1	Wednesday, 22 September 2021	1	describe as the Novichok attack in Salisbury in 2018.
2	(10.30 am)	2	The police have in fact kept my team informed of their
3	Pre-Inquest Review	3	developing investigation regarding Mr Sergeev in recent
4	THE CORONER: Good morning. This is the second hearing of	4	months and I received a briefing on this latest
5	the inquest into the death of Dawn Sturgess since my	5	development last week, for which I am very grateful.
6	appointment as coroner in January 2021. The first	6	When I gave my ruling on scope at the last hearing
7	hearing took place on 30 March of this year. This	7	in March I made it clear that the ruling was provisional
8	hearing is taking place in court 76 of the Royal Courts	8	and that it would be necessary to refine the lines of
9	of Justice in London. At the outset I make an order	9	enquiry that are to be pursued following disclosure.
10	varying the effects of section 9 of the Contempt of	10	As I understand it, all parties are agreed it would
11	Court Act 1981 to allow official audio broadcast.	11	be premature for me to revisit the question of scope at
12	The broadcast will be available to interested	12	today's hearing, but lest there should be any doubt
13	persons and the media, but it remains a contempt of	13	I make it clear that I regard Mr Sergeev's alleged
14	court to photograph or make an audio or video recording	14	involvement in the events in Salisbury as a matter that
15	of any part of this hearing.	15	I will wish to incorporate formally within the ambit of
16	Due to the Covid 19 pandemic I decided it was	16	my investigation when we do revisit the issue of scope.
17	necessary for this hearing to be held as a partially	17	I imagine those involved are already proceeding on that
18	remote hearing, so some parties are here in person and	18	assumption.
19	some are attending remotely.	19	Mr O'Connor.
20	Before we begin and I call on Mr O'Connor, counsel	20	MR O'CONNOR: My Lady I am grateful.
21	to the inquest, to outline the issues I have to resolve,	21	As you said, today is a partially remote hearing.
22	I should add that I am of course aware of yesterday's	22	Most, but not all, of the counsel representing
23	news, the Crown Prosecution Service have authorised	23	interested persons are present in court. A fairly large
24	charges against a third Russian man, Denis Sergeev, in	24	number of interested persons, including Charlie Rowley
25	connection with what the Crown Prosecution Service	25	and at least one member of Dawn Sturgess's family are
	D 1		D
	Page 1		Page 2
1	attending remotely.	1	My Lady, a few housekeeping points to start if
2	As to representation, my Lady, I appear with my	2	I may. A bundle has been prepared for today's hearing.
3	learned friends Ms Whitelaw and Ms Pottle as counsel to	3	I know you have it in hard copy and I also know that IPs
4	the inquest.	4	have been provided with an electronic version of the
5	The family of Dawn Sturgess and Mr Rowley are	5	same bundle. You have received helpful written
6	represented by my learned friends Mr Mansfield QC and	6	submissions that have been prepared by interested
7	Mr Straw QC.	7	persons for the purposes of this hearing, they of course
8	The Secretary of State for the Home Department on	8	are in your bundle. Those submissions contain some
9	her own behalf and in a representative capacity for	9	important detail about, amongst other things, the
10	a number of other Government departments and agencies	10	disclosure exercise that is underway. We are concerned
11	are represented by my learned friends Ms McGahey QC and	11	to ensure that all those observing these proceedings
12	Ms Woolff.	12	have a full understanding of this process, and
13	The Metropolitan Police Commissioner is represented	13	I therefore invite you to direct that, for the purposes
14	by my learned friend Ms Giovannetti QC and Mr Blake.	14	of today's hearing at least, the written submissions
15	The chief constable of Thames Valley Police is	15	that you have received will be published on the inquest
16	represented today by Mr Beer QC, who is one of those	16	website.
17	attending remotely.	17	We have had an opportunity this morning to canvass
18	The chief constable of Wiltshire Police is	18	this with I think all of those who have provided written
19	represented by Mr Beggs, who is here today.	19	submissions and my understanding is that everyone is
20	The South West Ambulance Service NHS foundation	20	happy that you should make a direction.
21	trust is represented by Ms Dolan QC, who is here.	21	THE CORONER: Provided there are no submissions to the
22	Wiltshire Council is represented by Mr Bethell, who	22	contrary, I so direct.
23	is the other counsel attending remotely.	23	MR O'CONNOR: I am grateful.
24	Also present, my Lady, is Ms Galland, who is	24	My Lady, the agenda for today's hearing is behind
25	representing NHS England and Improvement.	25	tab 1 of your bundle. I can very quickly run through it
	Page 3		Page 4

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1	for the purposes of those who don't have it in front of	1	for a moment after they have been called to allow the
2	them. There are five matters.	2	clerk time to unmute their microphone. They are then
3	First of all, the issue of inquest or public	3	invited to identify themselves before speaking for the
4	inquiry.	4	benefit of the transcriber.
5	Secondly, disclosure.	5	If any advocate attending remotely wishes to address
6	Thirdly, scope.	6	the court on any issue upon which they have not been
7	Fourth, the question of the substantive hearings and	7	invited to speak, they should send an email to the
8	in particular the venue and timings of the substantive	8	solicitor to the inquest, Mr Smith, who will facilitate
9	hearings.	9	this. They should also take the same course if there
10	Finally, the question of the next pre-inquest	10	are any technical difficulties during the course of the
11	review.	11	hearing.
12	As at the previous hearing, I propose to introduce	12	THE CORONER: Before you go on, Mr O'Connor, when
13	each item myself and then no doubt you will wish to hear	13	a representative speaking remotely comes on, is it that
14	IPs' submissions. Our submission is that it would be	14	screen I should look at? I can't really see that one.
15	practical for us to take the first two agenda items,	15	MR O'CONNOR: My Lady, I am afraid I don't know the answer
16	that is the question of the public inquiry and	16	to that question. I suspect it is going to be that one.
17	disclosure, separately and then to deal with the final	17	THE CORONER: All right, I can turn round. It is all right.
18	three items which are all relatively short together.	18	MR O'CONNOR: Is that sufficiently visible, my Lady?
19	Just a few practical points, if I may, my Lady, for	19	THE CORONER: I can see sufficiently, yes, thank you. Yes.
20	those counsel who are attending remotely. In order to	20	MR O'CONNOR: My Lady, finally in introduction, one further
21	reduce feedback and facilitate the smooth running of the	21	matter.
22	hearing, all microphones of those on the link will be	22	I mentioned a moment ago that Ms Galland, who acts
23	muted by the court until they are invited to speak.	23	for NHS England and Improvement, is present in court.
24	Cameras should also be turned off unless and until	24	As you know, but others will not, since the last
25	an advocate is speaking. Advocates are asked to pause	25	hearing, NHS E&I has made a written application for
			hearing, 1010 Eeer nas made a written appreadon for
	Page 5		Page 6
1	interested person status in these proceedings. You	1	possible Pussian state responsibility for
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2 (Pages 5 to 8)

25	an eventuality that, as I have said, I regard as very	25	conversion of these proceedings into an inquiry in
24	the documents contain. In that eventuality,	24	Secretary to indicate her provisional view as to the
23	detail, in particular that relating to issue 3(b), that	23	dated 29 July 2021. The letter invited the Home
22	provide open gists capturing the important and relevant	22	As I say, my Lady, that was a letter that you wrote,
21	public interest immunity and it will not be possible to	21	not at all."
20	the documents will have to be excluded by operation of	20	able to be examined and tested in a closed hearing or
19	proceedings remain as an inquest, most of the content of	19	means that the sensitive evidence is likely only to be
18	it seems to me to be very likely that if these	18	undesirable, the national security concerns in this case
17	That said, having considered these documents with care,	17	a closed hearing would, in usual circumstances, be
16	any applications that might in due course be made to me.	16	core participants may be excluded. Although such
14	proceedings and I make it clear that I am not prejudging	14	closed session, from which members of the public and
13	"I am well aware of the early stage of these	13	taken in the Litvinenko Inquiry. A statutory inquiry would permit me to allow some evidence to be heard in
12	Sturgess. Your letter continued:	12	
11	between the Skripal poisoning and the death of Dawn	11	these references would be consistent with the approach
10	following the Skripal poisoning; and any connection	10	8 July 2018. The broad terms of reference to reflect
10	steps taken by UK authorities to ensure public safety	10	circumstances Ms Sturgess came by her death on
8 9	poisoning of Sergel and Yulia Skripal, including possible Russian state responsibility for the poisoning;	9	a minimum be asked to ascertain how, where and in what
8	I interpose to note that those issues were: the poisoning of Sergei and Yulia Skripal, including	8	a 2005 Act public inquiry, an inquiry that I would of course be happy to chair. Such an inquiry should, as
0 7			
5 6	3(b), (c) and (d) above."	6	I will need to ask that you take steps to establish
5	relevant, to the issues of scope set out at paragraphs	5	"In the circumstances, my provisional view is that
3 4	that they are relevant, in some respects highly	4	death.
3	"Having reviewed these documents, I have no doubt	$\begin{vmatrix} 2\\ 3 \end{vmatrix}$	investigation into the circumstances of Dawn Sturgess's
2	Paragraphs 14 and 15 of the letter read as follows:	2	discharge my duty to conduct a full, fair and fearless
1	family.	1	likely to arise, it would be impossible for me to
	Page 9		Page 10
25	of occasions by members of the inquest legal team. As	25	interested persons, in particular from Dawn Sturgess's
24	that had been referred to have been reviewed on a number	24	request for conversion before hearing submissions from
23	Since that time, the sensitive overarching reports	23	wish to express a concluded view and make a formal
22	to be disclosed."	22	explained, however, that was simply because you did not
21	team and I have a better understanding of the material	21	expressed in provisional terms in the letter, as you
20	therefore reserve my decision until the inquest legal	20	Your view that an inquiry should be established was
19	of the nature and extent of the material. I shall	19	posted on the inquest website.
18	a public inquiry, but as yet I have a limited knowledge	18	written submissions for this hearing and it will be
17	the stage when I must invite the establishment of	17	29 July 2021. A copy of that letter was appended to our
16	"I think it is highly likely that I too will reach	16	letter that you wrote to the Home Secretary, dated
15	this issue you stated:	15	reasoning behind it, was set out in detail in a lengthy
14	the last hearing and at paragraph 51 of the ruling on	14	now be converted into an inquiry. That view, and the
13	You gave a short ruling dated 8 April 2021 following	13	a clear provisional view that these proceedings should
12	scope of the inquest.	12	and the other associated documents, you have reached
11	responsibility would be included within the provisional	11	Having inspected the sensitive overarching reports
10	indicated that this issue of Russian state	10	the Government departments involved.
9	important to add that at that hearing you also of course	9	the Home Secretary's legal team and members of staff at
8	indeed made a direction to that effect and it is	8	involved a considerable amount of work on the part of
7	Having heard oral submissions at the hearing, you	7	been completed and it is right to record that this has
6	overarching reports within a short period.	6	acting for the Home Secretary at the last hearing has
5	give directions providing for the inspection of the	5	In summary therefore, the process suggested by those
4	was an appropriate course to take and invited you to	4	documents in this category that had been made available.
3	and filed prior to the last hearing, we agreed that this	3	Finally, in July, you inspected all of the sensitive
2	In further written submissions dated 26 March 2021,	2	requested from and provided by Her Majesty's Government.

