

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

<p>1 for the purposes of those who don't have it in front of 2 them. There are five matters. 3 First of all, the issue of inquest or public 4 inquiry. 5 Secondly, disclosure. 6 Thirdly, scope. 7 Fourth, the question of the substantive hearings and 8 in particular the venue and timings of the substantive 9 hearings. 10 Finally, the question of the next pre-inquest 11 review. 12 As at the previous hearing, I propose to introduce 13 each item myself and then no doubt you will wish to hear 14 IPs' submissions. Our submission is that it would be 15 practical for us to take the first two agenda items, 16 that is the question of the public inquiry and 17 disclosure, separately and then to deal with the final 18 three items which are all relatively short together. 19 Just a few practical points, if I may, my Lady, for 20 those counsel who are attending remotely. In order to 21 reduce feedback and facilitate the smooth running of the 22 hearing, all microphones of those on the link will be 23 muted by the court until they are invited to speak. 24 Cameras should also be turned off unless and until 25 an advocate is speaking. Advocates are asked to pause</p> <p style="text-align: center;">Page 5</p>	<p>1 for a moment after they have been called to allow the 2 clerk time to unmute their microphone. They are then 3 invited to identify themselves before speaking for the 4 benefit of the transcriber. 5 If any advocate attending remotely wishes to address 6 the court on any issue upon which they have not been 7 invited to speak, they should send an email to the 8 solicitor to the inquest, Mr Smith, who will facilitate 9 this. They should also take the same course if there 10 are any technical difficulties during the course of the 11 hearing. 12 THE CORONER: Before you go on, Mr O'Connor, when 13 a representative speaking remotely comes on, is it that 14 screen I should look at? I can't really see that one. 15 MR O'CONNOR: My Lady, I am afraid I don't know the answer 16 to that question. I suspect it is going to be that one. 17 THE CORONER: All right, I can turn round. It is all right. 18 MR O'CONNOR: Is that sufficiently visible, my Lady? 19 THE CORONER: I can see sufficiently, yes, thank you. Yes. 20 MR O'CONNOR: My Lady, finally in introduction, one further 21 matter. 22 I mentioned a moment ago that Ms Galland, who acts 23 for NHS England and Improvement, is present in court. 24 As you know, but others will not, since the last 25 hearing, NHS E&I has made a written application for</p> <p style="text-align: center;">Page 6</p>
<p>1 interested person status in these proceedings. You 2 responded to the effect that you were not minded to 3 grant the application but giving Ms Galland and her 4 clients the opportunity to address you and to amplify 5 the application this morning, Ms Galland has told us 6 that she does not wish to make any oral submissions, at 7 least at this stage, and so I invite you formally to 8 dismiss the application. 9 THE CORONER: Ms Galland, thank you for your assistance, 10 I will dismiss the application but, as Mr O'Connor I am 11 sure is very aware, if circumstances change you can of 12 course make another application. Thank you. 13 MR O'CONNOR: My Lady, that was all by way of introduction, 14 so I turn to the first issue on the agenda, which is the 15 question of inquest or inquiry. 16 You will recall, my Lady, that there was debate at 17 the last hearing on 30 March 2021 as to whether you 18 should make a formal request that these proceedings be 19 converted into a public inquiry under the Inquiries Act 20 2005. We raised at that hearing the possible need for 21 an inquiry to be established and we set out in written 22 submissions served prior to that hearing a number of 23 detailed arguments relating to this issue, which I will 24 not repeat now. 25 In summary, we submitted that, if the issue of</p> <p style="text-align: center;">Page 7</p>	<p>1 possible Russian state responsibility for 2 Dawn Sturgess's death was to be included within the 3 scope of the inquest, then, first, it was most unlikely 4 that it would be possible to conduct a full and fair 5 investigation into that issue solely on the basis of 6 evidence that could be heard in public session. 7 Secondly, that there were therefore strong grounds 8 for making an immediate request to the Home Secretary 9 for conversion to an inquiry. 10 The Home Secretary's position at the last hearing, 11 again in summary, was that an immediate request for 12 conversion would be premature. Those acting for the 13 Home Secretary indicated that a set of sensitive 14 overarching reports could be made available for 15 inspection by your team and also by you and that any 16 request for conversion should be deferred until after 17 that inspection had taken place. 18 The Home Secretary's written submissions at the last 19 hearing added: 20 "If it is the case that on sight of certain material 21 the coroner takes the view that it is clearly too 22 sensitive to be shared openly, but also that it is 23 needed for her investigation, at that point the coroner 24 may need to request conversion to an inquiry without 25 first going through all the formal stages required by</p> <p style="text-align: center;">Page 8</p>

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

<p>1 advance of the next pre-inquest hearing -- that is 2 today's hearing. You explained that the purpose of that 3 request was to enable interested persons to make 4 meaningful submissions at the next hearing, and I refer 5 in particular in that regard to paragraphs 4 and 17 of 6 your letter.</p> <p>7 The Home Secretary responded in a brief letter dated 8 16 August 2021. The letter stated materially as 9 follows:</p> <p>10 "With regret, I am unable to provide the provisional 11 indication you seek. As I hope you will understand, it 12 would be inappropriate for me to consider whether or not 13 to establish a public inquiry ahead of any request from 14 you to do so. I can assure you though that I will 15 consider any such request you choose to make with 16 urgency and care."</p> <p>17 A copy of that letter too will be posted on the 18 inquiry website.</p> <p>19 My Lady, as we stated in our written submissions, it 20 is a matter of considerable regret that the Home 21 Secretary has not engaged more constructively with your 22 request. Since you have now reached a clear view as to 23 the need for an inquiry, it would have assisted all 24 involved to know the Home Secretary's provisional view 25 on this issue. We respectfully disagree with the</p> <p style="text-align: center;">Page 13</p>	<p>1 suggestion in the Home Secretary's letter that the 2 request you made to her was in any way inappropriate, or 3 that she was in some way unable to provide a substantive 4 response to it. It is common for decision makers to 5 express a provisional view on a subject before receiving 6 all relevant information. That indeed is what you did 7 here, not having heard IPs' submissions, and that is all 8 that you were asking the Home Secretary to do.</p> <p>9 Indeed, as we have noted in our written submissions, 10 the Home Secretary herself expressed just such 11 a provisional view in the Manchester Arena inquests, 12 where she included in her public interest immunity 13 certificate a voluntary indication that she would be 14 minded to convert the proceedings into an inquiry if 15 asked to do so, an indication that she subsequently 16 repeated orally and in writing through counsel acting on 17 her behalf.</p> <p>18 That indication in those proceedings provided 19 helpful context for submissions on the question of 20 conversion that were then made, and that had been the 21 intention here.</p> <p>22 We note that the written submissions served by the 23 Home Secretary for this hearing do not repeat the 24 suggestion that there was anything inappropriate about 25 your request, or indeed that the Home Secretary was</p> <p style="text-align: center;">Page 14</p>
<p>1 unable to respond to it. The explanation that is now 2 offered is that, in order to provide the provisional 3 view that you had requested, it would have been 4 necessary for the Home Secretary to read for herself the 5 overarching reports that you were shown and also to 6 consult cabinet colleagues.</p> <p>7 It appears that the view was taken in the Home 8 Office in July, when your letter was received, that 9 these tasks were too burdensome, despite the fact that 10 the reports took you only a few hours to read and the 11 Home Office is, of course, well practised at consulting 12 with other Government departments.</p> <p>13 The consequence is that you and other interested 14 persons do not have the benefit today at this hearing of 15 a provisional view on this issue from the Home Secretary 16 and should you decide to request that an inquiry be 17 established we are further behind in the process than we 18 would otherwise have been. As I have said, my Lady, 19 those are matters of regret.</p> <p>20 That said, whilst a provisional view from the Home 21 Secretary would have provided a helpful context for this 22 debate, it is of course still possible for you to 23 resolve the issue today in any event. You will hear 24 from interested persons but we note from their written 25 submissions that in light of the views that you</p> <p style="text-align: center;">Page 15</p>	<p>1 expressed in your July letter, which as I have said, 2 they have of course seen, none are opposed to you making 3 a formal request for conversion to an inquiry and the 4 family positively support you making such a request.</p> <p>5 We also note the welcome undertaking from the Home 6 Secretary in her written submissions that if you do make 7 a formal conversion request she will address it as 8 swiftly as possible.</p> <p>9 Finally on this topic, my Lady, we have referred in 10 our written submissions to the way in which the terms of 11 reference for an inquiry might be formulated. I will 12 say a little more on that issue now and it may also 13 assist you to hear IPs' views on this matter. The point 14 we made in writing is that if an inquiry is to be 15 established now, then the terms of reference should be 16 set broadly. At paragraph 19 of our written submissions 17 we have suggested draft terms of reference that are 18 modelled on the terms of reference in the Litvinenko 19 Inquiry and we are aware that similarly broad terms of 20 reference were set in the Hutton Inquiry and also the 21 Azelle Rodney Inquiry, both of which were of course 22 essentially converted inquests.</p> <p>23 The reason why the terms of reference should be set 24 broadly in this case, we say, is that the inquest 25 proceedings are still at a relatively early stage, in</p> <p style="text-align: center;">Page 16</p>

