

IN THE WILTSHIRE AND SWINDON CORONER'S COURT  
BEFORE THE RIGHT HONOURABLE THE BARONESS HALLETT DBE

IN THE MATTER OF THE INQUEST TOUCHING THE DEATH OF DAWN  
STURGESS

---

---

JOINT SUBMISSIONS OF THE METROPOLITAN POLICE SERVICE  
AND THAMES VALLEY POLICE

*For the Pre-Inquest Review on 22.09.21*

---

1. These joint submissions are filed on behalf of the Commissioner of Police of the Metropolis (“MPS”) and the Chief Constable of Thames Valley Police (“TVP”) in advance of the second Pre-Inquest Review, to be heard on 22 September 2021.

**Operation Verbasco**

2. Whilst both forces are separately represented as Interested Persons, they have come together to establish what is known as Operation Verbasco, the Counter-Terrorism Policing response to the Inquest into the death of Dawn Sturgess.
3. Operation Verbasco comprises officers from MPS Counter Terrorism Command (SO15) and Counter Terrorism Policing South East (CTPSE). It is led by Detective Superintendent Dominic Murphy with Detective Chief Inspector Luke Williams as his deputy. It is unprecedented in structure for an Inquest – so far comprising 35 staff (the “**Verbasco Team**”):
  - a. One Detective Superintendent
  - b. Two Detective Chief Inspectors
  - c. Three Detective Inspectors
  - d. Five Detective Sergeants
  - e. Eighteen Investigators (Detective Constables, Police Constables and Staff Investigators)

- f. Six further members of the Major Incident Room.
4. The establishment of an operation of this nature is a complex process which has taken some time to create and put in place the necessary infrastructure. Now that this has occurred, and the relevant HR and logistical processes have been completed, the pace at which disclosure and other support to the Coroner and Inquest Legal Team (“ILT”) can be increased.

### **The Disclosure Processes**

5. The MPS and TVP are grateful for the written submissions of Counsel to the Inquest (“CTI”). Those submissions have asked for HMG and the Police to set out the processes that are necessary to address security sensitivities, together with anticipated timescales.
6. Whilst certain aspects of the security review process are necessarily sensitive, in broad terms, the following process will be followed:
  - (i) Each document is reviewed and categorised based on its content;
  - (ii) The documents are then reviewed for security sensitivity, both by the Verbasco Team and by the other relevant HMG departments and agencies (the “HMG Disclosure Team”);
  - (iii) The documents are then provided to the ILT for a relevance review (referred to by CTI in their submission as “stage 1 disclosure”);
  - (iv) Documents identified as relevant by the ILT are returned to the HMG Disclosure Team for any security redactions (redactions to relevant material will be subject to an application at the appropriate time);
  - (v) The Verbasco Team will then add any further redactions, including for anonymity (again, redactions to relevant material will be subject to an application at the appropriate time);

- (vi) The Verbasco Team will provide the documents to the ILT for onward disclosure (referred to by CTI as “stage 2 disclosure”).
7. The above process has been developed after careful consideration with subject matter and national security experts because of the particular nature of the security implications involved. It is the minimum necessary for the proper protection of information, the disclosure of which may be damaging to national security, in the particular circumstances of this Inquest.
  8. The Coroner will be well aware of the special sensitivities involved in this Inquest which unfortunately means, in particular, that (i) all materials cannot simply be handed over to the ILT without prior review and (ii) every page that will be disclosed in “stage 2 disclosure” will need to be read on a line-by-line basis to ensure that there is no inadvertent disclosure of information (the consequences of which are assessed be grave, including a threat to life).
  9. Insofar as the timetable is concerned, the process of gathering material from across Counter Terrorism Policing (nationally) is still ongoing but a realistic estimate of the number of electronic documents is in the region of 18,000. The scale of materials in this Inquest is vast because of a range of factors, including: the number of police forces involved; the wide geographical area; the depth of the investigative techniques employed; the use of CCTV and cell site analysis; and the fact that the investigation addresses not just the tragic death of Dawn Sturgess, but also the poisoning of Sergei and Yulia Skripal, Charlie Rowley, and two police officers. It is anticipated that the initial review and categorisation of these materials (i.e. step 6(i) above) should be well advanced by the time of the proposed December hearing.
  10. By the time of the PIR, approximately 800 statements will have been provided to the ILT, together with a schedule containing exhibits (i.e. have reached step 6(iii) above). The material that has been so-far disclosed includes some of the most

significant information for the purposes of the Inquest, being first hand witness accounts concerning the poisoning.

11. Providing a realistic timetable for completion of disclosure (both “stage 1 disclosure” and “stage 2 disclosure”) at this time is not possible, in particular because the security review process will rely on the availability of those experts from the HMG Disclosure Team who will be conducting the same analysis on their own (or other departments’) disclosure to the Inquest<sup>1</sup>.
12. The Verbasco Team anticipates that the final stage of review (i.e. when documents have been identified as relevant by the ILT; considered by the HMG Disclosure Team for security redactions; and then returned to the Verbasco Team for final review) will be conducted on a rolling basis, with the final review taking no longer than 4 weeks after receipt by the Verbasco Team of each tranche of documents.

### **Issues of anonymity**

13. Applications for anonymity and special measures will likely protect the following broad categories:
  - a. The identities of security sensitive staff in circumstances where disclosure would damage the ability to investigate counter terrorism and counter espionage matters (and have implications for the safety of those individuals and their families).
  - b. The identities of certain witnesses involved in any associated criminal investigations and prosecutions, both in the interests of the safety of those individuals and their families and in order to protect the interests of justice (interference with witnesses).

---

<sup>1</sup> The Verbasco team will similarly need to develop a process for reviewing the materials which are being disclosed by other police forces or by the HMG Disclosure Team which contain MPS and TVP information and which may require redaction. Discussions are ongoing with the ILT as to whether this can take place on the disclosure platform prior to wider disclosure to Interested Persons.

- c. The identities of certain other witnesses, both in the interests of the safety of those individuals and their families and in order to ensure broader public confidence in the police's ability to protect the public by effectively investigating terrorism and espionage offences.
14. The Verbasco Team, in conjunction with the Solicitor to the Inquest, has already written to the witnesses who have been deemed relevant in the first batch of material which has been provided to the ILT in order to update those individuals on the proceedings and understand their views on special measures and anonymity.
15. With regard to future timescales, the Verbasco Team proposes the following:
  - a. Individuals who are have provided witness statements are to be written to within two weeks of the ILT confirming that the statement is relevant. This two week period is necessary in order to conduct enquiries to confirm that the person still resides at the address that is held by police.
  - b. The individuals are then given a two week period to respond and provide their position in respect of anonymity and special measures.
  - c. The Verbasco Team will then require a two week period to consider the response and to assess whether any such applications should be supported.
16. The timetable above provides that there will be a maximum period of six weeks between identification of the relevant statement and indication as to whether an application for anonymity or special measures will be made. This period will inevitably reduce over time as the same individuals are named in multiple documents.
17. It may assist the Coroner to hear a preliminary set of such applications at the proposed December hearing or at some other hearing, so that the Verbasco Team, the ILT and others who are involved have an understanding of the likely position

that will be adopted in respect of any further applications (subject to the timing point below).

### **Inquest/Inquiry**

18. The Verbasco team have no submissions or observations in respect of the potential conversion of the Inquest into an Inquiry. This matter will plainly need to be determined before any applications for anonymity, special measures or redactions are made so as to ensure the correct procedures are undertaken.

**For the MPS**

**Lisa Giovannetti QC**

**Julian Blake**

**For TVP**

**Jason Beer QC**

**8 September 2021**