

<p>1 Friday, 11 November 2022</p> <p>2 (11.00 am)</p> <p>3 THE CHAIR: Thank you for observing the mark of respect.</p> <p>4 This is a third preliminary hearing in the public</p> <p>5 inquiry into the death of Dawn Sturgess, who died</p> <p>6 in July 2018.</p> <p>7 Thank you all very much for coming. That includes</p> <p>8 not only those of you who are here but those of you who</p> <p>9 are listening or attending remotely. I am keen to give</p> <p>10 the maximum possible scope for attendance remotely, if</p> <p>11 that is convenient, as I know it is to Ms Sturgess's</p> <p>12 family.</p> <p>13 This will, like its predecessors, be a preliminary</p> <p>14 hearing. Its purpose is to manage the future conduct of</p> <p>15 the inquiry so that the evidence can be heard in due</p> <p>16 course in an orderly fashion, with all the parties</p> <p>17 having had the opportunity to prepare properly. The</p> <p>18 time for hearing the evidence, as I hope is apparent to</p> <p>19 everybody, comes later.</p> <p>20 Housekeeping</p> <p>21 There is one preliminary matter of housekeeping,</p> <p>22 which I am told you have all been alerted to. And it</p> <p>23 arises in this way: as you will all know, the reason why</p> <p>24 this investigation into Dawn Sturgess's death was</p> <p>25 converted from an inquest into a public inquiry is that,</p> <p style="text-align: center;">Page 1</p>	<p>1 you who are here, nor can you do it in relation to those</p> <p>2 who are hearing it in real time because they are on</p> <p>3 a live link. So what you can do in relation to all of</p> <p>4 you and to them is to require you to refrain from</p> <p>5 publishing anything about what is said in court until</p> <p>6 the end of the hearing, and that way again there can be</p> <p>7 time to take stock should an accident happen. It seems</p> <p>8 to me very unlikely that anything of that kind will</p> <p>9 occur, but you will understand the risks can't be taken.</p> <p>10 So I am persuaded that that's an appropriate thing</p> <p>11 to do for today and the order I propose to make is as</p> <p>12 follows:</p> <p>13 The public and media attending this hearing remotely</p> <p>14 will do so by means of a link with a five minute delay.</p> <p>15 Members of the public and the media who are in court may</p> <p>16 not, I am afraid, communicate using electronic devices</p> <p>17 during the hearing, for the obvious reason that I have</p> <p>18 given. The court participants and legal representatives</p> <p>19 who are attending the hearing remotely will have a live</p> <p>20 link. They may, of course, communicate with other</p> <p>21 members of their team in real time; they will need to do</p> <p>22 that. But what they may not do is communicate any more</p> <p>23 widely about the hearing while it is going on. Now,</p> <p>24 I gather that although there wasn't time to, and there</p> <p>25 perhaps ought to have been, there wasn't time to invite</p> <p style="text-align: center;">Page 3</p>
<p>1 because of the circumstances, it is obvious and</p> <p>2 inevitable that a good deal of highly sensitive material</p> <p>3 is bound to have to be considered in closed hearings.</p> <p>4 If it had remained an inquest that couldn't have been</p> <p>5 possible; it couldn't have been considered at all.</p> <p>6 Now, I have received a request from those acting for</p> <p>7 the various Government departments for arrangements to</p> <p>8 be made at this and later hearings to guard against any</p> <p>9 risk that there might be of accidental mention in court</p> <p>10 of sensitive material. The problem is, if you think</p> <p>11 about it, that if you don't make special arrangements</p> <p>12 once there has been such an accident, and something has</p> <p>13 been inadvertently mentioned, you can't undo it. So</p> <p>14 various other inquiries and some tribunals which handle</p> <p>15 sensitive material have evolved a technique for managing</p> <p>16 this risk, and what do you in essence is two things:</p> <p>17 first of all you introduce a delay of a few minutes of</p> <p>18 the feed from here to those members of the public and</p> <p>19 press who are observing proceedings remotely. Then, if</p> <p>20 there were an accidental mention of something which is</p> <p>21 very sensitive, the feed can be cut off before it</p> <p>22 reaches anybody outside this courtroom, and then there</p> <p>23 is scope for argument about whether it is necessary to</p> <p>24 do anything about it.</p> <p>25 You can't obviously do that in relation to those of</p> <p style="text-align: center;">Page 2</p>	<p>1 written submissions about this. I gather that all of</p> <p>2 you have been alerted to the problem and had time to</p> <p>3 think about it, and I hope and expect that that means</p> <p>4 that there isn't anything that anyone needs to say at</p> <p>5 this moment. Am I right about that?</p> <p>6 MR MANSFIELD: Yes, I thank you.</p> <p>7 THE CHAIR: Thank you very much, Mr Mansfield, I am</p> <p>8 grateful. Well then that is the order that I make in</p> <p>9 relation to today. For future hearings we will make</p> <p>10 sure, I shall make sure, that either those or perhaps</p> <p>11 modified arrangements are properly thought about well in</p> <p>12 advance and you all have time to think about it if</p> <p>13 necessary. But I hope everybody sees the sense of what</p> <p>14 is being done.</p> <p>15 Right, thank you for that. I shall ask Mr O'Connor</p> <p>16 to open proceedings. Yes Mr O'Connor.</p> <p>17 Submissions by MR O'CONNOR</p> <p>18 MR O'CONNOR: Sir, I am grateful. I will start with</p> <p>19 representation.</p> <p>20 THE CHAIR: Please.</p> <p>21 MR O'CONNOR: I appear as counsel to the inquiry, with my</p> <p>22 learned friends Ms Whitelaw and Ms Pottle. The family</p> <p>23 of Dawn Sturgess and also Charlie Rowley are represented</p> <p>24 by my learned friends Mr Mansfield KC and Mr Nichols.</p> <p>25 The Secretary of State for the Home Department and also</p> <p style="text-align: center;">Page 4</p>

<p>1 other Government departments are represented by my 2 learned friend Ms McGahey KC and Ms Woolf. 3 THE CHAIR: Yes. 4 MR O'CONNOR: Sir, the constituent parts of Operation 5 Verbasco are represented today. First of all the 6 Metropolitan Police, by my learned friend 7 Ms Giovanetti KC and Mr Moss. And Thames Valley Police 8 by Mr Goss. The Chief Constable of Wiltshire Police is 9 represented by Mr Beggs KC. Sergei and Yulia Skripal 10 are represented by Mr Chapman, who is here. 11 THE CHAIR: Good. 12 MR O'CONNOR: And lastly, sir, simply to mention that two 13 other core participants, that is Wiltshire Council and 14 the South Western Ambulance Service NHS Foundation 15 Trust. You are aware they have filed written 16 submissions for this hearing but have indicated to you 17 that they will not be attending. 18 THE CHAIR: They were kind enough to ask to be excused and 19 it seems to me perfectly appropriate. 20 MR O'CONNOR: Sir, yes. 21 Sir, as you have mentioned, this is the third open 22 directions hearing in this inquiry. Earlier open 23 directions hearings took place in March and July this 24 year, and each of those two hearings was followed 25 shortly afterwards by a closed hearing.</p> <p style="text-align: center;">Page 5</p>	<p>1 are any problems with the link, then as before, we 2 encourage anyone who is remote and suffering 3 difficulties in the first instance to contact either 4 Mr Smith or Ms Nichols by email. 5 THE CHAIR: Please. I am grateful to whoever it is who has 6 arranged the improved technology. It didn't work well 7 last time. 8 MR O'CONNOR: Sir, very briefly, there is a hearing bundle 9 that has been prepared. All core participants should 10 have received a copy of it electronically. I know you 11 have, I think you have a hard copy -- 12 THE CHAIR: I have a hard copy as well, yes. 13 MR O'CONNOR: -- as well as the electronic bundle. It is 14 numbered tabs 1 to 25, and I will be making some 15 reference to it during my submissions. 16 THE CHAIR: Mm-hm. 17 MR O'CONNOR: So written submissions. We, that is counsel 18 to the inquiry, filed our written submissions on 19 17 October, and core participants helpfully provided 20 responsive submissions on 31 October. Those are all in 21 the bundle at tabs 4 to 10. 22 THE CHAIR: Yes, I have seen them and read them. Thank you. 23 MR O'CONNOR: We propose to publish those submissions, sir, 24 on the inquiry website after this hearing. That is 25 a course we have adopted at previous hearings. Of</p> <p style="text-align: center;">Page 7</p>
<p>1 THE CHAIR: Mm-hm. 2 MR O'CONNOR: Following the July hearing, you issued 3 a ruling regarding the application for restriction 4 orders in relation to names that had been canvassed 5 before you, and you also gave certain directions. Both 6 the ruling and those directions have been published on 7 the inquiry website. 8 THE CHAIR: Yes. 9 MR O'CONNOR: And I will return to them both in the course 10 of my submissions this morning. 11 So just a few preliminary housekeeping matters, if 12 I may. 13 THE CHAIR: Mm-hm. 14 MR O'CONNOR: So first of all as you have already indicated 15 this is a hybrid hearing. All advocates are here in the 16 hearing room, but there are a number of observers, both 17 core participants and legal representatives, including, 18 sir, as you have already mentioned, some of the family 19 of Ms Sturgess, who are following on a remote link. So 20 it is right to say that at the last hearing there were 21 some difficulties with the remote connection. 22 THE CHAIR: Yes. 23 MR O'CONNOR: But we have made very different arrangements 24 on this hearing, and we very much hope, therefore, that 25 there not be any recurrence of those problems. If there</p> <p style="text-align: center;">Page 6</p>	<p>1 course if there are any objections to us doing that from 2 core participants we invite them to raise those 3 objections with you when they come to make oral 4 submissions in due course. 5 THE CHAIR: Yes. 6 MR O'CONNOR: Sir, the agenda for this hearing is at tab 1 7 of the bundle. Just to indicate how we propose to deal 8 with the hearing. For the purposes of the oral 9 hearings, I propose to take all of the issues arising 10 under the first three items on the agenda together, that 11 is the disclosure update, restriction notice, and what 12 we have described as the way ahead. I will make 13 submissions on those matters and then, sir, you will 14 invite submissions from core participants on those 15 matters. 16 THE CHAIR: Yes, I think those all go together, Mr O'Connor. 17 MR O'CONNOR: They do, sir. The intention is that after 18 that we will then deal separately with first of all the 19 question of the venue of the substantive hearings and 20 the timing of the substantive hearings. And lastly 21 there may be matters of any other business, including 22 the timing of the next preliminary hearing. 23 THE CHAIR: Yes. 24 MR O'CONNOR: So lastly in terms of housekeeping, I just 25 mention, I have already mentioned, that there were</p> <p style="text-align: center;">Page 8</p>

<p>1 closed hearings that followed the earlier preliminary 2 hearings in this inquiry. Just for the sake of 3 transparency, may I make it clear that arrangements have 4 been made so that a closed hearing can take place 5 following this hearing if you consider it necessary, 6 having heard open submissions.</p> <p>7 Our current view, which is reflected in our 8 submissions, is that it may well be that it is not 9 necessary to have a closed hearing following this 10 hearing.</p> <p>11 THE CHAIR: We will see.</p> <p>12 MR O'CONNOR: But sir, clearly it is a matter for you and 13 you will make a decision whether you think a closed 14 hearing is needed at the end of this hearing. And we 15 will of course confirm in due course whether such 16 a hearing has taken place for those core participants 17 who would not take part in such a hearing.</p> <p>18 THE CHAIR: Yes, well, if anybody proposes to suggest it 19 they should do so, please, while on their feet.</p> <p>20 MR O'CONNOR: Sir, I will turn, then, to those three matters 21 on the agenda, which I will address cumulatively. 22 Disclosure. Update. Future proposals.</p> <p>23 Sir, as we have observed, and other core 24 participants have observed at previous hearings, the 25 difficulty and sheer length of the disclosure process is</p> <p style="text-align: center;">Page 9</p>	<p>1 material to your team for review, we have provided some 2 fairly detailed points about this in our written 3 submissions. As I have said, we propose to publish 4 those, and so I am not going to go into that level of 5 detail in my oral submissions this morning. As you will 6 recall from both the previous hearing in July and the 7 hearing before that, the stage 1 disclosure process was 8 being delayed by what was described as the preliminary 9 security review. That was the requirement for the 10 Government department to review for security 11 sensitivities the majority of documents emanating from 12 the police before they were provided to us. As a result 13 of directions that you gave following the last hearing, 14 that process has now ended and that has had a very 15 significant effect. In a word, the process has become 16 unblocked. As you will see from written submissions, in 17 the months since the last hearing Operation Verbasco has 18 provided us, the inquiry legal team, with thousands of 19 documents for review.</p> <p>20 Sir, you will have seen that there is 21 an inconsistency between the numbers of Operation 22 Verbasco documents we have provided in our submissions, 23 and the numbers described in the Operation Verbasco 24 submissions. That inconsistency arises, it seems, from 25 how documents are counted, in other words whether</p> <p style="text-align: center;">Page 11</p>
<p>1 a striking feature of this inquiry. It is important 2 that I do start by referring again to these very unusual 3 features of this inquiry, and also as before 4 acknowledging the impact of this delay on all of those 5 with an interest in the inquiry, in particular of course 6 Dawn Sturgess's family.</p> <p>7 THE CHAIR: Yes.</p> <p>8 MR O'CONNOR: That said, at this hearing we are able to 9 share more positive news than at the last. As a result, 10 largely, of directions that you made, sir, at that last 11 hearing, or rather following the last hearing, the 12 process of disclosure is now moving much more rapidly 13 than it had been previously. There are various points 14 I am going to make covering both, first of all the 15 progress that has been made and developments since the 16 last hearing. Those points largely cover what we have 17 described as stage 1 disclosure. Then further points 18 about what we have described as the way forward, where 19 the focus is on restriction order applications and 20 stage 2 disclosure. Restriction orders in this case 21 will be essential to enabling stage 2 disclosure, that 22 is disclosure to core participants, to take place.</p> <p>23 THE CHAIR: Yes.</p> <p>24 MR O'CONNOR: Sir, first of all by way of a factual update, 25 then, on stage 1 disclosure, that is the provision of</p> <p style="text-align: center;">Page 10</p>	<p>1 a series of log entries, for example, is counted as 2 a single document or a series of items.</p> <p>3 THE CHAIR: That accounts for the difference between 4 something of the order of 4,000 or 5,000 and 60,000, 5 does it?</p> <p>6 MR O'CONNOR: It does sir, yes.</p> <p>7 THE CHAIR: All right.</p> <p>8 MR O'CONNOR: Not necessarily all logs, but that difference 9 of approach. We took the former approach and Operation 10 Verbasco the latter.</p> <p>11 THE CHAIR: Yes.</p> <p>12 MR O'CONNOR: At least for our part we don't think it is 13 going to be necessary for you to engage too closely this 14 morning with the distinction between a document and 15 an item. As the more important point is that there is 16 a common understanding and agreement about the volume of 17 documents being provided from Operation Verbasco to us, 18 and in short, where, as before, we were receiving very 19 small numbers of documents for review from Operation 20 Verbasco, now we are receiving their material in very 21 considerable volume.</p> <p>22 THE CHAIR: Right.</p> <p>23 MR O'CONNOR: Whilst this is a welcome development it does 24 of course place the onus on us to review the material as 25 quickly as possible. The submissions that you have</p> <p style="text-align: center;">Page 12</p>

