

<p>1 Tuesday, 30 March 2021 2 (10.30 am) 3 INQUEST INTO THE DEATH OF DAWN STURGESS 4 THE CORONER: Good morning. 5 This is the first hearing of the inquest into the 6 death of Dawn Sturgess since my appointment as coroner 7 in January 2021. 8 This hearing is taking place in court 76 at the 9 Royal Courts of Justice in London. At the outset I make 10 an order varying the effects of section 9 of the 11 Contempt of Court Act 1981 to allow official audio 12 broadcast. The order will be available to interested 13 persons and to the press, but it remains a contempt of 14 court to photograph or to make an audio or video 15 recording of any part of this hearing. 16 Due to the Covid-19 pandemic I decided it was 17 necessary for this hearing to be held as a remote 18 hearing. I am present in court together with counsel to 19 the inquest, Mr Andrew O'Connor Queen's Counsel and 20 Ms Francesca Whitelaw, and the solicitor to the inquest, 21 Mr Martin Smith and some other people, including 22 representatives of the media, are present in court. 23 Interested persons, their legal representatives and 24 other representatives of the media are attending 25 virtually.</p> <p style="text-align: center;">Page 1</p>	<p>1 I will ask Mr O'Connor to introduce them in 2 a moment. 3 However, I should like to begin by expressing my 4 sympathy to all the members of the family of Ms Sturgess 5 and to her partner at the time of her death, 6 Charlie Rowley. 7 The circumstances of her death were very unusual and 8 so they have lost not only a loved one but they have 9 done so in circumstances that have attracted national 10 and international attention. As we conduct this 11 investigation, and as it is reported, their loss must 12 remain at the forefront of our minds. The inquest team 13 and I also understand the effect upon them of any delay. 14 They, and all those affected, particularly in the county 15 of Wiltshire, have my assurance that we shall endeavour 16 to conduct a fearless, timely, thorough and fair 17 investigation into Dawn Sturgess' death. 18 Before I briefly address the circumstances of her 19 death, it is necessary to deal with a few technical 20 matters. In order to reduce feedback and facilitate the 21 smooth running of the hearing, all interested persons' 22 microphones will be muted by the court until they are 23 invited to speak. Cameras should also be turned off 24 unless and until an advocate is speaking. Advocates are 25 asked to pause for a moment after I have called their</p> <p style="text-align: center;">Page 2</p>
<p>1 name to allow the clerk time to unmute their microphone. 2 They are then invited to identify themselves before 3 speaking for the benefit of the transcriber. 4 If any advocate wishes to address the court on any 5 issue upon which they have not been invited to speak, 6 they should send an email to the solicitor to the 7 inquest, Mr Smith, who will facilitate this. They 8 should also take the same course if there are any 9 technical difficulties during the course of the hearing. 10 When it is time to invite submissions, to avoid 11 online chaos, I shall ask each representative in turn, 12 even if it may be an issue on which I do not expect them 13 to wish to make submissions. It is my intention to 14 provide after the hearing a written note of any rulings 15 I make with reasons, a transcript of the hearing will 16 also be provided. 17 I now turn to the very sad circumstances of 18 Ms Sturgess's death. Dawn Sturgess was 44 years of age 19 and living in Salisbury in Wiltshire when, on 20 30 June 2018, she was given a bottle of what appeared to 21 be perfume by her partner Charlie Rowley. She sprayed 22 herself with it. Subsequent testing established that 23 the bottle contained Novichok, a military-grade nerve 24 agent. 25 Dawn Sturgess collapsed at the scene of the incident</p> <p style="text-align: center;">Page 3</p>	<p>1 in Amesbury and was taken to the Salisbury District 2 Hospital by ambulance. On 5 July 2018 a diagnosis of 3 Novichok poisoning was recorded in her medical notes. 4 She never regained consciousness and was pronounced dead 5 in hospital on 8 July 2018. 6 Some four months before Dawn Sturgess's death, on 7 4 March 2018 Sergei-Skripal and Yulia Skripal, his 8 daughter, had been poisoned by Novichok in Salisbury. 9 Two Russian nationals using the names Alexander Petrov 10 and Ruslan Boshirov had travelled from Russia to the 11 United Kingdom on 2 March 2018. They then visited 12 Salisbury on 3 and 4 March, the day of the poisoning. 13 The UK government believes: these two individuals 14 are intelligence officers from the Russian military 15 intelligence service, the GRU; that the Novichok 16 originated in Russia; and that the two men were seeking 17 to kill Mr Skripal, who is a former GRU officer. 18 Police inquiries have led to charges, including 19 charges of attempted murder brought against Petrov and 20 Boshirov. There is evidence that Ms Sturgess was 21 poisoned by the same chemical nerve agent used against 22 the Skripals. 23 Ms Sturgess having died on 8 July 2018 at the 24 Salisbury District Hospital, Her Majesty's senior 25 coroner for Wiltshire and Swindon, Mr David Ridley, the</p> <p style="text-align: center;">Page 4</p>

<p>1 senior coroner was notified the same day and he 2 commenced an investigation pursuant to section 1 of the 3 Coroners and Justice Act 2009. On 19 July 2018 he 4 formally opened and adjourned the inquest. Following 5 correspondence with the Crown Prosecution Service, the 6 inquest was suspended on the grounds that somebody may 7 be charged with an offence of homicide following the 8 death of Ms Sturgess.</p> <p>9 A pre-inquest hearing was due to take place upon 10 resumption of the investigation on 18 October 2019 and 11 following representations from interested persons, on 12 20 December 2019 the senior coroner issued a written 13 ruling in which he made decisions on the engagement of 14 Article 2 of the European Convention on Human Rights and 15 the scope of the inquest.</p> <p>16 In relation to Article 2, he ruled that Article 2 17 was not engaged, either on the basis of an arguable 18 breach of the operational or known as Osman duty by the 19 UK authorities or on the basis of an arguable breach of 20 the positive duty owed by Russian state agents.</p> <p>21 In relation to scope, he ruled the inquest would 22 consider the acts and omissions of the two Russian 23 nationals, Petrov and Boshirov, and whether any act or 24 omission by them or either of them may have caused or 25 contributed to Dawn Sturgess's death. This would</p> <p style="text-align: center;">Page 5</p>	<p>1 include investigating how the Novichok came to 2 Salisbury. He ruled that he would investigate who was 3 responsible for Ms Sturgess's death, provided that that 4 issue was limited to the acts and omissions of Petrov 5 and Boshirov. He decided the inquest would not 6 investigate whether any other members of the Russian 7 state were responsible for her death and would not 8 investigate the source of the Novichok that appears to 9 have been killed her.</p> <p>10 The senior coroner ruled the issue of whether 11 appropriate medical care was provided to Ms Sturgess 12 would be within scope. The senior coroner's ruling was 13 challenged by Ms Sturgess's family by way of judicial 14 review. The claim was heard by the divisional court in 15 July 2020 and the judgment handed down on 24 July. The 16 court quashed the senior coroner's decision not to 17 investigate the issue of wider Russian responsibility. 18 It therefore falls to me to reconsider that issue.</p> <p>19 The purpose of the inquest. Following the 20 divisional court's decision, I was appointed to conduct 21 the inquest by the chief coroner pursuant to 22 paragraph 3, schedule 10 of the Coroners and Justice 23 Act. The purpose of an inquest is to establish the 24 answers to four important but limited questions: who the 25 deceased was and when, where and how she came to die.</p> <p style="text-align: center;">Page 6</p>
<p>1 At an inquest hearing witnesses are called to give 2 evidence in relation to those questions and documentary 3 evidence read. At the end of the hearing 4 a determination is made and recorded in the record of 5 inquest. After the inquest the coroner may, if 6 appropriate, make a prevention of future deaths report 7 to identify matters of concern to the relevant 8 authorities so that lessons can be learned. An inquest 9 therefore serves as a public investigation to determine 10 the truth.</p> <p>11 This inquest will undoubtedly raise issues of acute 12 public concern and importance. To borrow the words of 13 Sir Thomas Bingham, I am determined that the relevant 14 facts will be fully, fairly and fearlessly investigated. 15 A central function of this inquest will be to address 16 public fears and suspicion relating to the circumstances 17 of Ms Sturgess's death. I will do that by seeking out 18 the truth and exposing the facts to public scrutiny.</p> <p>19 Today, I intend to address several issues upon which 20 I have received submissions from most of the interested 21 parties. I am very grateful for their assistance.</p> <p>22 The issues are.</p> <p>23 Firstly, the decision of interested persons for the 24 purposes of the inquest.</p> <p>25 Second, the scope of the inquest.</p> <p style="text-align: center;">Page 7</p>	<p>1 Third, the process for disclosure. 2 Fourth, whether this inquest will proceed as 3 an inquest or ought to be converted to a public inquiry. 4 Fifth, the venue or venues for hearings. 5 Sixth, subsequent pre-inquest hearings and 6 timetable.</p> <p>7 With those words of introduction, I will now ask 8 Mr O'Connor to deal with each of those items in turn. 9 Mr O'Connor.</p> <p>10 MR O'CONNOR: My Lady, I am grateful. 11 As you have said, I appear today as counsel to the 12 inquest with my learned friend Francesca Whitelaw. 13 I will start if I may by introducing the other counsel 14 who will be speaking today.</p> <p>15 First of all, Henrietta Hill Queen's Counsel, who 16 represents Ms Sturgess's family and also Charlie Rowley. 17 Secondly, Catherine McGahey Queen's Counsel, who 18 appears on behalf of the Secretary of State for the Home 19 Department.</p> <p>20 Lisa Giovannetti Queen's Counsel, appears on behalf 21 of the commissioner for the Metropolitan Police. 22 Jason Beer Queen's Counsel appears for the chief 23 constable of Thames Valley Police. 24 John Beggs Queen's Counsel, appears for the chief 25 constable of Wiltshire Police.</p> <p style="text-align: center;">Page 8</p>

<p>1 Bridget Dolan Queen's Counsel appears for the South 2 West Ambulance Service NHS Foundation Trust. 3 Julie Austin appears for Salisbury NHS Foundation 4 Trust. 5 Mr Frank Cain appears for Wiltshire Council. 6 My Lady, as you have indicated, there has been 7 an exchange of written submissions in advance of this 8 hearing. We, first, provided a set of written 9 submissions dated 28 February 2021. Those parties who 10 I have just referred to then all provided helpful 11 responsive written submissions in around the middle of 12 March and, finally, we prepared some supplemental 13 written submissions which we served at the end of last 14 week. 15 My Lady, those written submissions, and also certain 16 other materials that are referred to in those 17 submissions, have been collated into a bundle. I know 18 that you have a hard copy bundle with you in court, if 19 anyone wishes to address you on those documents, the 20 index references I suspect will be the most convenient 21 way of doing that, and I know that the bundle has been 22 provided to the parties in electronic form. 23 My Lady, the first substantive item on the agenda, 24 as you have said, is the question of interested person 25 status and the decision of persons as interested persons</p> <p style="text-align: center;">Page 9</p>	<p>1 in these proceedings. 2 The previous coroner, Mr Ridley, did make some 3 rulings on this issue, of which I know you are aware, 4 and it will be necessary to come back to one of his 5 rulings in particular in due course. However, it seemed 6 appropriate to us that, since you have been freshly 7 appointed to conduct these proceeding, it was 8 appropriate for you to make your own fresh rulings on 9 interested person status. To that end we suggested that 10 persons or organisations seeking either to obtain or to 11 maintain that status should set out their position in 12 writing. No dissent has been raised to that course and, 13 indeed, as you know, the parties who are represented 14 today have all provided an indication in writing on 15 their position in this regard. 16 In light of the written submissions that have been 17 received, we invite you to make very broadly two sets of 18 orders. 19 First of all, I will in a moment invite you to grant 20 or to confirm interested person status in respect of all 21 of those parties who have sought that designation. 22 Secondly, I will raise an issue regarding 23 withdrawing interested person status from two other 24 persons. 25 Dealing with them in that order, my Lady, first of</p> <p style="text-align: center;">Page 10</p>
<p>1 all then the granting of interested person status. We 2 submit that you should now recognise the individuals and 3 organisations who I will list as interested persons in 4 these proceedings. They have all indicated in writing 5 that they wish to exercise that status. 6 First of all, there are the members of 7 Dawn Sturgess's family, and we invite you to designate 8 them as interested persons, pursuant to section 47(2)(a) 9 of the 2009 Act. They are: Stephen Stanley Sturgess, 10 Dawn Sturgess's father; Ms Sturgess's mother, 11 Caroline Sturgess; her two sons, Aidan and Ewan Hope; 12 and her daughter, who I will refer to for the moment as 13 GS, and I will come back to that point in due course, if 14 I may, my Lady. 15 Secondly, Charlie Rowley, Ms Sturgess's partner at 16 the time she died, we invite you to designate him as 17 an interested person pursuant to section 47(2)(a) and 18 section 47(2)(f) of the Act. 19 The chief constable of Wiltshire police, my Lady, we 20 invite you to designate pursuant to section 47(2)(i) of 21 the Act. 22 The commissioner of the Metropolitan Police and the 23 chief constable of Thames Valley Police we invite you to 24 designate pursuant to section 47(2)(m) of the Act. 25 My Lady, the Secretary of State for the Home</p> <p style="text-align: center;">Page 11</p>	<p>1 Department has applied for designation both on her own 2 behalf and also in a representative capacity for 3 a number of branches of government that she has listed 4 at paragraph 4 of her submissions. We invite you to 5 grant her that designation pursuant to section 47(2)(m) 6 of the Act. 7 We also invite to you grant designation pursuant to 8 47(2)(m) of the Act in respect of both the South West 9 Ambulance Service NHS foundation trust and also 10 Wiltshire County Council. 11 My Lady, there is one further party who appears 12 before you today who has not sought to exercise 13 interested person status and that is the Salisbury NHS 14 foundation trust. They are of course entitled to take 15 that approach and moreover it will be open to them to 16 reconsider the position, and if they wish, to apply for 17 interested person status at a later stage of these 18 proceedings. 19 My Lady, that covers the rulings we invite you to 20 make insofar as granting interested person status is 21 concerned. I will move if I may to the second matter 22 I mentioned, which is the question of withdrawing 23 interested person status. These submissions relate to 24 the two Russian individuals known as Alexander Petrov 25 and Ruslan Boshirov, whose role in these matters you</p> <p style="text-align: center;">Page 12</p>