<p>1 particular you have not yet made any final decisions on 2 scope and we anticipate that there will be further 3 debate about precisely which lines of enquiry you should 4 and perhaps should not pursue following disclosure. 5 Indeed, you have mentioned this morning that in due 6 course you will need to consider the impact of 7 yesterday's developments on the scope of your 8 investigation.</p> <p>9 The inquiry terms of reference would therefore need 10 to be broad in order to allow you to refine the precise 11 lines of enquiry at a future stage. Putting the matter 12 another way, the terms of reference should replicate the 13 broad discretion as to scope that you enjoy as 14 a coroner, precisely because of the early stage that we 15 are at, it would not, we say, be appropriate for the 16 terms of reference to be prescriptive about particular 17 issues or lines of enquiry either being included or 18 excluded from scope.</p> <p>19 My Lady, that is all I propose to say, at least at 20 this stage, on the first item on the agenda, and 21 I invite you to hear submissions from interested 22 persons.</p> <p>23 THE CORONER: Thank you. I will now go round the 24 representatives to invite submissions on whether 25 I should request the Secretary of State to convert the</p> <p style="text-align: center;">Page 17</p>	<p>1 inquest into inquiry and if she were to grant a request, 2 if made, the terms of reference.</p> <p>3 Mr Mansfield.</p> <p>4 MR MANSFIELD: My Lady, my colleague will speak.</p> <p>5 THE CORONER: Thank you very much.</p> <p>6 Mr Straw.</p> <p>7 MR STRAW: Thank you, my Lady.</p> <p>8 For the transcribers' notes I am making submissions 9 on behalf of the family, and by the family I am 10 referring to Ms Sturgess's relatives and also to 11 Mr Rowley.</p> <p>12 The family are grateful for your indication that 13 they should be kept at the heart of this process. They 14 also welcome the indication from the Secretary of State 15 that she will take into account their views on this 16 issue. Their view is that a public inquiry should be 17 established now and we invite you to make that 18 suggestion to the Home Secretary at this stage.</p> <p>19 Although they consider that there may be some advantages 20 to an inquest, for example a jury is a possibility in 21 this sort of case, their overriding concern is to ensure 22 that the truth of how Ms Sturgess died is established.</p> <p>23 You have made it as clear as you can do that there 24 are critical documents, critical information, which is 25 highly relevant to the scope of the inquest but which</p> <p style="text-align: center;">Page 18</p>
<p>1 will have to be excluded from the inquest and therefore 2 the only way that that can be considered is through the 3 means of a public inquiry. For that reason, section 5 4 of the Coroners and Justice Act 2009 would require there 5 to be a public inquiry so that that statutory duty can 6 be fulfilled.</p> <p>7 At least in the past there was some suggestion that 8 this decision should await the conclusion of the PII 9 process. We submit that there is no good reason for 10 this to wait until the end of the PII process. The Home 11 Secretary will know, or will be in a position to know at 12 this stage whether the highly relevant information that 13 you have identified will ultimately have to be excluded 14 from the inquest and therefore whether a public inquiry 15 will ultimately be necessary. Although there is 16 a possibility, a very unlikely possibility, that you 17 will reject any PII applications that are made by the 18 Home Secretary, if that happens, the Home Secretary has 19 a power to ensure that that information is in any event 20 excluded from the inquest. In particular, she can bring 21 about a public inquiry at that stage and use the 22 mechanism of section 19 of the Inquiries Act in order to 23 ensure that the information is excluded. So she will 24 know now whether that information has to be kept 25 private.</p> <p style="text-align: center;">Page 19</p>	<p>1 On the other hand, there are several important 2 reasons why a delay should be avoided and why the public 3 inquiry decision should be made now. Just to pick four 4 of them.</p> <p>5 The first is that further delay is likely to cause 6 further anguish to the family. If the public inquiry is 7 established now, your counsel has indicated that the 8 most optimistic estimate is that the public hearings in 9 this case will begin at the end of next year, 2022. If 10 a decision on a public inquiry is delayed until the end 11 of the PII process, then it is likely that that will 12 build in perhaps another year of delay. That will mean 13 the public hearings will not begin until five and a half 14 years after Ms Sturgess died and no family should have 15 to wait five and a half years to hear how their loved 16 one died.</p> <p>17 The second reason is to avoid duplication of work 18 and cost. Just to pick one example, the application 19 process and the basis for granting PII is not identical 20 to the process and basis for orders and restriction 21 notices under section 19 of the Inquiries Act, read 22 together with rule 12 of the inquiry rules. What that 23 means is that if we delay the decision on a public 24 inquiry until after the PII process, it may be necessary 25 to duplicate the process, to do a PII application and</p> <p style="text-align: center;">Page 20</p>

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

6 (Pages 21 to 24)

<p>1 send a letter tomorrow saying, "I have now made my 2 decision and I want a public inquiry", the Home 3 Secretary would not reply saying, "We think we need to 4 go through the PII process first".</p> <p>5 THE CORONER: Thank you, that is what I thought you meant, 6 thank you.</p> <p>7 MS MCGAHEY: The work on disclosure will continue in any 8 event and while my learned friend Mr Straw is absolutely 9 right to say that the PII process, the PII test, is 10 different in some respects from that of the rule 19 11 process for an inquiry, the crucial and the really 12 time-consuming work that has to be done first is 13 identifying the relevant material and identifying the 14 sensitivities and that work is the same and it will 15 continue.</p> <p>16 I am able to say -- as your Ladyship is aware, and 17 as has been clear from everybody's submissions, the 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 is highly likely to do, having heard from my 23 learned friend Mr Straw.</p> <p>24 While the Home Secretary cannot, bearing in mind all 25 the variables and the pressures of Government, give any</p> <p style="text-align: center;">Page 25</p>	<p>1 sort of absolute guarantee as to a timetable, she would 2 very much aim to make a decision by Christmas. Within 3 around three months of the request being made by your 4 Ladyship.</p> <p>5 My Lady, unless I can assist your Ladyship further 6 those are my submissions.</p> <p>7 THE CORONER: No, thank you very much, Ms McGahey. 8 Ms Giovannetti, do you have any comments on the 9 issue?</p> <p>10 MS GIOVANNETTI: Not to make any submissions on the question 11 of the inquest or inquiry, save to say that, for my 12 client's part, in relation to (Inaudible) generally for 13 us, the work on disclosure will continue in any event.</p> <p>14 As for terms of reference and scope, we understand 15 and accept that it is appropriate to give the terms of 16 reference (Inaudible) on the basis that the Secretary of 17 State can review (Inaudible).</p> <p>18 Thank you, my Lady.</p> <p>19 THE CORONER: Thank you very much.</p> <p>20 Mr Beer, you are attending remotely, so we need to 21 get your camera on and your microphone unmuted.</p> <p>22 MR BEER: I have done both of those things. Can you see and 23 hear me?</p> <p>24 THE CORONER: I can see you on the associate's laptop, 25 I don't think we can see you on the main screen but</p> <p style="text-align: center;">Page 26</p>
<p>1 I can see you, Mr Beer, so I am all right.</p> <p>2 MR BEER: Can you hear me?</p> <p>3 THE CORONER: I can.</p> <p>4 There we have you. Thank you.</p> <p>5 MR BEER: Brilliant, thank you very much. In fact it may 6 not have been worth the trouble because I have no 7 submissions on behalf of Thames Valley Police 8 representing Counter Terrorism Policing South East on 9 the issue of whether there should be a public inquiry or 10 this should continue as an inquest, nor indeed as to the 11 terms of reference if this is converted to an inquiry, 12 but thank you very much.</p> <p>13 THE CORONER: Thank you, Mr Beer, it definitely was worth 14 the trouble.</p> <p>15 Right, Mr Beggs?</p> <p>16 MR BEGGS: My Lady, I have no submissions either, thank you.</p> <p>17 THE CORONER: Thank you.</p> <p>18 Ms Dolan?</p> <p>19 MS DOLAN: My Lady, no, I am here to assist the court but, 20 my Lady, as you are aware my client has not put in any 21 written submissions in the (Inaudible) inquest document 22 in respect of all the issues and, if it makes your life 23 any easier, my Lady, you can just pass over me on the 24 other issues as well. If there is anything to say in 25 response I will indicate, but don't waste time asking</p> <p style="text-align: center;">Page 27</p>	<p>1 me.</p> <p>2 THE CORONER: Thank you, Ms Dolan.</p> <p>3 Mr Bethell, you are attending remotely.</p> <p>4 MR BETHELL: My Lady, yes, can you see and hear me?</p> <p>5 THE CORONER: I can see you now, thank you.</p> <p>6 MR BETHELL: My Lady, as with Mr Beer, I have no submissions 7 to make on the conversion to an inquiry or the terms of 8 reference.</p> <p>9 THE CORONER: Thank you very much, Mr Bethell.</p> <p>10 I don't think there is any other party that needs to 11 be invited to make submissions. I am grateful to 12 everyone, even those who had no submissions, because in 13 a sense they are also helpful.</p> <p>14 For all the reasons given by Mr O'Connor, counsel to 15 the inquest, and counsel for the family and Mr Rowley, 16 Mr Straw, and as set out in my letter to the Secretary 17 of State for the Home Department dated 29 July 2021, 18 I have, as I suspect Ms McGahey expected, firmly 19 concluded that I cannot conduct a full, fair and 20 effective investigation into the death of Dawn Sturgess 21 if these proceedings continue as an inquest. I have 22 seen and my team have seen sufficient material of 23 a highly relevant and relevant nature to the 24 investigation that is far too sensitive to be made 25 public, even in gisted form, and I should emphasise that</p> <p style="text-align: center;">Page 28</p>