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Pre Inquest Hearing into the Death of Dawn Sturgess

		1	
1	advance of the next pre-inquest hearing that is	1	suggestion in the Home Secretary's letter that the
2	today's hearing. You explained that the purpose of that	2	request you made to her was in any way inappropriate, or
3	request was to enable interested persons to make	3	that she was in some way unable to provide a substantive
4	meaningful submissions at the next hearing, and I refer	4	response to it. It is common for decision makers to
5	in particular in that regard to paragraphs 4 and 17 of	5	express a provisional view on a subject before receiving
6	your letter.	6	all relevant information. That indeed is what you did
7	The Home Secretary responded in a brief letter dated	7	here, not having heard IPs' submissions, and that is all
8	16 August 2021. The letter stated materially as	8	that you were asking the Home Secretary to do.
9	follows:	9	Indeed, as we have noted in our written submissions,
10	"With regret, I am unable to provide the provisional	10	the Home Secretary herself expressed just such
11	indication you seek. As I hope you will understand, it	11	a provisional view in the Manchester Arena inquests,
12	would be inappropriate for me to consider whether or not	12	where she included in her public interest immunity
13	to establish a public inquiry ahead of any request from	13	certificate a voluntary indication that she would be
14	you to do so. I can assure you though that I will	14	minded to convert the proceedings into an inquiry if
15	consider any such request you choose to make with	15	asked to do so, an indication that she subsequently
16	urgency and care."	16	repeated orally and in writing through counsel acting on
17	A copy of that letter too will be posted on the	17	her behalf.
18	inquiry website.	18	That indication in those proceedings provided
19	My Lady, as we stated in our written submissions, it	19	helpful context for submissions on the question of
20	is a matter of considerable regret that the Home	20	conversion that were then made, and that had been the
21	Secretary has not engaged more constructively with your	21	intention here.
22	request. Since you have now reached a clear view as to	22	We note that the written submissions served by the
23	the need for an inquiry, it would have assisted all	23	Home Secretary for this hearing do not repeat the
24	involved to know the Home Secretary's provisional view	24	suggestion that there was anything inappropriate about
25	on this issue. We respectfully disagree with the	25	your request, or indeed that the Home Secretary was
	Page 13		Page 14
1	unable to respond to it. The explanation that is now	1	expressed in your July letter, which as I have said,
	unable to respond to it. The explanation that is now offered is that, in order to provide the provisional		expressed in your July letter, which as I have said, they have of course seen, none are opposed to you making
1 2 3	offered is that, in order to provide the provisional	1 2 3	they have of course seen, none are opposed to you making
2	offered is that, in order to provide the provisional view that you had requested, it would have been	2	they have of course seen, none are opposed to you making a formal request for conversion to an inquiry and the
2 3	offered is that, in order to provide the provisional view that you had requested, it would have been necessary for the Home Secretary to read for herself the	2 3	they have of course seen, none are opposed to you making
2 3 4	offered is that, in order to provide the provisional view that you had requested, it would have been	2 3 4	they have of course seen, none are opposed to you making a formal request for conversion to an inquiry and the family positively support you making such a request. We also note the welcome undertaking from the Home
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1	particular you have not yet made any final decisions on	1	inquest into inquiry and if she were to grant a request,
2	scope and we anticipate that there will be further	2	if made, the terms of reference.
3	debate about precisely which lines of enquiry you should	3	Mr Mansfield.
4	and perhaps should not pursue following disclosure.	4	MR MANSFIELD: My Lady, my colleague will speak.
5	Indeed, you have mentioned this morning that in due	5	THE CORONER: Thank you very much.
6	course you will need to consider the impact of	6	Mr Straw.
7	yesterday's developments on the scope of your	7	MR STRAW: Thank you, my Lady.
8	investigation.	8	For the transcribers' notes I am making submissions
9	The inquiry terms of reference would therefore need	9	on behalf of the family, and by the family I am
10	to be broad in order to allow you to refine the precise	10	referring to Ms Sturgess's relatives and also to
11	lines of enquiry at a future stage. Putting the matter	11	Mr Rowley.
12	another way, the terms of reference should replicate the	12	The family are grateful for your indication that
13	broad discretion as to scope that you enjoy as	13	they should be kept at the heart of this process. They
14	a coroner, precisely because of the early stage that we	14	also welcome the indication from the Secretary of State
15	are at, it would not, we say, be appropriate for the	15	that she will take into account their views on this
16	terms of reference to be prescriptive about particular	16	issue. Their view is that a public inquiry should be
17	issues or lines of enquiry either being included or	17	established now and we invite you to make that
18	excluded from scope.	18	suggestion to the Home Secretary at this stage.
19	My Lady, that is all I propose to say, at least at	19	Although they consider that there may be some advantages
20	this stage, on the first item on the agenda, and	20	to an inquest, for example a jury is a possibility in
21	I invite you to hear submissions from interested	21	this sort of case, their overriding concern is to ensure
22	persons.	22	that the truth of how Ms Sturgess died is established.
23	THE CORONER: Thank you. I will now go round the	23	You have made it as clear as you can do that there
24	representatives to invite submissions on whether	24	are critical documents, critical information, which is
25	I should request the Secretary of State to convert the	25	highly relevant to the scope of the inquest but which
	1 2		
	Page 17		Page 18
1	will have to be excluded from the inquest and therefore	1	On the other hand, there are several important
1	will have to be excluded from the inquest and therefore the only you that that can be considered in through the	1	On the other hand, there are several important
2	the only way that that can be considered is through the	2	reasons why a delay should be avoided and why the public
2 3	the only way that that can be considered is through the means of a public inquiry. For that reason, section 5	2 3	reasons why a delay should be avoided and why the public inquiry decision should be made now. Just to pick four
2 3 4	the only way that that can be considered is through the means of a public inquiry. For that reason, section 5 of the Coroners and Justice Act 2009 would require there	2 3 4	reasons why a delay should be avoided and why the public inquiry decision should be made now. Just to pick four of them.
2 3 4 5	the only way that that can be considered is through the means of a public inquiry. For that reason, section 5 of the Coroners and Justice Act 2009 would require there to be a public inquiry so that that statutory duty can	2 3 4 5	reasons why a delay should be avoided and why the public inquiry decision should be made now. Just to pick four of them. The first is that further delay is likely to cause
2 3 4 5 6	the only way that that can be considered is through the means of a public inquiry. For that reason, section 5 of the Coroners and Justice Act 2009 would require there to be a public inquiry so that that statutory duty can be fulfilled.	2 3 4 5 6	reasons why a delay should be avoided and why the public inquiry decision should be made now. Just to pick four of them. The first is that further delay is likely to cause further anguish to the family. If the public inquiry is
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Pre Inquest Hearing into the Death of Dawn Sturgess

2       ap         3       if         4       ne         5       no         6       7         7       ar         8       w         9       10         10       de         11       in         12       CC         13       N         14       th         15       th         16       th         17       pr	hen a restriction order, or restriction notice pplication. That will, of course, cost much more than f a public inquiry is established now, where we only used to go through the restriction order and restriction notice process. The third reason is to avoid the loss of evidence, and in particular the possibility that recollections will fade if extra delay is built into this process. The fourth reason is the wider public interest in leterminations and any recommendations that a public inquiry may wish to make. The National Coordinator of Counter Terrorism Policing said yesterday that the Novichok that killed Ms Sturgess could have killed housands of members of the British public. That means that it is of great importance that any recommendations	1 2 3 4 5 6 7 8 9 10 11 12 13	support that. We support that for all of the reasons that Mr O'Connor has given today. In short, it is far to early to be excluding particular issues from the inquest when full disclosure hasn't been made. There is no basis to say that a particular body wasn't at fault at this early stage. Having the terms of reference in the form that they are in CTI's submissions has the benefit of flexibility. So for those reasons we would support what they say. THE CORONER: Thank you very much, Mr Straw. Ms McGahey, are you going next? MS MCGAHEY: My Lady, on the question of whether it would
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13     N       14     th       15     th       16     th       17     pr	Novichok that killed Ms Sturgess could have killed housands of members of the British public. That means	13	
14 th 15 th 16 th 17 pr	housands of members of the British public. That means		have been appropriate for the Home Secretary to give the
15 th 16 th 17 pr	-	14	indication that you sought in your letter, I should make
16 th 17 pr	and it is of great importance that any recommendations	15	absolutely clear that in her reply the Home Secretary
17 pr	hat the public inquiry seeks to make in order to	16	was not seeking to suggest for one moment that your
	revent something like this happening again should be	17	Ladyship's request was inappropriate, or indeed that it
18 m	nade swiftly.	18	was not possible as a matter of law for her to reply to
19	For all of those reasons, the family call on the	19	it or to give the indication that your Ladyship wanted.
20 H	Home Secretary to not neglect the protection of the	20	The Secretary of State's position was and is that in
	ublic for actions and not just words and for her to	21	the circumstances and on the facts of this inquest it
-	stablish a public inquiry as soon as possible.	22	would have been inappropriate for her to provide that
23	The last point is about the terms of reference.	23	provisional view.
	Your counsel in paragraph 19 identified terms of	24	The situation in Manchester was very different.
	eference that they invite you to put forward and we	25	Details have been provided in our written submissions of
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	Page 21		Page 22
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10 W			
11 an			•
11 an 12 the	he public domain. All that work had been done and it	13	families have welcomed both your indication that they
11 an 12 th 13 ha	ad not been done in this case.	14	
11 an 12 th 13 ha 14	ad not been done in this case. In this case, as your Ladyship knows, the focus has	14	wanted to hear their views first and also the same
11     an       12     the       13     ha       14     15	ad not been done in this case. In this case, as your Ladyship knows, the focus has een first in finding the essential material, the key	15	indication being given by the Secretary of State.
11 an 12 th 13 ha 14 15 be 16 an	ad not been done in this case. In this case, as your Ladyship knows, the focus has een first in finding the essential material, the key nd core documents, the overarching reports to make	15 16	indication being given by the Secretary of State. I can reassure your Ladyship and my learned friend
11     an       12     th       13     ha       14     15       15     be       16     an       17     av	ad not been done in this case. In this case, as your Ladyship knows, the focus has een first in finding the essential material, the key nd core documents, the overarching reports to make vailable to your team and then to you.	15 16 17	indication being given by the Secretary of State. I can reassure your Ladyship and my learned friend Mr Straw there is no intention at all to await the
11     an       12     th       13     ha       14     15       15     be       16     an       17     av       18	ad not been done in this case. In this case, as your Ladyship knows, the focus has een first in finding the essential material, the key nd core documents, the overarching reports to make vailable to your team and then to you. Secondly, in Manchester, the Secretary of State was	15 16 17 18	indication being given by the Secretary of State. I can reassure your Ladyship and my learned friend Mr Straw there is no intention at all to await the conclusion of any PII process. Work on disclosure will
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11       an         12       th         13       ha         14       15         15       be         16       an         17       av         18       19         19       in         20       in*         21       ha         22       a 1         23       24	ad not been done in this case. In this case, as your Ladyship knows, the focus has een first in finding the essential material, the key nd core documents, the overarching reports to make vailable to your team and then to you. Secondly, in Manchester, the Secretary of State was a practical terms the only minister who was going to be nvolved in making the decision, although she would have ad to notify the Prime Minister before establishing public inquiry. She was the only Secretary of State involved, not nly in making the decision but also in considering the	15 16 17 18 19 20 21 22 23 24	<ul> <li>indication being given by the Secretary of State.</li> <li>I can reassure your Ladyship and my learned friend</li> <li>Mr Straw there is no intention at all to await the</li> <li>conclusion of any PII process. Work on disclosure will</li> <li>continue in any event.</li> <li>THE CORONER: Can I just ask, when you say, "no intention to</li> <li>await the conclusion of the PII process", do you mean if</li> <li>I were to request that the inquest be converted into</li> <li>an inquiry, we don't have to wait till the end of any</li> <li>PII is that what you meant?</li> </ul>
11       an         12       th         13       ha         14       15         15       be         16       an         17       av         18       19         19       in         20       in*         21       ha         22       a 1         23       24	ad not been done in this case. In this case, as your Ladyship knows, the focus has een first in finding the essential material, the key nd core documents, the overarching reports to make vailable to your team and then to you. Secondly, in Manchester, the Secretary of State was a practical terms the only minister who was going to be nvolved in making the decision, although she would have ad to notify the Prime Minister before establishing public inquiry. She was the only Secretary of State involved, not	15 16 17 18 19 20 21 22 23	<ul> <li>indication being given by the Secretary of State.</li> <li>I can reassure your Ladyship and my learned friend</li> <li>Mr Straw there is no intention at all to await the</li> <li>conclusion of any PII process. Work on disclosure will</li> <li>continue in any event.</li> <li>THE CORONER: Can I just ask, when you say, "no intention to</li> <li>await the conclusion of the PII process", do you mean if</li> <li>I were to request that the inquest be converted into</li> <li>an inquiry, we don't have to wait till the end of any</li> </ul>
2 wl 3 su 4 M 5 th 6 in 7 a l 8 m 9 co	the situation in Manchester but in outline, for those who have not yet had a chance to look at the submissions, the provisional indication was given in Manchester as part of a formal PII application in which the Home Secretary had considered herself the material in question and all the sensitivities, because to make PII application, she of course must consider the material herself, must also consider whether any of it bould be gisted, whether redactions could be made, whether a witness statement giving an outline would be in alternative that would allow the material to go into	1 2 3 4 5 6 7 8 9 10 11 12 13	not the case in the present inquest. In my submission, my Lady, there has in fact been no delay, no delay will be caused by the Secretary of State's inability earlier to give a provisional indication. She would not in any event have been able to start the formal process towards establishing the inquiry until receiving a formal request. The first part of that would have involved a write round to other secretaries of state asking for their views and, as part of that process, the Secretary of State would have wished to know the views of the families involved. It is clear from the submissions of my learned friend Mr Straw Queen's Counsel that the families have welcomed both your indication that they