<p>1 mentioned in your opening remarks. 2 My Lady, as you said, these two men have been 3 charged with the attempted murder of Sergei and 4 Yulia Skripal and there is evidence that Dawn Sturgess 5 was killed by the same nerve agent, Novichok, that was 6 used in the attempted murder of the Skripals. As you 7 have also mentioned, my Lady, on 5 September 2018, the 8 then Prime Minister, Theresa May, told the House of 9 Commons that those two men were believed to be GRU 10 officers and that the names of Petrov and Boshirov were 11 aliases. The investigative news agency Bellingcat has 12 stated that the real names of the two men are in fact 13 Dr Alexander Mishkin and Colonel Anatoliy Chepiga, both 14 members of or associated with the GRU. 15 Mr Ridley, the senior coroner who previously had 16 conduct of these proceedings, recognised Petrov and 17 Boshirov as interested persons pursuant to 18 section 47(2)(f) of the Act. That is a person who may 19 by any act or omission have caused or contributed to the 20 death of the deceased. In 2019 Mr Ridley wrote to the 21 two men, care of the Russian embassy in London, 22 informing them of their entitlement to participate in 23 these proceedings and no reply was perceived. 24 Much more recently, Mr Smith, the solicitor to the 25 inquest, has written to Petrov and Boshirov care of the</p> <p style="text-align: center;">Page 13</p>	<p>1 Russian embassy twice, once on 18 January this year and 2 again on 22 February. His letters updated them as to 3 the progress of these proceedings and informed them of 4 the pre-inquest review hearing today. No response has 5 been received. 6 My Lady, the function of interested person status at 7 an inquest is to enable those who are entitled to 8 exercise that status to participate in the proceedings 9 in certain defined ways. Principally by receiving 10 disclosure and by questioning witnesses. There is no 11 requirement for such persons to engage with or to 12 participate in the proceedings and, in the absence of 13 any such engagement, the coroner is under no requirement 14 to engage with prospective IPs or to recognise their 15 status. 16 In Jervis On Coroners the following statements have 17 been made: 18 "A person entitled to claim the status of interested 19 person is not obliged to do so. If a person so entitled 20 declines to claim the status, the coroner is entitled to 21 continue on the basis that that person is not 22 an interested person." 23 That is paragraph 8.23 of the current edition of 24 Jervis. 25 Madam, in summary then, given the failure of Petrov</p> <p style="text-align: center;">Page 14</p>
<p>1 and Boshirov to respond to correspondence or to engage 2 in any other way with these proceedings over a matter 3 now of years, we submit that their names should now be 4 removed from the list of those currently recognised as 5 interested persons in these proceedings, and we invite 6 you to make a ruling to that effect. 7 My Lady, finally on the question of interested 8 person status, I referred to Ms Sturgess's daughter 9 using the cipher "GS" when I listed the members of her 10 family who in our submission should be granted 11 interested status. Those representing the family you 12 know in their written submissions have made an anonymity 13 application on behalf of Dawn Sturgess's daughter. It 14 seems to us, my Lady, that GS's name is in fact unlikely 15 to be of any relevance at all to these proceedings and 16 on that basis, her name can simply be redacted from 17 documents and substituted with the cipher GS, simply on 18 the ground of irrelevance and if her name does become 19 relevant at some point, then the question of anonymity 20 can be reconsidered at that stage. 21 Those are the submissions I proposed to make on the 22 question of interested person status. This may be the 23 moment to invite submissions from the other parties. 24 THE CORONER: Thank you very much, Mr O'Connor. 25 First of all, Ms Hill.</p> <p style="text-align: center;">Page 15</p>	<p>1 MS HILL: Can you see and hear me all right? 2 THE CORONER: We can, Ms Hill, thank you. 3 MS HILL: Thank you very much, my Lady. 4 I appear this morning with Mr Straw of Queen's 5 Counsel, Mr Mansfield of Queen's Counsel sends his 6 apologies, I am sorry he could not be here, he has 7 a prior professional commitment in another long-running 8 inquiry. 9 First of all, my Lady, we welcome your appointment 10 and the work that has been done by the inquest legal 11 team to date to progress matters. As I am sure you will 12 be aware, my Lady, it has been the family's position for 13 some time that this is a case of such sensitivity and 14 complexity that it merited the appointment of a judge as 15 coroner and we very pleased to see the progress that has 16 been made to date. I know my clients who are here will 17 also welcome my Lady the acknowledgment of the delay 18 that they have endured so far. It is perhaps obvious 19 from the procedural history that the judicial review 20 that they brought that was necessary in their view has 21 already led to significant delay, so, my Lady, we 22 welcome the observations that you will have that in mind 23 in progressing matters. 24 Just a few brief observations if I may, please, on 25 the interested persons topic. We welcome your counsel's</p> <p style="text-align: center;">Page 16</p>

<p>1 acceptance of the recognition of all of the family 2 members of Ms Sturgess and also that Mr Rowley should be 3 recognised both under subsections (a) and (f) of the 4 provisions of section 47. We do seek his designation in 5 the alternative under section 47(2)(f), for reasons set 6 out very briefly in our submissions. He is properly so 7 recognised in our submission. It seems inevitable that 8 he may be asked questions about his acts that may well 9 have, however innocently, have contributed to 10 Ms Sturgess's death. 11 We have no observations to make, my Lady, in 12 relation to the other UK-based organisations. As far as 13 the recognition or derecognition of Mr Petrov and 14 Mr Boshirov that is proposed, we have no objection to 15 that course. Just by way of additional detail, your 16 counsel has helpfully set out the attempts to engage 17 with those two individuals in the inquest process. For 18 completeness, my Lady, you can see from tab 13 that they 19 were named as interested parties in the judicial review 20 proceedings that we brought but, my Lady, as you can see 21 from the heading of the judgment at tab 13 of your 22 bundle, they didn't play any part in that judicial 23 review. Forgive me, it is tab 16, my Lady. 24 You will see that they were named as interested 25 persons but the record shows that they did not appear</p> <p style="text-align: center;">Page 17</p>	<p>1 and were not represented, so they played no active role 2 in the judicial review either. 3 We have no objection to the proposal by your counsel 4 to derecognise them. It may be prudent of course to 5 make it clear that if they wish to apply in the future 6 for IP status, they could do so. 7 My Lady, the only final point I would make on that 8 topic is simply to refer you perhaps back to our 9 submissions at tab 5 of the bundle, at paragraph 6 we 10 had alluded to a suggestion of making other elements of 11 the Russian state on notice of the proceedings and 12 I simply flag that the investigative committee of the 13 Russian Federation did play an active part in the 14 Litvinenko judicial review and you can see that, my 15 Lady, at tab 19. 16 On the final issue in relation to GS, we welcome 17 your counsel's proposal to deal with that issue as 18 a matter of relevance. It seems to us highly unlikely 19 that her name would ever be relevant to the inquest 20 proceedings but if it is, we can revisit at that point 21 and make any submission that is necessary. 22 My Lady, those are all the submissions I wish to 23 make on that topic, unless I can assist you further. 24 THE CORONER: Very helpful, Ms Hill. Thank you very much 25 indeed.</p> <p style="text-align: center;">Page 18</p>
<p>1 Ms McGahey. 2 MS MCGAHEY: My Lady, I am Catherine McGahey, I appear with 3 Georgina Wolfe on behalf of the Secretary of State for 4 the Home Department and in a representative capacity for 5 other agencies and Government departments. My Lady, on 6 the issue of interested person status, the Secretary of 7 State has no submissions to make. 8 THE CORONER: Thank you very much. 9 Ms Giovannetti. 10 MS GIOVANNETTI: Good morning, my Lady, can I check that you 11 can hear me? 12 THE CORONER: Yes, thank you, good morning. 13 MS GIOVANNETTI: Good morning. I appear with 14 Mr Julian Blake on behalf of the Commissioner of Police 15 of the Metropolis. Could I firstly join with my Lady on 16 behalf of the Metropolitan Police Service in expressing 17 our sympathy to Ms Sturgess's family and to Mr Rowley. 18 As Mr O'Connor has indicated, we would invite you to 19 formerly designate the Metropolitan Police Service as 20 an interested person pursuant to section 47(2)(m) of the 21 2009 Act and we have no observations to make as to the 22 other interested persons. 23 THE CORONER: Thank you very much. 24 MS GIOVANNETTI: Thank you, my Lady. 25 THE CORONER: Mr Beer.</p> <p style="text-align: center;">Page 19</p>	<p>1 MR BEER: Good morning, my Lady. On behalf of the chief 2 constable of Thames Valley Police I appear. We have, in 3 the light of what Mr O'Connor has kindly said as to the 4 appropriateness of us being designated a properly 5 interested person, no submissions to make. Thank you. 6 THE CORONER: Thank you very much, Mr Beer. 7 Mr Beggs. 8 MR BEGGS: Good morning, my Lady. As you know, I appear for 9 the chief constable of Wiltshire. Similarly I have no 10 further submissions to make in the light of 11 Mr O'Connor's observations, thank you. 12 THE CORONER: Thank you. 13 Ms Dolan. 14 MS DOLAN: (Inaudible) and the Ambulance Service are here to 15 assist your investigation and inquiry in any way that we 16 can, but I have nothing further to add. Thank you. 17 THE CORONER: Thank you, Ms Dolan. I missed the beginning 18 of what you said but I think what you were saying is you 19 have no further submissions on this particular issue, is 20 that right? 21 Now you are muted, sorry. 22 Ms Dolan, please. 23 MS DOLAN: We will assist the investigation and inquiry in 24 any way we can, but we have no further submissions to 25 make. Beyond that we welcome interested person status</p> <p style="text-align: center;">Page 20</p>

1 for ourselves. Thank you.
 2 THE CORONER: That is what I thought you said. Thank you,
 3 Ms Dolan.
 4 Ms Austin.
 5 MR AUSTIN: Good morning, my Lady, can you hear me?
 6 THE CORONER: I can hear you.
 7 MR AUSTIN: Thank you.
 8 We have no further submissions to make, my Lady.
 9 They are set out in writing. We don't seek interested
 10 person status at this stage but would welcome
 11 an opportunity to keep that under review as matters
 12 develop.
 13 THE CORONER: Of course. Thank you very much, Ms Austin.
 14 Finally, Mr Cain.
 15 MR CAIN: Yes, good morning, my Lady.
 16 Appearing on behalf of Wiltshire Council, we have no
 17 further submissions to make other than what Mr O'Connor
 18 has mentioned.
 19 THE CORONER: Thank you very much.
 20 Unless you have any further submissions,
 21 Mr O'Connor?
 22 MR O'CONNOR: My Lady, no, I have no further submissions to
 23 make on that issue.
 24 THE CORONER: Thank you very much.
 25 I am satisfied that all those who have sought

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1 to whether or not her daughter, GS, should have her full
 2 name reported. She has to date had the benefit of
 3 anonymity and is a child. I, like Mr O'Connor and the
 4 family, can see at present no relevance to naming her
 5 and therefore I am satisfied that we should maintain the
 6 present position whereby she is known as GS. Should
 7 anybody wish to revisit the issue at any stage,
 8 obviously I am content to hear submissions on the
 9 relevance or otherwise of naming her, as opposed to
 10 referring to her by the initials GS.
 11 Yes, Mr O'Connor.
 12 MR O'CONNOR: My Lady, thank you.
 13 The next item on the agenda is the question of the
 14 scope of the inquest. As you have already mentioned
 15 this morning, my Lady, this was an issue upon which
 16 Mr Ridley the previous coroner ruled and which was
 17 a focus of the JR proceedings. Since then it has been
 18 canvassed at some length in the written submissions that
 19 have been exchanged in advance of the hearing today.
 20 I would start if I may by making three preliminary
 21 points.
 22 First, as I mentioned, it is right to say that the
 23 previous coroner gave a detailed ruling on scope. That
 24 ruling was the focus of the JR proceedings. One
 25 important element of his ruling on scope was quashed by

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1 interested person status satisfy the various criteria
 2 set out by counsel to the inquest and counsel to those
 3 parties in section 47(2) of the 2009 act. Therefore
 4 I will grant them interested person status.
 5 As far as the two Russian nationals are concerned,
 6 Mr Petrov and Mr Boshirov, they have been granted
 7 interested person status but to date they have not
 8 cooperated anyway, either with the senior coroner for
 9 Wiltshire or with the solicitor to the inquest,
 10 Mr Martin Smith. Therefore, given the role of the
 11 interested person as set out by Mr O'Connor in his
 12 submissions, I am satisfied that it would be appropriate
 13 at this stage to withdraw their interested person
 14 status.
 15 However, I wish to emphasise that they may at any
 16 time, should they wish to cooperate with and participate
 17 in the inquest, apply for interested person status.
 18 That the South-West National Health Service foundation
 19 trust may, if they change their minds, also obviously
 20 apply and if any other party, for example an organ of
 21 the Russian state of the kind referred to in
 22 submissions, wish to apply, then obviously I would
 23 consider any applications and submissions made.
 24 Finally on this subject, Mr O'Connor has raised the
 25 issue initially raised by the family of Ms Sturgess as

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1 the divisional court and, given those circumstances, our
 2 submission, which we don't believe is contentious, is
 3 that it is appropriate for you now to consider the
 4 question of the scope of this inquest completely afresh.
 5 Secondly, we have emphasised in our written
 6 submissions -- it is at paragraphs 33 and 34 -- that the
 7 ruling that you make on scope at this very early stage
 8 of these proceedings should be a provisional decision,
 9 which will be revisited and very probably refined
 10 following the disclosure exercise. We are sure that
 11 interested persons will wish to address you more fully
 12 on scope once they have received disclosure of
 13 documents, but some high-level decisions on scope need
 14 to be taken, albeit provisionally, in order to inform
 15 disclosure requests. That is the process by which
 16 I mean the identification of provisional high-level
 17 decisions on scope that we invite you to undertake
 18 today.
 19 The third preliminary point, my Lady, for the
 20 reasons that we have set out in some detail in our
 21 written submissions at paragraph 37, this is not, at
 22 least as things stand, an Article 2 inquest. On that
 23 basis the inquest is a so-called Jamieson inquest, the
 24 core purpose of which will be to determine who the
 25 deceased was and when, where and how she died, with the