<p>1 both I and my team are well used to the option of 2 gisting material where it is available. In my view it 3 is not available in this instance. 4 I have no option therefore but to request the 5 Secretary of State to convert this inquest into 6 an inquiry and I invite her to consider and decide on my 7 request as a matter of urgency. I am pleased to hear 8 that Ms McGahey could at least put a timescale on the 9 decision, and I do understand the difficulties in 10 Government and consulting other secretaries of state, 11 but I really do hope that the Secretary of State can 12 respond within the timescale envisaged by Ms McGahey. 13 I am anxious, very anxious, as Mr Straw obviously is 14 on behalf of the family, and I am sure Mr Mansfield, 15 that we do not lose any time at all and that we do not 16 duplicate any precious resources. 17 Should the Secretary of State, having consulted her 18 colleagues and the Prime Minister, grant my request, 19 I am also satisfied that it is essential that the terms 20 of reference are broad and sufficiently broad to reflect 21 the discretion I would have had as a coroner and to 22 ensure a full, fair and effective investigation. As 23 Mr Straw observed, it is far too early to be able to 24 rule out issues from the provisional scope that I have 25 determined.</p> <p style="text-align: center;">Page 29</p>	<p>1 Anything else on that issue, Mr O'Connor? 2 MR O'CONNOR: No. 3 THE CORONER: Thank you. 4 Presumably I need to put that request into writing, 5 Ms McGahey, or is the fact it will be in my order 6 sufficient? 7 MS MCGAHEY: My Lady, I am instructed that it would be 8 helpful if the Secretary of State could receive a formal 9 request in writing from you. 10 THE CORONER: That will be winging its way promptly, so if 11 everyone could be alerted to the fact that it is on its 12 way and the machinery, which I assume has been in motion 13 anyway, can gather apace. 14 MS MCGAHEY: Certainly. 15 THE CORONER: Thank you. 16 Right, Mr O'Connor. 17 MR O'CONNOR: My Lady, I will turn to the second matter on 18 the agenda, which is the question of disclosure. 19 My Lady, the disclosure exercise in this case poses 20 certain very particular challenges. Those challenges, 21 which we understand more clearly now than at the time of 22 the last hearing earlier this year, are addressed at 23 length in the written submissions that you have 24 received. I will address at least the main points 25 orally in a moment and, as I have said, it was with that</p> <p style="text-align: center;">Page 30</p>
<p>1 in mind that we invited you to direct that those written 2 submissions in full should be posted on the website, so 3 that those observing these proceedings can have as full 4 an understanding as possible of the rather detailed 5 difficulties that arise. 6 I will start this introduction, if I may, simply 7 with five headline points. 8 First of all, may I say immediately that we share 9 the desire that has been expressed by Dawn Sturgess's 10 family and Mr Rowley in their submissions to proceed to 11 substantive hearings as quickly as possible in this 12 case. In that context, we wholly understand the 13 concerns that they have expressed about the disclosure 14 exercise, since the speed of that exercise and the time 15 when we can get it done is clearly one of the principal 16 factors, if not the principal factor, that will dictate 17 the timing of the final hearings. 18 The second point, my Lady, and if I may, just 19 putting the matter bluntly, the disclosure process is 20 going to take longer than we had hoped and longer than 21 is normal in large inquests and inquiries of this kind. 22 It has become increasingly clear to us that the special 23 sensitivities of this case, the provenance of many of 24 the documents, the national security issues that they 25 address, will require an unusually complicated and</p> <p style="text-align: center;">Page 31</p>	<p>1 therefore time-consuming process, both for stage 1 of 2 the disclosure exercise, by which we mean the stage at 3 which documents are provided to you and your team, and 4 stage 2, the stage at which documents are provided 5 onwards, relevant documents that is, to interested 6 persons. 7 Third, the disclosure process in an inquiry and 8 an inquest are not the same and for as long as there is 9 any uncertainty as to whether or not the proceedings 10 will be converted there is a risk, as Mr Straw has 11 mentioned, of duplicated effort and wasted work. You 12 have now made a formal request for conversion into 13 an inquiry, and the quicker a decision is made the less 14 disruption there will be to the disclosure exercise. 15 Fourth, in very brief summary, the current position: 16 since the first pre-inquest review on 30 March of this 17 year, that is six months ago, significant effort has 18 been made by your team to galvanise disclosure and real 19 progress is now being made. All involved have been 20 working hard, time has been spent putting arrangements 21 in place and searching for documents and much of that 22 work is now done and we do expect the process to gather 23 pace in the coming months. 24 Stage 1 of the process, as I said, the provision of 25 documents to the inquest team, is well underway.</p> <p style="text-align: center;">Page 32</p>

<p>1 We very much hope that stage 2 of the process, 2 onward disclosure of relevant material to interested 3 persons, will commence before December. The fact that 4 we cannot say any more than that demonstrates the 5 complexities of the process that are involved, which 6 I will detail in a moment.</p> <p>7 The fifth and final point, my Lady, given the 8 uncertainty as to when stage 2 can start, it is perhaps 9 no surprise that we cannot today give any sensible 10 estimate of the time when the entire process will be 11 complete, or even substantially complete. That said, 12 and perhaps by way of reassurance, we are confident that 13 we will be very well inside a three-year estimate 14 suggested at the last hearing by my learned friend 15 Ms McGahey. We very much hope that the position will be 16 clearer by December.</p> <p>17 I hope that those headline points assist in giving 18 at least a general view of where we are with this 19 process and I turn now to the detail.</p> <p>20 I have referred to the particularly complex national 21 security sensitivities which have caused and will 22 continue to cause some delay in the disclosure exercise. 23 Unusually complicated and resource-intensive procedures 24 are required for both stages of the disclosure exercise. 25 The need for these procedures is principally due to two</p> <p style="text-align: center;">Page 33</p>	<p>1 overlapping factors.</p> <p>2 First, the national security context of much of the 3 material.</p> <p>4 Second, the number of police and Government 5 departments and other bodies who are in possession of 6 potentially sensitive material.</p> <p>7 In relation to the national security context, as the 8 Metropolitan Police and Thames Valley Police have 9 explained in their joint submissions, the national 10 security considerations are grave and include threat to 11 life. As HMG have made clear in their submissions, 12 a large amount of the material that they hold arises 13 from the security and intelligence agency investigations 14 into the attack in Salisbury and the death of Dawn 15 Sturgess, covering the full spectrum of security 16 classifications. There are national security concerns 17 about not only this material but that held by the police 18 and others, including documents that may not bear 19 a security marking, and there are concerns that some 20 material could create a risk of future attacks.</p> <p>21 My Lady, I pause to simply emphasise what Mr Straw 22 said about what was said yesterday regarding the risk 23 that was created at the time of the Novichok attack in 24 2018. These submissions about disclosure may appear 25 rather arid, but at the bottom of it all is a concern to</p> <p style="text-align: center;">Page 34</p>
<p>1 do our best that no step is taken in these proceedings 2 that may either make the risk of a further Novichok 3 episode more likely or may reduce the capability of 4 Government agencies effectively responding to any such 5 incident should it take place. That is what it is all 6 about, and when we use this language of "national 7 security considerations", ultimately that is what it is 8 all about.</p> <p>9 My Lady, the second difficulty that I have mentioned 10 is the multiplicity of police and Government bodies 11 which hold relevant material. There are a number of 12 police forces involved and police entities, 13 Counter Terrorism Policing South East, a body for which 14 Thames Valley Police is responsible, also the 15 Metropolitan Police and SO15. I will say a little bit 16 more about Operation Verbasco, which is a combined 17 police effort, in a moment. We are also dealing with 18 Wiltshire Police and then in terms of Government 19 departments and agencies, the Home Office, the Cabinet 20 Office, the Ministry of Defence, Foreign Office, the 21 Department for Health and Social Care, the security and 22 intelligence agencies, to name but a few.</p> <p>23 As the police have explained in their submissions, 24 the investigations also concerned a wide geographical 25 area, not just the deceased, Dawn Sturgess, but other</p> <p style="text-align: center;">Page 35</p>	<p>1 victims of the related Novichok poisonings, Sergei and 2 Yulia Skripal, Charlie Rowley and two police officers.</p> <p>3 My Lady, we explain the challenges in the broadest 4 terms at paragraph 20(c) of our written submissions but, 5 in summary, we have been asked to inspect documents in 6 accordance with protocols and practical arrangements 7 that are far more demanding than their classification 8 would ordinarily require. A substantial number of 9 documents are subject to security review requirements 10 and authorities by a number of often multiple different 11 departments and, sometimes, experts. That is a matter 12 that is referred to at paragraph 8 of the Home 13 Secretary's submissions.</p> <p>14 Many documents must be reviewed not only 15 individually but in the context of other documents. 16 There are further processes and authorities required to 17 security check what is being disclosed on a line-by-line 18 basis. We anticipate that PII, if we remain an inquest, 19 or some form of restriction, will be sought over 20 a significant volume of the material with which we are 21 dealing. There are also likely to be applications for 22 anonymity and ciphering.</p> <p>23 All of these issues apply to a substantial 24 proportion of the documents held both by the police 25 forces and by the HMG, the Government departments, to</p> <p style="text-align: center;">Page 36</p>