<p>1 received from the family make a reasonable query as to 2 whether we have sufficient resources for that task. 3 THE CHAIR: Yes. 4 MR O'CONNOR: Given the sensitivity of the material in 5 question, there are limits to how we can scale up our 6 capacity, but we have managed to ensure that two further 7 members of the solicitors' team have obtained the 8 appropriate level of clearance and authorisations to 9 assist with the task of reviewing documents for 10 relevance. 11 THE CHAIR: Right. 12 MR O'CONNOR: We are making very good progress through the 13 police documents. Of the three tranches of material 14 delivered by Operation Verbasco before 8 November, we 15 have completed our review of two of those tranches, and 16 will complete the third in the next few weeks. 17 To date, we have reviewed over 23,000 documents, or 18 items, to use Operation Verbasco's terminology. 19 A fourth tranche was delivered just a few days ago, on 20 8 November, and that will take the total to just over 21 28,000 documents. 22 THE CHAIR: Right. 23 MR O'CONNOR: It is also worth noting that we have worked 24 with both Operation Verbasco and the Wiltshire Police to 25 try to prioritise documents within the disclosure</p> <p style="text-align: center;">Page 13</p>	<p>1 holding the vast majority of documents. 2 We have endeavoured to progress disclosure workflows 3 with both of those teams. HMG has now provided 4 disclosure strategies covering 13 departments or 5 agencies which it represents, and we have provided input 6 into those documents. We hold regular meetings with the 7 Operation Verbasco team to discuss progress on the 8 police report, and to facilitate the proportionate 9 disclosure of material. Operation Verbasco also 10 continues to share with us fortnightly its performance 11 dashboard, tracking the metrics for the number of 12 documents held, scheduled and provided for security 13 review. 14 THE CHAIR: Right. 15 MR O'CONNOR: So I will say more about the stage 2 16 disclosure process in a moment, but we anticipate 17 working even more closely with the Operation Verbasco 18 and HMG teams in that context. 19 So turning briefly to the stage 2 disclosure 20 process. 21 THE CHAIR: Yes. 22 MR O'CONNOR: As we have noted in paragraph 10 of our 23 written submissions, a limited amount of stage 2 24 disclosure, 40 or so documents, has been provided to 25 core participants since the July hearing.</p> <p style="text-align: center;">Page 15</p>
<p>1 process so that very broadly speaking documents which 2 may be more likely to be relevant are reviewed earlier 3 than those that are not. 4 Also, our stage 1 reviewing task is not limited to 5 police documents. As we note in our submissions, we 6 have also received further material for review, first of 7 all from Her Majesty's Government -- or His Majesty's 8 Government, sorry, and also from Wiltshire Council. As 9 to that material, we have now reviewed all of the 10 material provided by HMG since the last hearing, some 11 nine lever arch files. Relevant decisions have been 12 provided in writing in respect of three files of that 13 material and we have given an indication in meetings 14 regarding the way in which we propose to address the 15 remaining material. We have also reviewed all of the 16 material, that is two files, from Wiltshire Council and 17 a further three files that we have received from 18 Wiltshire Police. 19 Sir, it is also important to emphasise that our work 20 is not limited simply to reviewing documents that have 21 been provided. We have engaged very extensively in 22 a practice of holding regular meetings and engaging in 23 correspondence with all core participants, but in 24 particular with Operation Verbasco and the HMG teams. 25 Operation Verbasco and HMG, of course, between them</p> <p style="text-align: center;">Page 14</p>	<p>1 THE CHAIR: Well, that so far is pretty limited, isn't it? 2 MR O'CONNOR: Of course it is, sir, and it will be 3 immediately apparent that numbers of that nature, 40 or 4 so, bear no comparison to the thousands of documents 5 that are currently being reviewed for relevance. Many 6 of which ultimately will be disclosed to core 7 participants. It is right to say there is an increasing 8 volume of material that has been determined to be 9 relevant but which is being held back from stage 2 10 disclosure pending restriction order applications. That 11 includes the police report that I have mentioned, and 12 which we have discussed at previous hearings, and the 13 documents exhibited to it. 14 Sir, the small, in fact very small, proportion of 15 relevant documents that we are able to disclose to core 16 participants in advance of the restriction order process 17 is simply, we say, another consequence of the scale and 18 nature of the sensitivities in this case. 19 THE CHAIR: Yes. 20 MR O'CONNOR: Sir, I have mentioned the police report 21 a couple of times now. And as all will be aware, work 22 has been under way for some time in preparing 23 a statement, or report, describing the police 24 investigation and its outcome, together with key 25 underlying documents. This work has been led by</p> <p style="text-align: center;">Page 16</p>

<p>1 Operation Verbasco, but both we, and those acting for 2 HMG, have had very considerable input into it. We have 3 no doubt that Ms Sturgess's family and those 4 representing the family are keen to see this report. 5 THE CHAIR: Certainly. 6 MR O'CONNOR: But it is right to say that that report is 7 still in draft in that content from the Operation 8 Verbasco disclosure is being constantly added, or being 9 prepared for addition to it, as we review the stage 1 10 disclosure. 11 It, that is the police report, is also one of those 12 documents that cannot be disclosed to core participants 13 until you have determined, through ruling on restriction 14 or the applications, which aspects of this case must be 15 dealt with by way of open evidence and which can 16 properly be addressed in closed. Indeed, the police 17 report is a classic example of such a document. 18 THE CHAIR: Right. 19 MR O'CONNOR: At paragraphs 19 and 20 of our written 20 submissions, we drew attention to the fact that work on 21 preparing the police report and, equally important, on 22 determining which parts of it are and are not sensitive, 23 has been conducted in parallel to the document review 24 exercise. Indeed, you made a direction in relation to 25 this in April of this year.</p> <p style="text-align: center;">Page 17</p>	<p>1 can't make submissions about it. 2 MR O'CONNOR: Quite, sir. 3 THE CHAIR: Yes. 4 MR O'CONNOR: And you, of course, as the head of this 5 inquisitorial process will wish all parties to have the 6 material that they would need. 7 THE CHAIR: Oh, yes. 8 MR O'CONNOR: In order to -- 9 THE CHAIR: In due course I will have to decide whether 10 something is relevant or not, but all parties must have 11 the opportunity to see what they can -- 12 MR O'CONNOR: Yes. 13 THE CHAIR: -- of what might be relevant, so that they can 14 present their arguments. All right, thank you very 15 much. No, that is helpful, thank you. Now then, you 16 were going to go on to the restriction notice. 17 MR O'CONNOR: Yes, sir. 18 In August of this year the Government legal 19 department served on the inquiry team a restriction 20 notice signed by the then Home Secretary dated 21 27 July 2022. 22 THE CHAIR: Yes. 23 MR O'CONNOR: A copy of the notice was sent to us on that 24 date, as I say, and will be published on the inquiry 25 website after the hearing. I should say all core</p> <p style="text-align: center;">Page 19</p>
<p>1 THE CHAIR: Yes. 2 MR O'CONNOR: And as we note in our submissions, that work, 3 which is time consuming and which involves us, Operation 4 Verbasco and HMG, has continued in recent months and we 5 are pleased to report that significant progress 6 continues to be made in this regard. 7 Sir, I am going to come on now to address what is in 8 fact the second item on the agenda, which is 9 a restriction notice. 10 THE CHAIR: Well, just before you leave the very helpful 11 summary you have just given, may I ask a question about 12 relevance. When your team is reviewing these many 13 documents for the preliminary question of relevance, 14 what is being addressed? Is the test what you, as 15 counsel to the inquiry, may wish to adduce, or does it 16 extend to asking the question whether any other party 17 might reasonably think the material relevant? 18 MR O'CONNOR: Well, sir, this is of course an inquisitorial 19 process, and so perhaps the shortest answer to your 20 query is that the test is the question of what you will 21 need in order to conduct a full and fair investigation. 22 But, sir, to come back to the distinction you draw, it 23 is very much the latter. It is, we are of course 24 mindful -- 25 THE CHAIR: Well, that is important because otherwise they</p> <p style="text-align: center;">Page 18</p>	<p>1 participants have now seen it, because it was served 2 with our written submissions several weeks ago. 3 THE CHAIR: Yes. 4 MR O'CONNOR: Sir, a restriction notice is made under 5 Section 19 of the Inquiries Act 2005, and the relevant 6 provisions of Section 19 are in fact set out in our 7 written submissions, which, as I have said, will be 8 published after the hearing. For anyone following these 9 proceedings who is not familiar with the detailed 10 provisions of the Inquiries Act, a restriction notice is 11 a determination that has precisely the same effect as 12 a restriction order made by the chair of an inquiry. 13 They are both determinations relating to the way in 14 which sensitive material falls to be treated within 15 an inquiry process. The difference between the two, and 16 of course it is a very important difference, is that 17 a restriction order is a decision that you make in 18 a transparent way, having heard submissions from core 19 participants. A restriction notice, by contrast, is 20 essentially an instruction from a Government minister 21 made without consultation. Having received the notice, 22 it was clear to us that the core participants would wish 23 to know as much as possible about the material that it 24 covers. That material being referred to in the notice 25 as the schedule material.</p> <p style="text-align: center;">Page 20</p>

<p>1 We therefore discussed this matter with those acting 2 for HMG and consent was given to provide the following 3 form of words: 4 "The restriction notice only covers a small set of 5 documents which represent an extremely small proportion 6 of the total number of documents that have been provided 7 or are being provided to the inquiry legal team by HMG." 8 As you know, sir, the family have recently raised 9 further queries in correspondence which are summarised 10 in their written submissions, which is to be found at 11 tab 5 of the hearing bundle. Sir, I will let 12 Mr Mansfield address those matters, if he wishes, but in 13 summary it does appear to us that the family have been 14 given certain points of reassurance that they sought. 15 Sir, the correspondence to which I have referred is to 16 be found at tabs 18 to 21 of the bundle. I don't ask 17 you to call those matters up, but -- 18 THE CHAIR: I have seen it, Mr O'Connor. 19 MR O'CONNOR: And I should add, sir, that we are proposing 20 to publish those pieces of correspondence along with the 21 restriction notice on the inquiry website. 22 THE CHAIR: Yes. 23 MR O'CONNOR: Sir, finally, I would not wish to leave the 24 subject of the restriction notice without observing and 25 emphasising that it is an exceptional measure. In most,</p> <p style="text-align: center;">Page 21</p>	<p>1 THE CHAIR: Without that assurance the restriction notice 2 would cause very serious difficulties for any tribunal 3 chairman. 4 MR O'CONNOR: Sir, that's quite right. As I said, 5 Mr Mansfield and Ms McGahey may address you further on 6 that point, but that is our understanding. 7 THE CHAIR: That's what it comes to. All right. 8 MR O'CONNOR: The effect of the restriction notice is to 9 impose special security requirements and arrangements on 10 how you may adduce this material into evidence. 11 THE CHAIR: Yes. 12 MR O'CONNOR: Or refer to it in your report. But it doesn't 13 prevent you from doing either of those two things. 14 THE CHAIR: Yes. All right. Well, let's leave it there for 15 the moment. 16 MR O'CONNOR: Sir, I am going to move on to the future. 17 First of all in terms of the future progress and 18 completion of stage 1 disclosure, as I have already 19 said, the two organisations which are between them 20 providing by far the largest volume of material by way 21 of stage 1 disclosure are HMG and Operation Verbasco. 22 THE CHAIR: Mm-hm. 23 MR O'CONNOR: Both organisations have previously indicated 24 that the exercise of providing stage 1 disclosure to 25 you, or in the case of Operation Verbasco the exercise</p> <p style="text-align: center;">Page 23</p>
<p>1 some would say all, cases, it ought to be you and not 2 the Secretary of State who takes the decision, we would 3 submit a judicial decision, as to what evidence can be 4 adduced in open proceedings and what material must 5 remain in closed. All that said, it should be 6 emphasised that this particular restriction notice is 7 a limited measure. It applies to only a very small 8 proportion of the HMG documentation that has been made 9 available to you, and it will not prevent you, sir, 10 either from considering the schedule of material in 11 evidence or from referring to it, if of course you think 12 that appropriate, in your report. 13 THE CHAIR: Well, that's very important, Mr O'Connor, and 14 that's how I read the correspondence. 15 MR O'CONNOR: Yes. 16 THE CHAIR: You have had an assurance, have you, from His 17 Majesty's Government, that notwithstanding the 18 restriction notice I can look at this material and if 19 necessary, in order to reach the conclusions, whatever 20 they may be, that I arrive at, I can refer to it in 21 closed hearings. So at that point it becomes 22 an equivalent to a restriction order that I might have 23 made. 24 MR O'CONNOR: Sir, that is certainly the effect of the 25 correspondence as we read it.</p> <p style="text-align: center;">Page 22</p>	<p>1 of scheduling that material, with disclosure to you to 2 follow promptly thereafter, was likely to be complete by 3 the end of this calendar year. 4 THE CHAIR: That's about six weeks' time. 5 MR O'CONNOR: That's right. We did request in our written 6 submissions that they provide an update in this regard, 7 and both have now stated that their timings have 8 slipped. I will leave it to them to expand on the 9 extent -- causes of that slippage. It is obviously 10 unfortunate. 11 THE CHAIR: Very. 12 MR O'CONNOR: Particularly since we are now able to process 13 documents much more quickly than we were earlier in the 14 year, and of course we all wish to move on to the 15 stage 2 disclosure exercise. 16 Sir, as we indicated at paragraph 12 of our written 17 submissions, we do invite you to direct monthly updates 18 be provided now by HMG and Operation Verbasco to the 19 solicitor to the inquiry in a form that can be disclosed 20 to other CPs on their progress towards completing 21 stage 1 disclosure. 22 THE CHAIR: So that is not simply to let you know or to let 23 me know, but to let the other participants know. 24 MR O'CONNOR: Sir, we will come to the question of a further 25 hearing, but we have said in our written submissions</p> <p style="text-align: center;">Page 24</p>