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<p>1 how question having the narrower meaning of by what 2 means, rather than the broader Article 2 meaning of in 3 what circumstances. 4 That said, it is well established that a coroner has 5 a wide discretion in determining the scope of an inquest 6 and that even in a Jamieson inquest, scope can be set 7 broadly. We have referred in our written submissions to 8 the well known dicta from the cases of Thompson, 9 Jamieson and Dallaglio. I am not proposing to read them 10 all, my Lady, but I will if I may just read this short 11 passage from the passage of Lord Justice Simon Brown, as 12 he then was, in Dallaglio, where he said: 13 "The inquiry is almost bound to stretch wider than 14 strictly required for the purposes of a verdict. How 15 much wider is pre-eminently a matter for the coroner, 16 whose rulings upon the question will only exceptionally 17 be susceptible to judicial review." 18 That matter, that discretion, is of course something 19 which lies at the heart of your ruling on scope and 20 I dare say will be mentioned further this morning. 21 One of the factors, my Lady, that is relevant to 22 your discretion in setting the bounds of the 23 investigation is that of the function of the inquest in 24 addressing public concern about the circumstances of the 25 death. That is a factor that the divisional court in</p> <p style="text-align: center;">Page 25</p>	<p>1 its ruling in this case considered to be of particular 2 significance given the exceptional facts of this case, 3 and I will come back to the passage of their judgment in 4 that respect in a moment. 5 My Lady, those were the three preliminary points. 6 Our first set of submissions, my Lady, are at tab 3 7 of the bundle. At paragraph 40 of those submissions we 8 set out the outline scope that we proposed you should 9 adopt, provisionally at this stage. As we understand 10 the written submissions that have been provided by the 11 parties, no one contends that you should not set the 12 provisional scope in the terms that we have proposed at 13 paragraph 40. The family have proposed one further line 14 of investigation, which I will address in a moment. 15 Before I do that, I will summarise the outline scope 16 that we proposed at paragraph 40 of those written 17 submissions. There are in effect three parts to it. 18 The first part will involve hearing evidence 19 relating to Dawn Sturgess's life, her sudden illness and 20 hospitalisation in June and July 2018, the medical cause 21 of her death and the sufficiency of the medical 22 treatment that she received. 23 The final issue, the sufficiency of the medical 24 treatment that Ms Sturgess received, was a matter raised 25 by the family in their initial written submissions on</p> <p style="text-align: center;">Page 26</p>
<p>1 scope made to the senior coroner. The point that 2 concerns the family in this respect is the difference in 3 the emergency treatment provided by paramedics to 4 Ms Sturgess on the one hand and to Mr Rowley on the 5 other hand when they were both taken ill on 6 30 June 2018, in particular the fact that Mr Rowley was 7 treated with atropine and Ms Sturgess was not. That is, 8 as I have said, one of the matters that we propose you 9 investigate alongside more general narrative evidence 10 relating to the medical treatment that Dawn Sturgess 11 received following her arrival in hospital. 12 That then is the first part of our proposed scope. 13 The second part is the issue of Russian state 14 responsibility for Dawn Sturgess's death. In that 15 regard, we have proposed that the provisional scope 16 should include, first, an investigation into the 17 poisoning of Sergei and Yulia Skripal, covering both the 18 events around the poisoning and the issues of 19 responsibility for the poisoning, the involvement of 20 Alexander Petrov and Ruslan Boshirov, the source of the 21 Novichok, and, more generally, the question of Russian 22 state responsibility. Those issues, of course, have 23 some degree of overlap. 24 Then, second, we propose that these proceedings 25 should investigate the connection between the Skripal</p> <p style="text-align: center;">Page 27</p>	<p>1 poisoning and the death of Dawn Sturgess. The previous 2 coroner, Mr Ridley, approached this issue narrowly. He 3 ruled that the inquest should investigate the actions of 4 the two men using the names Petrov and Boshirov but 5 should not go further and investigate either the source 6 of the Novichok or Russian state responsibility more 7 generally. It was on this issue that the divisional 8 court allowed the challenge to his ruling. Our 9 submission is that the investigation that is now to be 10 conducted in these proceedings relating to the 11 responsibility for Dawn Sturgess's death should 12 encompass not only the conduct of Petrov and Boshirov 13 but also the source of the Novichok and wider questions 14 of Russian state responsibility. We say that for two 15 reasons. 16 First, because as the family argued before the 17 divisional court, any investigation into the conduct of 18 Petrov and Boshirov will be artificial and incomplete if 19 it does not extend to consider issues relating to the 20 source of the Novichok and wider questions of Russian 21 state responsibility. 22 Whilst it will of course be important as a first 23 stage to hear evidence as to the movements of the two 24 men, their presence in Salisbury and their possible 25 involvement in the Skripal poisoning, it will also be</p> <p style="text-align: center;">Page 28</p>

<p>1 necessary to consider the evidence that their names are 2 aliases and that they are in fact GRU officers. If this 3 investigation is to be one that is comprehensive and not 4 artificially limited, we submit that it must pursue the 5 evidence as far as it will take the inquiry and that it 6 must attempt to answer the most fundamental questions, 7 where did the Novichok come from? Who sent those two 8 men to Salisbury and with what instructions? And at 9 what level was that decision approved?</p> <p>10 The second reason we give for conducting a wide 11 investigation into Russian state responsibility is the 12 very significant public interest in exposing the full 13 facts of these matters, combined with the consideration 14 that this is likely to be the only opportunity to do so 15 forensically in a legal forum.</p> <p>16 I mentioned earlier this is a matter upon which the 17 divisional court had expressed their views and the 18 paragraph of their ruling, paragraph 88 of the 19 divisional court's ruling, reads as follows:</p> <p>20 "There is acute and obvious public concern, not 21 merely at the prima facie evidence that an attempt was 22 made on British soil by Russian agents to assassinate 23 Mr Skripal and that it led to the death of Ms Sturgess, 24 but also at the fact that it involved the use of 25 a prohibited nerve agent, exposing the population of</p> <p style="text-align: center;">Page 29</p>	<p>1 Salisbury and Amesbury to lethal risk. There has been 2 and, to be realistic, there will be no criminal trial in 3 which the details of how this appalling event came to 4 occur can be publicly examined."</p> <p>5 That was the way the divisional court put that 6 second matter, my Lady.</p> <p>7 My Lady, you will recall the citations from 8 Lord Lane and Sir Thomas Bingham in the Thompson and 9 Jamieson cases that we have at our paragraph 39 of our 10 written submissions. They are clear authority for the 11 proposition that the extent of public concern about the 12 circumstances of a death is a consideration that is 13 relevant to the scope of a Jamieson inquest. We also 14 note in this regard that that issue of public concern 15 was treated as a relevant consideration by 16 Sir Robert Owen when he set the scope of the Litvinenko 17 inquest, noting at that time it was an inquest -- it was 18 before the proceedings had been turned into 19 an inquiry -- and it was indeed a non-article 2 inquest. 20 We have put the references and the rulings in the 21 bundle, my Lady.</p> <p>22 That is the second aspect of the scope that we have 23 proposed at paragraph 40 of our submissions.</p> <p>24 The third issue I can take more shortly, and that is 25 the steps taken by the UK authorities to ensure public</p> <p style="text-align: center;">Page 30</p>
<p>1 safety following the Skripal poisoning, focusing on the 2 search for any remaining poison, to include relevant 3 aspects of the police investigation and the public 4 health response.</p> <p>5 For the reasons we have set out in our written 6 submissions, my Lady, this is not an issue that 7 Article 2 requires you to investigate. However, we do 8 submit that, given the basic facts of Dawn Sturgess's 9 death, in other words that she appears to have been 10 poisoned with Novichok left over from the Skripal 11 attack, notwithstanding the police investigation and the 12 clean-up operation, there ought to be at least some 13 level of investigation into the conduct and efficacy of 14 the immediate police investigation into the Skripal case 15 and that of the public health clean-up operation.</p> <p>16 My Lady, I emphasise in this respect that this is 17 very much high-level provisional scope we are inviting 18 you to set at this stage. This may well be one of those 19 issues following disclosure that can be refined 20 following further submissions.</p> <p>21 My Lady, those are the three parts of the scope that 22 we invited you to set at paragraph 40 of our 23 submissions. I have said we do not understand in fact 24 any of that to be contentious as far as those who are 25 represented before you are concerned. I did mention --</p> <p style="text-align: center;">Page 31</p>	<p>1 this is the last matter I am going to address under this 2 heading -- one further line of investigation that has 3 been proposed by the family.</p> <p>4 Ms Hill I am sure will address you further on this 5 but it is at paragraph 13 of their submissions. The 6 family propose that the provisional outline scope that 7 you set today should also include whether UK authorities 8 took appropriate precautions in early 2018 to protect 9 Mr Skripal from being attacked.</p> <p>10 My Lady, as I say, I am sure Ms Hill will address 11 you on this issue but if I may, I will make a few 12 preliminary observations on this issue.</p> <p>13 First of all, this further issue is clearly more 14 remote from Dawn Sturgess's death than those that we 15 have listed at paragraph 40 of our written submissions.</p> <p>16 Secondly, and on the other hand, there is 17 a potential causative connection between this issue and 18 Ms Sturgess's death. Depending of course on the facts, 19 it may arguably have been foreseeable that a failure to 20 take appropriate precautions to protect Mr Skripal would 21 have exposed others to danger. Moreover, there is 22 evidence that Her Majesty's Government may have been on 23 notice of a threat to Mr Skripal from Russian state 24 agents prior to the poisoning. We say that by reference 25 to a document which I will ask you to turn up, my Lady,</p> <p style="text-align: center;">Page 32</p>

<p>1 it is at tab 22 of your bundle. This was a letter 2 written by Sir Mark Sedwill, who, as you can see from 3 the top right-hand corner, was at the time the 4 Government's national security adviser to the Secretary 5 General of NATO in April 2018, so shortly after the 6 Skripal poisoning but some time before Dawn Sturgess's 7 death. 8 My Lady, I know you are familiar with this document. 9 It was in effect the British Government's description of 10 its case, if you like, or its grounds for asserting that 11 the Skripal poisoning had been conducted by Russia. For 12 these purposes at least there is just one passage in 13 here that we draw your attention to. It is on the last 14 page, the third page of the letter. If you see the 15 second paragraph starting halfway down, you will see 16 that Sir Mark Sedwill states: 17 "We have information indicating Russian intelligence 18 service interest in the Skripals dating back at least as 19 far as 2013, when email accounts belonging to 20 Yulia Skripal were targeted by GRU cyber specialists." 21 My Lady, that of course is a brief reference and one 22 would need to know far more about what lies behind it, 23 but on its face at least, as I say, that may provide 24 some support for the notion that there was a foreseeable 25 risk that was known about prior to the poisoning.</p> <p style="text-align: center;">Page 33</p>	<p>1 My Lady, next, we simply remind you of the 2 submissions I have already made this morning, that you 3 have a wide discretion in determining the scope of 4 an inquest, in particular one has in mind the passage 5 from Lord Justice Simon Brown's judgment in Dallaglio 6 that I read out a few moments ago. 7 My Lady, at paragraph 87 of the divisional court 8 judgment on the judicial review in this case, the 9 divisional court stated that a coroner in this case 10 would be justified in ruling in the exercise of his 11 discretion that the inquest need not extend to the 12 investigation of the career history of Mr Skripal or his 13 alleged links with intelligence agencies. That is 14 an observation which is obviously obiter, but it comes 15 close to this issue, but in having said that, in our 16 submission, on analysis, it probably provides only 17 limited assistance in resolving the issue that the 18 family have now raised. 19 First of all because those lines of inquiry referred 20 to by the divisional court -- that is an investigation 21 into the career history of Mr Skripal or his alleged 22 links with intelligence agencies -- are not the same as 23 the line of inquiry that the family have proposed and 24 they arguably lack the causative potency of the line of 25 investigation that the family have now proposed.</p> <p style="text-align: center;">Page 34</p>
<p>1 Secondly, of course, the divisional court recognised 2 the wide discretion enjoyed by the coroner in 3 determining scope. They didn't go so far as to say that 4 even those issues that they identified couldn't properly 5 be within scope. They simply said the other way, that 6 a coroner might be justified in excluding those matters 7 from scope. 8 Finally, in this regard, my Lady, I simply emphasise 9 what I have already said and I have noted more than 10 once, which is all you are being asked to do today is to 11 decide what issues should be included in the provisional 12 scope of the inquest. That provisional scope will be 13 used to inform the disclosure exercise and there is 14 a common expectation that further submissions will be 15 heard following disclosure and at that stage of course 16 you may be invited to remove items from scope in the 17 light of the material that has been disclosed. 18 My Lady, that is all I wanted to say about our 19 proposed scope in paragraph 40 of our submissions and 20 also about that further line of investigation. 21 THE CORONER: Mr O'Connor, one question I ask of you now, 22 just so the other parties know what is going through my 23 mind. If I were to conclude that the provisional scope 24 of the inquest should include Russian state 25 responsibility, I am not asking you to second guess the</p> <p style="text-align: center;">Page 35</p>	<p>1 divisional court but at the moment I am not following 2 how one could investigate that issue without 3 investigating the relationship between Mr Skripal and 4 the Russian state, in other words his background? 5 As I say, it is difficult for you, I know, because 6 the words of the divisional court are obviously binding 7 on us all, but I find that puzzling. 8 MR O'CONNOR: It may in the end I suspect come down to 9 a matter of degree, and so one may need to investigate 10 some elements of Mr Skripal's relationship with the 11 Russian state because one is investigating Russian state 12 responsibility for the Sturgess death but it may not be 13 necessary to investigate that issue, as it were, on its 14 own and for its own sake. 15 THE CORONER: As a background to the relationship between 16 them and as you read the words of the divisional court, 17 they were not necessarily excluding that? 18 MR O'CONNOR: They were not, as I read it, my Lady. In 19 fact, of course, they were not excluding anything, they 20 were simply saying that a coroner might be entitled to 21 exclude that matter. 22 THE CORONER: Thank you, Mr O'Connor. 23 Right, I shall now go through the representatives 24 again on the issue and I emphasise, as Mr O'Connor has 25 done more than once, that it is the provisional scope of</p> <p style="text-align: center;">Page 36</p>

