

**THE INQUIRIES ACT 2005
BEFORE THE RT. HON. LORD HUGHES**

PUBLIC INQUIRY INTO THE DEATH OF:

DAWN STURGESS

**SUBMISSIONS OF
THE CHIEF CONSTABLE OF WILTSHIRE POLICE
FOR THE OPEN PRELIMINARY INQUIRY HEARING
on 11 November 2022**

Introduction

1. This matter is listed for a Directions Hearing on 11 November 2022. These submissions made on behalf of the Chief Constable of Wiltshire Police (“Wiltshire Police”) address items 1 (Disclosure update) and 4 (Venue for substantive hearings) on the agenda set out in CTI’s written submissions dated 17 October 2022 at [4].

Disclosure update

2. Since the last Directions Hearing, the process for disclosure to the ILT has sped up for the reasons set out in CTI’s submissions at [7].
3. Wiltshire Police:
 - a. Has now retrieved 6,806 documents;
 - b. Has disclosed 248 documents to the ILT in hard copy for relevance assessment;
 - c. Has 4,209 documents scanned and registered ready for transfer to the ILT electronically for relevance assessment once the hardware and software needed to facilitate that transfer are in place (this is being prioritised by Wiltshire Police with the assistance of Operation Verbasco); and
 - d. Will be in a position to scan, register and transfer to the ILT the remaining 2,349 documents within 2 months.
4. Wiltshire Police remains grateful for the assistance of Operation Verbasco and the constructive dialogue it has had with STI.

Venue for substantive hearings

5. CTI's submissions at [30] set out three broad options for the configuration of the OPEN hearings as follows:
 - a. All OPEN hearings conducted at a venue in Salisbury;
 - b. Some OPEN hearings in Salisbury (focused on the evidence particularly related to the immediate circumstances of Dawn Sturgess' death), with the remaining OPEN evidence heard in London with a video link to a venue in Salisbury; and
 - c. All OPEN hearings in London with a video link to Salisbury.
6. If any of the OPEN hearings are to be held in Salisbury, all other things being equal, option (b) would give the Chair the flexibility to hold hearings in a way that would allow the evidence to be received most naturally. There is likely to be both CLOSED and OPEN evidence on particular stages of the chronology and particular themes which would become more disjointed than is already inevitable if the inquiry had to move from CLOSED to OPEN and *also* to decamp from London to Salisbury or vice versa.
7. Wiltshire Police would not oppose option (c) because of the very real challenges posed by the policing and security operation that would be required in order to hold the OPEN hearings at a public venue in Salisbury. Wiltshire Police continues to engage with the ILT on this issue. It is recognised that there are a number of considerations pointing in favour of at least some of the OPEN hearings taking place in Salisbury, not least the wishes of Dawn Sturgess' family.

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