<p>1 that we anticipate a further preliminary hearing being 2 held in early next year. But it seemed to us that it 3 was important for core participants to have regular 4 updates on this particular issue within this period, 5 rather than wait until early next year to be told what 6 has happened; simply because it is so important that we 7 do finish this stage of the proceedings so that we can 8 properly advance to stage 2.</p> <p>9 THE CHAIR: Right.</p> <p>10 MR O'CONNOR: So it is the stage 2 disclosure, and the 11 restriction orders in particular, relating to the 12 Operation Verbasco and HMG material that I now turn.</p> <p>13 And sir, I have already perhaps said this, but we 14 recall that the stage 2 disclosure is the process of 15 your team making available to core participants the 16 documents that have been deemed relevant at stage 1. 17 And in many inquiries this is simply a logistical 18 exercise of transferring documents from one part of 19 a database to another. But of course there is much more 20 to it here, and most importantly this is the stage at 21 which the sensitive contents of relevant documents are 22 removed from the open versions of the documents for 23 further consideration in closed session. And as 24 a starting point to some submissions on how this process 25 should go forward, we advance three general</p> <p style="text-align: center;">Page 25</p>	<p>1 certainly submit that there can be a considerable degree 2 of working in parallel.</p> <p>3 THE CHAIR: Right.</p> <p>4 MR O'CONNOR: Sir, you will have seen HMG's submission that 5 it is necessary to have a feel for the entirety of the 6 material in question before final decisions are made as 7 to where the boundaries between open and closed can and 8 should be drawn, but it absolutely does not follow, we 9 say, and in fairness I don't think this is really 10 contentious as between us and HMG, it doesn't follow 11 that no useful work can be done on stage 2 until the 12 final document has been reviewed for relevance at 13 stage 1. Indeed, at our instigation, the inquiry has of 14 course already begun to work on stage 2 issues. The 15 restriction order applications in respect of names that 16 was dealt with at the last hearing being one example, 17 and the preparatory work that was being done on the 18 police report being another.</p> <p>19 THE CHAIR: Yes.</p> <p>20 MR O'CONNOR: So we suggested in our written submissions 21 that work could begin immediately on identifying 22 a sample set of documents for which HMG and Operation 23 Verbasco could make applications for restriction orders. 24 We suggested directions for first of all a date by which 25 the set of sample documents were to be agreed.</p> <p style="text-align: center;">Page 27</p>
<p>1 propositions. First, the sensitivities surrounding this 2 case are such that the scale of this task, that is going 3 through the restriction order process, will be very 4 considerable indeed. In some cases the redaction 5 process will simply involve removing a name, or 6 a reference to a particular technique. Here, the 7 sensitivities are complex. Each document that is to be 8 disclosed in open will need to be considered with care.</p> <p>9 We anticipate many documents on a line by line or even 10 word by word basis. We anticipate that there will be 11 extensive restriction order applications to permit 12 redactions to be made to documents.</p> <p>13 THE CHAIR: Yes.</p> <p>14 MR O'CONNOR: Second, we must devise a means of dealing with 15 these issues that is workable and as efficient as 16 possible. And third, we must start to make progress 17 with the stage 2 exercise alongside the completion of 18 stage 1 disclosure.</p> <p>19 THE CHAIR: Yes, there is no reason at all why they have to 20 be sequential, is there?</p> <p>21 MR O'CONNOR: Well, sir, there --</p> <p>22 THE CHAIR: Some parts may.</p> <p>23 MR O'CONNOR: Sir, one needs to clearly reach a certain 24 stage with the stage 1 process in order to understand 25 the issues in the stage 2 process. But we would</p> <p style="text-align: center;">Page 26</p>	<p>1 Secondly, a date by which HMG and Operation Verbasco 2 were to make restriction orders, and then dates for open 3 and closed hearings to enable those applications to be 4 determined by you.</p> <p>5 THE CHAIR: Mm-hm.</p> <p>6 MR O'CONNOR: You have, of course, subsequently seen HMG and 7 Operation Verbasco's responses to our proposal. The 8 responses that were contained in their written 9 submissions. HMG have indicated that identifying 10 a sample set of documents now will detract from efforts 11 to complete stage 1 disclosure, and ultimately slow 12 progress overall. They also make the point, to which 13 I have already referred, that it is not possible to make 14 reliable applications on the basis of incomplete 15 material. Operation Verbasco are in a somewhat 16 different position. They have suggested making a single 17 overarching draft application in late January, before 18 they have completed scheduling of their own material.</p> <p>19 Sir, we have had productive discussions with both HMG 20 and Operation Verbasco since the filing of our 21 submissions and their submissions, and we have agreed 22 a proposal between all three of us which we believe will 23 make real progress towards stage 2 disclosure without 24 creating unnecessary work.</p> <p>25 THE CHAIR: Right.</p> <p style="text-align: center;">Page 28</p>

7 (Pages 25 to 28)

<p>1 MR O'CONNOR: HMG will consider the first batch of police 2 material that has been reviewed by the inquiry legal 3 team, as it has been described, and which within that 4 batch has been identified as relevant. That has been 5 referred to as batch 1. And also HMG will review the 6 documents which accompany the police report. They will 7 do that early next year, and produce a draft schedule of 8 sensitivities, the idea being that that will form the 9 basis of restriction order applications to follow, which 10 will be timetabled at the next hearing.</p> <p>11 As I will mention in a moment, we anticipate, we 12 think it appropriate, that Operation Verbasco are 13 directed by you to conduct a similar process.</p> <p>14 Sir, we therefore invite you to make the following 15 directions: first of all HMG to review what I will 16 describe as batch 1 of the Operation Verbasco disclosure 17 and also those documents appended to the police report 18 and then provide a draft schedule of sensitivities 19 referring to those documents by 28 February 2023.</p> <p>20 THE CHAIR: Now, are you contemplating that that all 21 happens, as it were, on 27 February, or is it 22 a continuous process?</p> <p>23 MR O'CONNOR: Sir, we very much -- clearly a direction of 24 this sort needs to have an end date.</p> <p>25 THE CHAIR: Oh yes.</p> <p style="text-align: center;">Page 29</p>	<p>1 of sensitivities in relation to the same documents by 2 the same date; that is 28 February 2023. And sir, just 3 to return to the point you have raised with me, this is 4 a tripartite exercise. If these schedules are to be 5 drafted and to assist you in due course, it will be 6 necessary for discussions to take place between each of 7 the three parties; that is Operation Verbasco and HMG 8 and us, in order to make that process as efficient and 9 helpful as possible.</p> <p>10 THE CHAIR: Yes.</p> <p>11 MR O'CONNOR: Sir, the first direction is simply a direction 12 for Operation Verbasco to ensure that it has provided 13 HMG with the documents in question by a backstop date of 14 30 November of this year. Without going into detail, 15 sir, we know it will be possible for them to provide 16 many of the documents earlier than that, but that is 17 a backstop date.</p> <p>18 And sir, the last direction relates, switches the 19 spot light to Wiltshire Police. Sir, I have already 20 mentioned that they have been providing us with 21 material. They have separate material, some of which, 22 as I will mention in a moment, they have not yet been 23 able to share with us because of computer difficulties. 24 But we invite you nonetheless to make a direction that 25 they provide a draft schedule of sensitivities in</p> <p style="text-align: center;">Page 31</p>
<p>1 MR O'CONNOR: It is very much our intention, and this is 2 something that we have discussed with both teams, that 3 that needs to be an iterative process and we hope to be 4 able to engage in this instance with the HMG team at 5 an early stage to discuss their work with them.</p> <p>6 THE CHAIR: So when can this process start, in your 7 judgment?</p> <p>8 MR O'CONNOR: Well sir, we are happy to start it. I will 9 come in a moment to the provision of the material to 10 HMG, but certainly we anticipate it starting in the next 11 few weeks.</p> <p>12 THE CHAIR: Right.</p> <p>13 MR O'CONNOR: And then a process rolling forward going to 14 the end of this year and early next year, so that we 15 hope that this will be a means of developing a much more 16 detailed understanding of what will be required in the 17 restriction order process by, as I say, the end 18 of February next year.</p> <p>19 THE CHAIR: End of February. Mm-hm.</p> <p>20 MR O'CONNOR: Sir, that is the first direction we invite you 21 to make, and of course you will hear submissions from 22 others in relation to that.</p> <p>23 Sir, the second direction is a similar direction in 24 relation to Operation Verbasco. We invite you to direct 25 that they provide a similar schedule or draft schedule</p> <p style="text-align: center;">Page 30</p>	<p>1 respect of their material by the same date; 2 28 February 2023. And sir, if I may make two brief 3 further points on those directions that we have 4 proposed. The first one does relate to Wiltshire 5 Police. As I have said, as we understand it the IT that 6 is required has still not been set up to allow them to 7 transfer their batch of documents, which we believe 8 number some 6,000 documents, to us. So that's a point 9 which is made in the written submissions. You may 10 recall it has come up at previous hearings.</p> <p>11 THE CHAIR: It has.</p> <p>12 MR O'CONNOR: It is possible, therefore, depending on how 13 quickly the IT problems are ironed out, that we will not 14 have made sufficient stage 1 progress with their 15 documents by early next year to enable them to comply 16 with the direction that we have invited you to make. We 17 hope to find a way around these difficulties, most 18 obviously by the IT problems being resolved speedily, 19 and therefore we do nonetheless invite you to make this 20 direction but we do acknowledge now, and on the record, 21 that there may be problems ahead for Wiltshire Police in 22 complying with it.</p> <p>23 Sir, the second point I make returns to some of the 24 points I have made a few moments ago, and it is really 25 one of emphasis. The purpose of these directions, as we</p> <p style="text-align: center;">Page 32</p>



