

## INQUIRY INTO THE DEATH OF DAWN STURGESS

---

### SUBMISSIONS ON BEHALF OF WILTSHIRE COUNCIL FOR THE OPEN PRELIMINARY INQUIRY HEARING ON 15 JULY 2022

---

#### Introductory

1. In written submissions dated 22 June 2022 Counsel to the Inquiry (CTI) has identified the following agenda for this hearing:
  - 1) Disclosure process
  - 2) Restriction Order applications in respect of names:
    - a) Her Majesties Government.
    - b) Operation Verbasco
  - 3) Any other Business
2. Wiltshire Council advances the following submissions in response to those issues:

#### Disclosure Process

3. Wiltshire Council agrees that the special sensitivities of this case have presented and continue to present significant challenges to the conduct of the disclosure process.
4. Whilst the majority of documents held by the Council have been classified as official sensitive and therefore not subject to sensitivity issues, there is a small but distinct group of documents where there is a risk that they may contain sensitive information. It was originally anticipated by the Council that these documents would be identified at risk and submitted to the ILT to check for relevance. If the documents were considered to be relevant, and did contain sensitive information, then that information could be restricted by the ILT team.

5. However, at the request of the Government Legal Department, (“GLD”) the Council has been liaising with HMG for these documents to be reviewed by HMG for sensitivity before being provided to ILT for relevance review.
6. Wiltshire Council would concur that this process is time consuming and is inefficient as time has and will be spent by both Council and HMG staff reviewing documents for sensitivity that may ultimately prove to be irrelevant.
7. This is particularly so as a significant portion of the risk of containing sensitive information will relate to names and for the reasons outlined below do create particular difficulties.
8. Council Officers are scheduled to meet with HMG on 7 July whereby it is hoped that the final issues can be resolved and stage 1 disclosure by the Council can be completed shortly thereafter.

#### **Restriction Order applications as to names**

9. Wiltshire Council notes the applications made by HMG and Operation Verbasco and will abide any Order of the Inquiry.
10. However, it concurs with the observations of Counsel to the Inquiry that: -
  - a. The applications are extremely wide ranging (paragraph 25 of their submissions)
  - b. Notwithstanding the HMG and Operation Verbasco’s responses to Counsel to the Inquiry’s note, Wiltshire Council considers the terms “HMG staff” and “CTP staff” are still too vague/ambiguous due to the depth of the proposed restrictions (paragraph 27 c) and that
  - c. The Proposed restrictions would cover names of individuals whose names have already been linked to the events at Salisbury and surrounding Dawn Sturgess’ death (paragraph 27 d).

The Council notes subsequent clarification from HMG and Operation Verbasco that this has been accepted but clarified as not including staff who have been officially “publicly linked” or “avowed” (refer open notes of clarification).

Should such a wide-ranging restriction order be made, the Council, when completing disclosure, would have difficulty identifying whether a staff member of

HMG or CTP has been officially publicly linked/avowed or not which may create additional unnecessary work and thereby slow down the process.

### **Further Hearings**

11. Wiltshire Council has no submissions to make.

FRANK CAIN  
Head of Legal Services  
Wiltshire Council

4 July 2022