<p>1 whom I have referred. They are between them the two 2 most significant document providers in terms of 3 relevance and quantity of material.</p> <p>4 To give you a sense of the volume of material, my 5 Lady, the police have indicated that they have some 6 18,000 electronic documents to be reviewed. That is 7 obviously a very considerable volume of material, my 8 Lady, but I would emphasise that whilst the volume of 9 material is one factor, I hope it is clear from the 10 submissions I have made that it is not in fact the only 11 or even perhaps the main factor which is causing such 12 a prolonged disclosure exercise. It is in fact the need 13 to subject a very large quantity of the documents that 14 we are dealing with to an unusually elaborate process 15 that is really at least as big a factor as simply the 16 volume of documentation.</p> <p>17 As I have already said this morning, then, my Lady, 18 disclosure is not as far advanced as we would have hoped 19 and it has not yet been possible to commence making 20 stage 2 disclosure to IPs. That said, progress has been 21 made and we very much hope that stage 2 disclosure will 22 commence in the coming months.</p> <p>23 In terms of the progress that has been made, my 24 Lady, and I start with the actions of the solicitor to 25 the inquest and your team, as we have set out at</p> <p style="text-align: center;">Page 37</p>	<p>1 paragraph 21(a) of our written submissions, the 2 multiplicity of Government bodies and agencies have 3 received disclosure requests. In addition, we have made 4 disclosure requests to other individuals and 5 organisations, including the investigative agency 6 Bellingcat. A document management platform, Relativity, 7 has been procured and initial coding has been applied 8 for receipt and management of incoming stage 1 9 disclosure. The solicitors to the inquest have liaised 10 with those to whom they have made stage 1 disclosure 11 requests variously and repeatedly through email, 12 telephone and indeed video correspondence and meetings, 13 in order to facilitate and progress disclosure.</p> <p>14 Again, my Lady, I would emphasise I referred earlier 15 to the need to establish protocols and working 16 arrangements. That is a process which has required 17 a large number of meetings, discussions through 18 correspondence, and to a large degree those processes 19 are now in place and we hope that matters will now pick 20 up pace.</p> <p>21 Focusing on disclosure from HMG, as we have 22 explained in the context of the inquest/inquiry issue, 23 your team reviewed a selection of very sensitive 24 overarching reports in order to progress resolution of 25 that issue. In addition to that, the ILT undertook</p> <p style="text-align: center;">Page 38</p>
<p>1 a preliminary inspection of key core HMG documents -- 2 this is a matter referred to at paragraph 11 of the Home 3 Secretary's submissions -- to make a provisional 4 assessment of relevance. This involved documents 5 emanating from the eight Government departments, set out 6 at paragraph 21(d) of our submissions, including in some 7 cases sub groups and departments within those bodies.</p> <p>8 More detail on this process is provided in the Home 9 Secretary's submissions at paragraphs 10 to 15.</p> <p>10 We then made a formal request for stage 1 inspection 11 of all of these documents, so that we could conduct 12 a full relevance review. The Home Secretary was asked 13 to bring all HMG material together in one place to 14 facilitate that and in fact since our written 15 submissions for this hearing were served, that has now 16 been done and the review has commenced and is underway.</p> <p>17 Formal stage 1 disclosure requests will commence 18 following the hearing, seeking disclosure in tranches on 19 a rolling basis from the relevant Government departments 20 to minimise delay.</p> <p>21 In a parallel to this exercise of reviewing key and 22 core documents provided by HMG, the ILT expects the Home 23 Secretary's team to continue to provide tranches of any 24 potentially relevant documents identified through its 25 initial scoping exercise and we intend to continue to</p> <p style="text-align: center;">Page 39</p>	<p>1 liaise with the Government Legal Department to assist in 2 progressing this further disclosure, as the Home 3 Secretary's submissions recognise at paragraphs 18 to 4 19.</p> <p>5 The Home Secretary's team has also been asked to 6 consider the obvious and fundamental questions that will 7 need to be addressed concerning PII and how this 8 material will be provided to IPs by way of stage 2 9 disclosure, given the security sensitivities that have 10 been explained to us. We see from paragraphs 20 to 21 11 of the Home Secretary's submissions that they are in the 12 process of finalising draft proposals for protocols of 13 gisting to further this request.</p> <p>14 Turning briefly to disclosure as far as it relates 15 to the police team, or teams, and in particular what you 16 will have seen referred to as Operation Verbasco. 17 Operation Verbasco is described as the Counter Terrorism 18 Policing response to this inquest. It currently 19 comprises officers from the Metropolitan Police 20 Counter Terrorism command, known as SO15, and also from 21 Counter Terrorism Policing South East, an organisation 22 for which Thames Valley Police bears responsibility. 23 You have received, my Lady, submissions served jointly 24 on behalf of those two organisations. They indicate 25 that the Operation Verbasco team is unprecedented in</p> <p style="text-align: center;">Page 40</p>

<p>1 terms of structure for an inquest and compromises 35 2 staff members who are dedicated to working on these 3 proceedings. That is paragraph 3 of the Verbasco 4 submissions. We are grateful for the work undertaken by 5 Operation Verbasco to install this infrastructure and 6 for its indication that now this has occurred, the pace 7 at which disclosure can take place will increase. 8 My Lady, we understand that the other police force 9 involved in these proceedings, Wiltshire Police, may 10 either join Operation Verbasco or at least ally its 11 processes with the processes that Operation Verbasco is 12 adopting and any measure of this nature would certainly 13 streamline our processes still further and is therefore 14 a step that, with respect, we encourage. 15 Further to paragraph 10 of the Verbasco submissions, 16 Operation Verbasco has now provided approximately 800 17 witness statements for preliminary inspection. Your 18 team are awaiting provision of the exhibits for the same 19 purpose. A significant proportion of these statements 20 are continuity statements rather than first-hand 21 accounts of the poisonings. 22 Operation Verbasco has set out at paragraph 6 of its 23 submissions the broad process that it proposes to 24 undertake to facilitate disclosure. We respectfully 25 agree the appropriateness of this process, subject to</p> <p style="text-align: center;">Page 41</p>	<p>1 the following comments. 2 First, ILT's expectation is that all potentially 3 relevant documents will be provided to us, unredacted 4 for a stage 1 relevance review, irrespective of the 5 outcome of the HMG disclosure team's security 6 sensitivity review. We appreciate that the security 7 sensitivities may be such that particular arrangements 8 will be necessary for this to take place. 9 Second, the ILT notes that Operation Verbasco has 10 not been able to provide a realistic overall timetable 11 for completion of stage 1 and stage 2 disclosure of its 12 material, in particular because it is dependent on the 13 availability of the HMG disclosure team. We invite 14 Operation Verbasco to create targets for these reviews 15 and an overall target timetable for disclosure 16 processes. We will continue to liaise with Operation 17 Verbasco and with the HMG team in pursuit of this aim, 18 as well as in relation to Operation Verbasco's security 19 review processes for police material held by other 20 interested persons. 21 Third, although we don't have at this stage 22 an overall timetable, we have indicated that the inquest 23 team is likely to require on average two weeks from the 24 date of receipt of stage 1 disclosure to review and 25 confirm documents required for stage 2 disclosure, and</p> <p style="text-align: center;">Page 42</p>
<p>1 that this process will take place on 2 a tranche-by-tranche rolling basis. We are grateful for 3 the indication that Verbasco anticipates a four-week 4 final review for each tranche of documents, also on 5 a rolling basis, once documents have been identified as 6 relevant for stage 2 disclosure and subject to the HMG 7 disclosure review. 8 Operation Verbasco has explained -- this is 9 paragraphs 9 and 10 of their written submissions -- that 10 it anticipates that by the next PIR in December its 11 initial review and categorisation of material should be 12 well advanced. We will of course monitor this 13 progression and seek regular updates. 14 My Lady, just finally on disclosure and briefly 15 relating to stage 1 disclosure as it relates to other 16 material providers, six other organisations have 17 responded to our disclosure requests and providing 18 limited stage 1 disclosure, this is a matter we describe 19 at paragraph 22 of our written submissions. 20 The organisations involved are: the Wiltshire air 21 ambulance, Salisbury NHS Foundation Trust; Birnberg 22 Peirce, who act for the family; CPS, who have provided 23 a nil return at present; the South West Ambulance 24 Service Foundation Trust; and also Wiltshire Council. 25 This material has been reviewed and uploaded to</p> <p style="text-align: center;">Page 43</p>	<p>1 Relativity. We expect it to be provided to IPs in 2 advance of the next hearing, once the security reviews 3 that have been requested have taken place and also the 4 material providers have confirmed whether any 5 applications for anonymity or ciphering or any other 6 redactions will be made. 7 As we indicated, and as I have said, we anticipate 8 that IPs will start to receive stage 2 disclosure in the 9 next few months. However, and I think as is also clear 10 from what I have said, given the security sensitivities, 11 it is unrealistic to expect disclosure to be anything 12 like nearing completion by Christmas. With that in 13 mind, we have suggested, my Lady, that you schedule 14 a further pre-inquest review in December to monitor 15 disclosure and maintain progress. We have noted in our 16 submissions that a request by the coroner for conversion 17 to an inquiry may well impact upon disclosure. You have 18 now made that request and that issue therefore of course 19 will be kept under close review. 20 My Lady, you will perhaps see now why I started this 21 section of my submissions with some headline points. It 22 is very difficult to capture, even in summary form, 23 orally the very many different strands of work that are 24 underway. Particularly, as I said at the outset, given 25 the very difficult sensitivity issues that arise and the</p> <p style="text-align: center;">Page 44</p>