<p>1 see them, is to provide you with a full and secure basis 2 on which to make directions for the restriction order 3 process at the next hearing. I will come to the 4 question of fixing a date for the substantive hearings 5 of the inquiry in due course, but we make it clear now 6 that it is imperative that we are able to make accurate 7 predictions about the detail and length of the 8 restriction order process at the next hearing. 9 THE CHAIR: Effectively timetable it at our next meeting. 10 MR O'CONNOR: Exactly, sir. Because unless we can produce 11 a reliable timetable, not just for the first restriction 12 order applications but for the whole process, at the 13 next hearing, then amongst other things it will be 14 difficult for you to fix a date for the substantive 15 hearings, which is a matter to which we will come. 16 THE CHAIR: Yes. 17 MR O'CONNOR: But it follows, we say, that these schedules 18 of sensitivities that are to be the subject of these 19 directions, if you make them, must be as robust and 20 detailed as possible. Everyone involved must be clear 21 that these documents will be relied on at the next 22 hearing for you to give final directions relating to the 23 restriction order process. And once you have given 24 those directions there can be no slippage, and as I have 25 already indicated, we do suggest that there will be much</p> <p style="text-align: center;">Page 33</p>	<p>1 hadn't intended by saying what we said in our 2 submissions that those points should be excluded. 3 I think we were simply using shorthand about some of the 4 steps that needed to take place. 5 THE CHAIR: The possible exercise of the Rule 12.3 power is 6 something that I would have to consider in any event, 7 and the core participants can make the necessary 8 submission. 9 In relation to the other points about date for 10 responses, does that, since you say you agree, does that 11 entail the modification or addition to the draft of the 12 directions that you have proposed? 13 MR O'CONNOR: No it doesn't, sir, because that will be 14 a matter which you will need to think about at the next 15 hearing when you make directions for the determination 16 of restriction orders. 17 THE CHAIR: Precisely. 18 MR O'CONNOR: Just to make it clear at this stage we 19 entirely agree. 20 THE CHAIR: But in principle you agree? 21 MR O'CONNOR: Of course. There must be an opportunity for 22 core participants to make submissions on restriction 23 order applications. 24 THE CHAIR: Absolutely. 25 MR O'CONNOR: Then secondly and lastly, further down the</p> <p style="text-align: center;">Page 35</p>
<p>1 to be gained if HMG and Op Verbasco in particular 2 involve us at a early stage in the proposals, and 3 equally if detailed discussions about the restriction 4 order process, discussions involving, as I have said, of 5 Operation Verbasco, HMG and us, can commence as soon as 6 possible. 7 Sir, I will of course come back to addressing any 8 submissions advanced by Mr Mansfield orally today 9 regarding the restriction order applications, once I've 10 had an opportunity to make oral submissions. May 11 I simply touch on a couple of points now that have been 12 raised in their written submissions and it may help if 13 you go to Mr Mansfield's written submissions at tab 5 of 14 the bundle. 15 THE CHAIR: Yes. 16 MR O'CONNOR: Sir, at paragraph 11 of the family's 17 submissions they assert that directions regarding the 18 determination of restriction order applications should 19 make provision for written responses from core 20 participants, and that you should also consider 21 exercising the power under Rule 12.3 of the inquiry 22 rules to disclose potentially restrictive material in 23 advance of determining restriction order applications. 24 Sir, may we simply say that we agree. Those are clearly 25 matters that you should have in mind. We certainly</p> <p style="text-align: center;">Page 34</p>	<p>1 page at paragraph 12 of the family submissions, first of 2 all they submit that restriction order applications when 3 they are made should follow the terms of the inquiry's 4 published restriction order protocol. We agree. 5 THE CHAIR: Yes. 6 MR O'CONNOR: And secondly, they have made a point of detail 7 about paragraph 5 of the restriction order protocol, and 8 could I simply say we agree with them that paragraph 9 5(c) of that protocol should be read as stipulating that 10 as much of the supporting evidence as possible should be 11 provided in open. Sir -- 12 THE CHAIR: I am not sure you even need to say that, 13 Mr O'Connor. But for the avoidance of doubt as far as 14 I am concerned it follows as a matter of principle; 15 everything in this inquiry must be open, unless there is 16 a reason for it not to be. 17 MR O'CONNOR: Sir, I am grateful for that. We entirely 18 adopt that. 19 THE CHAIR: Sadly there may be quite a lot for which there 20 is a reason. But there we are. 21 MR O'CONNOR: Sir, those are all of the submissions I wanted 22 to make on that first element relating to disclosure and 23 it may be now appropriate for you to invite submissions 24 on that issue from the parties. 25 THE CHAIR: Yes, thank you very much indeed. Mr Mansfield.</p> <p style="text-align: center;">Page 36</p>

<p>1 Submissions by MR MANSFIELD.</p> <p>2 MR MANSFIELD: Sir, can I say I am obliged. I can dispose</p> <p>3 of matters that seem to be agreed rather quickly,</p> <p>4 including the ones that have just been referred to,</p> <p>5 because they are all in the written submissions.</p> <p>6 I don't have anything to add to that.</p> <p>7 THE CHAIR: Thank you.</p> <p>8 MR MANSFIELD: As far as the publication on the website that</p> <p>9 was mentioned by my learned friend at the beginning,</p> <p>10 again no objection to that. Sir, I don't have anything</p> <p>11 to add on any of those matters.</p> <p>12 May I pass to the substantive matters here, because</p> <p>13 it is well known by you and everyone that there has been</p> <p>14 substantial delay, and one needs to occasionally just</p> <p>15 stand back and consider the stages that have already</p> <p>16 been through. I am not going through them, other than</p> <p>17 to refer in a particular context. The situation here,</p> <p>18 I think might be approached, and I am dealing really</p> <p>19 with the stage 1/stage 2 situation for the family, and</p> <p>20 I am going to start at the end if I may, because the</p> <p>21 concern that they have, and everybody has, and I am sure</p> <p>22 you do as well, is when are we going to get to the</p> <p>23 substantive hearings.</p> <p>24 THE CHAIR: Quite.</p> <p>25 MR MANSFIELD: And so may I say we have had extensive</p> <p style="text-align: center;">Page 37</p>	<p>1 THE CHAIR: Yes.</p> <p>2 MR MANSFIELD: -- that it might have started at the</p> <p>3 beginning of this year. But in any event, appreciating,</p> <p>4 as the family do, the national security issues, they</p> <p>5 also appreciate the amount of work that is being put in.</p> <p>6 However, they would emphasise that the time lapse is</p> <p>7 already considerable, and unless there is the pressure</p> <p>8 of a target date there is the risk, as we have heard</p> <p>9 only minutes ago, of slippage yet again in certain</p> <p>10 areas.</p> <p>11 THE CHAIR: Yes.</p> <p>12 MR MANSFIELD: So that would be the main point that I am</p> <p>13 making, I am sorry to take the last item on the agenda</p> <p>14 first, but that is the prism through which we would ask</p> <p>15 you to look at this matter.</p> <p>16 Now, as far as stage 1 and stage 2 is concerned,</p> <p>17 I think Mr O'Connor is aware that we particularly are</p> <p>18 whistling, or dancing, whichever is the most favoured</p> <p>19 phrase, in the dark, because we really don't know what</p> <p>20 the exact problems are. However, we would remind those</p> <p>21 who are engaged in it that this is not something that is</p> <p>22 disclosure and the question of sensitivity and relevance</p> <p>23 that has suddenly bounced out of the blue. This has</p> <p>24 been a matter on, I suspect, a large number of peoples'</p> <p>25 minds ever since the incident itself, at the beginning.</p> <p style="text-align: center;">Page 39</p>
<p>1 discussions between ourselves so that in fact my learned</p> <p>2 friend was aware of some of the points I might want to</p> <p>3 make today. So he is aware of them. So starting at the</p> <p>4 end, we would submit that if you accept the need for</p> <p>5 a hearing early next year to deal with the matters that</p> <p>6 have already been raised about schedules and so on, we</p> <p>7 would ask that at that hearing, whenever it is, in the</p> <p>8 early months of next year parties should be in</p> <p>9 a position to say what workable, effective date can be</p> <p>10 contemplated for the ultimate hearings, because if the</p> <p>11 matter is left in abeyance one recognises there is</p> <p>12 a certain relaxation that occurs. So we would ask that</p> <p>13 the opposite pressure is placed on everybody, and I am</p> <p>14 not apologising for that, because everybody is under the</p> <p>15 same kinds of stresses, strains and resources. And if</p> <p>16 there is a need for more resources, perhaps now is the</p> <p>17 time to indicate that need above all else, considering</p> <p>18 that this inquiry is dealing with the matters of the</p> <p>19 utmost importance, dealing with national security. So</p> <p>20 using that hopeful sign for next year, I say</p> <p>21 straightaway that it would be desirable if people were</p> <p>22 able to agree upon a date next year. Maybe towards the</p> <p>23 end of the year. Because already there is a 12-month</p> <p>24 slippage on that anticipated date. There was originally</p> <p>25 a hint, I say no more --</p> <p style="text-align: center;">Page 38</p>	<p>1 Because of course, as you will recall, I needn't go</p> <p>2 through it, a number of politicians were in a very</p> <p>3 strong position to make a lot of public statements about</p> <p>4 what can be revealed.</p> <p>5 THE CHAIR: Well, they made public statements, Mr Mansfield.</p> <p>6 They didn't of course give chapter and verse or the</p> <p>7 documents that backed them up.</p> <p>8 MR MANSFIELD: That is true.</p> <p>9 THE CHAIR: They didn't produce the evidence. They made</p> <p>10 assertions.</p> <p>11 MR MANSFIELD: Yes.</p> <p>12 THE CHAIR: Part of my function is to try to find out</p> <p>13 whether they were right or not.</p> <p>14 MR MANSFIELD: Yes. It is a contextual matter. It starts</p> <p>15 with that process. Somebody must have decided this can</p> <p>16 go into the public, even though there is a wealth of</p> <p>17 documents, this can go to the public domain. That is</p> <p>18 the bare beginnings. It is the embryonic stage. But</p> <p>19 what comes after that is even more important. Of course</p> <p>20 there is an interlude, if I can put it that way, whilst</p> <p>21 matters are resolved by the High Court in relation to</p> <p>22 the inquest. But then we get to a stage at which your</p> <p>23 predecessor was appointed, and so last year, and I just</p> <p>24 say, and I reminded Mr O'Connor of it, of course,</p> <p>25 because he was involved in it last year, last August.</p> <p style="text-align: center;">Page 40</p>

<p>1 A large quantity, we don't know how much, we don't know 2 what it was, but a series of "sensitive reports" were 3 being reviewed in order to decide whether to have 4 an inquiry. Now, I appreciate again it is only the 5 foot hills, but it is the context in which we say this 6 exercise of working out relevance and sensitivity is not 7 brand new and there will have to have been a form of 8 exercise undertaken at that time in August last year for 9 a decision to be taken to request an inquiry, which 10 obviously came.</p> <p>11 And since then of course you, well, it is now nearly 12 six months ago, asked for the report, the police report, 13 with underlying documents. So what I am trying to say 14 is please can we guard against the slippage which seems 15 to amount to six months at a time when something is 16 asked, and then it just can't be met, either because of 17 resources or because there are too many documents, or 18 can I make this point: we don't want to be carping, and 19 we don't want to be saying that we don't understand the 20 pressures, we do. The family do. That is the first 21 thing.</p> <p>22 THE CHAIR: Yes.</p> <p>23 MR MANSFIELD: But an approach that is rather different to 24 the one that is taken seems logical. But of course in 25 life nothing is entirely logical, unfortunately. But in</p> <p style="text-align: center;">Page 41</p>	<p>1 THE CHAIR: Where are you in the protocol, Mr Mansfield?</p> <p>2 MR MANSFIELD: Yes, I will just -- it is, if you have 3 paragraph 6.</p> <p>4 THE CHAIR: Yes.</p> <p>5 MR MANSFIELD: Sub-paragraph (e)?</p> <p>6 THE CHAIR: (e)?</p> <p>7 MR MANSFIELD: Yes, and it is (e)(2), that's where the 8 wording comes from.</p> <p>9 THE CHAIR: Got it, thank you.</p> <p>10 MR MANSFIELD: I realise that is in relation to 11 a restriction order process.</p> <p>12 THE CHAIR: Yes, it is.</p> <p>13 MR MANSFIELD: However, in order to determine, for example, 14 at this early stage whether something might be relevant, 15 it might be possible for you to, as it were, have 16 a private hearing, so not all the public are there, but 17 that the CPs are there in order to discuss the question 18 of relevance, because we say there must already be 19 a category of relevance that doesn't attract any 20 sensitivity. I hope I am right about that. I pause to 21 see whether later we will be told there isn't, or there 22 is. For example we know from the inquest stage that 23 a certain amount of documentation and statements were 24 revealed at that stage, of course for a very different 25 process, but we would submit that in relation to that</p> <p style="text-align: center;">Page 43</p>
<p>1 this stage 1/stage 2 process, first of all if there is 2 a large quantity, we understand whether it is itemised 3 or otherwise, it may be 20,000 it may be more, items or 4 documents are already being released to your team, if 5 I can call it that, and therefore within the quantity 6 released we don't know how many of those have already 7 been determined to be relevant.</p> <p>8 THE CHAIR: No.</p> <p>9 MR MANSFIELD: So it may not be all of them. It may be some 10 of them. Now, I will take this slowly, in stages. You 11 raised yourself a very important question, namely in 12 whose eyes are they relevant. And we could ask you to 13 consider what I understand is described in other 14 proceedings, but it is provided for in the protocol you 15 set out, and particularly in paragraph, the paragraph 6, 16 at (e), which has now been added -- it is tab 15A -- and 17 I am going to generically call it the restricted 18 hearings facility. Now, these are hearings that are 19 held in other inquiries that have touched on this, 20 Manchester Arena being one of them, the Infected Blood 21 being another, where in fact it has been necessary to 22 have -- can I call them a hybrid hearing? In other 23 words it is not completely open and it is not completely 24 closed. So in other words it is, the word that is used 25 in the protocol, is a private hearing.</p> <p style="text-align: center;">Page 42</p>	<p>1 material there must be other relevant material that is 2 not going to attract any sensitivity whatsoever. May we 3 ask that that material, relevant material, whether we 4 have a part in deciding what is relevant and what isn't, 5 to be appreciated alongside, could that be served now. 6 Because it is not just a question of when is the hearing 7 going to be, but for example if the authorities have had 8 this amount of time to decide what can be disclosed, 9 I think it is fair to say that on behalf of the family 10 we will need some time to assimilate what is being 11 given. So if we can have disclosed --</p> <p>12 THE CHAIR: So the question is why is it not possible now, 13 or is it possible now to serve relevant material where 14 there is no possibility of a restriction order being 15 asked for.</p> <p>16 MR MANSFIELD: That's right.</p> <p>17 THE CHAIR: Is that it?</p> <p>18 MR MANSFIELD: Yes, sir.</p> <p>19 THE CHAIR: Right. Got that.</p> <p>20 MR MANSFIELD: So the second stage is of course the relevant 21 material that does attract sensitivity. Now, we don't, 22 and I obviously can't be told, know exactly how this is 23 working but we are trying to introduce an element of 24 logic here. First of all in relation to relevance, 25 there will be some witnesses that are highly relevant,</p> <p style="text-align: center;">Page 44</p>