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1       excl a letter tomorrow sping. "There are made in device parameter as to a intrachle, the world         2       decision and I want a public inquity" due Home       1       every much aim to rate a decision by Christmas. Within         3       Secolary would not reply soying. "We fink we need to go through the PI process first".       My Lady, unless I can assist your Ladyship further         6       Most MCOATHY. The work on disclosure will community and we have the device are any abunisation.       My Lady, unless I can assist your Ladyship further         6       the event and while my Lamed friend Mr Straw is absoluddy       Mit Concentration.       Mit Concentration.         7       MK MACOATHY. The work on disclosure will community in the rest to a disclosure will community. The track is disclosure will community on the rest to a disclosure will community. The track is the same match will be made and signal association.       Mit Concentration and same and it will the same and it will the community of the inspectrate in adjustice and the same and it will the same that work is the same and it will the same that work is the same and it will the same that work is the same and it will the same that work is the same and it will the same that the work is the same that work is the same and it will the same that work is the same and it will the same that the same				
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4     Ladyship.       5     THE CORONER: Thank you, that is what I thought you mean, thus, you.       7     MS MCGAHLY: The work on disclosure will continue in any event and while ny elements will continue in any event and while ny elements will continue in any event and while ny elements of the rule 19       9     right to say that the PII process, the PII test, is a different in some respects from that of the rule 19       10     different in some respects from that of the rule 19       11     rime-consuming work that has to be done first is disoliting the elevant match and all will is some in distributing the elevant match and all will is a same and it will it is same and it will is a same and it will it is same and it will it is a same it will include the same and it will is a same and it will it is a same it will include the same and it will is a same it will include the same and it will it is a same that the same and it will it is a same that the same and it will is a same and it will ithe same and it will i	2	decision and I want a public inquiry", the Home	2	very much aim to make a decision by Christmas. Within
5THE CORONER: Thank you, that is what I thought you mean, thank you.5My Lady, unless I can assist your Ladyship further fund and you.6MS MCATHY: The work on disclosure will continue in any event and while my learned friend M Strav is aboutedy if different in some respects for an inquiry, the truck and the really time.THE CORONER: No, fluad you have any comments on the issue?7mode and the real PI process, the PII process, the PII process for an inquiry, the real and the really time.THE CORONER: No, fluad you have any comment, on the issue?8mode and you have any command will be and identifying the relevant material and identifying the sensitivities and that work is the same and it will continue.MS GIOVANNETT: Not to make any adminisions on the question of the inspect of multiply in the true and content of the inspect of multiply in the sensitivities and the true of the inspect of multiply in the sensitivities and the sensitivities and the sensitivity.9Tam able to say - as your I abybip in avara, and tam process is on straightforwand in this sense. Tam able to say - as your I abybip in avara, and tabybip requests an impairy, which we can assume your tabybip requests an impairy, which we can assume your tabybip in process is on straightforwand in this sense. The coron of the ingent of the inspect on and bar mere?24Which the Horne Secretary cannet, bearing in mind all the variables and the pressures of Government, give any the variables and the pressures of Government, give any the variables and the ready will work as one the variable and the ready of the inspect on inspect. THE CORONER: Thank you. M Lexis	3	Secretary would not reply saying, "We think we need to	3	around three months of the request being made by your
6       there are my promissions.         7       MS MCGAHLY: The work on discionare will contine in any event and while my learned friend Mr Straw is absolutely inplot any hard will even any output inserverses. For mit a of the rule 19       7         9       offferent in some respects from that of the rule 19       10         10       different in some respects from that of the rule 19       10         11       different in some respects from that of the rule 19       10         12       time-consuming work that has to be done first is indiverse in straightforeign the rule and and the rule)       11         12       time-consuming work that has to be done first is indiverse in straightforeign the rule and and the rule)       11         13       and accept that it's appropriate to give the terms of respects from everybody submissions, the far process in out signify routed in might, which we can assume your 1       12         14       as possible to ranch a decision, as soon as your 1       11       11         15       central difficult from they source and harme?       11         16       they make and the pressures of Government, give any       12       11         20       Ladyship is bightly likely to do, having beard from my       12       12         21       Ladyship is bightly likely to do, having beard from my       12       12         22       THE CORONER: I can so as one and	4	go through the PII process first".	4	Ladyship.
7       MS MCGAHLY: The work on disclosure will continue in any cent and when y learned friend. M Stars is aboulded by right to soly that be If process for PII tests is aboulded by right to soly that be If process. In PII tests is aboulded by the MC Giovannett, do you have any comments on the size of the impact of main inquiry, the crucial and the reall?         10       afficent in some respects from that of the rule 19         11       process for an inquiry, the crucial and the reall?         12       the industry, seve to say that, for my control is identifying the relevant material and identifying the issue?         13       as has been clear frim or very only of the impact on the issue?         16       T arrable to say - as your Ladyship is aware, and         17       as has been clear frim or very only of the impact on the issue?         18       process in not training work that has to be down from my         19       secretary actually has already sid will work as quickly         19       as has been clear frim or very only of the impact on a struct synt.         11       process in not straing in find M Stars.         12       Ladyship is highly likely to do. having heard from my         12       Ladyship is highly likely to do. having heard from my         12       the more Secretary cannot, having heard from my         13       the variables and the pressures of Government, give any         14       the variables and the pressures of Government	5	THE CORONER: Thank you, that is what I thought you meant,	5	My Lady, unless I can assist your Ladyship further
8       event and while my learned friend Mr Straw is absolutely       8       Ms Giovanetti, do you have any comments on the         9       right to say that the PII process, the PII test, is       9       issue?         11       process for an inspiry, the crucial and the real 19       11       of the inspaced or inspiry, save to say that, for my         12       time-consuming work that has to be door first is       12       elior4 part, in relation to (handble) generally for         13       issue?       11       of the inspaced or inspiry, save to say that, for my         14       sensitivities and that work is the same and it will       14       As for terms of reference and scopp, we understand         15       continue.       15       and accept that is appropriate to give the terms of         16       I and able to say – as your Ladyship is aware, and       15       and accept that is appropriate to give the terms of         17       as has been clear from everyholdy submissions, the       18       THE CORONE: Thank you were much.         18       process in on syning in mind all       17       State can review (Imadble).       18         20       Ladyship is highly likely to do, having heard from my       12       18       18         21       Ladyship is highly likely to do, having heard from my       19       10       10	6	thank you.	6	those are my submissions.
9       right to say that the PH process, the PH test, is       9       issue?         10       different in some respects from thir of the rule 19       10       MS GIOVANNETT. Not o make any submissions on the question         11       process for an inquiry, the crucial and the really       10       10       of the inquest or inquiry, we to say that, for my         12       identifying the relevant material and identifying the       13       as, has work on discloance will containe and it will         13       as has been clar from everybody's submissions, the       10       The containe.         14       As for trans of reference (famaldble); on the basis that the Secretary of       13       and secret the ins of         15       as bas been clar from everybody's submissions, the       15       The containe       16         12       Ladyship requests an inquiry, which we can assume your       24       THE CORONER: Thank you were model.         14       Ma for the review of the researce of the sectory cannot, bearing in mind all       17       24       THE CORONER: Thank you, were model to any minoryboare minored.         15       as new you, Mr Beer, i can all right.       1       me.       24       THE CORONER: I can sec you on the main screen but         16       representing Counter Terrorism Policing South Fast on the issue of whether three should be a publicing South Fast on the issue of whether thr	7	MS MCGAHEY: The work on disclosure will continue in any	7	THE CORONER: No, thank you very much, Ms McGahey.
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12       itme-consuming work that has to be done first is       12       client's part, in relation to (haudible) generally for         13       identifying the relevant naticula and identifying the       13       us, the work on disclosure will continue and new year.         14       as has been clear from correlation. So the same and it will       13       and accept that it is appropriate to give the terms of         16       I am able to say - as your Ladyship is aware, and       16       reference (fundible) on the basis that the Scenetary of         17       as has been clear from correlation. So the say out?       17       State and review (fundible).         18       process is not straightforward in this case. The Home       18       Thank you, my Lady.         19       Scenetary actually has already said will work as quick?       19       THE CORONER: Thank you way much.         21       Ladyship ropuests an inquiry, which we can assume your       21       get your camera on and your microphone unmated.         22       Ladyship is highlick?       10       Mr BEER: Thank you, we need to         23       the variables and the pressures of Government, give any       23       I don't think we can see you on the associate's laptop.         24       While the Home Scenetary cannot, bearing       1       mc.         25       the variables and the pressures of Government, give any       2	10	different in some respects from that of the rule 19	10	MS GIOVANNETTI: Not to make any submissions on the question
13       identifying the relevant material and identifying the         14       identifying the relevant material and identifying the         15       continue.         16       I am able to say as your Ladyship is sware, and         17       as has been clear from everyhody's submissions, the         18       process is not straightforward in this case. The Home         19       Sceretary atmulfy has abready said vill work as quickly         20       as possible to reach a decision, as soon as your         21       Ladyship is highly hight to do, having heard from my         22       Ladyship is highly hight to do, having heard from my         23       Iserned friend M: Straw.         24       While the Home Sceretary cannot, bearing in mind all         25       I can see you, Mr Beer, so I am all right.         26       MR BEER: Can you hear me?         27       HE CORONER: I can see you, on the associate's laptop,         28       Page 25         29       Page 26         10       this should continue as an inquest, nor indeed as to the         20       the save of whether there should be apublic inquiry or         20       this should continue as an inquest, nor indeed as to the         21       Ladyship is indehy like you very much.       THE CORONEE: Thank you, were mo	11	process for an inquiry, the crucial and the really	11	of the inquest or inquiry, save to say that, for my
14       sensitivities and that work is the same and it will       14       As for terms of reference and scope, we understand         15       I am able to say - asyour Ladyship is sware, and       16       I am able to say - asyour Ladyship is sware, and         16       I am able to say - asyour Ladyship is sware, and       16       reference (Inaudble) (Inaudble).         19       Secretary actually has already said will work as quickly       19       THE CORONER: Thank you very mach.         20       as possible to reach a decision, as soon as your       20       Mr BEER: Thave done both of those things. Can you see and         21       Ladyship requests an inquiry, which we can assume your       21       get your cameron and your microphone unmated.         22       Mr BEER: Thave done both of those things. Can you see and       23       hear me?         24       While the Home Secretary camot, bearing in mind all       24       THE CORONER: To so you on the associate's laptop,         25       the variables and the pressures of Government, give any       25       I dea't think we can see you on the associate's laptop,         26       THE CORONER: I can.       1       mé.         3       THE CORONER: I can.       1       mé.         4       There we have you.       In Get it may       6       not have been worth the trouble because I have no	12	time-consuming work that has to be done first is	12	client's part, in relation to (Inaudible) generally for
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16       I am able to say - a syour Ladyship is aware, and       16       reference (Imadified) on the basis that the Secretary of         17       as has been deter from everybody's submissions, the       17       State can review (Imadified).         18       process is not straightforward in this case. The Home       18       Thank you, my Lady.         20       as possible to reach a decision, as soon as your       19       THE CORONER: Thank you very much.         21       Ladyship is highly highly by do, huving heard from my       23       learned friend Mr Straw.         23       learned friend Mr Straw.       20       MR BEER: Thave done both of those things. Can you see and         23       the variables and the pressures of Government, give any       23       I den't think we can assume your         24       While the Home Secretary cannot, bearing in mind all       24       THE CORONER: I can see you on the associate's haptop,         25       the ansee you, Mr Beer, so I am all right.       1       me.         2       Page 26       2         3       mot have been worth the trouble beause I have no       3         4       There we have you. Thank you.       16 met think we can see you on the associate's laptop,         3       make bean outh the trouble beause I have no       3         4       Theer we have you. Thank yo	14	sensitivities and that work is the same and it will	14	As for terms of reference and scope, we understand
17       as has been clear from everybody's submissions, the       17       State can review (Inaudible),         18       process is not straightforward in this case. The Home       17       State can review (Inaudible),         19       Sceretary actually has already said will work as quickly       18       Thatk, you, my Lady,         20       as possible to reach a decision, as soon as your       21       Ladyship is highly likely to do, having heard from my         22       Ladyship is highly likely to do, having heard from my       22       MR BEER: Thank you are attending remotely, so we need to         24       While the Home Sceretary cannot, bearing in mind all       20       MR BEER: Thank you, Mr Beer, so I am all right.         25       I can see you, Mr Beer, so I am all right.       1       me.         26       I can see you, Mr Beer, so I am all right.       2       HE CORONER: Thank you, Ms Dolan.         3       THE CORONER: I can.       3       Mr BeER: Brilliant, thank you vary much. In fact it may         6       not have been worth the trouble because I have no       3       THE CORONER: Thank you, Mr Beer, I have no submissions         7       the issue of whether there should be a public inquiry or       the issue of whether there should be a public inquiry or         10       this should continue as an inquest, nor indeed as to the       1       THE CORONER: Thank yo	15	continue.	15	and accept that it is appropriate to give the terms of
18       process is not straightforward in this case. The Home         19       Secretary actually has already said will work as quickly         20       as possible to reach a decision, as soon as your         21       Ladyship requests an inquiry, which we can assume your         22       Ladyship requests an inquiry, which we can assume your         23       Ladyship requests an inquiry, which we can assume your         24       While the Home Secretary cannot, bearing in mind all         25       the variables and the pressures of Government, give any         26       Page 25         27       Page 26         28       THE CORONER: Tank you, Ms Dolan.         30       MR BEER: Can you hear mc?         31       THE CORONER: Tank you, Ms Dolan.         32       THE CORONER: Tank you, Ms Dolan.         33       Mr Bethell, you are attending remotely.         44       Wh BETHELL: My Lady, sex (noy use and hear mc?         54       MR BEER: Brillant, thank you very much. In fact it may         6       net have been worth the trouble because 1 have no         7       submissions on behalf of Thamse Valley Police         8       representing Counter Terrorism Policing South East on         9       the trouble.         10       this should continne as an in	16	I am able to say as your Ladyship is aware, and	16	reference (Inaudible) on the basis that the Secretary of
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7 (Pages 25 to 28)