<p>1 the inquest. 2 First of all, Ms Hill. 3 MS HILL: Thank you, my Lady. Can you see and hear me? 4 THE CORONER: I can hear you and I think you might be 5 popping up -- I cannot see you. 6 MS HILL: I have enabled my camera, I can see myself in fact 7 being seen by you. 8 Thank you, my Lady. 9 In relation to the submissions on scope, I will just 10 deal briefly with the introductory comments my learned 11 friend Mr O'Connor made. 12 We plainly welcome the inclusion of wider Russian 13 state responsibility that is proposed as being 14 provisionally included. That was the entire thrust of 15 the judicial review brought on behalf of the family and 16 so it remains our firm view that that is a central issue 17 that should be properly investigated. My Lady, in 18 relation to the additional issue that is flagged at 19 paragraph 13 of our submissions, namely whether the UK 20 authorities took appropriate precautions in early 2018 21 to protect Mr Skripal, we do invite you to include that 22 in a provisional or outline ruling on scope. 23 Could I ask my Lady to turn up, please, the ruling 24 on scope in the Litvinenko inquest from January 2013. 25 My Lady should find that at tab 16 of the bundle.</p> <p style="text-align: center;">Page 37</p>	<p>1 THE CORONER: I have it. 2 MS HILL: If my Lady turns, please, to paragraph 11, one can 3 see there the approach that Sir Robert Owen took to the 4 scope questions in Litvinenko and the test that was 5 applied by him at paragraph 11 in order to decide 6 whether to include a line of inquiry was firstly, does 7 the line of inquiry have at least potentially causative 8 relevance to the death and/or is it in the public 9 interest to pursue a line of inquiry so as to allay 10 suspicion of deliberate wrongdoing? My Lady, it is our 11 submission that either or both of those routes merit the 12 addition of this issue to your provisional scope. 13 My Lady's been taken I think in brief terms to the 14 senior coroner's ruling on the Osman issue but for the 15 avoidance of doubt, that did not deal with any issues 16 prior to the poisoning of the Skripals. My Lady, just 17 for reference, you will see from tab 14, paragraphs 35 18 to 47 of his scope ruling, if you wish to just turn it 19 up briefly, you might be assisted by looking under the 20 heading that begins at paragraph 35 "The Osman duty" in 21 the senior coroner's ruling. 22 My Lady, you can see, if you have a chance to read 23 that, that essentially, what was being looked at, and it 24 is perhaps made most clear I think from paragraph 40, 25 you can see reference there to the aftermath and to</p> <p style="text-align: center;">Page 38</p>
<p>1 events between the poisoning of the Skripals and the 2 death of Ms Sturgess, so, very broadly, my Lady can read 3 those paragraphs that the ruling to date by the senior 4 coroner on the Osman issue does not touch on this issue 5 that we invite you to include in scope and in any event 6 I think the acceptance is, certainly from your counsel, 7 that scope needs to be revisited. The reason 8 I highlight that, my Lady, is because the reality is 9 that no disclosure at all has been provided to date on 10 this issue that we now invite you to include. 11 Accordingly, there is necessarily a limit to the 12 submissions that I can make. Broadly, my Lady, it is 13 our submission that there is sufficient evidence to pass 14 either or both of the routes to inclusion that were set 15 out in Sir Robert Owen's test. 16 If I could ask my Lady to turn up the letter from 17 Sir Mark Sedwill, at tab 22. There are certain parts of 18 that that I wish to perhaps draw out for my Lady. 19 THE CORONER: I have it. 20 MS HILL: My Lady will see on the second page that what 21 Sir Mark does in this letter is set out three key 22 reasons why the case is being put for Russian state 23 responsibility. 24 First, at the top of page 2, the technical means. 25 Then, second, operational experience and it says</p> <p style="text-align: center;">Page 39</p>	<p>1 this: 2 "Russia has a proven record of conducting 3 state-sponsored assassinations. The Owen report from 4 the UK public inquiry into the death of 5 Alexander Litvinenko concluded that he was deliberately 6 poisoned with polonium-210, that there was a strong 7 possibility that the FSB directed the operation and that 8 President Putin probably approved it." 9 Then this: 10 "Commenting other suspected assassinations between 11 2002 and 2006, Sir Robert Owen wrote that these cases 12 suggest that in the years prior to Mr Litvinenko's death 13 the Russian state may have been involved in the 14 assassination of Mr Putin's critics and that the Russian 15 state may have sponsored attacks against its opponents 16 using poison." 17 Sir Mark continues by saying: 18 "Since 2006, there have been numerous suspected 19 Russian state-sponsored assassinations outside the 20 former Soviet union." 21 Perhaps also just on this, my Lady, for your note, 22 in the Litvinenko report itself, paragraph -- I hope 23 I've got the numbering correct -- 9.155, Sir Robert Owen 24 concluded that leading opponents of President Putin, 25 including those living outside Russia, were at risk of</p> <p style="text-align: center;">Page 40</p>

<p>1 assassination. One of risks they faced was that of 2 being poisoned. 3 Given that there has been media reporting that 4 Mr Skripal had provided information to MI6 about his 5 former employer, the GRU, in our submission it is 6 self-evident there was at least an arguable risk to him. 7 Then my Lady sees over the page in the 8 Sir Mark Sedwill letter the passage that your learned 9 counsel took you to under third "The motive": 10 "He was a former Russian GRU intelligence officer, 11 convicted of espionage in 2004 [according to the letter] 12 highly likely that the Russian intelligence view at 13 least some of its defectors as legitimate targets for 14 assassination." 15 Then the crucial sentence that your learned counsel 16 has highlighted in my submission is this: 17 "We have information indicating Russian intelligence 18 service interest in the Skripals dating back at least as 19 far as 2013." 20 And then reference to the email accounts. 21 My Lady may also wish to look in due course at the 22 Intelligence and Security Committee of Parliament's 23 report from July of last year that, again, looked at 24 this issue of the vulnerability of former Russian 25 intelligence officers. I am just quoting, this document</p> <p style="text-align: center;">Page 41</p>	<p>1 is not in the bundle, my Lady but we can provide it to 2 you, paragraph 62 of that report: 3 "The Salisbury attack has highlighted the 4 vulnerability of former Russian intelligence officers 5 who have settled in the UK." 6 That issue was investigated by the committee to some 7 degree, but the material relating to that investigation 8 is currently in a classified annex. 9 My Lady, for present purposes, it is our submission 10 that based on those factors, there is sufficient 11 evidence to merit inclusion of this line of inquiry by 12 either of the routes set out in Sir Robert Owen's test. 13 My Lady, your counsel accepted in their submissions that 14 this issue has a potential causative connection with 15 Ms Sturgess's death and that is a concession that is 16 rightly made in my submission. 17 My Lady, if one turns back, please, to the 18 Litvinenko test at tab 11, that proposition, that this 19 issue has a potentially causative connection with 20 Ms Sturgess's death in our submission reflects very much 21 what is the first limb in Sir Robert Owen's test. On 22 that basis we would submit that this line of inquiry 23 should be included. 24 It is plainly also, in our submission, in the public 25 interest to look at this issue because either the</p> <p style="text-align: center;">Page 42</p>
<p>1 Government knew about Mr Skripal's existence and the 2 potential risks to him and then there is a question 3 about what measures were taken if any to protect him. 4 Or the Government did not know, and in our 5 respectful submission, either of those matters are in 6 the public interest. 7 My Lady will also see if one looks just towards the 8 end paragraph 11 in the Litvinenko ruling that 9 Sir Robert Owen gives some insight in the remainder of 10 paragraph 11 to the threshold at which he was looking. 11 Essentially my Lady will see beneath the 1 and 2 that he 12 was looking for, and I quote the third line down of the 13 substantive paragraph: 14 "... at least some evidential basis for 15 a suspicion." 16 Saying he was not required to investigate things 17 that were mere assertion or speculation wholly 18 unsupported by any evidence. 19 My Lady, based on the material that I have referred 20 to so far in our submission, we are clearly in the 21 territory of a proposition that has at least some 22 evidential basis. It may be that we could assist you 23 with further publicly available material if need be, but 24 in our respectful submission it would be premature and 25 inappropriate to exclude this line of inquiry, absent</p> <p style="text-align: center;">Page 43</p>	<p>1 any disclosure at all. We fully hear what is said by 2 your counsel about the need to be proportionate and we 3 do recognise that this particular line of inquiry is 4 a little more remote than some of the others. I am 5 confident, my Lady, that your counsel can be trusted to 6 make proportionate disclosure requests. 7 In our submission -- again I reiterate, all you are 8 being invited to do at this point is to include this 9 issue on a provisional or outline ruling on scope, in 10 order to obtain targeted and focused proportionate 11 disclosure, so that the issue can be revisited. In our 12 submission it is appropriate for you to take that 13 course. We do respectfully invite you to include this 14 issue in your provisional or outline ruling on scope. 15 My Lady, those are my submissions and perhaps I can 16 just simply conclude by saying that I agree with respect 17 with the analysis of your learned counsel of the 18 divisional court's ruling. It does also seem to us, my 19 Lady, that you have alighted on a practical issue, that 20 if one is looking at his relationship with the Russian 21 state, then that does, in our submission, segue very 22 naturally into a question of what that relationship 23 meant for what the British state knew about his 24 activity. Although it is an extension of the proposed 25 scope, in our submission at the moment it is</p> <p style="text-align: center;">Page 44</p>

<p>1 a relatively modest one that can be dealt with 2 proportionately. 3 My Lady, those are my submissions, unless I can 4 assist you further on this issue. 5 THE CORONER: No. Thank you very much indeed, Ms Hill. 6 Right, Ms McGahey. 7 MS MCGAHEY: My Lady, on the issue of scope, the Secretary 8 of State is grateful for the common recognition that the 9 decisions that you are being asked make at the moment 10 are those at a very high-level of generality and they 11 are very much preliminary and until disclosure takes 12 place it is going to be very difficult for any fixed 13 decisions of any sort to be made. 14 We make no submissions at all on the issue of 15 sufficiency of medical treatment, but the Secretary of 16 State seeks to make submissions on two aspects of scope 17 on which both Mr O'Connor and Ms Hill have touched this 18 morning. 19 Firstly, the family's proposal that your current 20 outline scope should include the question of whether the 21 UK authorities took appropriate precautions to protect 22 Mr Skripal and, secondly, the issue of other similar 23 poisonings that may or may not be attributed to the 24 Russian state. 25 The Secretary of State's starting point is that this</p> <p style="text-align: center;">Page 45</p>	<p>1 is a Jamieson inquest and that all matters to come 2 within it should be at the very least those with 3 potentially causative relevance to the death of 4 Ms Sturgess. The Secretary of State accepts entirely of 5 course that the scope of the inquest is a matter of 6 broad discretion for you but in a Jamieson inquest, as 7 this one is, the scope will be determined by the four 8 statutory questions that you have to answer under 9 section 9 of the 2009 Act -- who the deceased was, how, 10 when and where she came by her death. In this inquest 11 as in the vast majority, the most difficult issue is 12 obviously going to be how she came by her death. 13 Obviously before the Human Rights Act came into 14 force, the question of how somebody came by her death 15 was always interpreted to mean by what means. Since the 16 Middleton case and now the incorporation of the human 17 rights provisions into the 2009 Act, in an Article 2 18 case then the court must consider by what means and in 19 what circumstances an individual came by his or her 20 death. At least currently that is not such an inquest 21 ... in a case where Article 2 is not engaged, the test 22 is still a test for relevance, and the test for 23 inclusion of an issue is still limited by the means of 24 a death, and one sees that for example in the case of 25 Hurst, to which we refer in our submissions, and</p> <p style="text-align: center;">Page 46</p>
<p>1 elsewhere. 2 It was something that Sir Thomas Bingham himself 3 made clear in the Jamieson case. I don't ask your 4 Ladyship to turn to it, it is quoted by the divisional 5 court in the GS judicial review, which is at tab 15 and 6 paragraph 62. What Sir Thomas Bingham said was: 7 "How is to be understood as meaning by what means. 8 It is noteworthy that the task is not to ascertain how 9 the deceased died, which might raise general and 10 far-reaching issues but how the deceased came by his 11 death, a more limited question directed to the means by 12 which the deceased came to his death." 13 Something very similar was said by Lord Burnett in 14 the Hamilton case in Birmingham: 15 "The scope of an inquest is not determined by 16 looking at the broad circumstances of what occurred and 17 requiring all matters touching such circumstances to be 18 explored." 19 There is other authority, the case of Homberg (1994) 20 158 JP 357. Again, there is no need for anyone to look 21 it up, it's simply a general proposition: 22 "The question of how the deceased came by his death 23 is of course wider than merely finding the medical cause 24 of death and it is therefore right and proper that the 25 coroner should enquire into acts and omissions which are</p> <p style="text-align: center;">Page 47</p>	<p>1 directly responsible for the death." 2 The Secretary of State accepts entirely that any 3 investigation is almost bound to stretch more widely 4 than is strictly required for the purposes of that type 5 of conclusion and how far it should stretch is a matter 6 for you, and you have to conduct a sufficient inquiry to 7 answer those statutory questions. 8 We accept absolutely that you have a very wide 9 discretion and you may of course investigate matters 10 relevant to the issue of preventing death in future, 11 even if those are of only marginal relevance to the 12 death you are investigating. 13 It is a question of judgment as to how far back one 14 can trace a chain of events and how far one should trace 15 back a chain of events, but both Mr O'Connor and Ms Hill 16 very fairly recognised that the proposal by the families 17 to investigate the protection of the Skripals is more 18 remote than any other issue you have been asked to 19 consider in the list set out at paragraph 40 of counsel 20 to the inquiry's submissions. 21 Mr O'Connor has highlighted and you have referred 22 this morning to the fact that the divisional court gave 23 a steer, an indication, that any coroner would be 24 justified in ruling that the career, the investigation 25 of the career history of Mr Skripal, his alleged links</p> <p style="text-align: center;">Page 48</p>