<p>1 can I call them core witnesses, and a number of those 2 must already have been identified in the process of 3 foot hills that I have already described, and therefore 4 there are categories of relevance from top to bottom, as 5 it were, putting it shortly. The first thing is what 6 are the top, as it were, highest priority of relevant 7 witnesses or documents. That's the first consideration. 8 In other words people and documents that are necessarily 9 going to have to be, as it were, introduced into the 10 hearing at some point.</p> <p>11 Then you have sort of superimposed on that 12 a different framework, which is framework of 13 sensitivity. Because there are different sensitivities. 14 Some things may be sensitive but really not that 15 important. The sensitivity is there. So that having 16 determined your top priority of relevant witnesses, you 17 then superimpose what is the most -- you know, are there 18 sensitivities in this bracket that are so sensitive that 19 obviously it would have to be in closed, or the 20 sensitivity is minor and it doesn't require more than 21 a redaction of a word, or something of that kind.</p> <p>22 So those two schemes may be being employed, we don't 23 know. But we would suggest, and I am coming to the main 24 point here, that we do welcome the progress that is 25 being made. As I said, we are not meaning to say -- we</p> <p style="text-align: center;">Page 45</p>	<p>1 the room have been involved in other inquiries, and one 2 knows of course this one will have more sensitivities, 3 this one may have different types of sensitivity, one 4 appreciates that, but that's why I started with the 5 incident itself. People must have been thinking about 6 what the sensitivities are, particularly in the light of 7 what is happening internationally at the moment.</p> <p>8 So we welcome that. We would submit that that draft 9 schedule of sensitivities must be in some form already. 10 The process that is being suggested by my learned friend 11 on your behalf is welcome, but it could be even quicker 12 than it is if these sorts of matters had been addressed 13 a little bit earlier. So we say that we don't want to 14 interfere with the model that has been put up, but we do 15 say could the model be influenced by the triage that 16 I have suggested of relevant witnesses, and degrees of 17 relevance, and degrees of sensitivity, so that it may be 18 possible to get a much earlier indication, so that we 19 won't, ourselves, be deluged with material once this 20 process has been gone through.</p> <p>21 Sir, those are the main submissions that I make. If 22 there is anything I can help on further.</p> <p>23 THE CHAIR: No, I am very grateful, Mr Mansfield. I quite 24 understand and if I may say so, also understand, I hope, 25 the difficulties of batting in the dark.</p> <p style="text-align: center;">Page 47</p>
<p>1 are trying to assist, and the conversations we have had 2 is to see if there is some way of speeding this up even 3 more than has been speeded up. So for example in the 4 present timetable scheme that has been put to you today, 5 is that on the sampling method, and I don't repeat the 6 written submissions we have made, that there are risks 7 with the sample that they may not be comprehensive, but 8 within that scheme, that sampling --</p> <p>9 THE CHAIR: What is now proposed is a slightly different 10 system, isn't it?</p> <p>11 MR MANSFIELD: I am so sorry?</p> <p>12 THE CHAIR: What is now proposed, as Mr O'Connor has 13 explained, is slightly different.</p> <p>14 MR MANSFIELD: Yes it is, yes. We accept that. We have had 15 discussions about that.</p> <p>16 May I just come to the central point here, I think 17 it is the central point, in the new scheme, which is 18 a draft schedule of sensitivities will be produced.</p> <p>19 THE CHAIR: Yes.</p> <p>20 MR MANSFIELD: May I ask in a very simple way, this could 21 have been done, if I may say so, a draft schedule of 22 sensitivities, at the beginning of last year.</p> <p>23 THE CHAIR: Well, I don't know about that. You may be 24 right.</p> <p>25 MR MANSFIELD: Because, and I think a number of people in</p> <p style="text-align: center;">Page 46</p>	<p>1 MR MANSFIELD: Yes. Thank you.</p> <p>2 THE CHAIR: Yes. Ms McGahey.</p> <p>3 Submissions by MS MCGAHEY</p> <p>4 MS MCGAHEY: Sir, His Majesty's government recognises 5 absolutely that the need to provide disclosure to the 6 family and the public is a pressing one. But it is also 7 hugely important that nothing disclosed could help 8 a hostile state or a terrorist to prepare another attack 9 or to make another attack more deadly. As you said at 10 the beginning of this hearing, sir, if something is 11 disclosed by mistake, it can't be retrieved. And it is 12 for that reason that this process takes as long as it 13 does. There has been no delay in the sense of 14 needlessly wasted time. But this process of disclosure 15 really does take time and immensely careful thought. It 16 is absolutely right if material is identified that is 17 clearly never going to be the subject of a restriction 18 order, then His Majesty's Government would have no 19 objection whatsoever of it being disclosed and material 20 that may well come into that category is being reviewed 21 at the moment.</p> <p>22 THE CHAIR: Well, there is a very limited amount that has 23 already been passed at the stage 2 process. That 24 presumably must be of that kind. But what Mr Mansfield 25 is saying is that there must be quite a lot more of it.</p> <p style="text-align: center;">Page 48</p>

<p>1 Is that right?</p> <p>2 MS MCGAHEY: As far as I am aware, sir, no. The material</p> <p>3 that is time consuming and may give rise to</p> <p>4 sensitivities is the greater proportion.</p> <p>5 THE CHAIR: Well, I think the question that you are being</p> <p>6 asked is: is it practicable, and if not why not, to at</p> <p>7 any rate identify now relevant material where there will</p> <p>8 never be any question of an application for</p> <p>9 a restriction order, because if it can be done, then</p> <p>10 that can be handed over in short order.</p> <p>11 MS MCGAHEY: I can take instructions, sir, on how much</p> <p>12 material there is, and where it comes from.</p> <p>13 THE CHAIR: Well, I think I would be grateful if, as part of</p> <p>14 the process which Mr O'Connor has outlined to me, that</p> <p>15 specific question, which Mr Mansfield reasonably asks,</p> <p>16 should be addressed.</p> <p>17 MS MCGAHEY: Of course, sir.</p> <p>18 THE CHAIR: All right.</p> <p>19 MS MCGAHEY: As you have heard from Mr O'Connor, since</p> <p>20 counsel to the inquiry and HMG put in their written</p> <p>21 submissions there have been many useful discussions</p> <p>22 about the way forward. They have been outlined to you.</p> <p>23 THE CHAIR: Yes.</p> <p>24 MS MCGAHEY: And we do submit it is absolutely right that</p> <p>25 the focus of the disclosure exercise should be on the</p> <p style="text-align: center;">Page 49</p>	<p>1 possible, ultimately, to agree gists or redactions of,</p> <p>2 for example, irrelevant elements --</p> <p>3 THE CHAIR: Yes.</p> <p>4 MS MCGAHEY: -- that may reduce the number of instances in</p> <p>5 which restriction order applications have to be made.</p> <p>6 THE CHAIR: Yes.</p> <p>7 MS MCGAHEY: The Government is optimistic that as things</p> <p>8 currently stand the work to draft the list of potential</p> <p>9 sensitivities identified in those documents will be</p> <p>10 completed by the end of February next year. Obviously</p> <p>11 if further requests are made and large numbers of</p> <p>12 documents added then that will have an impact on whether</p> <p>13 the timeframe can be met.</p> <p>14 THE CHAIR: So a schedule of sensitivities by the end</p> <p>15 of February.</p> <p>16 MS MCGAHEY: Yes, sir.</p> <p>17 THE CHAIR: Do you want to deal with Mr Mansfield's</p> <p>18 suggestion that you might have expected, I think he says</p> <p>19 he might have expected, that such a list or schedule or</p> <p>20 concept of topics which are sensitive must have been in</p> <p>21 mind for a considerable time by now.</p> <p>22 MS MCGAHEY: Oh it certainly has been, sir, and it is very</p> <p>23 well known. What is being done now is the matching of</p> <p>24 those sensitivities to specific documents and to</p> <p>25 paragraphs and words within those documents. And it is</p> <p style="text-align: center;">Page 51</p>
<p>1 documents that the inquiry legal team have identified as</p> <p>2 relevant to the inquiry's work. At the moment the</p> <p>3 intention is that HMG should focus its efforts on the</p> <p>4 around 2,000 police documents that the inquiry legal</p> <p>5 team have collated and that they want us to start</p> <p>6 reviewing. And HMG is more than happy to start with</p> <p>7 a review of those documents. We are grateful for</p> <p>8 an indication that we should receive everything in that</p> <p>9 tranche by the end of this month.</p> <p>10 THE CHAIR: Mm-hm.</p> <p>11 MS MCGAHEY: The streamlined securities checking process</p> <p>12 outlined by Mr O'Connor were agreed with the inquiry</p> <p>13 legal team following detailed discussions. But when</p> <p>14 this process begins, the process of looking at these</p> <p>15 2000-odd documents, the first stage of the review by HMG</p> <p>16 will be a review by national security experts who must</p> <p>17 look for content that is so sensitive it should not be</p> <p>18 shared more widely even within the HMG teams. Once that</p> <p>19 work has been done the documents will be reviewed by all</p> <p>20 HMG departments and agencies so that they can identify</p> <p>21 any sensitivities within their own areas of</p> <p>22 responsibility and the intention is that the Government</p> <p>23 clients will create as they go along a list of potential</p> <p>24 sensitivities to be discussed with the inquiry legal</p> <p>25 team and it is hoped that during that process it will be</p> <p style="text-align: center;">Page 50</p>	<p>1 that that is time consuming.</p> <p>2 THE CHAIR: I see. Yes.</p> <p>3 MS MCGAHEY: And as has already been outlined to you by</p> <p>4 Mr O'Connor, the making of a formal restriction order</p> <p>5 application will, the Government thinks, be possible</p> <p>6 once the inquiry legal team have identified all, or the</p> <p>7 vast majority, of relevant material for disclosure</p> <p>8 because it is only then that HMG can view all the</p> <p>9 strands of information in the round, and it is at that</p> <p>10 point that one can work out whether something that seems</p> <p>11 quite innocuous in one document is actually immensely</p> <p>12 sensitive when viewed against parallel information in</p> <p>13 another, because that is the jigsaw effect.</p> <p>14 THE CHAIR: Well, I absolutely understand the jigsaw</p> <p>15 concept, Ms McGahey, I am sure everybody does. It</p> <p>16 doesn't prevent, does, it a good deal of work being done</p> <p>17 before, as it were, everybody has read everything.</p> <p>18 MS MCGAHEY: Oh, no, and that isn't possible because one</p> <p>19 always has to start somewhere.</p> <p>20 THE CHAIR: Yes.</p> <p>21 MS MCGAHEY: Because if one starts with the first 2,000</p> <p>22 documents, it almost doesn't matter whether the next</p> <p>23 8,000 are already ready sitting there waiting to be read</p> <p>24 or still to be identified, the first 2,000 still have to</p> <p>25 be analysed.</p> <p style="text-align: center;">Page 52</p>