<p>1 great number of parties with whom your team are dealing. 2 Perhaps I may end as I started, simply to emphasise that 3 we do understand the concerns that the length of this 4 disclosure exercise gives rise to, particularly on the 5 part of the family team. We are working hard and we can 6 report that the other material providers are also 7 working hard and we very much hope that the position 8 will be that much clearer in December and we will be 9 able to provide not only at that stage an update but 10 a much more confident prognosis as to the path ahead. 11 THE CORONER: As far as the confidentiality undertakings are 12 concerned, Mr O'Connor -- 13 MR O'CONNOR: My Lady, we did refer to that matter in our 14 written submissions and we in particular referred to the 15 fact that there were some outstanding undertakings. 16 I am glad to say as a result of discussions in the last 17 day or so, those matters are well on the way to being 18 resolved, so I don't need to trouble you with that 19 today. 20 THE CORONER: Thank you very much. 21 Mr Mansfield, Mr Straw -- Mr Mansfield, are you 22 dealing with this issue? 23 MR MANSFIELD: Yes, good morning, my Lady. 24 Yes, we divided the work in terms of the two major 25 issues.</p> <p style="text-align: center;">Page 45</p>	<p>1 My Lady, I have listened very carefully obviously to 2 the observations that are being made. Perhaps it would 3 assist first of all to acknowledge your own and also 4 your team's anxiety to ensure that matters are dealt 5 with with alacrity and that there is as early as 6 possible a hearing date. The problem that arises 7 obviously is not yours in one sense. I would like to, 8 as it were, work backwards, because the danger is that 9 a process in which national security is the flag that is 10 often waved, I think both your good self and certainly 11 myself over the years have appeared in many cases where 12 national security is flagged up. That of itself doesn't 13 necessarily mean that the process is going to be more 14 sluggish, because actually in terms of disclosure it is 15 staged. The fears that are being raised today that the 16 community may be put at risk by the disclosure exercise, 17 it might be, if in fact finally decisions are taken 18 which involve the revelations that are invidious. But 19 we haven't reached that stage, so I think we don't need 20 references to that at this point. 21 If in fact the date that was I think has been 22 mentioned, of holding the hearing, the substantive 23 hearing, hopefully an inquiry, is going to be the end of 24 next year, then there certainly has to be an increase in 25 what is the process, which we understand the volume, we</p> <p style="text-align: center;">Page 46</p>
<p>1 understand the concerns and we understand the anxieties, 2 but there couldn't be, and I am using the words that you 3 cited yourself from the hearing of the judicial review, 4 it's in paragraph 38, that you agreed with. There is 5 an acute and obvious public concern in this case, 6 I don't want to rehearse matters that are only too 7 obvious to you and everyone else. If that is going to 8 be taken seriously, it is acute, when it is acute it 9 means that it must be top priority, which I am sure it 10 is for you and your team. 11 But we are not so convinced that it is necessarily 12 that that pursues, for example, three months to take 13 a decision about whether this is suitable for a public 14 inquiry. We submit that it show as attitude or 15 an approach to these matters which is not making it 16 a priority. I hope it is not unfair to say that 17 obviously we are dancing in the dark in this case, more 18 than anyone else, we have absolutely no idea what is 19 just around -- we have an idea, but of course a lot of 20 material has been in the public domain anyway. 21 However, appreciating that, three months is we say 22 not necessary and we would ask that when your letter or 23 email, however you convey it later today, should 24 indicate a preference for a much earlier date. The 25 reason being, another reason, is that the next hearing,</p> <p style="text-align: center;">Page 47</p>	<p>1 which is I think an agreed date of 17 December, is 2 actually coinciding with the three months that have been 3 set -- we submit we would like to know long in advance 4 of that next hearing whether this is going to be 5 a public inquiry, because it is interlinked with the 6 disclosure process. If it is not going to be 7 an inquiry, what is it going to be? How are you going 8 to do disclosure? What issues are going to be capable 9 under Jamieson, as you know, permitted? 10 Therefore, when you say to the Home Secretary: 11 "I cannot deal with these matters which are of acute 12 and obvious public concern, through an inquest, in the 13 normal sense, rather than an inquiry." 14 We would say that it behoves the Home Secretary to 15 have deference to that and say to herself -- if no one 16 else -- then of course she may need to consult, but all 17 of that can be done, the consultation with other 18 departments and so on, much, much quicker, so we do 19 submit that perhaps a month. Could they decide within 20 a month, please, of today, so that we all know where we 21 stand in terms of the disclosure process? 22 I turn therefore from the date, because we on behalf 23 of the family would endorse the possibility that it is 24 heard at the end of next year. Working backwards from 25 that, by the time of the next PIR we would hope to, well</p> <p style="text-align: center;">Page 48</p>

<p>1 before that, know that it will be a public inquiry. 2 Secondly, disclosure itself, and it has been of 3 course described in circuitous terms, so it is rather 4 difficult to know -- one gets a quotation of a figure 5 18,000 in the middle of this. I think again, my Lady, 6 will have been through cases and inquiries, there is of 7 course an obvious one that you dealt with, there will 8 have been thousands and thousands of documents, so we 9 are not overwhelmed -- I might be but others are not -- 10 by the digital process that is now possible. 11 As far as the security aspect of it and the 12 protocols that they have to go through, you have to go 13 through and your counsel have to go through, of course 14 we don't know them all but I can imagine some of them. 15 Again, if this is going to be given the acute and top 16 priority it should have, then again this process -- and 17 it certainly was anticipated, because it must have been 18 known when it was said on the previous occasion and it 19 is certainly in writing, that we would be getting 20 disclosure shortly after this hearing. Well, we get the 21 distinct flavour that it probably won't be shortly after 22 this hearing. It is not a criticism of my learned 23 friend, but it is a criticism of a process which can do 24 better, because the risk to the public is at stake if it 25 is not dealt with speedily.</p> <p style="text-align: center;">Page 49</p>	<p>1 May I just in this context remind you that this was 2 2018. The inquest opened in 2018. What was the Home 3 Secretary and the rest doing -- thinking, "Oh, that is 4 interesting", did they not consider at that stage that 5 there could be just the possible ... not remote, 6 possibility they might be involved in an inquest, they 7 might need to produce evidence, they might need to 8 prepare? 9 One gets the feeling and I appreciate again the 10 pressures on Government departments and of course 11 I don't forget the fact we are all wearing masks and 12 Covid and so on, has a bearing. One doesn't want to be 13 unfair, but on the other hand if you are going to be 14 concerned about public safety and given the comments 15 yesterday, plainly it is on everybody's minds, certainly 16 those of Salisbury and Amesbury, then in that year when 17 the inquest was opened, we say we hope that the Home 18 Secretary and other departments were already thinking -- 19 they were thinking, because as you will recall, between 20 the date, that is 4 March and September, there was a lot 21 of activity. Why? Because they had to show the public 22 they were doing something and that they had answers and 23 they had answers. Very quickly. Theresa May stood up 24 in the House of Commons in September 2018, was able to 25 give a full review for the public's benefit and in fact</p> <p style="text-align: center;">Page 50</p>
<p>1 quite a detailed one. So somebody, before she stood up, 2 must have already thought what the connections are. 3 That's not quite the same as disclosure, but it does 4 mean that the processes of identifying -- which was my 5 learned friend's word -- what is needed for at least to 6 brief politicians on what to say. She wasn't the only 7 one because other spokespeople in that period -- that is 8 March through to September -- had made public statements 9 to allay fear, to allay rumour. That is precisely one 10 of the objects anyway of an inquest. 11 We hope, again, because of all that, that the 12 process has not been left to we will wait until we are 13 asked, which one gets the feeling a little bit that it 14 is we will wait until we are asked, we are not going to 15 do any work before we do that. So I hope one is not 16 being too unfair about this, because we do recognise the 17 significance of it but we also recognise, as I am sure 18 you do, the need to ensure that the public have the 19 necessary information, in the interests of justice, 20 because as the divisional court said, and I hope it is 21 not unfair to say it again, the chances of a realistic 22 criminal trial are remote to probably infinitesimal. So 23 therefore this process is probably the only one that is 24 going to reach the truth of one of the most devastating 25 attacks -- well, it was described -- since the Second</p> <p style="text-align: center;">Page 51</p>	<p>1 World War. So whether it can be described in that way 2 continually, I don't know, because there are lots of 3 other things going on. However, it is extremely 4 serious. 5 In terms of the process itself, we would ask -- 6 again, it is not quantity, but we would ask that if the 7 categories -- which you presumably have an idea of, know 8 yourself -- are prioritised such that disclosure, 9 I think, I hope I have this right, will be done on 10 a rolling basis, is the favourite term, but we don't 11 have to wait until the end, because there are some 12 documents where it is clear they could be released much 13 earlier and we don't want a drip feed of one document at 14 a time, but you can do it compendiously, so you have 15 category A, which is the ones that can be disclosed, in 16 different brackets, but that can be disclosed within the 17 month. 18 I would think there must be a number of those, 19 because one can see that the tentacles of the case 20 stretch out in all sorts of directions and that is 21 something we cannot deal with until we have the 22 information about disclosure and that too bears upon the 23 next hearing on 17 December. 24 We would ask that not only the Home Secretary 25 decides at least within a month, but the first, as it</p> <p style="text-align: center;">Page 52</p>