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1	both I and my team are well used to the option of	1	Anything else on that issue, Mr O'Connor?
2	gisting material where it is available. In my view it	2	MR O'CONNOR: No.
3	is not available in this instance.	3	THE CORONER: Thank you.
4	I have no option therefore but to request the	4	Presumably I need to put that request into writing,
5	Secretary of State to convert this inquest into	5	Ms McGahey, or is the fact it will be in my order
6	an inquiry and I invite her to consider and decide on my	6	sufficient?
7	request as a matter of urgency. I am pleased to hear	7	MS MCGAHEY: My Lady, I am instructed that it would be
8	that Ms McGahey could at least put a timescale on the	8	helpful if the Secretary of State could receive a formal
9	decision, and I do understand the difficulties in	9	request in writing from you.
10	Government and consulting other secretaries of state,	10	THE CORONER: That will be winging its way promptly, so if
11	but I really do hope that the Secretary of State can	11	everyone could be alerted to the fact that it is on its
12	respond within the timescale envisaged by Ms McGahey.	12	way and the machinery, which I assume has been in motion
13	I am anxious, very anxious, as Mr Straw obviously is	13	anyway, can gather apace.
14	on behalf of the family, and I am sure Mr Mansfield,	14	MS MCGAHEY: Certainly.
15	that we do not lose any time at all and that we do not	15	THE CORONER: Thank you.
16	duplicate any precious resources.	16	Right, Mr O'Connor.
17	Should the Secretary of State, having consulted her	17	MR O'CONNOR: My Lady, I will turn to the second matter on
18	colleagues and the Prime Minister, grant my request,	18	the agenda, which is the question of disclosure.
19	I am also satisfied that it is essential that the terms	19	My Lady, the disclosure exercise in this case poses
20	of reference are broad and sufficiently broad to reflect	20	certain very particular challenges. Those challenges,
21	the discretion I would have had as a coroner and to	21	which we understand more clearly now than at the time of
22	ensure a full, fair and effective investigation. As	22	the last hearing earlier this year, are addressed at
23	Mr Straw observed, it is far too early to be able to	23	length in the written submissions that you have
24	rule out issues from the provisional scope that I have	24	received. I will address at least the main points
25	determined.	25	orally in a moment and, as I have said, it was with that
	Page 29		Page 30
1	in mind that we invited you to direct that those written	1	therefore time-consuming process, both for stage 1 of
2	submissions in full should be posted on the website, so	2	the disclosure exercise, by which we mean the stage at
3	that those observing these proceedings can have as full	3	which documents are provided to you and your team, and
4	an understanding as possible of the rather detailed	4	stage 2, the stage at which documents are provided
5	difficulties that arise.	5	onwards, relevant documents that is, to interested
6	I will start this introduction, if I may, simply	6	persons.
7	with five headline points.	7	Third, the disclosure process in an inquiry and
8	First of all, may I say immediately that we share	8	an inquest are not the same and for as long as there is
9	the desire that has been expressed by Dawn Sturgess's	9	any uncertainty as to whether or not the proceedings
10	family and Mr Rowley in their submissions to proceed to	10	will be converted there is a risk, as Mr Straw has
11	substantive hearings as quickly as possible in this	11	mentioned, of duplicated effort and wasted work. You
12	case. In that context, we wholly understand the	12	have now made a formal request for conversion into
13	concerns that they have expressed about the disclosure	13	an inquiry, and the quicker a decision is made the less
14	exercise, since the speed of that exercise and the time	14	disruption there will be to the disclosure exercise.
15	when we can get it done is clearly one of the principal	15	Fourth, in very brief summary, the current position:
16	factors, if not the principal factor, that will dictate	16	since the first pre-inquest review on 30 March of this
17	the timing of the final hearings.	17	year, that is six months ago, significant effort has
18	The second point, my Lady, and if I may, just	18	been made by your team to galvanise disclosure and real
19	putting the matter bluntly, the disclosure process is	19	progress is now being made. All involved have been
20	going to take longer than we had hoped and longer than	20	working hard, time has been spent putting arrangements
21	is normal in large inquests and inquiries of this kind.	21	in place and searching for documents and much of that
22	It has become increasingly clear to us that the special	22	work is now done and we do expect the process to gather
23	sensitivities of this case, the provenance of many of	23	pace in the coming months.
24	the documents, the national security issues that they	24	Stage 1 of the process, as I said, the provision of
25	address, will require an unusually complicated and	25	documents to the inquest team, is well underway.
	Dame 21		Dame 22

8 (Pages 29 to 32)

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Pre Inquest Hearing into the Death of Dawn Sturgess

16	clearer by December.	16	classifications. There are national security concerns
14 15	suggested at the last hearing by my learned friend Ms McGahey. We very much hope that the position will be	14 15	into the attack in Salisbury and the death of Dawn Sturgess, covering the full spectrum of security
16	clearer by December.	16	classifications. There are national security concerns
17	I hope that those headline points assist in giving	17	about not only this material but that held by the police
18	at least a general view of where we are with this	18	and others, including documents that may not bear
19	process and I turn now to the detail.	19	a security marking, and there are concerns that some
20	I have referred to the particularly complex national	20	material could create a risk of future attacks.
21	security sensitivities which have caused and will	21	My Lady, I pause to simply emphasise what Mr Straw
22	continue to cause some delay in the disclosure exercise.	22	said about what was said yesterday regarding the risk
23	Unusually complicated and resource-intensive procedures	23	that was created at the time of the Novichok attack in
24	are required for both stages of the disclosure exercise.	24	2018. These submissions about disclosure may appear
25	The need for these procedures is principally due to two	25	rather arid, but at the bottom of it all is a concern to
	Page 33		Page 34
1	do our best that no step is taken in these proceedings	1	victims of the related Novichok poisonings, Sergei and
2	that may either make the risk of a further Novichok	2	Yulia Skripal, Charlie Rowley and two police officers.
3	episode more likely or may reduce the capability of	3	My Lady, we explain the challenges in the broadest
4	Government agencies effectively responding to any such	4	terms at paragraph 20(c) of our written submissions but,
5	incident should it take place. That is what it is all	5	in summary, we have been asked to inspect documents in
6	about, and when we use this language of "national	6	accordance with protocols and practical arrangements
7	security considerations", ultimately that is what it is	7	that are far more demanding than their classification
8	all about.	8	would ordinarily require. A substantial number of
9	My Lady, the second difficulty that I have mentioned	9	documents are subject to security review requirements
10	is the multiplicity of police and Government bodies	10	and authorities by a number of often multiple different
11	which hold relevant material. There are a number of	11	departments and, sometimes, experts. That is a matter
12	police forces involved and police entities,	12	that is referred to at paragraph 8 of the Home
13	Counter Terrorism Policing South East, a body for which	13	Secretary's submissions.
14	Thames Valley Police is responsible, also the	14	Many documents must be reviewed not only
15	Metropolitan Police and SO15. I will say a little bit	15	individually but in the context of other documents.
16	more about Operation Verbasco, which is a combined	16	There are further processes and authorities required to
17	police effort, in a moment. We are also dealing with	17	security check what is being disclosed on a line-by-line
18	Wiltshire Police and then in terms of Government	18	basis. We anticipate that PII, if we remain an inquest,
19	departments and agencies, the Home Office, the Cabinet	19	or some form of restriction, will be sought over
20	Office, the Ministry of Defence, Foreign Office, the	20	a significant volume of the material with which we are
21	Department for Health and Social Care, the security and	21	dealing. There are also likely to be applications for
22	intelligence agencies, to name but a few.	22	anonymity and ciphering.
23	As the police have explained in their submissions,	23	All of these issues apply to a substantial
24	the investigations also concerned a wide geographical	24	proportion of the documents held both by the police
25		1 25	forces and by the UMC the Covernment departments to
25	area, not just the deceased, Dawn Sturgess, but other	25	forces and by the HMG, the Government departments, to