<p>1 THE CHAIR: Yes.</p> <p>2 MS MCGAHEY: And in many cases it will be possible to say</p> <p>3 this is a discreet topic and we can make a submission</p> <p>4 about the need for redaction or gisting and it is very</p> <p>5 unlikely to be affected by something from another</p> <p>6 organisation coming further down the line. But</p> <p>7 sometimes it isn't.</p> <p>8 THE CHAIR: Mm-hm.</p> <p>9 MS MCGAHEY: And there is also a risk that if one does it</p> <p>10 too early, and says yes, fine, this document can go out</p> <p>11 with this bit unredacted, then later that decision is</p> <p>12 really regretted, because there is something very</p> <p>13 important in another document that one would want to</p> <p>14 share with the families or the public and can't because</p> <p>15 the jigsaw effect means that something that has already</p> <p>16 gone out means a second piece of more important</p> <p>17 information has to be kept private.</p> <p>18 THE CHAIR: Mm-hm.</p> <p>19 MS MCGAHEY: But we do anticipate that the inquiry legal</p> <p>20 team are obviously going to continue their relevance</p> <p>21 review and they will identify further material as they</p> <p>22 go. So this exercise of reviewing relevant material</p> <p>23 will become a rolling process until disclosure is</p> <p>24 complete, and that we do absolutely recognise that the</p> <p>25 inquiry legal team have a huge task in going through all</p> <p style="text-align: center;">Page 53</p>	<p>1 undertake to complete the work by the end of this year.</p> <p>2 Our hope was it would be done not before the end of this</p> <p>3 year, and it is taking longer.</p> <p>4 THE CHAIR: Well, we have had various dates at different</p> <p>5 times, Ms McGahey, as you know, they have tended to move</p> <p>6 forward.</p> <p>7 MS MCGAHEY: Sir, it is absolutely inevitable. We have</p> <p>8 tried using a streamlined disclosure process using the</p> <p>9 disclosure strategies, as we have outlined in</p> <p>10 paragraph 11 of our submissions. That has had the</p> <p>11 inevitable consequence, as we knew would happen, that</p> <p>12 actually the search has to go more widely. You start</p> <p>13 with the streamlined process, you find something else</p> <p>14 that is relevant and it is right that it should be</p> <p>15 investigated, but that inevitably takes more time.</p> <p>16 THE CHAIR: Right. Go on.</p> <p>17 MS MCGAHEY: But the Government clients are working</p> <p>18 immensely hard because it is in everybody's interests to</p> <p>19 finish this process as soon as we can. We will work as</p> <p>20 hard as we can. We will continue to liaise with the</p> <p>21 inquiry legal team to identify priorities and the</p> <p>22 liaison with that team has been immensely helpful.</p> <p>23 THE CHAIR: Now, you have heard the suggested directions</p> <p>24 that Mr O'Connor asks me to give.</p> <p>25 MS MCGAHEY: Yes.</p> <p style="text-align: center;">Page 55</p>
<p>1 potentially relevant material, and we don't know how</p> <p>2 long that process will take.</p> <p>3 THE CHAIR: Well, you must leave them to tell me about that,</p> <p>4 Ms McGahey. At the moment I am concerned about what is</p> <p>5 happening in your neck of the woods.</p> <p>6 MS MCGAHEY: Indeed. But it is really important, sir, that</p> <p>7 I don't raise false hopes or expectations, because HMG</p> <p>8 does believe that the most efficient way of approaching</p> <p>9 disclosure is the one that is now proposed by the</p> <p>10 inquiry legal team; to identify relevant material first,</p> <p>11 undertake sensitivity reviews, and make restriction</p> <p>12 order applications only in respect of that relevant</p> <p>13 material. But on any view this is a slow process and it</p> <p>14 takes considerable time, and expert time, to get it</p> <p>15 right.</p> <p>16 THE CHAIR: Yes. Well, yes, I understand that Ms McGahey,</p> <p>17 and you have made the point before that those who have</p> <p>18 the necessary expertise have one or two things on their</p> <p>19 plate at the moment. But it has to be done.</p> <p>20 MS MCGAHEY: Yes.</p> <p>21 THE CHAIR: Yes.</p> <p>22 MS MCGAHEY: It is probable that working towards the</p> <p>23 restriction order application timetable for these 2,000</p> <p>24 documents will affect the timetable for HMG to complete</p> <p>25 its stage 1 disclosure. I should say that we did not</p> <p style="text-align: center;">Page 54</p>	<p>1 THE CHAIR: Do you resist any of them?</p> <p>2 MS MCGAHEY: No, sir.</p> <p>3 THE CHAIR: Is there any reason why I shouldn't add to them</p> <p>4 that by the same date, 28 February, you should identify</p> <p>5 any relevant, any documents which the legal team has</p> <p>6 identified as relevant, in respect of which there is</p> <p>7 simply no prospect of a restriction order application.</p> <p>8 MS MCGAHEY: Within those 2,000 documents, yes, sir,</p> <p>9 I imagine that -- I will take instructions.</p> <p>10 THE CHAIR: That is tranche 1, is it?</p> <p>11 MS MCGAHEY: Tranche 1, yes, batch 1.</p> <p>12 THE CHAIR: Sorry, batch 1, yes.</p> <p>13 MS MCGAHEY: Batch 1, yes.</p> <p>14 THE CHAIR: In batch 1.</p> <p>15 MS MCGAHEY: Yes.</p> <p>16 THE CHAIR: What about any others?</p> <p>17 MS MCGAHEY: Sir, I would need to take instructions, because</p> <p>18 we have finite resources and I also have no idea what</p> <p>19 the volume of material is that could be landed upon us.</p> <p>20 THE CHAIR: All right. Well, would you take away, please,</p> <p>21 the principled question, that if it is possible, without</p> <p>22 slowing everything else down, to identify documents</p> <p>23 which, in respect of which the restriction order process</p> <p>24 will not be invoked.</p> <p>25 MS MCGAHEY: Yes.</p> <p style="text-align: center;">Page 56</p>

<p>1 THE CHAIR: Whether successfully or otherwise, will not be 2 invoked at all. Those ought to be identified as soon as 3 possible. 4 MS MCGAHEY: Yes, sir, I understand that. 5 THE CHAIR: And in respect of batch 1, by 28 February will 6 be part of the directions, unless anybody persuades me 7 otherwise. All right, thank you. 8 MS MCGAHEY: Thank you, sir. 9 THE CHAIR: Thank you very much indeed. 10 Ms Giovanetti. 11 Submissions by MS GIOVANETTI 12 MS GIOVANETTI: Thank you, sir. We are very grateful to 13 counsel to the inquiry, for Mr O'Connor's careful and 14 detailed submissions, which has significantly reduced 15 the length of time, I think, that I will want to take. 16 But I will do my very best to address the points which 17 I know concern you and indeed which concern the family. 18 Could I start by saying that we of course appreciate the 19 family's concern to proceed to the hearings, well first 20 to disclosure and then to the hearings, as swiftly as 21 possible. And I hope they are reassured that Operation 22 Verbasco has devoted very, very substantial resources to 23 ensure that the disclosure exercise is conducted 24 appropriately, rigorously, and at the same time as 25 swiftly as possible. And of course there is a tension</p> <p style="text-align: center;">Page 57</p>	<p>1 significantly sped up stage 1 of the disclosure process. 2 I think we are all agreed about the progress that has 3 been made. I don't know if you want to hear from me 4 briefly on the distinction between items and documents. 5 We have addressed -- 6 THE CHAIR: Honestly, no, Ms Giovanetti. 7 MS GIOVANETTI: I was hoping that you would say that. 8 So could I move on, then, I think, to restriction 9 order applications. 10 THE CHAIR: Yes. 11 MS GIOVANETTI: We also are content with the order proposed 12 by counsel to the inquiry. 13 THE CHAIR: Yes. 14 MS GIOVANETTI: And in fact had been discussing sotto voce 15 before you proposed it, sir, that if it became apparent 16 that from our perspective there were documents that 17 simply didn't have any sensitivities, that they could be 18 identified as part of that process, and as long as His 19 Majesty's Government also don't have any identified 20 sensitivities, then we can't see why there needs to be 21 any delay in proceeding to disclose those documents. 22 THE CHAIR: And you can do that by 28 February? 23 MS GIOVANETTI: Yes. 24 THE CHAIR: Good. 25 MS GIOVANETTI: We don't think it would be the most</p> <p style="text-align: center;">Page 59</p>
<p>1 between those aspects, and both are of great importance. 2 We have done our best throughout, as well, to be 3 realistic about the targets that we have set, and the 4 dates we have proposed. So I am pleased to be able to 5 say that for example in our written submissions we 6 anticipated that by the date of this hearing we would 7 have produced 28,885 items to the inquiry by way of 8 stage 1 disclosure. We have actually done rather better 9 than that, and we are slightly over 29,200, as 10 I understand it. 11 In respect of the slippage, I can see how it can be 12 put that way, but what we anticipated in March 2022 at 13 the directions hearing then, and it is paragraph 5 of 14 our written submissions, was that we would have 15 scheduled 55,000 items by the end of the year. That was 16 realistic, and we are on track to do that. The 17 slippage, such as it is, is simply that as you will see 18 by the next paragraph, we have identified further 19 potentially relevant material. So while we are on track 20 for doing what we said we would be able to do, the task 21 is slightly more extensive than we anticipated. 22 THE CHAIR: You now have some more, yes. 23 MS GIOVANETTI: We are extremely grateful to the inquiry 24 legal team for the very constructive liaison there has 25 been, which has, I think everybody has agreed,</p> <p style="text-align: center;">Page 58</p>	<p>1 efficient use of resources to be trying to identify 2 non-sensitive documents, if I can call them that, from 3 amongst the cache that have not yet been identified as 4 relevant. 5 THE CHAIR: No. 6 MS GIOVANETTI: No. So it has to come from the 7 documentation -- 8 THE CHAIR: That wasn't the suggestion as I understood it. 9 MS GIOVANETTI: No, I just wanted to be clear about that. 10 And by the same token whilst of course we will do 11 our very best to provide documents to His Majesty's 12 Government by 30 November, obviously we are dependent to 13 a degree on the inquiry legal team being able to provide 14 to us those documents which they have identified as 15 relevant. Now, we have a substantial number of those 16 documents, but we don't yet have them all. But 17 presuming they can be provided to us, as is anticipated 18 quite speedily, then we shouldn't have any difficulty 19 with meeting that deadline either. 20 THE CHAIR: Right. 21 MS GIOVANETTI: We agree, obviously, with the submission 22 made by Mr Mansfield on behalf of the family in respect 23 of them being able to make submissions in respect of 24 restriction order applications. 25 THE CHAIR: Of course.</p> <p style="text-align: center;">Page 60</p>

<p>1 MS GIOVANETTI: We have also taken on board their 2 suggestion, it is quite right as well, that as well as 3 there being categories of sensitivity there are degrees 4 of sensitivity, and we will have that very well in mind 5 as we go through the process. So if I may, I will just 6 very briefly take instructions to make sure there is 7 nothing else I should address in my submissions. 8 (Pause) 9 And obviously the number that we are going to be 10 identifying as non-relevant in the first instance will 11 be from that first batch. Sorry, non-sensitive. 12 THE CHAIR: Non-sensitive. Relevant but non-sensitive. 13 MS GIOVANETTI: Exactly, yes. I hope that was implicit. 14 THE CHAIR: Yes. 15 MS GIOVANETTI: Was there anything else I could assist you 16 with, sir? 17 THE CHAIR: No, I don't think so, Ms Giovanetti, except that 18 you haven't -- I should perhaps have asked Ms McGahey as 19 well, you have both heard Mr O'Connor express the hope, 20 indeed the determination, that by the time of the next 21 hearing I am in a position to fix a timetable for the 22 restriction order process. If I don't do that we are 23 not going to get anywhere. 24 MS GIOVANETTI: No. I completely understand that, and we 25 are working to that end.</p> <p style="text-align: center;">Page 61</p>	<p>1 I update on you that, in our note at 3(c). 2 THE CHAIR: Yes. 3 MR BEGGS: Which is we anticipate resolution of the 4 remaining IT issues within the next four weeks. 5 Obviously if we can do better so much the better, but 6 that is the anticipated realistic resolution, thereby 7 keeping us well on track for your 28 February deadline. 8 THE CHAIR: Good, thank you very much. And again, if it 9 applies are you content that the direction also requires 10 you to identify, or rather to, yes, to identify the 11 documents which are relevant but in relation to which 12 there is no prospect of a restriction order application? 13 MR BEGGS: Yes, sir. Thank you. 14 THE CHAIR: Thank you very much. That, I think, is all. 15 Anybody else? No. Mr O'Connor. 16 MR O'CONNOR: Sir, I am grateful. I don't think there are 17 any specific points on which I wish to reply. It has 18 been a useful debate. We certainly agree that it is 19 a very natural next step to emerge from the scheduling 20 process that we have discussed to include within that 21 identification of documents that are relevant and will 22 not be part of a restriction order process. 23 THE CHAIR: Good, thank you. 24 MR O'CONNOR: So those can be disclosed, and sir, we of 25 course have listened carefully to the submissions</p> <p style="text-align: center;">Page 63</p>
<p>1 THE CHAIR: Yes. 2 MS GIOVANETTI: We also take on board Mr O'Connor's 3 suggestion that we should be liaising with your legal 4 team to make sure we are making constructive progress on 5 the sensitivities, and we are happy to do that. 6 THE CHAIR: Yes. Well, as far as I am able to detect what 7 is happening there seems to a very good level of 8 inter partes discussion, for which I am grateful. 9 MS GIOVANETTI: Yes. 10 THE CHAIR: Ms McGahey, on that last point are you content? 11 MS MCGAHEY: Yes, sir. 12 THE CHAIR: Good, thank you. Mr Goss, do you want to add 13 anything? 14 MR GOSS: No, thank you, sir. 15 THE CHAIR: What about you, Mr Beggs? 16 Submissions by MR BEGGS 17 MR BEGGS: Sir, just three points. Firstly, Mr O'Connor 18 kindly indicated the proposed direction in respect of 19 Wiltshire Police. 20 THE CHAIR: Mm-hm. 21 MR BEGGS: We don't resist it, indeed we welcome it as it 22 will help to focus minds and resource allocation. 23 THE CHAIR: You had better tell whoever is in charge of the 24 IT that I am afraid we insist. 25 MR BEGGS: Indeed, sir. My third and final point. Can</p> <p style="text-align: center;">Page 62</p>	<p>1 Mr Mansfield makes, which as he said are matters that he 2 and I have discussed already and we will bear those very 3 much in mind going forward. 4 Directions 5 THE CHAIR: Yes, I don't doubt it. Well then, Mr O'Connor, 6 I will deal with it now rather than come back to it at 7 the end, while it is in everybody's mind. I make the 8 directions that you invite me to make. I am picking 9 them up, have other people got copies of your draft 10 speaking note? No they haven't. Very well. 11 Well then, first His Majesty's Government is to 12 review the documents marked as relevant by the inquiry 13 legal team from the tranche of material which was 14 provided by Operation Verbasco on 15 August 2022. That 15 is to say batch 1. And those documents appended to the 16 police report, version 3, and in respect of them provide 17 (a) a draft schedule of sensitivities and (b) a list of 18 any documents in respect of which there is no prospect 19 of a restriction order application, and to do that by 20 28 February. 21 Secondly, Operation Verbasco is to do the same in 22 relation to its documents by the same date. 23 MR O'CONNOR: Just to be clear, sir, in fact that is in 24 relation to the same set of documents. 25 THE CHAIR: I am sorry, you are quite right, yes it is.</p> <p style="text-align: center;">Page 64</p>