<p>1 with the intelligence agencies fell outside scope. 2 In our submission, similarly, the question of the 3 protection of Mr Skripal is a matter that should fall 4 outside the scope of this inquest. The divisional court 5 drew a clear distinction between this case and the case 6 of Mr Litvinenko. In Mr Litvinenko's inquiry he was the 7 primary target of attack. That is not the case in the 8 tragic death of Ms Sturgess. She was an unintended 9 victim and in the Secretary of State's submission, the 10 focus of this inquest should be on the events that led 11 to her death as an unintended victim. 12 May I turn briefly now to the question of Russian 13 alleged run state-sponsored assassinations and other 14 attempted assassinations by poisoning. In the Secretary 15 of State's submission, these are equally remote. One 16 very obvious example is the very high-profile case, the 17 alleged assassination attempts of Mr Navalny. We 18 respectfully say it is difficult to see how on any view 19 an alleged murder or attempted murder that took place 20 months or even years after the death of Ms Sturgess 21 could be said in any way to have caused or contributed 22 to it. The death of Mr Navalny can form no part of any 23 chain leading to her death. We submit that equally 24 irrelevant will be attacks that occurred years or months 25 earlier.</p> <p style="text-align: center;">Page 49</p>	<p>1 We also submit that there are true issues of 2 practicality in an inquest attempting to investigate 3 matters of this sort. To be of any use to this 4 inquest, any investigation into an attempted or 5 an actual assassination attempt overseas would have to 6 be thorough and it would have to be comprehensive. 7 There would be absolutely no point in this inquest 8 trying to cobble together pieces of information here in 9 the UK and trying to reach conclusions from it. While 10 I have absolutely no inside knowledge in this respect, 11 it does seem very unlikely that this inquest would be 12 able to obtain the full details from the police or other 13 security agency investigations into deaths that occurred 14 in other jurisdictions or attacks, or alleged attacks in 15 other jurisdictions. 16 Insofar as alleged assassinations or attempts in the 17 UK are concerned, these have of course already been 18 investigated. There was a hugely extensive 19 investigation into the death of Mr Litvinenko and 20 an inquest into the death of Mr Perepilichnyy. Again 21 a full investigation there, as full as could be 22 achieved, into a potential murder, although ultimately 23 found to be a death by natural causes. 24 In my submission, that work has been done and it 25 would be wrong and unnecessary for this inquest to seek</p> <p style="text-align: center;">Page 50</p>
<p>1 to reopen it and redo the work of others. 2 The Secretary of State accepts entirely on the case 3 law that a non-article 2 inquest can and it sometimes 4 must explore issues that are wider than are required for 5 the narrow conclusion relating to the means by which 6 an individual came by his or her death. There will be 7 times when it is absolutely necessary for the court to 8 go more widely, and that is precisely why the divisional 9 court ruled that such matters as the activities of 10 Russian state actors and the source of the Novichok 11 could be in scope. We accept entirely that it wouldn't 12 tell the full story if we were to say simply that 13 Ms Sturgess sprayed herself with a bottle of perfume and 14 died shortly thereof. That is why the divisional court 15 has ruled that the source of the Novichok can properly 16 be in scope. 17 But, in my respectful submission, the fact that in 18 some cases a non-article 2 inquest can be just as wide 19 as an Article 2 one, or that in some respects, such as 20 the source of Novichok, it is appropriate for this 21 inquest to investigate that wider issue, that does not 22 mean that a Jamieson inquest will always be, or the 23 matters investigated in a Jamieson inquest will or may 24 always be as wide as those of an Article 2 inquest. The 25 case law says that often there will be no difference.</p> <p style="text-align: center;">Page 51</p>	<p>1 To take a very, very common example, in the case of 2 deaths in the care of the state, or the custody of the 3 state, if somebody takes his own life by hanging in 4 a prison, that is automatically an Article 2 inquest. 5 If somebody takes his own life by hanging when 6 a voluntary inpatient in a psychiatric unit, that would 7 be a Jamieson inquest. But very often the issues to be 8 identified would be absolutely the same: what was the 9 mechanism of death and, secondly, what did that person 10 intend, did he intend to die? That would lead to 11 an investigation into the circumstances leading up to 12 the act that caused his death. 13 The only difference in such a situation, between 14 those two inquests, might be literally the buildings in 15 which the death occurred and the nature of the staff who 16 were present. But in this case, in my submission, there 17 is absolutely no reason to say that if it were 18 an Article 2 inquest the issues to be investigated would 19 be exactly the same. 20 In my submission, to pursue a line of inquiry about 21 whether the UK authorities took appropriate precautions 22 to protect Mr Skripal or whether Russia was behind other 23 assassinations, would extend this inquest well into and 24 very possibly well beyond even an Article 2 inquest. On 25 the matter of the poisonings, it would essentially be</p> <p style="text-align: center;">Page 52</p>

1 an investigation into Russian hostile state action,
 2 potentially globally, and that is way beyond the scope,
 3 in my submission, of any inquest.
 4 The high-level scope that has already been
 5 identified by counsel to the inquest does provide you
 6 with an opportunity to pursue in the first instance such
 7 factual areas as may be of concern or interest to the
 8 inquest without going more widely into issues that we
 9 submit would belong, if they belonged at all, in
 10 an Article 2 inquest. Of course, my Lady, these are
 11 very much preliminary submissions on behalf of the
 12 Secretary of State and we would seek to make further
 13 submissions to you once disclosure has taken place.
 14 Unless I can assist your Ladyship further, those are
 15 my submissions.
 16 THE CORONER: Ms McGahey, you heard the question I put to
 17 Mr O'Connor. You have referred to the divisional court
 18 stating that the coroner would be entitled to exclude
 19 Mr Skripal's background. I for my part at the moment
 20 don't follow how if I did conclude we should investigate
 21 Russian state responsibility, I could do that without,
 22 to some extent, exploring Mr Skripal's background and
 23 relationship with the Russian state.
 24 MS MCGAHEY: My Lady, I suspect the answer is very much
 25 evidence dependent but my submission certainly at the

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1 extent it may not be necessary to ask why the primary
 2 victim was a victim -- why the primary target was
 3 a target, because what is highly relevant to the death
 4 of the unintended victim is actually the mechanism used,
 5 the reckless mechanism that enabled somebody who was not
 6 the target to be exposed to Novichok and to die.
 7 THE CORONER: Sorry, I have interrupted you again, it is so
 8 difficult remotely.
 9 That argument depends on the extent to which you say
 10 that because Ms Sturgess was not the primary target, and
 11 because there is a gap in time, that somehow that breaks
 12 any chain of causation, but if I were to find that she
 13 was poisoned by Novichok that had been left over by the
 14 attempt on Mr Skripal's life, supposing I were to find
 15 that, surely there is a direct causal link between that,
 16 the attack on Mr Skripal, and the death of Ms Sturgess,
 17 isn't there?
 18 MS MCGAHEY: Yes, my Lady, absolutely. My submission is
 19 that there is no particular need for this inquest to
 20 investigate why Mr Skripal was targeted.
 21 If, for example, somebody is the unintended victim
 22 of a drive-by shooting, there will undoubtedly be
 23 an investigation into how that person came to die, why
 24 that person was there, but the basic fact would be that
 25 they were not the intended victim, someone else was the

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1 moment is that it would be perfectly sufficient for your
 2 inquest to investigate whether agents of the Russian
 3 state were, as a matter of fact, responsible for the
 4 attempt on the life of Mr Skripal and it would not be
 5 necessary --
 6 THE CORONER: Sorry, I interrupted you, but why would agents
 7 of the Russian state come to Wiltshire to poison
 8 somebody -- if you don't investigate the background to
 9 Mr Skripal, you have this complete lack of any kind of
 10 link. He is just a Russian national, or was a Russian
 11 national.
 12 MS MCGAHEY: My Lady, there is already substantial
 13 information in the public domain about the background of
 14 the alleged assassins or those who attempted to kill
 15 Mr Skripal.
 16 THE CORONER: I am not talking about going much further than
 17 where was he employed, in what general circumstances did
 18 his employment come to an end, his conviction -- I am
 19 not talking about what information did he provide, if he
 20 provided any, to British intelligence. I am just
 21 talking about an overall general impression of his
 22 relationship with the Russian state, that is all.
 23 MS MCGAHEY: Your Ladyship may feel a need to go that far.
 24 In my submission, the focus should be on the death
 25 of Ms Sturgess, who was an unintended victim and to that

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1 target. How far one needed to go as to why the other
 2 person was the target would be very fact specific to
 3 a particular case. It might not actually matter at all.
 4 It might be sufficient for the inquest to say:
 5 "I have heard from a police officer that there was
 6 warfare between two gangs and this led to violence and
 7 Ms X was in the wrong place at the wrong time walking
 8 behind somebody when shots were fired."
 9 There would be absolutely no need in those
 10 circumstances for the inquest to investigate the history
 11 of feuding between the two rival gangs, or indeed even
 12 the police action that allowed the shooting to take
 13 place or failed to stop it.
 14 THE CORONER: We may be discussing -- I was going to say
 15 "arguing", but I shouldn't use that expression -- the
 16 extent to which one should go into Mr Skripal's
 17 background but for my part at the moment, it seems to me
 18 that certainly some bare facts need to be established
 19 about his background. They may be facts that are
 20 already in the public domain and any concern the
 21 Secretary of State may have about going too far down
 22 this line is not merited but, anyway, I have heard
 23 your -- unless there is anything else you want to add to
 24 that, at the moment it seems to me that if I do decide
 25 to explore Russian state responsibility, I want some

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1 bare facts about its relationship with Mr Skripal,
 2 otherwise the whole thing is in a vacuum, there is
 3 something missing.
 4 MS MCGAHEY: My Lady, I don't think I have any further
 5 submissions to make. It may be easier when disclosure
 6 has taken place.
 7 THE CORONER: Indeed. Indeed, that is why this is, as you
 8 say, provisional scope and very high level.
 9 Can I ask you this. Supposing I was satisfied that
 10 the issue raised by the family was possibly speculative
 11 but there was just enough material in the public domain
 12 to merit further investigation. Then disclosure would
 13 occur and I would find out whether the family's concerns
 14 were justified or not and we could then come back to the
 15 issue.
 16 If I were to exclude it, as you suggest or the
 17 Secretary of State suggests at present, I would never
 18 know whether or not that was a legitimate issue, would
 19 I? Because I wouldn't see the material by way of
 20 disclosure.
 21 MS MCGAHEY: That is correct, my Lady, yes. That is right.
 22 In my submission that is an inevitable consequence where
 23 a coroner draws a line somewhere.
 24 THE CORONER: I see that. But there is some material in the
 25 public domain to suggest that there may have been --

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1 be investigated.
 2 THE CORONER: The family, Ms Hill and others, they have
 3 limited the issue to early 2018. Obviously that would
 4 involve investigating if there had been any build up to
 5 2018. It is limited in time to some extent, isn't it,
 6 the issue as put forward by the family.
 7 MS MCGAHEY: It is as currently framed, my Lady, yes.
 8 THE CORONER: But you would say it is bound to go back
 9 several years if I were to explore it?
 10 MS MCGAHEY: I honestly don't know the answer to that, my
 11 Lady --
 12 THE CORONER: Right.
 13 MS MCGAHEY: -- I am afraid.
 14 THE CORONER: I appreciate that and I am sorry if I ask any
 15 questions that you find, obviously, it is difficult to
 16 answer. Please just say if you find yourself in that
 17 position.
 18 MS MCGAHEY: I am grateful, my Lady.
 19 My submission is made purely on a matter of
 20 principle, that this is one step too far back on the
 21 facts that this inquest is to investigate.
 22 THE CORONER: Right.
 23 Those were all the questions I have, Ms McGahey.
 24 Anything else you wanted to add?
 25 Mr O'Connor, were you about to rise? No.

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1 I say may and it is obviously has to be investigated or
 2 may have to be investigated properly, but that there may
 3 have been material available to the UK authorities that
 4 certainly the Skripals were of interest to the Russian
 5 state, if they hadn't been actually threatened.
 6 MS MCGAHEY: My Lady, the letter that we had from
 7 Sir Mark Sedwill indicates there was a cyber interest in
 8 2013, it doesn't indicate a threat to life. And is, of
 9 course, several years before the attack took place.
 10 THE CORONER: That is true. Well, it is since 2013, it is
 11 not in 2013, I think the letter says -- isn't it
 12 "since"?
 13 MS MCGAHEY: Yes, it is. I'm sorry, that was inaccurate on
 14 my part, yes, it is.
 15 Again, in absolutely any inquest, there has to be
 16 a cut-off point beyond which the coroner does not find
 17 out something that might, indeed, have some -- sorry?
 18 THE CORONER: You carry on, I was interrupting you again.
 19 MS MCGAHEY: There has to be, in any inquest, a cut-off
 20 point and it may very well be in any case that one
 21 coroner would cut off the point which another would not.
 22 One coroner would not learn things that another would
 23 learn. In my submission one has to take a proportionate
 24 approach, bearing in mind the inevitable complexities
 25 and the very large number of issues that are already to

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1 MS MCGAHEY: No, I am grateful, my Lady.
 2 THE CORONER: Right, thank you very much indeed, Ms McGahey.
 3 MR O'CONNOR: My Lady, since you have in fact -- we have now
 4 finished Ms McGahey's submissions, I am conscious that
 5 we have now been going for an hour and a half.
 6 THE CORONER: I was going to wonder do people need a break.
 7 MR O'CONNOR: I was going to ask you for a break for 10
 8 minutes.
 9 THE CORONER: I am sorry, we should have established that at
 10 the very beginning.
 11 How long do we need to break?
 12 MR O'CONNOR: 10 minutes.
 13 THE CORONER: Thank you very much.
 14 (12.01 pm)
 15 (A short break)
 16 (12.10 pm)
 17 THE CORONER: Mr O'Connor, just before I go through the
 18 other submissions, if there are any, I gather that the
 19 wish would be, if we could, to complete this hearing
 20 this morning, so as you know I have another commitment
 21 but I have put it off, so we can go through and I think
 22 it is okay with the court staff, everyone happy if we go
 23 through to about 1.15, is that all right? Okay.
 24 MR O'CONNOR: We will do our very best to finish by that
 25 time, my Lady.

