to keep this hearing</p> <p>19 under review.</p> <p>20 Sir, we confirmed in our submissions that the open</p> <p>21 substantive hearings will commence in Salisbury at the</p> <p>22 Guildhall on 14 October 2024; the London hearings will</p> <p>23 commence on 28 October 2024 and will take place at the</p> <p>24 International Dispute Resolution Centre in London.</p> <p>25 THE CHAIR: On the 28th?</p> <p style="text-align: center;">Page 64</p>



<p>1 MS WHITELAW: 28 October.</p> <p>2 THE CHAIR: Right, thank you.</p> <p>3 MS WHITELAW: Sir, unless I can assist you further, those</p> <p>4 are my submissions.</p> <p>5 THE CHAIR: Thank you very much indeed.</p> <p>6 Mr Watson.</p> <p>7 Further submissions by MR WATSON</p> <p>8 MR WATSON: Sir, very much more shortly on these issues, and</p> <p>9 I think actually perhaps starting at the end because it</p> <p>10 really goes back to the restriction order applications,</p> <p>11 ie the next hearing. I hope it is of some comfort to</p> <p>12 Mr Mansfield, King's Counsel, who quite rightly asked</p> <p>13 the question, or presents this, that if you know there</p> <p>14 is a problem, that we need to know in advance. Well,</p> <p>15 sir, we are listed to be back of you on 15 March and of</p> <p>16 course, as at today's date, we are still a considerable</p> <p>17 number of weeks -- I think 11 weeks -- away from</p> <p>18 19 April deadline and of course by then we will be only</p> <p>19 five weeks away; so a much more nuanced and sensitive</p> <p>20 assessment as to what is going to be achieved and of</p> <p>21 course you have heard all I have said about anticipating</p> <p>22 and hoping that all can be done by 19 April but a much</p> <p>23 more sensitive assessment can be made then.</p> <p>24 Of course I accept what Ms Whitelaw has observed</p> <p>25 about the restriction order application process and the</p> <p style="text-align: center;">Page 65</p>	<p>1 Op Verbasco observations that, to the extent there is</p> <p>2 a longer delay, it may not in fact have a great impact</p> <p>3 on the open notice principle and it may in fact, we</p> <p>4 would submit, also practically lead to fewer</p> <p>5 interruptions, because I know that that has been the</p> <p>6 experience of some of those around me where a longer</p> <p>7 delay has been afforded.</p> <p>8 But I don't think we need to say more about that.</p> <p>9 All will recognise, I am sure, that comparison with the</p> <p>10 Post Office Inquiry, the Covid Inquiry or even the</p> <p>11 Infected Blood Inquiry is not apt here and nor indeed,</p> <p>12 sir, are comparisons with London Bridge and Westminster</p> <p>13 Bridge. Each presents different issues and you, sir,</p> <p>14 will have to consider the specifics as they arise in</p> <p>15 this particular context.</p> <p>16 THE CHAIR: It is crossing my mind, Mr Watson, that the time</p> <p>17 to resolve the detail of the length of the delay, given</p> <p>18 there may well be consensus that there will need to be</p> <p>19 one, could well be a good deal closer to the event than</p> <p>20 now.</p> <p>21 MR WATSON: Yes, sir. Yes, sir, and I know that -- I should</p> <p>22 say, there are technical aspects of this that are also</p> <p>23 being addressed by those whom I represent with --</p> <p>24 THE CHAIR: Well, they have to have time to do that and so</p> <p>25 has everybody else. So it cannot be delayed too long.</p> <p style="text-align: center;">Page 67</p>
<p>1 purpose of that hearing. We are well alive to that and</p> <p>2 that is already informing the decisions that we are</p> <p>3 making about putting applications before you. So I hope</p> <p>4 there is no controversy about that date and the purpose</p> <p>5 that it can serve.</p> <p>6 Of course we would have no objection to then further</p> <p>7 hearings being listed in May and, as necessary, in June</p> <p>8 to consider the issues that will then arise.</p> <p>9 THE CHAIR: Yes.</p> <p>10 MR WATSON: Returning then to issue 4 on the agenda, the</p> <p>11 streaming of the substantive hearings, sir, I don't</p> <p>12 think so there is anything that I need to add at this</p> <p>13 stage beyond that which is set out in our written</p> <p>14 submissions; very happy to reassure you, sir, and</p> <p>15 Mr Bunting when he reaches this part of the transcript</p> <p>16 that there is no dispute as to the relevant principles</p> <p>17 and no objection to your ruling at the level of</p> <p>18 principle that the substantive hearing should be</p> <p>19 broadcast and live link should be made available to CPs</p> <p>20 during those hearings and that any departure from either</p> <p>21 will require cogent justification in evidence.</p> <p>22 As to the length of the default delay, I think that</p> <p>23 is a matter that ought properly to be considered later.</p> <p>24 We recognise what is said about the appropriate time</p> <p>25 that that should be and we note in particular the</p> <p style="text-align: center;">Page 66</p>	<p>1 MR WATSON: No.</p> <p>2 THE CHAIR: All right.</p> <p>3 MR WATSON: Unless I can assist further on those points,</p> <p>4 I think that is all I need to say.</p> <p>5 THE CHAIR: Thank you very much indeed.</p> <p>6 Ms Giovannetti?</p> <p>7 MS GIOVANNETTI: Nothing further from us on that, thank you</p> <p>8 very much, sir.</p> <p>9 THE CHAIR: Do you want to ask me to say anything about the</p> <p>10 length of the delay today?</p> <p>11 MS GIOVANNETTI: Not today, no. We agree that --</p> <p>12 THE CHAIR: Is 15 minutes really going to be viable?</p> <p>13 MS GIOVANNETTI: We think it is, yes. Yes. But we note</p> <p>14 what your counsel has said about this needing to be</p> <p>15 justified in evidence. It may need to be addressed in</p> <p>16 closed. We would agree with all of that and I think</p> <p>17 there is probably very little that we can do in terms of</p> <p>18 generalities today. We will have specific matters to</p> <p>19 raise -- I completely adopt and endorse what Mr Watson</p> <p>20 said about this being a very, very different context to</p> <p>21 some of the other inquiries that have been conducted in</p> <p>22 recent times and are ongoing.</p> <p>23 THE CHAIR: All right, thank you.</p> <p>24 Mr Berry, do you want to add anything on this one?</p> <p>25 MR BERRY: Nothing useful to add, thank you, sir.</p> <p style="text-align: center;">Page 68</p>

<p>1 THE CHAIR: Thank you very much indeed, Mr Berry.</p> <p>2 Does that occasion any kind of response,</p> <p>3 Ms Whitelaw?</p> <p>4 MS WHITELAW: No, thank you, sir.</p> <p>5 THE CHAIR: Right.</p> <p>6 Well, I am very grateful to everybody. Is there any</p> <p>7 other topic which anybody else needs, rather than</p> <p>8 wishes, but needs to raise today?</p> <p>9 All right, well, I shall consider what directions to</p> <p>10 give. I have probably made the approach which I am</p> <p>11 likely to take -- which I do take -- sufficiently clear.</p> <p>12 For the moment, at least, the important thing is the</p> <p>13 timetable. That, at the moment, is as much as I am</p> <p>14 going to say in court.</p> <p>15 Thank you very much indeed for all your help.</p> <p>16 (11.59 am)</p> <p>17 (The hearing concluded)</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p> <p>Page 69</p>	
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