

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

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

JOINT SUBMISSIONS OF THE METROPOLITAN POLICE SERVICE
AND THAMES VALLEY POLICE

For the Pre-Inquest Review on 17.12.21

1. These joint submissions are filed on behalf of the Commissioner of Police of the Metropolis (“MPS”) and the Chief Constable of Thames Valley Police (“TVP”) (together “Operation Verbasco”) in advance of the third Pre-Inquest Review, to be heard on 17 December 2021.

The Progress of Operation Verbasco

2. At the previous Pre-Inquest Review the MPS and TVP outlined the establishment of Operation Verbasco, the Counter-Terrorism Policing response to the Inquest into the death of Dawn Sturgess. At that time, the team comprised 35 staff.
3. We are pleased to update the Coroner that, since the last hearing, the operation has grown to respond to the demands of the disclosure task:
 - a. A request was made to mobilise Counter Terrorism Police resource across different areas of the Counter Terrorism Network. This resulted in 11 staff from elsewhere in the country being deployed to assist Verbasco for a four-week period ending 17th December 2021.
 - b. Authority was sought to uplift the number of staff by a further 21 posts. This significant request, totalling an additional £1.3 million, has been approved. Recruitment plans are already underway.

4. The Operation Verbasco team are grateful for the recognition of their efforts in the submissions of Counsel to the Inquest (“CtI”). There is, of course, a great deal of work still to do in respect of what is now estimated to involve consideration of circa 50,000 documents/items.
5. Whilst Wiltshire Police are not a part of Operation Verbasco, the two teams have been working closely in order to ensure a consistent police approach. The Operation Verbasco team are assisting Wiltshire Police in their disclosure exercise, which will follow the same process, and have dedicated significant resource to setting up the relevant infrastructure to assist Wiltshire Police to provide relevant disclosure to the Coroner in a manner which does not harm national security.

Public Inquiry

6. The Operation Verbasco team are grateful for the anticipated timetable provided by the Coroner which recognises the significant task ahead. No submissions are made in respect of the suspension of the inquest, the practical steps to establish the Inquiry, or the venue(s).
7. The MPS and TVP agree that it would be sensible to designate existing Interested Persons as Core Participants (subject to their agreement) and both police forces agree to their own separate designation. Neither the MPS nor TVP will be applying for funding under s.40(1) of the Inquiries Act 2005.

Witness Statement

8. As set out at §24 of CtI’s submissions, the MPS has agreed to provide (on behalf of Operation Verbasco) an overarching corporate witness statement from a senior officer (involved in the investigations or with the relevant knowledge), setting out the narrative of events leading to Ms Sturgess’ death and the investigations that took place.

9. It is anticipated that this statement will be of assistance to the Inquiry in identifying provisional witnesses and lines of enquiry and may also help to indicate at an early stage what parts of the evidence may or may not be adduced in OPEN session.
10. The production of such a statement is in itself a significant task and will require reprioritisation of some resourcing. The Operation Verbasco Team will continue to liaise closely with the Inquest Legal Team (or Inquiry Legal Team in due course) in respect of structure, content and timing of the statement.

Other matters

11. As CtI anticipates, it may be necessary at the next Pre-Inquest Review (provisionally scheduled for 24 February 2022) to consider arrangements and timings for restriction order applications and for applications for anonymity and special measures. It is too early to make such arrangements although it is noted that Counsel for the Secretary of State has been asked to make any relevant submissions concerning whether and to what extent restriction notices have been considered or are envisaged.

For MPS

Lisa Giovannetti QC

Julian Blake

Ruby Shrimpton

For TVP

Jason Beer QC

10 December 2021