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1 THE CORONER: Right, it is now Ms Giovannetti, please,
2 I don't know if you have any submissions on scope.
3 MS GIOVANNETTI: My Lady, no, we don't. Thank you.
4 THE CORONER: Thank you very much.
5 Mr Beer, any submissions?
6 You are still muted.
7 Sorry, Mr Beer, I could see you but cannot yet hear
8 you. But we are working on it. (Pause)
9 Mr O'Connor, given the problems we are having,
10 I just asked Mr Smith if he is in email contact with
11 everybody, whether he could just email the other
12 advocates to ask if any of them have any submissions on
13 this issue?
14 MR O'CONNOR: As you anticipate, my Lady, I suspect it may
15 well be the case that they don't. I wonder if there are
16 issues, I could perhaps make a start and make my
17 submissions on the next issue of disclosure, which is
18 a relatively discrete topic.
19 THE CORONER: We are confident everybody can still follow
20 proceedings, are we? If we do get the link back up or
21 operating in a way we can follow, just stop, but by all
22 means move to disclosure, thank you.
23 MR O'CONNOR: My Lady, as we have observed in our written
24 submissions, this is paragraph 53 of our first
25 submissions, disclosure in an inquest is a two-stage

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1 inquest.
2 We have also had some discussions with those
3 representing the Home Secretary in relation to
4 disclosure to be provided by central Government. We are
5 aware that HMG disclosure is likely to take some time,
6 given the complexities and sensitivities that such work
7 necessarily involves. It may be that Ms McGahey will be
8 able to provide you with at least some more detail about
9 the timescales and the challenges that they face in that
10 regard.
11 My Lady, as far as stage 2 disclosure -- disclosure
12 of documents to be made by the inquest to interested
13 persons -- is concerned, we have addressed a number of
14 practical matters in our written submissions which
15 I will not repeat. In summary, all interested persons
16 and their legal representatives will be invited to give
17 undertakings only to use disclosed material for the
18 purpose of the inquest and to keep it confidential,
19 unless and until the material is deployed in court. The
20 use of such undertakings is now standard practice in
21 large inquests and inquiries. An electronic document
22 management platform will be used for making disclosure.
23 That platform has now been procured. Disclosure is
24 provided by material being uploaded onto the platform
25 and each interested person who has provided a signed

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1 process.
2 At the first stage the coroner -- in this case the
3 coroner and your team -- request and receive documents
4 from individuals and organisations likely to hold
5 relevant material.
6 At the second stage onward disclosure of relevant
7 documentation is made to interested persons.
8 As to stage 1, once you have given your ruling on
9 the provisional scope of the inquest, the legal team
10 will make requests for disclosure to a range of
11 individuals and organisations. We have set out a fairly
12 lengthy list in our written submissions of those
13 organisations and individuals and I will not read that
14 list out now. It includes, my Lady, as you would
15 expect, police forces, NHS bodies, central and local
16 government and also Bellingcat, that I mentioned
17 earlier.
18 We also record in our written submissions that we
19 have spoken to officers from the Metropolitan Police and
20 the Thames Valley Police about the investigations that
21 they have conducted into both the Skripal poisonings and
22 Dawn Sturgess's death. We know from those discussions
23 that they hold a substantial quantity of documentation
24 in connection with those investigations, all of which we
25 are likely to wish to review for relevance to the

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1 confidentiality undertaking is given access to the
2 platform and by that means the documents on it.
3 Documents received under stage 1 of the disclosure
4 process will be reviewed and, if relevant, will be
5 disclosed to interested persons by being uploaded onto
6 the platform in batches. We have indicated in our
7 submissions that redactions will be made on the familiar
8 grounds of irrelevance, a possible claim for public
9 interest immunity and also if they give rise to issues
10 relating to anonymity.
11 My Lady, as I say, that is the process in outline.
12 There are a few finer points of detail that have been
13 canvassed in the written submissions. You have those
14 submissions. I don't propose to go into those matters
15 orally now. Our understanding is that all involved are
16 content with the procedure that we are proposing. We
17 will, of course, continue to liaise, both with those
18 providing and with those receiving material as the
19 process moves forward. The next step, as I have said,
20 is for disclosure requests to be made and we hope to do
21 that very soon.
22 My Lady, that was all I proposed to say about the
23 subject of disclosure. I don't know if we are now ready
24 to go back --
25 THE CORONER: Any luck? Or any skill I should say rather

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<p>1 than luck. 2 MR BEER: My Lady, can you see and hear me? 3 THE CORONER: We can, Mr Beer. Welcome back. I think you 4 were always there but we couldn't here you. 5 Mr Beer, did you have any submissions on scope? 6 MR BEER: Just very shortly. As Mr O'Connor's written and 7 oral submissions properly recognise, there is of course 8 a significant difference in a Jamieson inquest between 9 setting the scope of the inquest, ie the matters to be 10 investigated in the course of the inquest, and those 11 matters which may properly be included within the record 12 of inquest, the verdict in old money, ie at the end of 13 the inquest. 14 In the light of that recognition, which of course is 15 merely a reflection of numerous authorities that address 16 those issues, we have no submissions to make on the 17 provisional scope of the investigation proposed by 18 Mr O'Connor. 19 That is particularly so when the decision you are 20 being asked to make, as has been repeatedly emphasised, 21 is a provisional one, ie it is an interim one that 22 really just gets disclosure off the ground and which, of 23 course, may feed into the important issue to be 24 discussed in a moment, of whether the inquest 25 (Inaudible).</p> <p style="text-align: center;">Page 65</p>	<p>1 THE CORONER: You are breaking up, Mr Beer, in case you 2 wonder why we are looking at you. 3 MR BEER: I had in fact finished speaking. I don't know 4 whether you can hear me say that? 5 THE CORONER: I think we missed about the last five words. 6 MR BEER: They were unimportant, and they said I have 7 nothing more to say. 8 THE CORONER: Thank you very much. 9 Mr Beer, before I lose you this time, do you have 10 any submissions -- I appreciate this is taking things 11 out of turn -- on disclosure, on what Mr O'Connor said 12 about disclosure? 13 MR BEER: No, thank you very much, my Lady. 14 THE CORONER: Thank you, Mr Beer. 15 Right, Mr Beggs, I am going to ask you about scope 16 and disclosure at the same time, if I may as well. 17 MR BEGGS: My Lady, thank you. 18 Nothing to say on either for the time being. 19 THE CORONER: Thank you, Mr Beggs. 20 I am told, Ms Dolan, you have no submissions on 21 scope, because you have been very kindly emailing or 22 I asked Mr Smith to email you. What about disclosure, 23 anything on disclosure or scope? 24 MS DOLAN: My Lady, I have nothing more to say than was in 25 our written submissions already, thank you.</p> <p style="text-align: center;">Page 66</p>
<p>1 THE CORONER: Thank you very much. 2 Ms Austin, anything on scope or disclosure? 3 MR AUSTIN: Nothing to add to what is in our written 4 submissions, my Lady. 5 THE CORONER: Thank you. 6 Mr Cain, finally. 7 MR CAIN: Nothing to add to either scope or disclosure. 8 THE CORONER: Right. I think that leaves -- right, to go 9 back to scope, Mr O'Connor, anything you want to say by 10 way of reply? 11 MR O'CONNOR: My Lady, I have nothing to say by way of reply 12 on the issue of the further limb of proposed scope that 13 was raised by Ms Hill. 14 There is one point I was going to mention briefly in 15 response to Ms McGahey's submissions. In particular, 16 her submissions on the issue of other similar 17 poisonings, if I can put it that way. 18 It is really just to clarify where, at least as far 19 as we are concerned, we stand on that issue. Can I do 20 that by asking you to go back to our first set of 21 submissions, so that is tab 3 in your bundle and 22 paragraph 40. 23 THE CORONER: I appreciate you mentioned it in those 24 submissions. I didn't take it that it was part of your 25 current suggestions for provisions of scope.</p> <p style="text-align: center;">Page 67</p>	<p>1 MR O'CONNOR: My Lady, you are ahead of me then, because 2 what you see is that, at paragraph 40, whilst we do 3 raise the general issue of Russian state responsibility, 4 there is nothing there about the other similar 5 poisonings. In fact if one goes on to paragraph 50 of 6 the same set of submissions, we actually identify that 7 sub issue, if you like, as being one of the matters 8 which you may well wish to return to following 9 disclosure and in light of Ms McGahey's submissions, 10 I think we can say, for almost certain, that we will 11 wish to. 12 Very finally on this point, my Lady, may I just add 13 the riser, I don't ask you to go back to, it but you 14 will recall that the Sir Mark Sedwill letter identified 15 three, as it were, headline grounds for the UK 16 Government's public assertion of Russian state 17 responsibility. You will also recall that one of those 18 three grounds was this very point about a previous 19 history of other Russian state-sponsored attacks, so it 20 does seem to us, with respect that, at least as far as 21 the Sedwill letter is concerned the issue is in play 22 but, to be clear, we are not inviting you to put it 23 within scope now, it is one of the issues we propose to 24 return to. 25 THE CORONER: Thank you, Mr O'Connor.</p> <p style="text-align: center;">Page 68</p>

1 I will give what rulings I am prepared to give today
2 on scope in a moment but before I forget, can I just
3 check with the three advocates I didn't ask about
4 disclosure.
5 Ms Hill, anything on what Mr O'Connor said about
6 disclosure?
7 MS HILL: My Lady, nothing to add, simply that we welcome
8 the list of requests set out at paragraph 56 and we
9 understand and welcome the staged process.
10 Thank you very much.
11 THE CORONER: Thank you very much.
12 Ms McGahey, anything on disclosure?
13 MS MCGAHEY: My Lady, yes, I can provide the court and the
14 interested persons with a bit more information, if that
15 would assist.
16 At the inquest's request a number of Government
17 departments and agencies have carried out preliminary
18 high-level searches in relation to the broad topics that
19 were outlined by counsel to the inquiry as being outline
20 scope topics in their submissions. This exercise was
21 done to help estimate the time that it would take to
22 find and review material of relevance to the inquest.
23 Obviously at this point any estimates that I give have
24 to be extremely vague, but they are the best that we can
25 do.

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1 done. We would then work with the inquest team to
2 provide any further disclosure that was necessary in
3 these areas, and we could consider further gisting to
4 put more matters into the public domain, if that were
5 possible, to supplement the public statements.
6 I understand that the court and the interested
7 persons may very well want to know why it would take so
8 long to carry out a full disclosure exercise. There are
9 a number of reasons. These include the fact that, while
10 the Government and all its agency departments will give
11 every assistance possible to this inquest, any
12 disclosure exercise will actually involve some
13 operational security agency staff, those with the
14 expertise, the knowledge and the language skills to do
15 the work being diverted from their day-to-day duties in
16 helping to protect the UK from hostile state actors and
17 those are duties from which they cannot be diverted
18 either on a full-time basis or even short term, we sort
19 of cannot pull everybody off their work in order to
20 conduct the disclosure exercise for this inquest.
21 There would be a similar effect on Ministry of
22 Defence staff, including those who work with the Defence
23 Science and Technology Laboratory.
24 Secondly, the Government may need to ask others for
25 authority to disclose material more widely and that is

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1 Based on the current indication of scope, the
2 Secretary of State believes that a full disclosure
3 exercise could take a minimum of two years to complete.
4 We have also realised that in order for the inquest to
5 review some of the raw data, then specialist expertise
6 would be required to interpret it.
7 The Secretary of State has suggested as a starting
8 point that the Government should share some high-level
9 assessments that were written in 2018, to share them
10 with you, with counsel to the inquiry and with the
11 solicitor to the inquiry for your review. These
12 assessments draw together the complex intelligence
13 jigsaw puzzle that was put together during the very
14 large-scale investigation that took place into the
15 Salisbury and Amesbury poisonings. Those assessments
16 form the basis of the Prime Minister's assessment to the
17 House in September 2018.
18 Providing this material would allow you and your
19 team to consider the extent to which you are satisfied
20 that the public statements made in 2018 do provide
21 an accurate representation of the underlying
22 intelligence and assessment. It would then be open to
23 you if you chose to consider whether there were any
24 further issues on which you wanted particular
25 investigation, particular further in depth work to be

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1 a procedure that may take a certain amount of time.
2 Thirdly, simply the volume and the complexity of
3 some of the material that has to be searched.
4 While we have done our best and we realise that
5 people are likely to be dismayed at the idea that it
6 could take two years, the Secretary of State's
7 submission is that this is a realistic estimate and we
8 have provided it in an effort to help as much as we can.
9 Unless I can assist further.
10 THE CORONER: Thank you, I am one of those who is dismayed
11 at the prospect that disclosure would take two years.
12 What I suggest is that we bear in mind the warnings or
13 estimates given and see where we go. We can only get
14 a better idea of what is going to happen when
15 Mr O'Connor and Ms Whitelaw get a chance to see at least
16 some of the material, the reports to which you referred,
17 to see how much further investigation is necessary.
18 I, for one, would much prefer that, accepting all
19 that is said about national security, of course
20 I wouldn't want in any way endanger that, but if we
21 can get on, we need to get on for the sake of the family
22 and all those affected by the poisoning.
23 Thank you for making the position plain and I do
24 understand the amount of work that would be required and
25 has gone into what you have said so far, but I am sure