<p>1 Operation Verbasco is to do the same two things in 2 relation to that same set of documents.^ 3 Thirdly, I didn't ask Ms Giovanetti about it 4 specifically but she told me she agreed. Operation 5 Verbasco is to provide the batch 1 relevant documents to 6 His Majesty's Government so that this process can 7 proceed and do that by 30 November next, which is about 8 a fortnight. 9 MR O'CONNOR: It is, sir, and of course I can say I heard 10 what Ms Giovanetti said about our part in that process. 11 THE CHAIR: Of course. 12 And lastly, Wiltshire Police are to provide a draft 13 schedule of sensitivities and to identify any documents 14 which are accepted by the inquiry legal team as 15 relevant, and in respect of which there is no prospect 16 of a restriction order application, and they are to do 17 both of those things by 28 February. 18 MR O'CONNOR: Yes, sir, and that is about a separate cohort 19 of documents -- 20 THE CHAIR: It is. 21 MR O'CONNOR: -- in respect of their documents. 22 THE CHAIR: It is. 23 MR O'CONNOR: Yes, I am grateful. 24 THE CHAIR: Right, is there anything else on disclosure, 25 Mr O'Connor?</p> <p style="text-align: center;">Page 65</p>	<p>1 secondly. 2 MR O'CONNOR: Sir, yes. 3 As far as place is concerned, first of all you have 4 previously indicated an intention to conduct open 5 hearings of the inquiry in Salisbury. 6 THE CHAIR: Mm-hm. 7 MR O'CONNOR: The closed hearings, of course, are different. 8 They will take place at a secure location that hasn't 9 been determined yet and in any event will not be 10 disclosed. 11 THE CHAIR: Quite. 12 MR O'CONNOR: The inquiry secretariat has been undertaking 13 scoping work relating to possible venues for open 14 hearings, and associated practical arrangements. There 15 are inevitably a wealth of competing practical 16 logistical and financial considerations. Some of those 17 considerations, for example, the ease of attendance for 18 Dawn Sturgess's family, and other members of the public, 19 and also security considerations, have been referred to 20 in the written submissions you have received for this 21 hearing. In our written submissions we indicated that 22 very broadly speaking there are three possible ways in 23 which the open hearings could be configured. That is 24 first of all oral open hearings being conducted at 25 a venue in Salisbury.</p> <p style="text-align: center;">Page 67</p>
<p>1 MR O'CONNOR: Sir, no. 2 THE CHAIR: No, I think not. I absolutely, I think 3 I probably ought to say, understand how potentially 4 frustrating this can be. But it is the key to the 5 entire process of this inquiry, and it is perhaps worth 6 saying that it may well be that no doubt on advice, 7 public statements were made by public figures a long 8 time ago about what was asserted to have happened. It 9 doesn't -- that did not include, as I understand it, 10 revealing the evidence on which the assertion was based, 11 and what we are now talking about is examining the 12 evidence. That's why this is a different process. 13 MR O'CONNOR: Indeed. 14 THE CHAIR: All right. 15 Further submissions by MR O'CONNOR 16 MR O'CONNOR: Sir, we move to the question of arrangements 17 for the substantive hearings. 18 THE CHAIR: Venue. 19 MR O'CONNOR: And again it is right that I start by 20 acknowledging, sir, that we are of course acutely aware 21 of the importance to all involved, and again in 22 particular to Dawn Sturgess's family, of having as much 23 certainty as possible, as early as possible, about the 24 arrangements for the substantive hearings. 25 THE CHAIR: Yes, can we take place first and come to date</p> <p style="text-align: center;">Page 66</p>	<p>1 THE CHAIR: Mm-hm. 2 MR O'CONNOR: Secondly, some open hearings in Salisbury, and 3 we suggested that those hearings would be focused on the 4 evidence particularly related to the immediate 5 circumstances of Dawn Sturgess's death, with the 6 remaining open evidence heard in London with 7 a video link to a venue in Salisbury. And the third 8 alternative being oral open hearings in London -- 9 THE CHAIR: Yes. 10 MR O'CONNOR: -- with a video link to Salisbury. 11 Sir, you have seen the written submissions that have 12 been filed in response to those three alternatives that 13 we posed in our submissions. And you will have seen 14 that very broadly speaking there is a consensus 15 developing around the second option, that is initial 16 hearings in Salisbury to be followed by subsequent open 17 hearings in London. 18 THE CHAIR: Mm-hm. 19 MR O'CONNOR: Sir, it seems to us -- 20 THE CHAIR: I think that's right in particular that is 21 Wiltshire County Council's favoured solution, isn't 22 it -- 23 MR O'CONNOR: It is. 24 THE CHAIR: -- because I was exercising my mind over the 25 obvious local interest. Revisiting it and inflicting</p> <p style="text-align: center;">Page 68</p>

<p>1 a large number of people on the locality may have its 2 downside as well as its upside. 3 MR O'CONNOR: Sir, perhaps, as you say, sir, that was 4 a matter that we were aware you had in mind. As 5 I mentioned at the outset of the hearing, Wiltshire 6 Council are not here but they have filed written 7 submissions. Perhaps it is appropriate if I simply read 8 what they have submitted regarding venue. Others that 9 are here will have an opportunity to make their own 10 submissions but what the Council said is this: 11 "The Council is neutral as to whether the inquiry 12 sits in Salisbury or London. However, the Council would 13 support option B in counsel to the inquiry's 14 submissions; namely that the inquiry should hear some 15 open evidence in Salisbury, focused on the evidence 16 particularly related to the immediate circumstances of 17 Dawn Sturgess's death, with the remaining open evidence 18 heard in London with a video link to a venue in 19 Salisbury. The Council considers that this would best 20 aid public participation and confidence in the inquiry." 21 And they add that Council officers would be happy to 22 assist the ILT in finding suitable venues. 23 THE CHAIR: If that is adopted do I understand your 24 submission to be that it is a necessary part of it that 25 a link be provided in relation to any hearings that take</p> <p style="text-align: center;">Page 69</p>	<p>1 said anything about the question of venue, I will hear 2 in a minute from those that are here, is the ambulance 3 trust. 4 MR O'CONNOR: Yes, sir. And again perhaps -- 5 THE CHAIR: And their preference is for open hearings in 6 Salisbury, at least as far as it affects them, and 7 presumably their staff. 8 MR O'CONNOR: Yes. So again, perhaps it is appropriate if 9 I simply read out a short paragraph in their 10 submissions. This is the South Western Ambulance 11 Service NHS Foundation Trust. They say that they 12 strongly prefer a Salisbury venue to be used for all or 13 part of the open hearings, because this inquiry is of 14 key importance to the people of Salisbury. And 15 secondly, due to their preference for their staff not to 16 have to attend to give evidence in London, they would 17 support hybrid hearings, remote access for other 18 attendees. 19 THE CHAIR: Yes, well, I understand that and the sheer 20 logistics of travel between Wiltshire and London in 21 either direction are obviously one factor. 22 MR O'CONNOR: Yes. 23 THE CHAIR: All right. Thank you very much. 24 MR O'CONNOR: That is all I wish to say. But save that it 25 does seem to us that you may well be in a position to</p> <p style="text-align: center;">Page 71</p>
<p>1 place physically in London, a link to somewhere near 2 Salisbury, for particularly the family? 3 MR O'CONNOR: Yes. That's certainly something we have in 4 mind, and it follows were open hearings to take place 5 away from Salisbury then it follows from what we know of 6 their circumstances that that would make, impose 7 a difficulty in them attending, and so that is why we 8 have suggested a remote link to -- 9 THE CHAIR: Well, particularly for them and it may be for 10 other people who live locally, or indeed I suppose the 11 local press. 12 MR O'CONNOR: Well, certainly, sir, the provision of a link 13 is something that we have suggested. So it needs to be 14 borne in mind that you have yet to decide whether the 15 substantive inquiry hearings will in fact be streamed on 16 the internet and if so that will be subject to a delay. 17 So these are all factors that have to be borne in mind 18 as to the need for any particular link to a venue in 19 Salisbury. 20 THE CHAIR: All right. 21 MR O'CONNOR: But it is certainly something we have raised 22 and it is something that no doubt once you have made 23 a decision in principle, it is something that we can 24 discuss further with the family and others. 25 THE CHAIR: And the other party, which isn't here, which has</p> <p style="text-align: center;">Page 70</p>	<p>1 make a decision on this matter today, and if that is the 2 case, then it is clearly important that core 3 participants who are present have an opportunity to set 4 out their position. 5 THE CHAIR: Absolutely. Absolutely. 6 Mr Mansfield. 7 Submissions by MR MANSFIELD 8 MR MANSFIELD: Sir, yes, I can be very quick. The favoured 9 one for the family is B, the hybrid. I needn't say 10 more. It is really rather obvious. 11 THE CHAIR: Yes, well, you have heard that the idea is that 12 they will have a necessary link to anything that happens 13 in London -- 14 MR MANSFIELD: Yes. 15 THE CHAIR: -- and you will be able to have, if you choose, 16 some part of your legal team there with them. 17 MR MANSFIELD: Yes. 18 THE CHAIR: It is up to you. 19 MR MANSFIELD: Thank you very much. 20 THE CHAIR: All right, thank you. Mrs McGahey, I don't 21 suppose it much affects you, does it? 22 Submissions by MS MCGAHEY 23 MS MCGAHEY: No, sir, HMG favoured option B which is the one 24 that now seems to be the preference of the majority. 25 THE CHAIR: Yes.</p> <p style="text-align: center;">Page 72</p>

<p>1 MS MCGAHEY: Thank you.</p> <p>2 THE CHAIR: All right, thank you very much. Obviously</p> <p>3 numbers of witnesses of those with whom you are most</p> <p>4 concerned are likely to be metropolitan based.</p> <p>5 MR GOSS: Yes, sir.</p> <p>6 THE CHAIR: Yes, Ms Giovanetti.</p> <p>7 Submissions by MS GIOVANETTI</p> <p>8 MS GIOVANETTI: As you have have seen from our written</p> <p>9 submissions, our preferred option would be for all of</p> <p>10 the open hearings to be in London, but equally we can</p> <p>11 see considerable force in having some of them in</p> <p>12 Salisbury, having the hybrid model, and we take the view</p> <p>13 that following the course proposed by counsel to the</p> <p>14 inquiry, which is that some open hearings take place in</p> <p>15 Salisbury with the focus being in particular on the</p> <p>16 evidence relating to the immediate circumstances of Dawn</p> <p>17 Sturgess's death --</p> <p>18 THE CHAIR: Yes.</p> <p>19 MS GIOVANETTI: -- would alleviate the need for the</p> <p>20 extensive and complex security arrangements that we --</p> <p>21 THE CHAIR: That is something that you particularly applied,</p> <p>22 or those behind you have particularly applied their</p> <p>23 minds to. Do I summarise it correctly, there will</p> <p>24 obviously be some witnesses for whom special security</p> <p>25 arrangements are going to have to be made, even for open</p> <p style="text-align: center;">Page 73</p>	<p>1 satisfied that a large proportion of the rest of the</p> <p>2 evidence to the extent that it is open ought to be taken</p> <p>3 in London. The reasons are essentially (1) security and</p> <p>4 (2) simple logistics; large numbers of people are</p> <p>5 otherwise going to have to be billeted somewhere in</p> <p>6 Salisbury, or near Salisbury, for quite a long time.</p> <p>7 The expense would not be inconsiderable, but the</p> <p>8 important thing is the security, which has to be managed</p> <p>9 properly and it is important that there shouldn't be</p> <p>10 an inhibition on the calling of witnesses in open</p> <p>11 hearings who will nevertheless need special security</p> <p>12 arrangements. As far as the ambulance trust is</p> <p>13 concerned, I would hope that to the extent that their</p> <p>14 locally based staff have to give evidence, it ought to</p> <p>15 be possible to take those witnesses in Salisbury as</p> <p>16 well. On the other hand I don't contemplate at the</p> <p>17 moment switching back and forth. We will start in</p> <p>18 Salisbury. We will do as much as we sensibly can there</p> <p>19 and that may well include the ambulance staff, who will</p> <p>20 presumably be dealing with an early part of the history</p> <p>21 in any event, and thereafter the hearings -- we should</p> <p>22 look for a suitable location in London somewhere with</p> <p>23 a feed to a location, not necessarily in Salisbury, but</p> <p>24 near Salisbury. It doesn't have to be a big public</p> <p>25 building in the middle of Salisbury. Indeed it probably</p> <p style="text-align: center;">Page 75</p>
<p>1 hearings?</p> <p>2 MS GIOVANETTI: Yes.</p> <p>3 THE CHAIR: And those, as I understand it, are very much</p> <p>4 more easily made in London than they are elsewhere.</p> <p>5 MS GIOVANETTI: In London, yes, that's right. And you will</p> <p>6 have seen from our submissions if you wanted more detail</p> <p>7 from us we could happily provide a closed note, but for</p> <p>8 obvious reasons --</p> <p>9 THE CHAIR: I don't think it takes an enormous amount of</p> <p>10 imagination, Ms Giovanetti, to work out why.</p> <p>11 MS GIOVANETTI: No. Again, it doesn't surprise me. Thank</p> <p>12 you.</p> <p>13 THE CHAIR: Thank you very much indeed. Mr Goss, do you</p> <p>14 want to add anything?</p> <p>15 MR GOSS: No.</p> <p>16 THE CHAIR: Mr Beggs?</p> <p>17 MR BEGGS: No, sir.</p> <p>18 Directions</p> <p>19 THE CHAIR: Right. Well, Mr O'Connor, I think I can deal</p> <p>20 with this now, and I think the sooner we know the</p> <p>21 better. I am quite satisfied that these hearings should</p> <p>22 start in Salisbury. The open hearings. And that the</p> <p>23 evidence of the family, and of the immediate</p> <p>24 circumstances of this unfortunate lady's death should be</p> <p>25 dealt with there. For very good reason, I am equally</p> <p style="text-align: center;">Page 74</p>	<p>1 shouldn't be, but with a feed to somewhere near</p> <p>2 Salisbury which is convenient for the family and if</p> <p>3 necessary any of their legal advisers who need to be</p> <p>4 with them to attend and for other local people, if</p> <p>5 necessary, to attend as well.</p> <p>6 MR O'CONNOR: Yes. I am grateful.</p> <p>7 THE CHAIR: Right, that's that. That leads on to the</p> <p>8 question of when that's to be.</p> <p>9 Submissions by MR O'CONNOR</p> <p>10 MR O'CONNOR: It does and clearly that is a matter that has</p> <p>11 been lurking in the background of many of the</p> <p>12 submissions that you have heard this morning.</p> <p>13 THE CHAIR: It has.</p> <p>14 MR O'CONNOR: And you will have seen that in our written</p> <p>15 submissions we indicated that we have of course</p> <p>16 considered again very carefully whether it is possible</p> <p>17 now to set a realistic date for the commencement of the</p> <p>18 substantive hearings, and we indicated in our written</p> <p>19 submissions in short that we didn't think we had reached</p> <p>20 that stage. So, as I say, the context for that has</p> <p>21 really been apparent for the last hour or so (inaudible)</p> <p>22 until we know exactly how the restriction order process</p> <p>23 is going to go, how long it is going to take, we are not</p> <p>24 going to be able to be confident about identifying</p> <p>25 a date for the substantive hearings. And that is why,</p> <p style="text-align: center;">Page 76</p>

