

**BEFORE THE RIGHT HONOURABLE LORD HUGHES
IN THE MATTER OF THE PUBLIC INQUIRY INTO THE DEATH OF DAWN STURGESS**

SUBMISSIONS ON BEHALF OF WILTSHIRE COUNCIL

Introduction

1. In a letter dated 11 March 2022 the Inquiry Legal Team have sought written submissions from Interested Persons for the date of the next hearing (10.30am on Friday 25 March 2022) in respect of the the following issues:
 - a) Applications for Core Participant status.
 - b) Applications for section 40 funding.
 - c) A full account of their Stage 1 disclosure process (i.e. provision of documents to the Inquiry), including in particular details of the nature / volume of documents yet to be provided to the Inquiry, the process to be followed, any anticipated delaying factors, and a realistic timescale going forward.
 - d) An outline of any likely applications for Restriction Orders, including for the avoidance of doubt any such applications that are anticipated to be made for anonymity / special measures.
 - e) The Secretary of State for the Home Department ('SSHHD') is to state whether or not Restriction Notices are contemplated, and if so the likely subject matter thereof and proposed timings.
 - f) SSHHD and Operation Verbasco are each to provide a CLOSED Annex to their submissions containing all detail regarding disclosure, Restriction Order applications and Restriction Notices that cannot be included in OPEN submissions. Their respective OPEN submissions are to include an indication of which topics are addressed in CLOSED submissions and an OPEN summary of those submissions that is as full as possible.

2. Wiltshire Council advances the following submissions in response to those issues.

Application for Core Participant status

3. Wiltshire Council would seek Core participant status.

4. The Council notes that it has been designated an Interested Person in respect of the Inquest. It seeks Core Participant status on the basis that the Inquest (now the Inquiry) is seeking disclosure from the Council and secondly that it is the Principal Local Authority in which the events occurred.
5. The Council therefore considers that it has a significant interest in an important aspect of the matters to which the Inquiry relates (Rule 5 (2) of the Inquiry Rules 2006).

Application for Funding:

6. Due the wide-ranging scope of the Inquest and various public bodies roles during the emergency it is difficult, at this stage, for the Council to determine whether it will be required to take an active role in the Inquiry and if required, the nature of that role.
7. Therefore, the Council does not intend to make an application for public funding at this stage. However, the Council reserves its position to make such an application should it become necessary to ensure a disproportionate cost does not fall on the residents of Wiltshire.

Disclosure

8. Wiltshire Council is continuing to provide disclosure to the Inquest/Inquiry Legal Team. Due to the limited resources, sufficiently experienced and knowledgeable, available to the Council to undertake the key work of identifying relevant disclosure information and its sensitivity and the effect that pandemic management has had on those officers it has meant that disclosure has taken longer than originally anticipated.
9. Wiltshire Council has been and continues to liaise with the Government legal Team (GLD) in regard to relevant Council's documents which may contain sensitive information. These documents have been viewed by clients represented by GLD with the last meeting occurring on Thursday 17 March 2022.
10. The Council is awaiting advice from GLD as to the sensitivity of information contained within Council documents to complete disclosure of documents within the Council's control.
11. Wiltshire Council hopes to have completed stage 1 disclosure of documents within the control of the Council within six weeks (by 29 April 2022).

Applications for Restriction Orders/Restriction notices:

12. Wiltshire Council is unlikely to make any such applications on its own account however depending on the feedback from GLD there may be such applications made by Government teams in respect of information contained within Council documents that they may wish to be subject to restriction.

13. The Council is awaiting advice in this regard from GLD as set out in paragraph 10 above to identify the extent of any such applications and by whom.

Items e. and f of Directions

14. These are specific directions to SSHD and Operation Verbasco and Wiltshire Council has no submissions to make.

FRANK CAIN
Head of Legal Services
Wiltshire Council

18 March 2022