<p>1 were, seedlings and saplings of disclosure occur again 2 within the next month, please, if that can be done, so 3 that once there is a target date and a framework of 4 urgency, and it is hopefully not just lip service, then 5 that I think the family will have their own worries and 6 concerns and anxieties allayed for that reason. 7 My Lady, I don't know whether there is any other 8 matter I can assist on? 9 THE CORONER: No, you have been very helpful, Mr Mansfield. 10 Thank you very much. 11 Ms McGahey, a number of issues raised by 12 Mr Mansfield there. 13 Perhaps the first one going back to the first 14 decision I made about asking the Secretary of State to 15 convert this inquest into an inquiry. Can I urge you, 16 because I see force in what Mr Mansfield is saying, to 17 press upon those advising the Secretary of State for the 18 Home Department that really, the parties would like to 19 know in ample time before the next hearing what the 20 decision is. The Secretary of State and those advising 21 her have known for some time that this was likely to 22 come, so I assume the machinery is in place. So 23 although, like Mr Mansfield, as I said earlier, I do 24 understand the difficulties, the earlier that decision 25 can be made the better.</p> <p style="text-align: center;">Page 53</p>	<p>1 MS MCGAHEY: My Lady, that will certainly be relayed to the 2 Home Secretary and those advising her. 3 THE CORONER: Thank you. 4 As far as disclosure is concerned, the picture one 5 gets from Mr O'Connor is, after not a sluggish start but 6 after a slowish start that things are now gathering 7 pace. How can you reassure me and the inquest team, the 8 family, Mr Rowley, how can you assure us that the 9 disclosure process will be now gathering apace? 10 MS MCGAHEY: Your Ladyship is aware of the way in which it 11 was started and your Ladyship and counsel to the inquiry 12 have also acknowledged the immense sensitivity of some 13 of this material and that sensitivity alone was a reason 14 for steps being taken with great caution at the outset 15 and indeed it was part of the recent decision being 16 taken that we would start with overarching reports and 17 move outwards in response to inquiry requests. 18 That process is now happening and the more we do it, 19 the easier it becomes, the more familiar people become 20 with the process and therefore the more efficient it 21 becomes, which is happening. We are also grateful for 22 indications from the inquiry team as to the areas of 23 interest that they have, because of the difficulty, both 24 of volume and sensitivity, it helps enormously if we 25 have a certain amount of direction, if the inquiry team</p> <p style="text-align: center;">Page 54</p>
<p>1 can say, we have looked at the report on X, and we think 2 that is enough, we don't, we think it is going to areas 3 that are likely to be outside scope, but we have also 4 looked at Y, and we think for Y we would like the 5 underlying documents. That process is now underway. So 6 it is becoming more focused and more efficient. It will 7 still, my Lady, be very time consuming. 8 THE CORONER: Given the number of bodies involved, what 9 worries me at the moment is there is a sense of one body 10 marking another body's homework, in other words 11 a duplication, triplication, whatever the words are, 12 a number of bodies looking at the same material. Is 13 that a possibility that could happen and therefore delay 14 the disclosure process? 15 MS MCGAHEY: My Lady, it is not a question of marking each 16 other's homework. It is a question of a number of 17 agencies, departments or even individuals or experts who 18 have an interest or knowledge in a document or 19 a subject, all looking at that material from a different 20 point of view. So agency or department A may say, "We 21 know about paragraphs 1 to 6, and we have concerns about 22 A, B and C". 23 Department B may say, "Our input into this document 24 was paragraph 7 to 11, and we have these concerns". 25 Or indeed there may be a mixture, it is very</p> <p style="text-align: center;">Page 55</p>	<p>1 difficult to be specific, but the very nature of the 2 work done and the investigation following the Novichok 3 attack was that it involved a very large number of 4 agencies, departments, individuals. 5 THE CORONER: Many of whom will have similar expertise. 6 I am just concerned that if every single one of these 7 bodies, with their different set of experts and 8 specialists, have to look at the same document, I could 9 see how this process could go on forever. What I am 10 concerned with, as are the family, is that we should get 11 on with this investigation, it is only fair to them, and 12 it is only fair to the public. 13 I just wonder if somebody could look at whether it 14 is necessary for lots of people with similar expertise 15 and skills, all to be looking at the same document. 16 MS MCGAHEY: My Lady, it is absolutely not the case when we 17 have documents X, we say right, we have 12 Government 18 clients here, everyone should look at it, there will be 19 a great deal of material, for example, emanating from 20 DSTL that Defra do not need to look at -- again, I am 21 using completely made-up examples from the top of my 22 head, but it is absolutely not the case that everybody 23 looks at everything. There are processes in place to 24 ensure as far as we can that agencies or departments 25 with an equity in a particular document, a particular</p> <p style="text-align: center;">Page 56</p>

<p>1 piece of information, a particular area, do have input 2 into it. Because, as my learned friend Mr O'Connor said 3 at the outset, it is so important that we do not 4 disclose into the public domain something that might 5 make an attack more likely or a response to such 6 an attack less effective, and we have to get that right. 7 THE CORONER: I am very grateful to the various police 8 services who set up Operation Verbasco, which seems to 9 me to be an excellent idea and I appreciate will involve 10 considerable resources. I assume that the Government 11 Legal Departments have made sure that they have 12 a sufficiently strong team to direct all this material 13 that is coming from sources other than the police 14 services involved? 15 Operation Verbasco, as I understand it, is a team of 16 35 or so officers and staff dedicated to this process. 17 Is a similar thing going on within the Government area? 18 MS MCGAHEY: My Lady, I can say that there are taskforces or 19 working groups or whatever they may be with a focus on 20 this disclosure work, yes. 21 THE CORONER: Right. 22 I might at some stage ask you whether they are 23 sufficiently large and well resourced but I will leave 24 it there for the time being, Ms McGahey. 25 MS MCGAHEY: My Lady, in an exercise of this sort, it is</p> <p style="text-align: center;">Page 57</p>	<p>1 true of every inquiry and probably investigation and 2 inquest of this sort of scale and probably more so in 3 this, one would always want more resources. 4 THE CORONER: I know. I know, everything comes down to 5 a question of resources, but when someone has died 6 tragically, as Dawn Sturgess did, and when so many 7 people were put at risk, I agree with Mr Mansfield, 8 there is a degree of urgency that people need answers -- 9 not just the bereaved family but the public too. 10 I do understand the problems and I am pressing you 11 because I want everyone to know that I will be watching 12 very carefully and if my legal team advise me that they 13 think there is any area for whereby matters could be 14 refined so that things don't take as long, then I will 15 be holding another public hearing and holding to account 16 those who are not assisting. As I say, at the moment 17 I get the impression that things having started are now 18 gathering apace, but I just want everyone to know I am 19 going to be keeping the pressure on. 20 MS MCGAHEY: I understand that, my Lady. My Lady, there has 21 been excellent operation cooperation between the inquiry 22 legal team and the Government Legal Department with 23 a view to focusing disclosure efforts and meetings are 24 planned in the future and as we said in our written 25 submissions, the plan is that there should be bespoke</p> <p style="text-align: center;">Page 58</p>
<p>1 arrangements for each department, so that we don't go to 2 everybody and say: 3 "Please, will you put the word 'Skripal' or 4 'Dawn Sturgess' into a search engine and see what you 5 get." 6 Which would take forever and be useless. 7 We are very alive to the need to progress as quickly 8 as possible. 9 I am instructed that, regrettably, the idea of 10 having a decision within a month on whether there should 11 be a public inquiry is unrealistic but -- 12 THE CORONER: Two months? 13 MS MCGAHEY: I don't know, my Lady. I am afraid. 14 THE CORONER: If it were within two months, it would mean 15 that all parties would have the decision in ample time 16 before the next hearing, which would be very helpful. 17 MS MCGAHEY: I understand that, completely, my Lady, but 18 however long it takes, the disclosure work will continue 19 and that will be necessary and will not actually change 20 in practical terms in the early stages, whenever that 21 decision is made. 22 In terms of getting disclosure out to the families, 23 the work to achieve that will continue at exactly the 24 same rate. 25 THE CORONER: Right.</p> <p style="text-align: center;">Page 59</p>	<p>1 As far as timetabling is concerned, Mr O'Connor in 2 his submissions suggested that -- I appreciate you are 3 acting on instructions -- the timetable ... it is not 4 going to be easy to get hearings on before the end of 5 next year, I know that, which will come as 6 a disappointment, I am sure to the family and for all 7 concerned, but you did rather issue a dire warning that 8 it could take three years for disclosure. Do you think 9 that with a fair wind and pressure from all those 10 involved that we can be looking at hearings at the end 11 of next year, maybe beginning of 2023? 12 MS MCGAHEY: I thought, my Lady, we said two years. 13 THE CORONER: I thought you did too, but Mr O'Connor said 14 three. 15 MS MCGAHEY: On this side we thought it was two. 16 THE CORONER: Are you going to confess an error, 17 Mr O'Connor, or do you remember three? 18 MR O'CONNOR: My Lady, I am sorry, I had remembered it being 19 three, but it seems I am in the minority on that. 20 THE CORONER: I do remember taking you up on it, Ms McGahey, 21 at the time that I thought whatever you said was long -- 22 anyway, as far as I am concerned, I can see how it can 23 take until the end of next year/the beginning of 2023, 24 but I am anxious that we do not start thinking beyond 25 that, I really am. There is a huge amount of material,</p> <p style="text-align: center;">Page 60</p>