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<p>1 with a good will we can perhaps shorten the period. We 2 will see what we can do. 3 Anyway, thank you. 4 Ms Giovannetti, anything further on disclosure? 5 I know you came up or the MPS came up with a disclosure 6 scheme. Are you content with the way forward 7 Mr O'Connor has suggested? 8 MS GIOVANNETTI: Yes, thank you, my Lady. 9 THE CORONER: I am prepared and I think it would be 10 appropriate to give what rulings I can today on 11 provisional scope, given that it will affect the way 12 matters proceed from today. 13 I should emphasise, as everyone has asked me to do, 14 that this a provisional ruling and it is, as Ms McGahey 15 has said, at a high level of generality but I am 16 satisfied that the following matters as set out by my 17 counsel are within, or should be within provisional 18 scope, namely: the death of Dawn Sturgess, this to 19 include a pen portrait evidence of her, which her family 20 have very kindly offered to provide; the events between 21 June 2018 to 8 July 2018, namely from her poisoning to 22 her death; the medical cause of her death; the 23 sufficiency of medical treatment that she was given; the 24 next issue, the general heading is the poisoning of 25 Sergei and Yulia Skripal, with the events as a sub</p> <p style="text-align: center;">Page 73</p>	<p>1 issue; responsibility for the poisoning, including the 2 involvement of Petrov and Boshirov; the source of the 3 Novichok; and the Russian state responsibility. 4 I have considered very carefully whether it is 5 appropriate to pursue the source of the Novichok and the 6 Russian state responsibility in the light of the ruling 7 made by the senior coroner for Wiltshire, but to my mind 8 there is very considerable force in the submissions made 9 by Mr O'Connor that to conduct an investigation of the 10 death of Ms Dawn Sturgess without investigating how the 11 Novichok came to be in Salisbury and then Amesbury, how 12 or why it was brought to this country if it was and who 13 brought it and who directed the people who brought it, 14 then this would be an incomplete and potentially 15 misleading investigation. 16 I have no doubt whatsoever that the provisional 17 scope should include the source of the Novichok and 18 Russian state responsibility. 19 I also accept that steps taken to ensure public 20 safety following the poisoning, as set out in 21 paragraph 40 of counsel to the inquest's submissions, 22 should be included. Focusing on the search for any 23 remaining poison, including the police investigation and 24 the public health response. Also plainly, in my view, 25 there is a link between the Skripal poisoning and the</p> <p style="text-align: center;">Page 74</p>
<p>1 death of Dawn Sturgess. If they were both poisoned by 2 Novichok, a deadly nerve agent, not normally found on 3 the streets of Wiltshire. Accordingly, that is 4 a connection which in my view should be explored. 5 As far as Russian state responsibility, I should 6 make it plain, as Mr O'Connor did by way of response to 7 submissions from the other parties, at the moment I am 8 not directing that within provisional scope, are other 9 possible poisonings or attempted assassinations by the 10 Russian state. At the moment, it is limited in the way 11 that I have described. 12 Finally, as far as the issue the family wish me to 13 consider, namely whether the United Kingdom authorities 14 took appropriate precautions in early 2018 to protect 15 Mr Skripal from being attacked, this is a matter I would 16 wish to consider further. I take very much the points 17 made by Ms Hill about the material that is already in 18 the public domain, that suggests at the very least 19 an interest that the Russian state had in the Skripals, 20 in particular the letter from Sir Mark Sedwill, but 21 I also bear very much in mind Ms McGahey's submissions 22 as to the extent of a Jamieson inquest and for the 23 moment, just so the parties understand, I am considering 24 whether or not there is a possible compromise to ensure 25 that I don't roam too far from my initial ideas about</p> <p style="text-align: center;">Page 75</p>	<p>1 scope, but I haven't finally decided and I wish to 2 consider the matter further. I will let the parties 3 know as soon as I have decided on that point. 4 As far as disclosure is concerned I too approve of 5 the proposal, Mr O'Connor. 6 Anything else on scope I need to mention? 7 MR O'CONNOR: My Lady, may I simply just make one very, very 8 small point and it simply arises from an ambiguity in 9 our paragraph 40. Just looking at (a)(ii) the events of 10 June 2018 to 8 July, my Lady I think in giving your 11 ruling you said that that equated to the time of 12 Ms Sturgess's poisoning to her death. We did have in 13 mind that it would be necessary to hear evidence about 14 some events preceding her poisoning. 15 THE CORONER: As to when Mr Rowley found the bottle? Yes, 16 I had not meant to exclude that. Events from the 17 beginning of June 2018 to 8 July 2018. 18 MR O'CONNOR: I am grateful, my Lady. 19 THE CORONER: So the issue of inquest or inquiry? 20 MR O'CONNOR: Yes, that does bring us to that issue, my 21 Lady. 22 This is an issue which has been canvassed in the 23 written submissions. Of course in the written 24 submissions, it has been canvassed on the premise that 25 you might rule that those issues of Russian state</p> <p style="text-align: center;">Page 76</p>

<p>1 responsibility, the source of the Novichok and so on, 2 might be in scope. You have now ruled that they are in 3 scope and so that, as it were, brings this issue into 4 sharper focus.</p> <p>5 As I say, we have set out some quite lengthy 6 arguments on this issue in our written submissions. You 7 have those written submissions and I don't propose to 8 repeat everything that we said in writing now. That is 9 in part because we are in agreement with those acting 10 for the Home Secretary that you should not make 11 an immediate request for a public inquiry to be 12 established. The course they have suggested -- which in 13 fact Ms McGahey mentioned a few moments ago -- with 14 which we are in agreement, is that you and your team 15 should review at least some of their material, and 16 Ms McGahey mentioned some overarching documents. That 17 those documents should be reviewed before reaching 18 a view as to whether conversion to an inquiry is 19 necessary. It may or may not be that we will need to 20 return to this issue in court in due course.</p> <p>21 Having said that, I hope it will assist and perhaps 22 particularly to inform the public, if I summarise the 23 position we have reached on this issue. One starts 24 perhaps with two relatively straightforward 25 propositions.</p> <p style="text-align: center;">Page 77</p>	<p>1 One is that the Government holds highly sensitive 2 material that is relevant to the issue of Russian state 3 responsibility for Dawn Sturgess's death, in particular 4 the Skripal poisoning. As Ms McGahey referred to the 5 statements made by Theresa May when she was 6 Prime Minister at the end of 2018 and in the course of 7 her public statements she indicated just that, that the 8 assertions made by the UK Government were based on 9 highly sensitive information that it held. We have also 10 looked at the Sedwill letter from rather earlier in 11 2018, which makes very much the same point.</p> <p>12 Having decided, as you have, that Russian state 13 responsibility is within the scope of the inquest, that 14 material to which Theresa May and Mark Sedwill were 15 referring, the highly sensitive material that formed the 16 basis of their assessments, will be we say of clear 17 relevance to your investigation.</p> <p>18 The second proposition is that in an inquest, as 19 opposed to an inquiry, there is no power to conduct 20 a so-called closed material procedure, by which highly 21 sensitive material can be admitted as evidence in 22 hearings from which the public and interested persons 23 are excluded. My Lady, that position was established, 24 as you well know, by a divisional court ruling that 25 arose from the 7/7 inquests, in which you were of course</p> <p style="text-align: center;">Page 78</p>
<p>1 the coroner.</p> <p>2 Since a closed material procedure is not permissible 3 in an inquest, the only mechanism available to deal with 4 highly sensitive and relevant material is public 5 interest immunity. That process involves the coroner 6 balancing the harm that the public disclosure of the 7 material would cause against the importance of the 8 material being put into evidence in the inquest's public 9 hearings. Depending on the balance, the material is 10 either made public or it is excluded in its entirety 11 from the proceedings. We do not, of course, pre-empt 12 PII applications that have not been made, far less 13 argued, but we have referred in our written submissions 14 to case law that suggests that where the material in 15 question is highly sensitive national security material, 16 the result may very well be that that material has to be 17 excluded.</p> <p>18 The operation of PII, as it is known, is problematic 19 where its effect is to exclude core evidence with the 20 consequence that the coroner is unable at an inquest to 21 discharge the duty of ensuring, to use Lord Bingham's 22 words, that the relevant facts are fully, fairly and 23 fearlessly investigated. This position has been reached 24 in two major inquests.</p> <p>25 In the Litvinenko inquest the exclusion on the</p> <p style="text-align: center;">Page 79</p>	<p>1 grounds of PII of material relating to possible Russian 2 state responsibility for Mr Litvinenko's death led the 3 coroner, Sir Robert Owen, to conclude that the inquest 4 could only then proceed on what he described as 5 "an incomplete and potentially misleading basis".</p> <p>6 In the more recent Manchester Arena inquest the 7 coroner, Sir John Saunders, upheld a PII claim, the 8 effect of which was to exclude what he described as 9 "centrally important material" relating to the question 10 of whether the bombing could have been prevented.</p> <p>11 A public inquiry established under the Inquiries Act 12 2005 can, in contrast to an inquest, conduct a closed 13 material procedure. In both the Litvinenko and the 14 Manchester Arena cases the impasse that had been reached 15 in the inquest proceedings was resolved by the Home 16 Secretary of the day establishing a public inquiry to 17 serve in effect as a substitute for the inquest 18 proceedings, with the advantage that the public inquiry 19 could conduct closed hearings to consider the central 20 but sensitive material that had been excluded from the 21 inquest by operation of PII.</p> <p>22 Turning back to the facts of this case, in our 23 February submissions we made the following submissions, 24 assuming then, which we know now, that Russian state 25 responsibility would be within scope.</p> <p style="text-align: center;">Page 80</p>

<p>1 Our submissions were, first, that an investigation 2 into Russian state responsibility in this case is bound 3 to require consideration of material that is both highly 4 sensitive and central to the issues. 5 Second, that, because of its sensitivity, there 6 appears to be no real prospect that all of this 7 material, or even much of it, will be capable of being 8 deployed in open proceedings. 9 Third, that the coroner may take the view that these 10 matters are sufficiently clear now and that it would 11 therefore be a waste of time and resources for these 12 proceedings to continue as an inquest. 13 Fourth, that if the coroner did take that view, you 14 should write to the Home Secretary now, inviting her to 15 establish a public inquiry. 16 But, fifth, if on the other hand there was some 17 doubt about this issue, directions should be given so 18 that it could be resolved speedily and efficiently. 19 My Lady, if I may, I will very briefly develop the 20 submissions that we made as to the centrality of 21 sensitive material, by reference to two documents in the 22 bundle. 23 The first is the letter from Sir Mark Sedwill that 24 we have already looked at more than once, it is at 25 tab 22 of the bundle. As I have said, we see that it</p> <p style="text-align: center;">Page 81</p>	<p>1 was written shortly after the Skripal poisoning but 2 before Dawn Sturgess died. The two passages I wanted to 3 take you to. 4 First of all, towards the bottom of the first page, 5 we see, in the final paragraph, Sir Mark Sedwill 6 stating: 7 "I would like to share with you and allies further 8 information regarding our assessment that it is highly 9 likely that the Russian state was responsible for the 10 Salisbury attack. Only Russia has the technical means, 11 operational experience and the motive." 12 Those were the three points I referred to earlier. 13 He goes on, and this is addressing the first of those 14 issues: 15 "The technical means, DSTL [that's the Defence 16 Science and Technology Laboratory, part of the MoD, it's 17 Porton Down] scientific analysis found that Sergei and 18 Yulia Skripal were poisoned using a specific Novichok 19 nerve agent. OPCW [that is the Organisation for the 20 Prohibition of Chemical Weapons] their analysis 21 confirmed the findings of the United Kingdom relating to 22 the identity of the toxic chemical, this was found at 23 environmental samples taken at the scene and in 24 biomedical samples from both Skripals and Police 25 Sergeant Nick Bailey, the first responder. DSTL</p> <p style="text-align: center;">Page 82</p>
<p>1 established that the highest concentrations were found 2 on the handle of Mr Skripal's front door. These are 3 matters of fact, but of course the DSTL analysis does 4 not identify the country or laboratory of origin of the 5 agent used in this attack." 6 Then he goes on to give the UK Government's 7 assertion on those matters. He says: 8 "A combination of credible open source reporting and 9 intelligence shows that in the 1980s the Soviet Union 10 developed a new class of fourth-generation nerve agents 11 known as Novichoks. The key institute responsible for 12 this work was a branch of the State Institute for 13 Organic Chemistry and Technology at Shikany near 14 Volgograd. The code word for the offensive chemical 15 weapons programme, which Novichoks were one part, was 16 FOLIANT. It is highly likely that Novichoks were 17 developed to prevent detection by the west and to 18 circumvent international chemical weapons controls. The 19 Russian state has previously produced Novichoks and 20 would still be capable of doing so. Within the last 21 decade, Russia has produced and stockpiled small 22 quantities of Novichok." 23 We can skip over the next two paragraphs and simply 24 go to the top of the next page, we see him picking up 25 the similar theme:</p> <p style="text-align: center;">Page 83</p>	<p>1 "During the 2000s Russia commenced a programme to 2 commence means of delivering chemical warfare agents and 3 to train personnel from special units in the use of 4 these weapons. This programme subsequently included 5 investigation of ways of delivering nerve agent, 6 including by application to door handles. Within the 7 last decade Russia has produced and stockpiled small 8 quantities of Novichoks under the same programme." 9 In summary, my Lady, we see in that letter what 10 Sir Mark Sedwill accepts is a summary of including 11 intelligence material of assertions which plainly go to 12 the very heart of the scope as you have now set it. The 13 Russian use, development and capabilities relating to 14 Novichok. 15 If one just goes in fact forward in the bundle one 16 tab, we see a lengthy document which has been published 17 on the internet by the London embassy of the Russian 18 Federation. What it amounts to is a rebuttal of many of 19 the allegations that have been made by the British 20 Government and others in public about the Skripal 21 poisoning. If I could ask you simply to turn to 22 page 13, the numbers at the top of the pages, at the top 23 of that page, and after the numbered "1", I am not going 24 to read it out in full, my Lady but perhaps I can just 25 ask you to cast your eyes down those 10 or so lines.</p> <p style="text-align: center;">Page 84</p>

21 (Pages 81 to 84)