9 (Pages 33 to 36)

1	whom I have referred. They are between them the two	1	paragraph 21(a) of our written submissions, the
2	most significant document providers in terms of	2	multiplicity of Government bodies and agencies have
3	relevance and quantity of material.	3	received disclosure requests. In addition, we have made
4	To give you a sense of the volume of material, my	4	disclosure requests to other individuals and
5	Lady, the police have indicated that they have some	5	organisations, including the investigative agency
6	18,000 electronic documents to be reviewed. That is	6	Bellingcat. A document management platform, Relativity,
7	obviously a very considerable volume of material, my	7	has been procured and initial coding has been applied
8	Lady, but I would emphasise that whilst the volume of	8	for receipt and management of incoming stage 1
9	material is one factor, I hope it is clear from the	9	disclosure. The solicitors to the inquest have liaised
10	submissions I have made that it is not in fact the only	10	with those to whom they have made stage 1 disclosure
11	or even perhaps the main factor which is causing such	11	requests variously and repeatedly through email,
12	a prolonged disclosure exercise. It is in fact the need	12	telephone and indeed video correspondence and meetings,
13	to subject a very large quantity of the documents that	13	in order to facilitate and progress disclosure.
14	we are dealing with to an unusually elaborate process	14	Again, my Lady, I would emphasise I referred earlier
15	that is really at least as big a factor as simply the	15	to the need to establish protocols and working
16	volume of documentation.	16	arrangements. That is a process which has required
17	As I have already said this morning, then, my Lady,	17	a large number of meetings, discussions through
18	disclosure is not as far advanced as we would have hoped	18	correspondence, and to a large degree those processes
19	and it has not yet been possible to commence making	19	are now in place and we hope that matters will now pick
20	stage 2 disclosure to IPs. That said, progress has been	20	up pace.
21	made and we very much hope that stage 2 disclosure will	21	Focusing on disclosure from HMG, as we have
22	commence in the coming months.	22	explained in the context of the inquest/inquiry issue,
23	In terms of the progress that has been made, my	23	your team reviewed a selection of very sensitive
24	Lady, and I start with the actions of the solicitor to	24	overarching reports in order to progress resolution of
25	the inquest and your team, as we have set out at	25	that issue. In addition to that, the ILT undertook
	D 27		D 20
	Page 37		Page 38
1	a preliminary inspection of key core HMG documents	1	liaise with the Government Legal Department to assist in
1 2	a preliminary inspection of key core HMG documents this is a matter referred to at paragraph 11 of the Home	1 2	liaise with the Government Legal Department to assist in progressing this further disclosure, as the Home
	a preliminary inspection of key core HMG documents this is a matter referred to at paragraph 11 of the Home Secretary's submissions to make a provisional		liaise with the Government Legal Department to assist in progressing this further disclosure, as the Home Secretary's submissions recognise at paragraphs 18 to
2	this is a matter referred to at paragraph 11 of the Home	2	progressing this further disclosure, as the Home
2 3	this is a matter referred to at paragraph 11 of the Home Secretary's submissions to make a provisional	2 3	progressing this further disclosure, as the Home Secretary's submissions recognise at paragraphs 18 to
2 3 4	this is a matter referred to at paragraph 11 of the Home Secretary's submissions to make a provisional assessment of relevance. This involved documents	2 3 4	progressing this further disclosure, as the Home Secretary's submissions recognise at paragraphs 18 to 19.
2 3 4 5	this is a matter referred to at paragraph 11 of the Home Secretary's submissions to make a provisional assessment of relevance. This involved documents emanating from the eight Government departments, set out	2 3 4 5	progressing this further disclosure, as the Home Secretary's submissions recognise at paragraphs 18 to 19. The Home Secretary's team has also been asked to
2 3 4 5 6	this is a matter referred to at paragraph 11 of the Home Secretary's submissions to make a provisional assessment of relevance. This involved documents emanating from the eight Government departments, set out at paragraph 21(d) of our submissions, including in some	2 3 4 5 6	progressing this further disclosure, as the Home Secretary's submissions recognise at paragraphs 18 to 19. The Home Secretary's team has also been asked to consider the obvious and fundamental questions that will
2 3 4 5 6 7	this is a matter referred to at paragraph 11 of the Home Secretary's submissions to make a provisional assessment of relevance. This involved documents emanating from the eight Government departments, set out at paragraph 21(d) of our submissions, including in some cases sub groups and departments within those bodies.	2 3 4 5 6 7	progressing this further disclosure, as the Home Secretary's submissions recognise at paragraphs 18 to 19. The Home Secretary's team has also been asked to consider the obvious and fundamental questions that will need to be addressed concerning PII and how this
2 3 4 5 6 7 8	this is a matter referred to at paragraph 11 of the Home Secretary's submissions to make a provisional assessment of relevance. This involved documents emanating from the eight Government departments, set out at paragraph 21(d) of our submissions, including in some cases sub groups and departments within those bodies. More detail on this process is provided in the Home	2 3 4 5 6 7 8	progressing this further disclosure, as the Home Secretary's submissions recognise at paragraphs 18 to 19. The Home Secretary's team has also been asked to consider the obvious and fundamental questions that will need to be addressed concerning PII and how this material will be provided to IPs by way of stage 2
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2 3 4 5 6 7 8 9 10 11	this is a matter referred to at paragraph 11 of the Home Secretary's submissions to make a provisional assessment of relevance. This involved documents emanating from the eight Government departments, set out at paragraph 21(d) of our submissions, including in some cases sub groups and departments within those bodies. More detail on this process is provided in the Home Secretary's submissions at paragraphs 10 to 15. We then made a formal request for stage 1 inspection of all of these documents, so that we could conduct	2 3 4 5 6 7 8 9 10 11	progressing this further disclosure, as the Home Secretary's submissions recognise at paragraphs 18 to 19. The Home Secretary's team has also been asked to consider the obvious and fundamental questions that will need to be addressed concerning PII and how this material will be provided to IPs by way of stage 2 disclosure, given the security sensitivities that have been explained to us. We see from paragraphs 20 to 21 of the Home Secretary's submissions that they are in the
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	<ul> <li>this is a matter referred to at paragraph 11 of the Home Secretary's submissions to make a provisional assessment of relevance. This involved documents emanating from the eight Government departments, set out at paragraph 21(d) of our submissions, including in some cases sub groups and departments within those bodies.</li> <li>More detail on this process is provided in the Home Secretary's submissions at paragraphs 10 to 15.</li> <li>We then made a formal request for stage 1 inspection of all of these documents, so that we could conduct a full relevance review. The Home Secretary was asked to bring all HMG material together in one place to facilitate that and in fact since our written submissions for this hearing were served, that has now been done and the review has commenced and is underway.</li> <li>Formal stage 1 disclosure requests will commence following the hearing, seeking disclosure in tranches on a rolling basis from the relevant Government departments to minimise delay.</li> <li>In a parallel to this exercise of reviewing key and core documents provided by HMG, the ILT expects the Home</li> </ul>	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	progressing this further disclosure, as the Home Secretary's submissions recognise at paragraphs 18 to 19. The Home Secretary's team has also been asked to consider the obvious and fundamental questions that will need to be addressed concerning PII and how this material will be provided to IPs by way of stage 2 disclosure, given the security sensitivities that have been explained to us. We see from paragraphs 20 to 21 of the Home Secretary's submissions that they are in the process of finalising draft proposals for protocols of gisting to further this request. Turning briefly to disclosure as far as it relates to the police team, or teams, and in particular what you will have seen referred to as Operation Verbasco. Operation Verbasco is described as the Counter Terrorism Policing response to this inquest. It currently compromises officers from the Metropolitan Police Counter Terrorism Counter Metropolitan Police
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10 (Pages 37 to 40)