<p>1 but we have all done cases involving a huge amount of 2 material before, huge sensitivities I do understand, but 3 if we can be working towards that kind of timetable, 4 unless you are going to tell me that you think that is 5 impossible, in which case I would like to know now and 6 if so why.</p> <p>7 MS MCGAHEY: My Lady, I have no instructions to suggest it 8 is impossible. I think if I sought them, I would get 9 the answer we really don't know, because disclosure is 10 at an early stage but I think on this side we have been 11 working towards the idea of hearings in 2023, not with 12 a timetable in mind but with the knowledge that the 13 inquiry legal team had hoped for the end of 2022, but we 14 are seeing that as possibly ambitious. I am afraid 15 I really cannot give any indication, I am sorry.</p> <p>16 THE CORONER: Again, a marker that I will be keeping 17 pressure on.</p> <p>18 Right, anything else from you on the issue of 19 disclosure Ms McGahey?</p> <p>20 MS MCGAHEY: No, thank you, my Lady.</p> <p>21 THE CORONER: Who is going next? It is Ms Giovannetti, 22 I think -- may I offer my thanks, I have already 23 expressed my gratitude, for the setting up of the 24 setting up of Operation Verbasco and my being kept in 25 the loop as I was by two of the senior officer and the</p> <p style="text-align: center;">Page 61</p>	<p>1 his deputy last week.</p> <p>2 I think Mr Mansfield was talking about possible 3 timetables, I appreciate it is very difficult, can you 4 say anything to offer the family any consolation about 5 timetabling of disclosure?</p> <p>6 MS GIOVANNETTI: The only thing I can add, further to what 7 Ms McGahey has already said, I am grateful to my Lady 8 for her acknowledgment that Operation Verbasco is, 9 I don't want to use an overused word, "unprecedented", 10 which it is. I hope it is apparent to the family and to 11 my Lady that, it is being taken really seriously here, 12 that resources are being devoted to this and we are very 13 grateful to the inquiry legal team for their assistance 14 and the really good liaison that there has been. We are 15 also liaising with Wiltshire to see what support we can 16 provide to them. We hope to be in a position to provide 17 something more concrete before the next hearing, but 18 things are gathering pace and moving forward, we think, 19 very productively.</p> <p>20 THE CORONER: Mr O'Connor mentioned the possibility of 21 Wiltshire joining in as well. It does make sense if all 22 police forces are joined together. Especially as 23 Wiltshire do not have anywhere near the resources that 24 the Metropolitan Police do.</p> <p>25 MS GIOVANNETTI: Our team has been liaising very closing and</p> <p style="text-align: center;">Page 62</p>
<p>1 that will continue and we are going to do our best to 2 ensure the most effective processes are applied across 3 the board to the police teams.</p> <p>4 THE CORONER: Right. Thank you.</p> <p>5 Mr Beggs, as I am on the issue of Wiltshire, it does 6 sound an excellent idea to have this team dedicated to 7 assisting the inquest. A couple of people have now said 8 "inquiry", it is almost as if they are leaping ahead. 9 Ms McGahey talked about an inquiry, as did 10 Ms Giovannetti, so I am going to have to try and stick 11 with "inquest".</p> <p>12 Are you content that things are proceeding apace?</p> <p>13 MR BEGGS: My Lady, yes, the team that Wiltshire have put 14 together is certainly not as big as Operation Verbasco, 15 but in short order it will soon be in double figures, 16 which is substantial for Wiltshire. Of course we see 17 the benefits of aligning ourselves to any more efficient 18 and better-resourced processes that Verbasco may offer. 19 I hope that, certainly by the next hearing, we will have 20 made very substantial stage 1 disclosure to your team.</p> <p>21 THE CORONER: Thank you very much.</p> <p>22 Mr Beer, who is attending remotely.</p> <p>23 Are you there, Mr Beer?</p> <p>24 MR BEER: Yes, I am here, can you see and hear me?</p> <p>25 THE CORONER: I can hear you but not see you, but don't tell</p> <p style="text-align: center;">Page 63</p>	<p>1 me you are going to tell us again it is not worth the 2 trouble to hear and see you.</p> <p>3 MR BEER: No, I am going to add a little bit more to that 4 which I said earlier. We respectfully agree with what 5 your counsel said in their submissions in paragraph 3, 6 namely:</p> <p>7 "It has become apparent that the special 8 sensitivities of the case will require an unusually 9 complicated and therefore time-consuming process for 10 both stage 1 and stage 2 disclosure."</p> <p>11 We respectfully agree with that, notwithstanding 12 that which others have said, the special sensitivities 13 of the case do require that process for stage 1 and 14 stage 2 of disclosure.</p> <p>15 As Mr O'Connor has explained, jointly with the 16 Metropolitan Police, Thames Valley Police promptly 17 formed a team to ensure a streamlined and joined-up 18 approach by each organisation. That is so that the 19 inquest team has to deal with only one team to ensure 20 that a clear, well understood and dependable process is 21 undertaken and to ensure that decisions are taken as 22 promptly as possible, leading hopefully to consistent 23 substantive decisions on disclosure.</p> <p>24 Reflecting that, the unusual and exceptional step of 25 establishing a very large team of police officers and</p> <p style="text-align: center;">Page 64</p>

<p>1 police staff has been undertaken to respond to the 2 unusual circumstances of this inquest. 3 I think everything else that we wish to say jointly 4 as to the process that is being undertaken is set out in 5 our joint written submissions with the Met, which appear 6 in tab 10 of your bundle. 7 THE CORONER: Thank you very much, Mr Beer. 8 Ms Dolan told me not to invite submissions from her. 9 Mr Bethell for Wiltshire Council, attending 10 remotely, anything you wish to add? 11 MR BETHELL: My Lady, if you can see and hear me, I can give 12 you a very brief update, if it is at all helpful, as to 13 where we were at the time of our written submissions. 14 THE CORONER: Yes. 15 MR BETHELL: As Mr O'Connor mentioned, we have already 16 provided some documents to your legal team. Those 17 include many of the most substantial and obviously 18 relevant of the council's documents. Work is ongoing on 19 the other material that the council holds to identify 20 further potentially relevant material. 21 The council is naturally taking a cautious approach 22 to any potentially sensitive material that may be 23 contained in the council's disclosure. A small number 24 of documents have so far been identified that it is 25 thought may engage national security concerns and the</p> <p style="text-align: center;">Page 65</p>	<p>1 council is intending to consult in the first instance 2 with Wiltshire Police before providing those documents 3 to the inquest legal team in due course. 4 We had said in our written submissions that we 5 expected to conclude provision of documents within 6 around two months and we are continuing to work on that 7 basis, my Lady. 8 THE CORONER: Mr Bethell, I'm just a bit concerned about the 9 delay inherent in the council then consulting Wiltshire 10 Police and Wiltshire Police possibly are not working 11 with other police forces. 12 If material is relevant to this investigation, then 13 what is the objection to showing it to the inquest legal 14 team, all of whom have the appropriate security 15 clearances, in secure arrangements if necessary? I am 16 not quite understanding why highly material would not be 17 shown to the team, albeit subject to security 18 provisions. 19 MR BETHELL: My Lady, that is entirely understood, I think 20 that may reflect what our understanding had been of how 21 Verbasco disclosure would take place, and Mr O'Connor 22 referred to that briefly in his submissions. We will 23 obviously be guided by the tribunal's direction on that. 24 It is not suggested at all that we would withhold 25 material from the inquiry, it was simply the suggestion</p> <p style="text-align: center;">Page 66</p>
<p>1 that in terms of the sequence of when material was 2 provided, we would like to be clear in our own minds as 3 to the extent of any security concerns that might arise 4 from documents that the council holds. 5 THE CORONER: I understand. 6 You will of course have noted, I think Mr O'Connor 7 in his submissions commented, about how the inquest team 8 would like to see the material in unredacted form, but 9 I do appreciate that assessing the security implications 10 is obviously important, because apart from anything 11 else, it affects how you make arrangements for 12 disclosure. I do understand that but I just don't want 13 any inbuilt delay, but thank you anyway, Mr Bethell, 14 that is very helpful. 15 Is that all on disclosure, Mr O'Connor, or is there 16 anything else anybody else wanted to add on disclosure? 17 MR O'CONNOR: My Lady, I think that is then the end of that 18 topic. There are no directions we invite you to give, 19 I think we have all heard what you have to say and we 20 hope that we will have something very much more -- first 21 of all that there will be disclosure made between now 22 and the next hearing and, secondly, that there will be 23 something much more optimistic or at least complete that 24 we can give you by way of a report at the December 25 hearing.</p> <p style="text-align: center;">Page 67</p>	<p>1 THE CORONER: I haven't yet directed there will be the 2 hearing on 17 December. 3 MR O'CONNOR: That is one of the matters I was going to come 4 to. 5 There are three matters left on the agenda, scope, 6 the next hearing and questions of venue and timing of 7 the substantive hearings. 8 To some extent we have nibbled at all of those 9 already, they are short issues so I was going to take 10 them together now and then invite you to hear any 11 submissions that anyone has about any of those matters, 12 that they have not already made, after that. 13 My Lady, taking those matters in turn. 14 As far as scope is concerned, you made it clear at 15 the last hearing that the rulings you gave on scope were 16 provisional and that there would be an opportunity for 17 interested persons to make further submissions, both as 18 to issues they contend should be included and as to 19 issues that they might suggest should be excluded from 20 scope following stage 2 disclosure. That is a matter 21 you referred to at the outset of the hearing. 22 As we have now said a number of times, stage 2 23 disclosure has not in fact even started, so it is 24 obvious and everyone agrees that it would be premature 25 for you to review scope at this stage. Therefore there</p> <p style="text-align: center;">Page 68</p>