<p>1 THE CORONER: Yes. 2 MR O'CONNOR: In summary, they refer to that allegation that 3 we see in the Sedwill letter that within the last decade 4 Russia has investigated ways of delivering nerve agents 5 and stockpiled Novichoks. It amounts to a flat denial 6 on the part of the Russian embassy that Russia has ever 7 held such agents and it relies on the fact that the OPCW 8 was, as it were, policing during that same period the 9 destruction of its nerve agent holdings. 10 My Lady, I refer you to that document simply to 11 demonstrate how contentious that issue as to the Russian 12 production, holding and use of Novichoks is. I equally 13 say that mindful that there are other similar issues, 14 for example the whole identity and role in the Skripal 15 poisoning of Mr Petrov and Mr Boshirov, which have 16 a similar character, I should say, of being highly 17 disputed in terms of what actually happened. 18 The point we make is that given the fundamental 19 importance of these issues to this case, you will need, 20 we submit, to consider the fullest and the most detailed 21 evidence possible in order to reach your conclusions. 22 It does seem very likely that that detail will be so 23 sensitive that it will not be possible to adduce it into 24 evidence in public inquest hearings. 25 We therefore do submit that you will be, or are very</p> <p style="text-align: center;">Page 85</p>	<p>1 likely to be, in just the same position as 2 Sir Robert Owen in the Litvinenko proceedings and 3 Sir John Saunders in the Manchester Arena case, in that 4 you will be being asked under a PII procedure to exclude 5 the very material that is central to your investigation. 6 The practical question for now is the steps that you 7 should take to resolve this issue. 8 In our earlier written submissions we set out the 9 legal and factual basis for our contention that, 10 assuming as we then did that Russian state 11 responsibility would be within scope, it can be said 12 with confidence, for the reasons I have now explained, 13 that even at this early stage, that it will be necessary 14 for you to invite the Home Secretary to convert these 15 proceedings into an inquiry. 16 In response, those representing the Secretary of 17 State and others have submitted that you should 18 undertake the procedure outlined in the chief coroner's 19 guidance note number 30, essentially that you should 20 conduct a PII exercise in full, prior to reaching any 21 decision on conversion. 22 While we entirely agree that this approach would be 23 appropriate in the majority of cases, and indeed we 24 describe that approach as the normal procedural route in 25 our submissions, it doesn't follow, we say, that it must</p> <p style="text-align: center;">Page 86</p>
<p>1 be followed mechanistically, even in cases where it is 2 already clear that conversion to a public inquiry is 3 necessary. That the chief coroner's guidance is just 4 that, we submit, guidance. For the detailed reasons 5 that we have set out, our view remains that this is 6 a case in which exceptionally it will be necessary to 7 depart from that guidance. 8 We also disagree with the suggestion that we see in 9 some of the submissions that no time will be wasted if 10 a PII exercise is undertaken, even if the proceedings 11 are subsequently converted to a public inquiry. That is 12 certainly not the case if, as in the Litvinenko inquiry, 13 restriction notices are relied upon following conversion 14 to an inquiry. We note that the Secretary of State's 15 submissions are careful to preserve that option in this 16 case. 17 In the Litvinenko proceedings, the process from the 18 appoint of Sir Robert Owen as coroner to the 19 establishment of the public inquiry, involving a lengthy 20 PII process, took two years. We note what the family 21 have said as to the need to avoid unnecessary delay in 22 that case, and of course we heard your observations on 23 that view also, my Lady. 24 If perhaps we can just take a step back, we have 25 already heard Ms McGahey this morning talking in terms</p> <p style="text-align: center;">Page 87</p>	<p>1 of a simple disclosure exercise, not even PII, that may 2 take years not months. In our submission, that simply 3 reinforces the position that, of course, that process 4 will take as long as it needs to take and there may well 5 be, as you have observed, ways of finding methods to 6 speed that process up. What we say is fundamental is 7 that this process needs to be going along the right 8 track as quickly as possible. We don't suggest that you 9 should invite conversion to an inquiry until you are 10 satisfied that that is necessary, but by the same token 11 if you do get to that point, and however quickly you get 12 to that point, we say you ought to invite conversion 13 rather than simply going through a process which you 14 know -- that is the PII process -- is not necessary. 15 Having said all that, my Lady, we will hear from 16 Mr McGahey and we have seen the position the Secretary 17 of State has adopted in writing. In light of that, we 18 don't press our submission that you should make 19 an immediate request for conversion to an inquiry. We 20 did say in our earlier submissions that if you were not 21 satisfied of the immediate need for conversion, then it 22 would be necessary for you to make tailored directions, 23 designed to ensure that this issue can be resolved 24 speedily and efficiently. We note in this regard that 25 the Secretary of State's written submissions accept --</p> <p style="text-align: center;">Page 88</p>

<p>1 this is at paragraph 14 of their written submissions -- 2 that it may be that you would request conversion to 3 an inquiry after having seen some of the sensitive 4 material, but importantly, we submit, without first 5 going through all of the formal stages required by the 6 PII application process. 7 In the course of the discussions that we have had 8 with those representing the Secretary of State, and as 9 you have heard from Ms McGahey this morning, they have 10 indicated that they will disclose a set of overarching 11 reports for the inquest team to review in the first 12 instance. It may well be that that is a method by which 13 early progress can be made, not only in the question of 14 disclosure generally but also on this issue of inquest 15 or inquiry. That does seem, with respect, to us to be 16 an appropriate first step. 17 I mentioned earlier you giving tailored direction, 18 my Lady, and it does seem appropriate to us that you 19 give some direction as to the timescale within which 20 those documents are made available to the inquest team. 21 You will hear Ms McGahey on that, but our submission is 22 that you should give a direction that those materials 23 are to be made available within two weeks. 24 My Lady, that is all I propose to say on that issue. 25 THE CORONER: Mr O'Connor, I don't want to pre-empt anyone</p> <p style="text-align: center;">Page 89</p>	<p>1 from making any submissions but I am a great believer in 2 not forming judgments or reaching conclusions without 3 considering at least some of the evidence. At the 4 moment my inclination -- I say this so that all the 5 parties can hear -- is to at the very least see the 6 overarching reports to which you referred so I can get 7 some kind of handle on the material we are talking 8 about. 9 At the moment, as it seems to me, it is 10 extraordinarily likely that we will have to return to 11 this issue. I can assure everybody that if and when 12 I reach the conclusion that I must return to this issue 13 that, for the reasons you have given, an inquiry is 14 inevitable, rather than reach the position that 15 Sir Robert Owen reached, waiting years for the matter to 16 be resolved, I will direct a hearing be heard within 17 a matter of days of my reaching that conclusion. But as 18 it seems to me there is some force in saying that 19 I should at least see some of the material before I even 20 hear submissions. 21 I say that now so that those waiting to make 22 submissions, obviously I wish to hear from Ms McGahey on 23 when knows overarching reports can be made available 24 because, as I think I have made clear, I don't intend to 25 hang around any more than I absolutely have to.</p> <p style="text-align: center;">Page 90</p>
<p>1 MR O'CONNOR: I am grateful, my Lady. 2 THE CORONER: Ms Hill, having heard what I have said, as it 3 seems to me it is premature, slightly premature, 4 although I do understand why you have raised the issue, 5 I think it is, as I have said, extremely likely we will 6 come back to it but I don't think I should really turn 7 to this issue today, before I have at least seen the 8 overarching reports. 9 MS HILL: My Lady, we are very grateful for those 10 indications. 11 You know that our primary position in our written 12 submissions had been to support the request now for 13 a public inquiry. In light of the indications you have 14 given and the commitments that your team have plainly 15 evidenced to promptness, I have no further submissions. 16 All I would indicate is that if you are minded to agree 17 with your learned counsel's proposal to have another PIR 18 in June, that might give a focus for the immediate 19 requests for disclosure that is being made. 20 That is all I wish to add, my Lady. 21 THE CORONER: Thank you very much, Ms Hill. 22 Ms McGahey, having heard what I said, following to 23 some extent the suggestions you made on behalf of the 24 Secretary of State, do you wish to add anything against 25 that course?</p> <p style="text-align: center;">Page 91</p>	<p>1 I will ask you about the timetable in a second. 2 MS MCGAHEY: Nothing against that course, my Lady, thank 3 you. 4 THE CORONER: Timetable, Ms McGahey. As you know, I want to 5 get a move on. Two weeks Mr O'Connor says, is that 6 possible? 7 MS MCGAHEY: My Lady, instructions are being taken urgently 8 at the moment, we think it is highly likely but at the 9 moment we would ask for four weeks, to the end of April. 10 We think it would be achieved much more quickly than 11 that, but at the moment I am not in a position to say we 12 can definitely achieve it within two. 13 THE CORONER: I appreciate we have Easter in the middle of 14 the two weeks as well. 15 What if I said three weeks and if you need more time 16 you can make obviously an application, but obviously 17 I would want to have some kind of reason provided. If 18 I say three weeks? 19 MS MCGAHEY: I would be grateful for that, my Lady. 20 THE CORONER: Thank you very much, Ms McGahey. 21 Anything else you want to say on this issue? 22 MS MCGAHEY: No. 23 THE CORONER: Thank you, Ms McGahey. 24 Ms Giovannetti, anything on this issue? 25 MS GIOVANNETTI: No, thank you, my Lady, that all sounds</p> <p style="text-align: center;">Page 92</p>

<p>1 very sensible. 2 THE CORONER: Thank you. 3 Mr Beer. 4 MR BEER: No. Thank you very much, my Lady. 5 THE CORONER: Thank you. 6 Anything, Mr Beggs? 7 MR BEGGS: No thank you, my Lady. 8 THE CORONER: Ms Dolan? 9 MS DOLAN: No, thank you, my Lady. 10 THE CORONER: Ms Austin? 11 MR AUSTIN: No, thank you, my Lady. 12 THE CORONER: Mr Cain? 13 MR CAIN: No, thank you, my Lady. 14 THE CORONER: Thank you, all. 15 Right, what is called administrative and logistical 16 arrangements, including timing and location. Venue and 17 timetable, is that really what it is about? 18 MR O'CONNOR: Exactly, my Lady, just that. 19 I will take those two items together. They are 20 short. 21 As far as venue is concerned, we are of course 22 sitting in the Royal Courts of Justice, others are 23 remote from us. In our written submissions we did 24 canvass the question of whether at least some of the 25 substantive hearings in these proceedings, be they</p> <p style="text-align: center;">Page 93</p>	<p>1 inquest or by that stage inquiry, should be held in 2 Salisbury, given obviously the close connection that 3 that city has with the events that you will be 4 investigating. 5 The submissions that we have received back 6 demonstrate a widespread support for Salisbury to be at 7 least a venue for substantive hearings. I think all 8 accept that there may have to be some hearings that are 9 held in London, in particular if it is necessary to hear 10 evidence relating to sensitive documents and so on but, 11 as I say, you will have seen what is said in the written 12 submissions. There is a general approval of the idea of 13 Salisbury being a venue for substantive hearings as and 14 when they come about. 15 My Lady, it seems to us that the next stage is for 16 the solicitor to the inquest, Mr Smith, to make some 17 enquiries as to whether there are in fact any suitable 18 venues in Salisbury. One appreciates that in these 19 times venues are being used for other matters. We don't 20 anticipate clearly the substantive hearings being held 21 for some time in any event, but it is something that 22 Mr Smith will look into. 23 My Lady, that does only leave the question of the 24 next pre-inquest review hearing. In fact what we have 25 proposed in our written submissions is that two dates</p> <p style="text-align: center;">Page 94</p>
<p>1 should be listed at this stage. We don't invite you to 2 list the dates themselves now, but what we have proposed 3 is that there should be a hearing in September of this 4 year, by which stage we hope the disclosure process will 5 be considerably advanced and so it will be possible at 6 that stage to hear those further submissions on scope 7 informed by disclosure that we have discussed today. 8 But, as Ms Hill mentioned, we have also suggested 9 that it would be wise to list a hearing in June or July, 10 in other words before the summer break, in case it is 11 necessary to deal with issues arising from the 12 disclosure exercise. 13 THE CORONER: Everybody seems to agree that, if at all 14 possible, and I firmly am of the view that if we can 15 hold some of the hearings in Wiltshire, preferably in 16 Salisbury, given the impact on the local people, 17 Ms Sturgess was poisoned and died in Wiltshire, it would 18 be very important to reassure the citizens of Wiltshire 19 and the family that we are doing all we can to 20 investigate this matter. Yes, Mr O'Connor, I entirely 21 agree, if it is possible, it is a while since I have 22 been to the courts in Wiltshire, but I hope we could 23 find a suitable venue. 24 As far as the timetable is concerned, I do believe 25 that dates in the diary focus the mind. So I am</p> <p style="text-align: center;">Page 95</p>	<p>1 entirely content to direct that we will have a hearing 2 in June/July, if necessary, and September of this year. 3 I have one other matter I wish to raise with Mr Cain 4 and Ms McGahey. Is there anything else as far as you 5 are concerned? 6 MR O'CONNOR: No, nothing else from us, my Lady. 7 THE CORONER: Mr Cain, first of all. I have concerns that 8 to date the costs of this investigation are being met by 9 the Wiltshire ratepayers. I wonder if any steps have 10 been taken to invite central government to take over the 11 funding of the investigation, even if it remains 12 an inquest? Have any attempts being made? 13 MR CAIN: I do not have instructions on that, my Lady. 14 I will immediately after this get in touch with the 15 proper officer and see what steps have been taken. 16 THE CORONER: Thank you. It is obviously an issue, 17 a matter, a case of national concern and I would have 18 thought that steps should be taken. 19 Thank you, Mr Cain. 20 Ms McGahey, I appreciate you probably do not have 21 instructions on the matter of costs, but I think we are 22 all agreed that -- I am now investigating possible 23 Russian state responsibility in an assassination attempt 24 on British soil and anything that you can do to persuade 25 central government to consider whether the funding</p> <p style="text-align: center;">Page 96</p>

1 should be removed, as I say, inquest or inquiry, funding
2 can be taken up by central government, it was when I was
3 coroner for 7/7. Anything you could do, I would be very
4 grateful.
5 MS MCGAHEY: Certainly, my Lady, I will pass that message
6 on.
7 THE CORONER: Thank you very much.
8 Anything further we need to consider, Mr O'Connor
9 and Ms Whitelaw?
10 Thank you all very much.
11 Anything further we need to do by way of technology?
12 No?
13 Thank you very much for your help.
14 (1.05 pm)
15 (The hearing concluded)
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