1	terms of structure for an inquest and compromises 35	1	the following comments.
2	staff members who are dedicated to working on these	2	First, ILT's expectation is that all potentially
3	proceedings. That is paragraph 3 of the Verbasco	3	relevant documents will be provided to us, unredacted
4	submissions. We are grateful for the work undertaken by	4	for a stage 1 relevance review, irrespective of the
5	Operation Verbasco to install this infrastructure and	5	outcome of the HMG disclosure team's security
6	for its indication that now this has occurred, the pace	6	sensitivity review. We appreciate that the security
7	at which disclosure can take place will increase.	7	sensitivities may be such that particular arrangements
8	My Lady, we understand that the other police force	8	will be necessary for this to take place.
9	involved in these proceedings, Wiltshire Police, may	9	Second, the ILT notes that Operation Verbasco has
10	either join Operation Verbasco or at least ally its	10	not been able to provide a realistic overall timetable
11	processes with the processes that Operation Verbasco is	11	for completion of stage 1 and stage 2 disclosure of its
12	adopting and any measure of this nature would certainly	12	material, in particular because it is dependent on the
13	streamline our processes still further and is therefore	13	availability of the HMG disclosure team. We invite
14	a step that, with respect, we encourage.	14	Operation Verbasco to create targets for these reviews
15	Further to paragraph 10 of the Verbasco submissions,	15	and an overall target timetable for disclosure
16	Operation Verbasco has now provided approximately 800	16	processes. We will continue to liaise with Operation
17	witness statements for preliminary inspection. Your	17	Verbasco and with the HMG team in pursuit of this aim,
18	team are awaiting provision of the exhibits for the same	18	as well as in relation to Operation Verbasco's security
19	purpose. A significant proportion of these statements	19	review processes for police material held by other
20	are continuity statements rather than first-hand	20	interested persons.
21	accounts of the poisonings.	21	Third, although we don't have at this stage
22	Operation Verbasco has set out at paragraph 6 of its	22	an overall timetable, we have indicated that the inquest
23	submissions the broad process that it proposes to	23	team is likely to require on average two weeks from the
24	undertake to facilitate disclosure. We respectfully	24	date of receipt of stage 1 disclosure to review and
25	agree the appropriateness of this process, subject to	25	confirm documents required for stage 2 disclosure, and
	Page 41		Page 42
1	that this process will take place on	1	Polativity. We appear it to be provided to IDe in
1	that this process will take place on	1	Relativity. We expect it to be provided to IPs in
2	a tranche-by-tranche rolling basis. We are grateful for	2	advance of the next hearing, once the security reviews
2 3	a tranche-by-tranche rolling basis. We are grateful for the indication that Verbasco anticipates a four-week	2 3	advance of the next hearing, once the security reviews that have been requested have taken place and also the
2 3 4	a tranche-by-tranche rolling basis. We are grateful for the indication that Verbasco anticipates a four-week final review for each tranche of documents, also on	2 3 4	advance of the next hearing, once the security reviews that have been requested have taken place and also the material providers have confirmed whether any
2 3 4 5	a tranche-by-tranche rolling basis. We are grateful for the indication that Verbasco anticipates a four-week final review for each tranche of documents, also on a rolling basis, once documents have been identified as	2 3 4 5	advance of the next hearing, once the security reviews that have been requested have taken place and also the material providers have confirmed whether any applications for anonymity or ciphering or any other
2 3 4 5 6	a tranche-by-tranche rolling basis. We are grateful for the indication that Verbasco anticipates a four-week final review for each tranche of documents, also on a rolling basis, once documents have been identified as relevant for stage 2 disclosure and subject to the HMG	2 3 4 5 6	advance of the next hearing, once the security reviews that have been requested have taken place and also the material providers have confirmed whether any applications for anonymity or ciphering or any other redactions will be made.
2 3 4 5 6 7	a tranche-by-tranche rolling basis. We are grateful for the indication that Verbasco anticipates a four-week final review for each tranche of documents, also on a rolling basis, once documents have been identified as relevant for stage 2 disclosure and subject to the HMG disclosure review.	2 3 4 5 6 7	advance of the next hearing, once the security reviews that have been requested have taken place and also the material providers have confirmed whether any applications for anonymity or ciphering or any other redactions will be made. As we indicated, and as I have said, we anticipate
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24	a tranche-by-tranche rolling basis. We are grateful for the indication that Verbasco anticipates a four-week final review for each tranche of documents, also on a rolling basis, once documents have been identified as relevant for stage 2 disclosure and subject to the HMG disclosure review. Operation Verbasco has explained this is paragraphs 9 and 10 of their written submissions that it anticipates that by the next PIR in December its initial review and categorisation of material should be well advanced. We will of course monitor this progression and seek regular updates. My Lady, just finally on disclosure and briefly relating to stage 1 disclosure as it relates to other material providers, six other organisations have responded to our disclosure requests and providing limited stage 1 disclosure, this is a matter we describe at paragraph 22 of our written submissions. The organisations involved are: the Wiltshire air ambulance, Salisbury NHS Foundation Trust; Birnberg Peirce, who act for the family; CPS, who have provided a nil return at present; the South West Ambulance	$ \begin{array}{c} 2\\3\\4\\5\\6\\7\\8\\9\\10\\11\\12\\13\\14\\15\\16\\17\\18\\19\\20\\21\\22\\23\end{array} $	advance of the next hearing, once the security reviews that have been requested have taken place and also the material providers have confirmed whether any applications for anonymity or ciphering or any other redactions will be made. As we indicated, and as I have said, we anticipate that IPs will start to receive stage 2 disclosure in the next few months. However, and I think as is also clear from what I have said, given the security sensitivities, it is unrealistic to expect disclosure to be anything like nearing completion by Christmas. With that in mind, we have suggested, my Lady, that you schedule a further pre-inquest review in December to monitor disclosure and maintain progress. We have noted in our submissions that a request by the coroner for conversion to an inquiry may well impact upon disclosure. You have now made that request and that issue therefore of course will be kept under close review. My Lady, you will perhaps see now why I started this section of my submissions with some headline points. It is very difficult to capture, even in summary form, orally the very many different strands of work that are
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11 (Pages 41 to 44)

1     gest number of parties with whom your term are dealing.     1     My Lady, I have listanced very carcfully obviously to the observations that are being made. Perhaps it would assist first of all no achowolds gover awore and also assis first of all no achowolds gover awore and also assist first of all no achowolds gover awore and also assist first of all no achowolds gover awore and also assist first of all no achowolds gover awore and also assist first of all no achowolds gover awore and also assist first of all no achowolds gover awore and also assist first of all no achowolds gover awore and also assist first of all no achowolds gover awore and also assist first of all no achowolds gover awore and also assist first of all no achowolds gover and balant and we way make hope that the position as a work of the abend for an arbot more confident programs as to be path abad.     6       10     and that much charer in barres of the position are achieved by a process in which mitican laccurity is filling that is an envel of discussions as to be path abad.     6       11     concerned. My COCOME - Aft is the confidentiality undertakings are concerned. My OCOMON: My Lady, we did refer to that mater in our that as persons and we in periodic reference to the first the were some containing modernikings.     1       16     Time (CORONE: My Lady, we did refer to that reference to the first of discussions in the last in the serve some containing undernikings.     1       17     High CORONE: My Lady, we did refer to that reference to the first of the abard.     10     math and bard as a sing of the abard in the serve some and abard abard abard as a sing of the abard in the serve some and abard aba				
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25 attacks well, it was described since the Second 25 decides at least within a month, but the first, as it				
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13 (Pages 49 to 52)

1	were, seedlings and saplings of disclosure occur again	1	MS MCGAHEY: My Lady, that will certainly be relayed to the
2	within the next month, please, if that can be done, so	2	Home Secretary and those advising her.
3	that once there is a target date and a framework of	3	THE CORONER: Thank you.
4	urgency, and it is hopefully not just lip service, then	4	As far as disclosure is concerned, the picture one
5	that I think the family will have their own worries and	5	gets from Mr O'Connor is, after not a sluggish start but
6	concerns and anxieties allayed for that reason.	6	after a slowish start that things are now gathering
7	My Lady, I don't know whether there is any other	7	pace. How can you reassure me and the inquest team, the
8	matter I can assist on?	8	family, Mr Rowley, how can you assure us that the
9	THE CORONER: No, you have been very helpful, Mr Mansfield.	9	disclosure process will be now gathering apace?
10	Thank you very much.	10	MS MCGAHEY: Your Ladyship is aware of the way in which it
11	Ms McGahey, a number of issues raised by	11	was started and your Ladyship and counsel to the inquiry
12	Mr Mansfield there.	12	have also acknowledged the immense sensitivity of some
13	Perhaps the first one going back to the first	13	of this material and that sensitivity alone was a reason
14	decision I made about asking the Secretary of State to	14	for steps being taken with great caution at the outset
15	convert this inquest into an inquiry. Can I urge you,	15	and indeed it was part of the recent decision being
16	because I see force in what Mr Mansfield is saying, to	16	taken that we would start with overarching reports and
17	press upon those advising the Secretary of State for the	17	move outwards in response to inquiry requests.
18	Home Department that really, the parties would like to	18	That process is now happening and the more we do it,
19	know in ample time before the next hearing what the	19	the easier it becomes, the more familiar people become
20	decision is. The Secretary of State and those advising	20	with the process and therefore the more efficient it
21	her have known for some time that this was likely to	21	becomes, which is happening. We are also grateful for
22	come, so I assume the machinery is in place. So	22	indications from the inquiry team as to the areas of
23	although, like Mr Mansfield, as I said earlier, I do	23	interest that they have, because of the difficulty, both
24	understand the difficulties, the earlier that decision	24	of volume and sensitivity, it helps enormously if we
25	can be made the better.	25	have a certain amount of direction, if the inquiry team
	Page 53		Page 54
	1 age 55		1 age 34
1	can say, we have looked at the report on X, and we think	1	difficult to be specific, but the very nature of the
2	that is enough, we don't, we think it is going to areas	2	work done and the investigation following the Novichok
3	that are likely to be outside scope, but we have also	3	attack was that it involved a very large number of
4	looked at Y, and we think for Y we would like the	4	agencies, departments, individuals.
5	underlying documents. That process is now underway. So	5	THE CORONER: Many of whom will have similar expertise.
6	it is becoming more focused and more efficient. It will	6	I am just concerned that if every single one of these
7	still, my Lady, be very time consuming.	7	bodies, with their different set of experts and
8	THE CORONER: Given the number of bodies involved, what	8	specialists, have to look at the same document, I could
9	worries me at the moment is there is a sense of one body	9	see how this process could go on forever. What I am
10	marking another body's homework, in other words	10	concerned with, as are the family, is that we should get
11	a duplication, triplication, whatever the words are,	11	on with this investigation, it is only fair to them, and
12	a number of bodies looking at the same material. Is	12	it is only fair to the public.
13	that a possibility that could happen and therefore delay	13	I just wonder if somebody could look at whether it
14	the disclosure process?	14	is necessary for lots of people with similar expertise
15	MS MCGAHEY: My Lady, it is not a question of marking each	15	and skills, all to be looking at the same document.
16	other's homework. It is a question of a number of	16	MS MCGAHEY: My Lady, it is absolutely not the case when we
	1 I		
17	agencies, departments or even individuals or experts who	17	have documents X, we say right, we have 12 Government
17 18	*	18	have documents X, we say right, we have 12 Government clients here, everyone should look at it, there will be
	agencies, departments or even individuals or experts who		
18	agencies, departments or even individuals or experts who have an interest or knowledge in a document or	18	clients here, everyone should look at it, there will be
18 19 20 21	agencies, departments or even individuals or experts who have an interest or knowledge in a document or a subject, all looking at that material from a different point of view. So agency or department A may say, "We know about paragraphs 1 to 6, and we have concerns about	18 19 20 21	clients here, everyone should look at it, there will be a great deal of material, for example, emanating from DSTL that Defra do not need to look at again, I am using completely made-up examples from the top of my
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Pre Inquest Hearing into the Death of Dawn Sturgess