<p>1 is nothing more really to say about that today, other 2 than to confirm that it certainly is something that we 3 will have to come back to and it is something which at 4 least touches on the question of the drafting of the 5 terms of reference should there be an inquiry, again 6 a matter that has been canvassed before you already. 7 THE CORONER: Other than also the remarks I made at the 8 beginning about the alleged involvement of Mr Sergeev. 9 MR O'CONNOR: Yes, you did make that point. 10 THE CORONER: Which is plainly highly relevant to scope and 11 at the moment there are two Russian nationals identified 12 and, in my view, if there is material available, which 13 plainly there is, to satisfy the Crown Prosecution 14 Service that a warrant should be issued for his arrest, 15 then there is sufficient material for me to include him 16 within that scope. I think to make it clear from what 17 I said earlier, that scope is going to include material 18 relating to him. 19 MR O'CONNOR: Mr Sergeev, yes, my Lady. 20 THE CORONER: To that extent we are amending provisional 21 scope. 22 MR O'CONNOR: Provisional scope, yes. 23 My Lady, moving on to the question of the next 24 pre-inquest hearing, which is something that has already 25 been canvassed. We suggested that a further pre-inquest</p> <p style="text-align: center;">Page 69</p>	<p>1 review be held before Christmas. We identified the date 2 of Friday, 17 September in our written submissions. 3 Whilst the matter is only three months away, in 4 light of everything you have heard about disclosure, we 5 submit that, and I think it is clear from others' 6 submissions, this is not a matter in dispute, that from 7 that disclosure point of view coming back to review the 8 progress within that relatively short period will be 9 a good thing to attempt to maximise momentum being 10 maintained in the disclosure process. 11 My Lady, I had intended to come back in this regard 12 to the question of the inquiry decision, because, as 13 Mr Mansfield referred, the three-month period between 14 now and the next hearing is the same as the period that 15 Ms McGahey gave for the inquiry decision. 16 My Lady, in short, I would echo Mr Mansfield's 17 submission that it would be of great assistance if 18 an inquiry decision could be taken by the Home Secretary 19 well in advance of that next hearing. 20 My Lady, it is true, as Ms McGahey said, that this 21 hearing in December was initially conceived as a hearing 22 to review the progress of disclosure. She is right when 23 she says that what is happening now, in terms of the 24 disclosure exercise, is broadly similar to the exercise 25 that would be happening for an inquiry. So within that</p> <p style="text-align: center;">Page 70</p>
<p>1 parameter the inquiry decision is not directly in play, 2 and so we could have a hearing in December that did what 3 we intended to do about disclosure, whatever happens 4 with the inquiry decision. 5 But it doesn't, in my respectful submission, follow 6 that the inquiry decision can therefore take whatever 7 time it takes without any impact on the overall 8 timetable of these proceedings. 9 My Lady, as you will be well aware, whatever 10 decision is taken on the request that you have now made 11 for an inquiry, whether the decision is affirmative and 12 an inquiry is to be established or negative, as happened 13 in the Litvinenko Inquiry, and the Home Secretary says, 14 "No, you have got to carry on as an inquest", whichever 15 of those two decisions is made will have substantial 16 procedural implications for this process. At least some 17 of those implications will need to be worked through in 18 court. 19 It is therefore highly desirable that this decision 20 is taken, not only before the next hearing but in 21 sufficient time that all of us involved, both your team 22 and the other IPs, have a chance to understand what the 23 decision is and in the normal way to formulate 24 submissions/exchange submissions about the procedural 25 implications that will arise. We are therefore not</p> <p style="text-align: center;">Page 71</p>	<p>1 necessarily talking about the decision being taken 2 within one month and two months to do that work, but at 3 least a few weeks would be needed. If the situation 4 does arise that the decision ultimately is only taken at 5 very much the same time as the hearing and therefore the 6 full three months is used, that will mean even if the 7 disclosure process is not greatly affected, other things 8 that follow from that decision will then have to take 9 longer. We will then have to come back to them in the 10 new year. 11 To coin a phrase, it would be a missed opportunity 12 if it weren't possible to address those matters in 13 December. It may well then lead -- I am going to come 14 to the question of the substantive hearings, that the 15 knock-on effect of those matters may lead to the 16 substantive hearing being delayed. 17 My Lady, Ms McGahey is right to say that there has 18 been a very good working relationship between our team 19 and the Secretary of State's team on this case so far. 20 We know that the Home Secretary is fully engaged and 21 wishes to take a constructive approach to these 22 proceedings. I hope that she will do what she can to 23 ensure that that decision is made, one way or the other, 24 in sufficient time before the next hearing, that you can 25 use that hearing with all the other IPs to the greatest</p> <p style="text-align: center;">Page 72</p>

<p>1 effect and therefore speed up the process just that 2 little bit further, so that we can try and reduce the 3 time between now and the substantive hearings, which is 4 something that everyone in this room wants to achieve. 5 THE CORONER: Mr O'Connor, you and Mr Mansfield have 6 persuaded me that three months is, with respect, too 7 long and my written communication to the Secretary of 8 State will invite a decision to be with my team at the 9 latest within two months of today's hearing. That would 10 allow four weeks before the next hearing, maybe just 11 under -- I can't work out the date. I was trying to 12 work them out but I couldn't work them out. 13 I think it is entirely right that if we are going 14 to -- I mean, presumably, if the Secretary of State 15 refused my request, there is the possibility of other 16 legal proceedings which would all involve delay, so we 17 really do have to focus. I am going to urge the 18 Secretary of State to give me and my team, and therefore 19 the other parties, a reply within two months of today. 20 MR O'CONNOR: I am grateful. 21 My Lady, just then the last agenda item, which is 22 the question of the substantive hearings and the venue 23 and timing. 24 As far as the venue is concerned, in accordance with 25 directions that you made following the last hearing, the</p> <p style="text-align: center;">Page 73</p>	<p>1 solicitors to the inquest have made enquiries regarding 2 the availability of suitable accommodation in Salisbury 3 so that public hearings of the substantive hearings 4 might be held there. 5 There has been provisional agreement with the city 6 council that the guildhall in the centre of Salisbury 7 will be made available for the substantive hearings. 8 It is likely I should say that some hearings will 9 also be held in London and we propose that the question 10 of how the hearings are to be split, as it were, between 11 Salisbury and London, is something that we should review 12 when matters are further advanced. 13 THE CORONER: I am very anxious, as you know Mr O'Connor, 14 that we hold at least some hearings in Salisbury. 15 I think it is very important to the residents of 16 Wiltshire that they understand that they and the family 17 of Ms Sturgess and Ms Rowley and the others affected by 18 the poisoning are at the heart of this investigation. 19 MR O'CONNOR: My Lady, yes. 20 Finally, the timing of the substantive hearings, 21 another issue which we have mentioned already, but may 22 I simply say that it had been hoped that it would be 23 possible to hold the substantive hearings towards the 24 end of next year. 25 Whether that will be possible remains uncertain. It</p> <p style="text-align: center;">Page 74</p>
<p>1 depends on a number of factors. One factor, as I have 2 said, is the timing of the inquest/inquiry decision and 3 consequential procedural steps. Another significant 4 factor, probably the most significant, is of course the 5 disclosure process that we have spent much of this 6 morning discussing, including related issues, perhaps 7 including applications for PII or restriction orders, if 8 the decision is to establish an inquiry. 9 For today's purposes, we propose simply to say, my 10 Lady, that the matter remains uncertain and to invite 11 you to revisit the timing of the substantive hearings at 12 the December hearing where we hope, in light of 13 everything that has been said, matters will be clearer. 14 My Lady, that is all I wish to say on those final 15 three agenda items. 16 THE CORONER: Thank you, Mr O'Connor. 17 Anything else anybody else wishes to raise. 18 Mr Mansfield? 19 MR MANSFIELD: My Lady, one very short point. We very 20 grateful for those submissions, which we support. 21 In relation to the hearing and the venues, it may be 22 my omission, but a procedure that has been used in the 23 past is that if there is a hearing in London, it is 24 relayed to the guildhall, or wherever is available, so 25 that you have a live feed, that is all.</p> <p style="text-align: center;">Page 75</p>	<p>1 THE CORONER: Good point, Mr Mansfield, but really it is 2 whatever best meets the interests of those involved. 3 We will certainly explore it, thank you for that. 4 Anybody else? 5 I will ask Mr Smith whether any emails have arrived, 6 if anybody wanted to raise anything? 7 In which case, I think that concludes the issues 8 that we have to deal with today. Thank you very much to 9 everybody for attending and I hope there will come 10 a time when we don't have to rely on technology to 11 conduct these hearings, but at least we can get ahead 12 with the matter and make some progress. 13 Thank you all very much. 14 (12.20 pm) 15 (The hearing concluded) 16 17 18 19 20 21 22 23 24 25</p> <p style="text-align: center;">Page 76</p>

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