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1	piece of information, a particular area, do have input	1	true of every inquiry and probably investigation and
2	into it. Because, as my learned friend Mr O'Connor said	2	inquest of this sort of scale and probably more so in
3	at the outset, it is so important that we do not	3	this, one would always want more resources.
4	disclose into the public domain something that might	4	THE CORONER: I know. I know, everything comes down to
5	make an attack more likely or a response to such	5	a question of resources, but when someone has died
6	an attack less effective, and we have to get that right.	6	tragically, as Dawn Sturgess did, and when so many
7	THE CORONER: I am very grateful to the various police	7	people were put at risk, I agree with Mr Mansfield,
8	services who set up Operation Verbasco, which seems to	8	there is a degree of urgency that people need answers
9	me to be an excellent idea and I appreciate will involve	9	not just the bereaved family but the public too.
10	considerable resources. I assume that the Government	10	I do understand the problems and I am pressing you
11	Legal Departments have made sure that they have	11	because I want everyone to know that I will be watching
12	a sufficiently strong team to direct all this material	12	very carefully and if my legal team advise me that they
13	that is coming from sources other than the police	13	think there is any area for whereby matters could be
14	services involved?	14	refined so that things don't take as long, then I will
15	Operation Verbasco, as I understand it, is a team of	15	be holding another public hearing and holding to account
16	35 or so officers and staff dedicated to this process.	16	those who are not assisting. As I say, at the moment
17	Is a similar thing going on within the Government area?	17	I get the impression that things having started are now
18	MS MCGAHEY: My Lady, I can say that there are taskforces or	18	gathering apace, but I just want everyone to know I am
19	working groups or whatever they may be with a focus on	19	going to be keeping the pressure on.
20	this disclosure work, yes.	20	MS MCGAHEY: I understand that, my Lady. My Lady, there has
21	THE CORONER: Right.	21	been excellent operation cooperation between the inquiry
22	I might at some stage ask you whether they are	22	legal team and the Government Legal Department with
23	sufficiently large and well resourced but I will leave	23	a view to focusing disclosure efforts and meetings are
24	it there for the time being, Ms McGahey.	24	planned in the future and as we said in our written
25	MS MCGAHEY: My Lady, in an exercise of this sort, it is	25	submissions, the plan is that there should be bespoke
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1	arrangements for each department, so that we don't go to	1	As far as timetabling is concerned, Mr O'Connor in
2	everybody and say:	2	his submissions suggested that I appreciate you are
3	"Please, will you put the word 'Skripal' or	3	acting on instructions the timetable it is not
4	'Dawn Sturgess' into a search engine and see what you	4	going to be easy to get hearings on before the end of
5	get."	5	next year, I know that, which will come as
6	Which would take forever and be useless.	6	a disappointment, I am sure to the family and for all
7	We are very alive to the need to progress as quickly	7	concerned, but you did rather issue a dire warning that
8	as possible.	8	it could take three years for disclosure. Do you think
9	I am instructed that, regrettably, the idea of	9	that with a fair wind and pressure from all those
10	having a decision within a month on whether there should	10	involved that we can be looking at hearings at the end
11	be a public inquiry is unrealistic but	11	of next year, maybe beginning of 2023?
12	THE CORONER: Two months?	12	MS MCGAHEY: I thought, my Lady, we said two years.
13	MS MCGAHEY: I don't know, my Lady. I am afraid.	13	THE CORONER: I thought you did too, but Mr O'Connor said
14	THE CORONER: If it were within two months, it would mean	14	three.
15	that all parties would have the decision in ample time	15	MS MCGAHEY: On this side we thought it was two.
16	before the next hearing, which would be very helpful.	16	THE CORONER: Are you going to confess an error,
17	MS MCGAHEY: I understand that, completely, my Lady, but	17	Mr O'Connor, or do you remember three?
18	however long it takes, the disclosure work will continue	18	MR O'CONNOR: My Lady, I am sorry, I had remembered it being
19	and that will be necessary and will not actually change	19	three, but it seems I am in the minority on that.
20	in practical terms in the early stages, whenever that	20	THE CORONER: I do remember taking you up on it, Ms McGahey,
21	decision is made.	21	at the time that I thought whatever you said was long
22	In terms of getting disclosure out to the families,	22	anyway, as far as I am concerned, I can see how it can
23	the work to achieve that will continue at exactly the	23	take until the end of next year/the beginning of 2023,
24	same rate.	24	but I am anxious that we do not start thinking beyond
25	THE CORONER: Right.	25	that, I really am. There is a huge amount of material,
1		1	
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		1	
1	but we have all done cases involving a huge amount of	1	his deputy last week.
2	material before, huge sensitivities I do understand, but	2	I think Mr Mansfield was talking about possible
3	if we can be working towards that kind of timetable,	3	timetables, I appreciate it is very difficult, can you
4	unless you are going to tell me that you think that is	4	say anything to offer the family any consolation about
5	impossible, in which case I would like to know now and	5	timetabling of disclosure?
6	if so why.	6	MS GIOVANNETTI: The only thing I can add, further to what
7	MS MCGAHEY: My Lady, I have no instructions to suggest it	7	Ms McGahey has already said, I am grateful to my Lady
8	is impossible. I think if I sought them, I would get	8	for her acknowledgment that Operation Verbasco is,
9	the answer we really don't know, because disclosure is	9	I don't want to use an overused word, "unprecedented",
10	at an early stage but I think on this side we have been	10	which it is. I hope it is apparent to the family and to
11	working towards the idea of hearings in 2023, not with	11	my Lady that, it is being taken really seriously here,
12	a timetable in mind but with the knowledge that the	12	that resources are being devoted to this and we are very
13	inquiry legal team had hoped for the end of 2022, but we	13	grateful to the inquiry legal team for their assistance
14	are seeing that as possibly ambitious. I am afraid	14	and the really good liaison that there has been. We are
15	I really cannot give any indication, I am sorry.	15	also liaising with Wiltshire to see what support we can
16	THE CORONER: Again, a marker that I will be keeping	16	provide to them. We hope to be in a position to provide
17	pressure on.	17	something more concrete before the next hearing, but
18	Right, anything else from you on the issue of	18	things are gathering pace and moving forward, we think,
19	disclosure Ms McGahey?	19	very productively.
20	MS MCGAHEY: No, thank you, my Lady.	20	THE CORONER: Mr O'Connor mentioned the possibility of
21	THE CORONER: Who is going next? It is Ms Giovannetti,	21	Wiltshire joining in as well. It does make sense if all
22	I think may I offer my thanks, I have already	22	police forces are joined together. Especially as
23	expressed my gratitude, for the setting up of the	23	Wiltshire do not have anywhere near the resources that
24	setting up of Operation Verbasco and my being kept in	24	the Metropolitan Police do.
25	the loop as I was by two of the senior officer and the	25	MS GIOVANNETTI: Our team has been liaising very closing and
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1	that will continue and we are going to do our best to	1	me you are going to tell us again it is not worth the
2	ensure the most effective processes are applied across	2	trouble to hear and see you.
3	the board to the police teams.	3	MR BEER: No, I am going to add a little bit more to that
4	THE CORONER: Right. Thank you.	4	which I said earlier. We respectfully agree with what
5	Mr Beggs, as I am on the issue of Wiltshire, it does	5	your counsel said in their submissions in paragraph 3,
6	sound an excellent idea to have this team dedicated to	6	namely:
7	assisting the inquest. A couple of people have now said	7	"It has become apparent that the special
8	"inquiry", it is almost as if they are leaping ahead.	8	sensitivities of the case will require an unusually
9	Ms McGahey talked about an inquiry, as did	9	complicated and therefore time-consuming process for
10	Ms Giovannetti, so I am going to have to try and stick	10	both stage 1 and stage 2 disclosure."
11	with "inquest".	11	We respectfully agree with that, notwithstanding
12	Are you content that things are proceeding apace?	12	that which others have said, the special sensitivities
13	MR BEGGS: My Lady, yes, the team that Wiltshire have put	13	of the case do require that process for stage 1 and
14	together is certainly not as big as Operation Verbasco,	14	stage 2 of disclosure.
15	but in short order it will soon be in double figures,	15	As Mr O'Connor has explained, jointly with the
16	which is substantial for Wiltshire. Of course we see	16	Metropolitan Police, Thames Valley Police promptly
17	the benefits of aligning ourselves to any more efficient	17	formed a team to ensure a streamlined and joined-up
18	and better-resourced processes that Verbasco may offer.	18	approach by each organisation. That is so that the
19	I hope that, certainly by the next hearing, we will have	19	inquest team has to deal with only one team to ensure
	1 , , , , , ,	20	that a clear, well understood and dependable process is
	made very substantial stage 1 disclosure to your team	1 1	
20	made very substantial stage 1 disclosure to your team. THE CORONER: Thank you very much.	21	undertaken and to ensure that decisions are taken as
20 21	THE CORONER: Thank you very much.	21 22	undertaken and to ensure that decisions are taken as promptly as possible, leading hopefully to consistent
20 21 22	THE CORONER: Thank you very much. Mr Beer, who is attending remotely.	22	promptly as possible, leading hopefully to consistent
20 21 22 23	THE CORONER: Thank you very much. Mr Beer, who is attending remotely. Are you there, Mr Beer?	22 23	promptly as possible, leading hopefully to consistent substantive decisions on disclosure.
20 21 22	THE CORONER: Thank you very much. Mr Beer, who is attending remotely. Are you there, Mr Beer? MR BEER: Yes, I am here, can you see and hear me?	22	promptly as possible, leading hopefully to consistent
20 21 22 23 24	<ul><li>THE CORONER: Thank you very much.</li><li>Mr Beer, who is attending remotely.</li><li>Are you there, Mr Beer?</li><li>MR BEER: Yes, I am here, can you see and hear me?</li><li>THE CORONER: I can hear you but not see you, but don't tell</li></ul>	22 23 24	promptly as possible, leading hopefully to consistent substantive decisions on disclosure. Reflecting that, the unusual and exceptional step of
20 21 22 23 24	THE CORONER: Thank you very much. Mr Beer, who is attending remotely. Are you there, Mr Beer? MR BEER: Yes, I am here, can you see and hear me?	22 23 24	promptly as possible, leading hopefully to consistent substantive decisions on disclosure. Reflecting that, the unusual and exceptional step of

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1	police staff has been undertaken to respond to the	1	council is intending to consult in the first instance
2	unusual circumstances of this inquest.	2	with Wiltshire Police before providing those documents
3	I think everything else that we wish to say jointly	3	to the inquest legal team in due course.
4	as to the process that is being undertaken is set out in	4	We had said in our written submissions that we
5	our joint written submissions with the Met, which appear	5	expected to conclude provision of documents within
6	in tab 10 of your bundle.	6	around two months and we are continuing to work on that
7	THE CORONER: Thank you very much, Mr Beer.	7	basis, my Lady.
8	Ms Dolan told me not to invite submissions from her.	8	THE CORONER: Mr Bethell, I'm just a bit concerned about the
9	Mr Bethell for Wiltshire Council, attending	9	delay inherent in the council then consulting Wiltshire
10	remotely, anything you wish to add?	10	Police and Wiltshire Police possibly are not working
11	MR BETHELL: My Lady, if you can see and hear me, I can give	11	with other police forces.
12	you a very brief update, if it is at all helpful, as to	12	If material is relevant to this investigation, then
13	where we were at the time of our written submissions.	13	what is the objection to showing it to the inquest legal
14	THE CORONER: Yes.	14	team, all of whom have the appropriate security
15	MR BETHELL: As Mr O'Connor mentioned, we have already	15	clearances, in secure arrangements if necessary? I am
16	provided some documents to your legal team. Those	16	not quite understanding why highly material would not be
17	include many of the most substantial and obviously	17	shown to the team, albeit subject to security
18	relevant of the council's documents. Work is ongoing on	18	provisions.
19	the other material that the council holds to identify	19	MR BETHELL: My Lady, that is entirely understood, I think
20	further potentially relevant material.	20	that may reflect what our understanding had been of how
21	The council is naturally taking a cautious approach	21	Verbasco disclosure would take place, and Mr O'Connor
22	to any potentially sensitive material that may be	22	referred to that briefly in his submissions. We will
23	contained in the council's disclosure. A small number	23	obviously be guided by the tribunal's direction on that.
24	of documents have so far been identified that it is	24	It is not suggested at all that we would withhold
25	thought may engage national security concerns and the	25	material from the inquiry, it was simply the suggestion
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1	that in terms of the sequence of when material was	1	THE CORONER: I haven't yet directed there will be the
2	provided, we would like to be clear in our own minds as	2	hearing on 17 December.
3	to the extent of any security concerns that might arise	3	MR O'CONNOR: That is one of the matters I was going to come
4	from documents that the council holds.	4	to.
5	THE CORONER: I understand.	5	There are three matters left on the agenda, scope,
6	You will of course have noted, I think Mr O'Connor	6	the next hearing and questions of venue and timing of
7	in his submissions commented, about how the inquest team	7	the substantive hearings.
8	would like to see the material in unredacted form, but	8	To some extent we have nibbled at all of those
9	I do appreciate that assessing the security implications	9	already, they are short issues so I was going to take
10	is obviously important, because apart from anything	10	them together now and then invite you to hear any
11	else, it affects how you make arrangements for	11	submissions that anyone has about any of those matters,
12	disclosure. I do understand that but I just don't want	12	that they have not already made, after that.
13	any inbuilt delay, but thank you anyway, Mr Bethell,	13	My Lady, taking those matters in turn.
14	that is very helpful.	14	As far as scope is concerned, you made it clear at
15	Is that all on disclosure, Mr O'Connor, or is there	15	the last hearing that the rulings you gave on scope were
16	anything else anybody else wanted to add on disclosure?	16	provisional and that there would be an opportunity for
17		1 17	interested persons to make further submissions, both as
17	MR O'CONNOR: My Lady, I think that is then the end of that	17	*
17	MR O'CONNOR: My Lady, I think that is then the end of that topic. There are no directions we invite you to give,	18	to issues they contend should be included and as to
			to issues they contend should be included and as to issues that they might suggest should be excluded from
18	topic. There are no directions we invite you to give,	18	-
18 19	topic. There are no directions we invite you to give, I think we have all heard what you have to say and we	18 19	issues that they might suggest should be excluded from
18 19 20	topic. There are no directions we invite you to give, I think we have all heard what you have to say and we hope that we will have something very much more first	18 19 20	issues that they might suggest should be excluded from scope following stage 2 disclosure. That is a matter
18 19 20 21	topic. There are no directions we invite you to give, I think we have all heard what you have to say and we hope that we will have something very much more first of all that there will be disclosure made between now	18 19 20 21	issues that they might suggest should be excluded from scope following stage 2 disclosure. That is a matter you referred to at the outset of the hearing.
18 19 20 21 22	topic. There are no directions we invite you to give, I think we have all heard what you have to say and we hope that we will have something very much more first of all that there will be disclosure made between now and the next hearing and, secondly, that there will be	18 19 20 21 22	issues that they might suggest should be excluded from scope following stage 2 disclosure. That is a matter you referred to at the outset of the hearing. As we have now said a number of times, stage 2
18 19 20 21 22 23	topic. There are no directions we invite you to give, I think we have all heard what you have to say and we hope that we will have something very much more first of all that there will be disclosure made between now and the next hearing and, secondly, that there will be something much more optimistic or at least complete that	18 19 20 21 22 23	issues that they might suggest should be excluded from scope following stage 2 disclosure. That is a matter you referred to at the outset of the hearing. As we have now said a number of times, stage 2 disclosure has not in fact even started, so it is
18 19 20 21 22 23 24	topic. There are no directions we invite you to give, I think we have all heard what you have to say and we hope that we will have something very much more first of all that there will be disclosure made between now and the next hearing and, secondly, that there will be something much more optimistic or at least complete that we can give you by way of a report at the December	18 19 20 21 22 23 24	issues that they might suggest should be excluded from scope following stage 2 disclosure. That is a matter you referred to at the outset of the hearing. As we have now said a number of times, stage 2 disclosure has not in fact even started, so it is obvious and everyone agrees that it would be premature

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1	is nothing more really to say about that today, other	1	review be held before Christmas. We identified the date
2	than to confirm that it certainly is something that we	2	of Friday, 17 September in our written submissions.
3	will have to come back to and it is something which at	3	Whilst the matter is only three months away, in
4	least touches on the question of the drafting of the	4	light of everything you have heard about disclosure, we
5	terms of reference should there be an inquiry, again	5	submit that, and I think it is clear from others'
6	a matter that has been canvassed before you already.	6	submissions, this is not a matter in dispute, that from
7	THE CORONER: Other than also the remarks I made at the	7	that disclosure point of view coming back to review the
8	beginning about the alleged involvement of Mr Sergeev.	8	progress within that relatively short period will be
9	MR O'CONNOR: Yes, you did make that point.	9	a good thing to attempt to maximise momentum being
10	THE CORONER: Which is plainly highly relevant to scope and	10	maintained in the disclosure process.
11	at the moment there are two Russian nationals identified	11	My Lady, I had intended to come back in this regard
12	and, in my view, if there is material available, which	12	to the question of the inquiry decision, because, as
13	plainly there is, to satisfy the Crown Prosecution	13	Mr Mansfield referred, the three-month period between
14	Service that a warrant should be issued for his arrest,	14	now and the next hearing is the same as the period that
15	then there is sufficient material for me to include him	15	Ms McGahey gave for the inquiry decision.
16	within that scope. I think to make it clear from what	16	My Lady, in short, I would echo Mr Mansfield's
17	I said earlier, that scope is going to include material	17	submission that it would be of great assistance if
18	relating to him.	18	an inquiry decision could be taken by the Home Secretary
19	MR O'CONNOR: Mr Sergeev, yes, my Lady.	19	well in advance of that next hearing.
20	THE CORONER: To that extent we are amending provisional	20	My Lady, it is true, as Ms McGahey said, that this
21	scope.	21	hearing in December was initially conceived as a hearing
22	MR O'CONNOR: Provisional scope, yes.	22	to review the progress of disclosure. She is right when
23	My Lady, moving on to the question of the next	23	she says that what is happening now, in terms of the
24	pre-inquest hearing, which is something that has already	24	disclosure exercise, is broadly similar to the exercise
25	been canvassed. We suggested that a further pre-inquest	25	that would be happening for an inquiry. So within that
20		25	and would be happening for an inquiry. So whill that
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1	parameter the inquiry decision is not directly in play,		necessarily talking about the decision being taken
2	and so we could have a hearing in December that did what	2	within one month and two months to do that work, but at
3	we intended to do about disclosure, whatever happens	3	least a few weeks would be needed. If the situation does arise that the decision ultimately is only taken at
4 5	with the inquiry decision.	5	
-	But it doesn't, in my respectful submission, follow that the inquiry decision can therefore take whatever	6	very much the same time as the hearing and therefore the full three months is used, that will mean even if the
6 7	time it takes without any impact on the overall	7	disclosure process is not greatly affected, other things
8	•	8	that follow from that decision will then have to take
8 9	timetable of these proceedings.	9	longer. We will then have to come back to them in the
	My Lady, as you will be well aware, whatever	10	
10	decision is taken on the request that you have now made	10	new year. To coin a phrase, it would be a missed opportunity
11	for an inquiry, whether the decision is affirmative and	12	
12	an inquiry is to be established or negative, as happened	12	if it weren't possible to address those matters in
13	in the Litvinenko Inquiry, and the Home Secretary says,	13	December. It may well then lead I am going to come to the question of the substantive hearings, that the
14	"No, you have got to carry on as an inquest", whichever	14	knock-on effect of those matters may lead to the
15	of those two decisions is made will have substantial	16	substantive hearing being delayed.
16 17	procedural implications for this process. At least some	17	My Lady, Ms McGahey is right to say that there has
17	of those implications will need to be worked through in	18	
18	court.	19	been a very good working relationship between our team and the Secretary of State's team on this case so far.
19 20	It is therefore highly desirable that this decision	20	We know that the Home Secretary is fully engaged and
20	is taken, not only before the next hearing but in	20	we know that the none secretary is fully engaged and wishes to take a constructive approach to these
21	sufficient time that all of us involved, both your team	21	proceedings. I hope that she will do what she can to
22	and the other IPs, have a chance to understand what the	22	ensure that that decision is made, one way or the other,
23	decision is and in the normal way to formulate	23	in sufficient time before the next hearing, that you can
24 25	submissions/exchange submissions about the procedural	24	use that hearing with all the other IPs to the greatest
25	implications that will arise. We are therefore not	25	ase that nearing with an the other it 5 to the greatest
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1	effect and therefore speed up the process just that	1	solicitors to the inquest have made enquiries regarding
2	little bit further, so that we can try and reduce the	2	the availability of suitable accommodation in Salisbury
3	time between now and the substantive hearings, which is	3	so that public hearings of the substantive hearings
4	something that everyone in this room wants to achieve.	4	might be held there.
5	THE CORONER: Mr O'Connor, you and Mr Mansfield have	5	There has been provisional agreement with the city
6	persuaded me that three months is, with respect, too	6	council that the guildhall in the centre of Salisbury
7	long and my written communication to the Secretary of	7	will be made available for the substantive hearings.
8	State will invite a decision to be with my team at the	8	It is likely I should say that some hearings will
9	latest within two months of today's hearing. That would	9	also be held in London and we propose that the question
10	allow four weeks before the next hearing, maybe just	10	of how the hearings are to be split, as it were, between
11	under I can't work out the date. I was trying to	11	Salisbury and London, is something that we should review
12	work them out but I couldn't work them out.	12	when matters are further advanced.
13	I think it is entirely right that if we are going	13	THE CORONER: I am very anxious, as you know Mr O'Connor,
14	to I mean, presumably, if the Secretary of State	14	that we hold at least some hearings in Salisbury.
15	refused my request, there is the possibility of other	15	I think it is very important to the residents of
16	legal proceedings which would all involve delay, so we	16	Wiltshire that they understand that they and the family
17	really do have to focus. I am going to urge the	17	of Ms Sturgess and Ms Rowley and the others affected by
18	Secretary of State to give me and my team, and therefore	18	the poisoning are at the heart of this investigation.
19	the other parties, a reply within two months of today.	19	MR O'CONNOR: My Lady, yes.
20	MR O'CONNOR: I am grateful.	20	Finally, the timing of the substantive hearings,
21	My Lady, just then the last agenda item, which is	21	another issue which we have mentioned already, but may
22	the question of the substantive hearings and the venue	22	I simply say that it had been hoped that it would be
23	and timing.	23	possible to hold the substantive hearings towards the
24	As far as the venue is concerned, in accordance with	24	end of next year.
25	directions that you made following the last hearing, the	25	Whether that will be possible remains uncertain. It
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1	depends on a number of factors. One factor, as I have	1	THE CODONED. Conduction McMan-Sold but wells it is
2	said, is the timing of the inquest/inquiry decision and	$\begin{vmatrix} 1\\2 \end{vmatrix}$	THE CORONER: Good point, Mr Mansfield, but really it is whatever best meets the interests of those involved.
3	consequential procedural steps. Another significant	$\begin{vmatrix} 2\\ 3 \end{vmatrix}$	
4	factor, probably the most significant, is of course the	4	We will certainly explore it, thank you for that. Anybody else?
5	disclosure process that we have spent much of this	5	I will ask Mr Smith whether any emails have arrived,
6	morning discussing, including related issues, perhaps	6	if anybody wanted to raise anything?
7	including applications for PII or restriction orders, if	7	In which case, I think that concludes the issues
8	the decision is to establish an inquiry.	8	that we have to deal with today. Thank you very much to
° 9	For today's purposes, we propose simply to say, my	9	everybody for attending and I hope there will come
		10	
10	Lady, that the matter remains uncertain and to invite		a time when we don't have to rely on technology to conduct these hearings, but at least we can get ahead
11	you to revisit the timing of the substantive hearings at	11 12	
12 13	the December hearing where we hope, in light of	12	with the matter and make some progress.
	everything that has been said, matters will be clearer.		Thank you all very much.
14 15	My Lady, that is all I wish to say on those final	14	(12.20 pm) (The beering concluded)
15 16	three agenda items. THE CORONER: Thank you, Mr O'Connor.	15	(The hearing concluded)
	-	16	
17 18	Anything else anybody else wishes to raise. Mr Mansfield?	17 18	
18 19	MR MANSFIELD: My Lady, one very short point. We very	18	
20	grateful for those submissions, which we support.	20	
20	In relation to the hearing and the venues, it may be	20	
		21	
22	my omission, but a procedure that has been used in the		
23 24	past is that if there is a hearing in London, it is relayed to the guildhall, or wherever is available, so	23 24	
24 25	that you have a live feed, that is all.	24	
23	that you have a five feed, that is all.	2.5	
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