<p>1 really, we have floated this already, but our dual 2 proposal is that at the next hearing, first of all we 3 will -- we hope that you will be in a position to set 4 a timetable for the restriction order process, and so 5 much of what we have already debated this morning is 6 intended to help us arrive at that position. But then 7 it follows, and we hope it will follow from that, that 8 once you have done that, then at the same time you will 9 also be in a position to set a time for the substantive 10 hearings. So we entirely agree with Mr Mansfield's 11 point that of course it is in the way of human nature 12 that once you have set that time then that of course 13 will be an extra motivation to making all of the earlier 14 processes that lead to it effective.</p> <p>15 THE CHAIR: Yes. That's a commonplace of case management, 16 isn't it, you start with the trial date and work 17 backwards.</p> <p>18 MR O'CONNOR: Yes.</p> <p>19 THE CHAIR: It tends to concentrate minds.</p> <p>20 MR O'CONNOR: Yes.</p> <p>21 THE CHAIR: But it has to be realistic. It won't work 22 otherwise. All right, thank you very much.</p> <p>23 I understand that. Is there anything else you want to 24 add?</p> <p>25 MR O'CONNOR: Nothing on that point. There are two other</p> <p style="text-align: center;">Page 77</p>	<p>1 almost inevitably going to have to be a closed hearing 2 associated with that?</p> <p>3 MR O'CONNOR: Sir, we will give that some thought. That's 4 right. It may be, it may be that there will be merit in 5 having, unusually within our processes, a closed hearing 6 in advance of an open hearing so that you can be fully 7 apprized of where things stand and where --</p> <p>8 THE CHAIR: So you can tell the other core participants what 9 is happening.</p> <p>10 MR O'CONNOR: Exactly, sir. The idea, and, sir, I am not 11 sure this is a decision which it is appropriate for you 12 to take now --</p> <p>13 THE CHAIR: No.</p> <p>14 MR O'CONNOR: -- but the advantage of it hypothetically 15 would be that at the end of such a closed hearing you 16 would be much more advanced in your understanding, and 17 would therefore be able to relay that information at 18 an open hearing that might follow.</p> <p>19 THE CHAIR: Yes.</p> <p>20 MR O'CONNOR: But sir, as I say, we are not suggesting you 21 set particular dates now, but our suggestion is that the 22 open hearing should be some time towards the end 23 of March, and we will see about other matters around 24 that.</p> <p>25 THE CHAIR: Right. Thank you very much indeed.</p> <p style="text-align: center;">Page 79</p>
<p>1 very brief matters which it may make sense for me to 2 mention now.</p> <p>3 THE CHAIR: Yes.</p> <p>4 MR O'CONNOR: It is really under a or b. Again, the first 5 of those is something that we have canvassed, but it 6 relates to the timing of the next preliminary hearing.</p> <p>7 THE CHAIR: Yes.</p> <p>8 MR O'CONNOR: In our written submissions we suggested aiming 9 that for February/March. In the meetings we have had 10 with both HMG and Operation Verbasco, it has become 11 apparent that January, of course, will be a time of hard 12 focus work on completing stage 1 disclosure, and 13 complying with the directions that you have set.</p> <p>14 THE CHAIR: Indeed it will.</p> <p>15 MR O'CONNOR: And in light of those directions for documents 16 to be prepared by the end of February, we suggest that 17 the latter part of March is going to be a realistic date 18 for the next open preliminary hearing.</p> <p>19 THE CHAIR: Easter is the first week of April, isn't it?</p> <p>20 MR O'CONNOR: That's right, sir, yes. So I am not 21 suggesting you set a precise date now, but we will go 22 away and find a date that, for example, the court can 23 accommodate. But that is the zone we are suggesting.</p> <p>24 THE CHAIR: Yes. Since that is going to be particularly 25 focused on the restriction order process, is there</p> <p style="text-align: center;">Page 78</p>	<p>1 MR O'CONNOR: So the very last matter, without coming back 2 to where we started, you mentioned at the outset that 3 the arrangements you were directing today regarding the 4 delayed link and so on were really only for today and 5 you would wish the position to be regularised for future 6 hearings, and so sir, may I suggest that you direct that 7 we, that is the inquiry legal team, circulate a draft 8 protocol for these arrangements. That is something that 9 other inquiries have done.</p> <p>10 THE CHAIR: For future hearings.</p> <p>11 MR O'CONNOR: For future hearings, covering both future 12 preliminary hearings and also the substantive hearings. 13 That is something, if you agree, we will draft and 14 circulate amongst core participants in advance of the 15 next hearing. It will be, the intention will be that it 16 would apply at the next hearing, and then subsequent 17 hearings, but there will then be an opportunity for both 18 the core participants -- and the media, we can circulate 19 it to the media too -- to make representations about it 20 at that hearing.</p> <p>21 THE CHAIR: Yes, you should. Right, thank you very much.</p> <p>22 MR O'CONNOR: That covers everything I want to say today.</p> <p>23 THE CHAIR: Mr Mansfield, I think you may have said what you 24 wanted to say about date. Do you want to add anything 25 now.</p> <p style="text-align: center;">Page 80</p>

1 Submissions by MR MANSFIELD  
 2 MR MANSFIELD: Yes, very briefly, if I may.  
 3 THE CHAIR: Of course.  
 4 MR MANSFIELD: One can see the fears that the family have,  
 5 for example if it is end of March/beginning of April  
 6 that these matters are going to be as it were determined  
 7 in relation to the exercise of restriction orders, then  
 8 one fears that the actual substantive hearings are not  
 9 going to be next year. And I would ask this: that by  
 10 the time of the spring hearings all those who are  
 11 involved should be in a position to indicate then when  
 12 it would be workable to start the substantive hearings  
 13 before the end of the year, next year.  
 14 THE CHAIR: Well, they should say when it is possible and  
 15 you would submit before the end of next year.  
 16 MR MANSFIELD: Yes, please.  
 17 THE CHAIR: Understood.  
 18 MR MANSFIELD: And one other matter. When considering the  
 19 hearings in the spring, could it please be remembered to  
 20 take into account the possibility of the private hybrid  
 21 meeting.  
 22 THE CHAIR: Yes, thank you. I will have to think about  
 23 that. Right, thank you.  
 24 Ms McGahey.  
 25 MS MCGAHEY: No, thank you, sir.

Page 81

1 THE CHAIR: Ms Giovanetti.  
 2 MS GIOVANETTI: No, thank you.  
 3 THE CHAIR: Where are we? I am so sorry, Mr Goss.  
 4 MR GOSS: No.  
 5 THE CHAIR: Not you either Mr Beggs. I haven't asked  
 6 Mr Chapman, at all, but you would have leapt to your  
 7 feet if you needed to, I have no doubt.  
 8 Right. Well, first of all I agree that it is not  
 9 possible to fix a date for the final hearing now.  
 10 Secondly, it is essential that at the next hearing,  
 11 which I do agree needs to be at the end of March, I am  
 12 then in a position to fix that date, and to that end all  
 13 participants who wish to make submissions about it  
 14 should please indicate in advance the earliest date that  
 15 they submit the final hearings can begin upon. And it  
 16 is also essential that at that hearing in March, working  
 17 backwards from whatever date we can fix for the hearing,  
 18 I fix a timetable which will have to be obeyed for the  
 19 restriction order process. It may be possible, it may  
 20 be necessary, or visible, to build into that the  
 21 possibility of what Mr Mansfield conveniently calls  
 22 private or hybrid hearings. I would like you to think  
 23 about that. It may be possible, it may not, I don't  
 24 know. But keep that option available. But I want,  
 25 please, everybody to come to the next meeting in March

Page 82

1 with a firm date which they can undertake to meet for  
 2 the final hearing. If I haven't got that, I can't fix  
 3 the necessary preparation stages which have to precede  
 4 it.  
 5 It goes without saying that the sooner it is, the  
 6 better.  
 7 MR O'CONNOR: Sir, yes.  
 8 THE CHAIR: All right. Next hearing, then, further  
 9 preliminary hearing, latter part of March. It is  
 10 likely, I would think, that there will need to be  
 11 an associated closed hearing. Precisely when and  
 12 whether before or after will need thinking about as the  
 13 work proceeds.  
 14 Is there anything else, Mr O'Connor?  
 15 MR O'CONNOR: Sir, no.  
 16 THE CHAIR: Does anybody else want to ask me to do anything  
 17 else now?  
 18 MR MANSFIELD: No, thank you.  
 19 THE CHAIR: Well, there we are. Everybody's satisfied, or  
 20 at least as near as possible. Understood. And I am  
 21 very grateful to you all for your help and what has  
 22 obviously been a good deal of realistic liaison. No  
 23 doubt sometimes reasonably tense, going on behind the  
 24 scenes. Thank you very much.  
 25 (12.57 pm)

Page 83

1 (The hearing concluded)  
 2  
 3  
 4 Housekeeping .....1  
 5 Submissions by MR O'CONNOR .....4  
 6 Submissions by MR MANSFIELD .....37  
 7 Submissions by MS MCGAHEY .....48  
 8 Submissions by MS GIOVANETTI .....57  
 9 Submissions by MR BEGGS .....62  
 10 Directions .....64  
 11 Further submissions by MR O'CONNOR .....66  
 12 Submissions by MR MANSFIELD .....72  
 13 Submissions by MS MCGAHEY .....72  
 14 Submissions by MS GIOVANETTI .....73  
 15 Directions .....74  
 16 Submissions by MR O'CONNOR .....76  
 17 Submissions by MR MANSFIELD .....81  
 18  
 19  
 20  
 21  
 22  
 23  
 24  
 25

Page 84

<b>A</b>				
<b>abeyance</b> 38:11	23:10	<b>analysed</b> 52:25	<b>April</b> 17:25 78:19	<b>authorities</b> 44:7
<b>able</b> 10:8 16:15	<b>adduced</b> 22:4	<b>answer</b> 18:19	81:5	<b>available</b> 22:9
24:12 30:4 31:23	<b>adopt</b> 36:18	<b>anticipate</b> 15:16	<b>arch</b> 14:11	25:15 82:24
33:6 38:22 58:4	<b>adopted</b> 7:25	25:1 26:9,10	<b>areas</b> 39:10 50:21	<b>avoidance</b> 36:13
58:20 60:13,23	69:23	29:11 30:10	<b>Arena</b> 42:20	<b>aware</b> 5:15 16:21
62:6 72:15 76:24	<b>advance</b> 4:12	53:19 63:3	<b>argument</b> 2:23	38:2,3 39:17
79:17	16:16 25:8,25	<b>anticipated</b> 38:24	<b>arguments</b> 19:14	49:2 66:20 69:4
<b>absolutely</b> 27:8	34:23 79:6 80:14	58:6,12,21 60:17	<b>arises</b> 1:23 11:24	
35:24 48:5,16	82:14	63:6	<b>arising</b> 8:9	<b>B</b>
49:24 52:14	<b>advanced</b> 34:8	<b>anybody</b> 2:22 9:18	<b>arranged</b> 7:6	<b>b</b> 64:17 69:13 72:9
53:24 55:7 66:2	79:16	57:6 63:15 83:16	<b>arrangements</b> 2:7	72:23 78:4
72:5,5	<b>advantage</b> 79:14	<b>apologising</b> 38:14	2:11 4:11 6:23	<b>back</b> 16:9 18:22
<b>accept</b> 38:4 46:14	<b>advice</b> 66:6	<b>apparent</b> 1:18	9:3 23:9 66:16	34:7 37:15 64:6
<b>accepted</b> 65:14	<b>advisers</b> 76:3	16:3 59:15 76:21	66:24 67:14	75:17 80:1
<b>access</b> 71:17	<b>advocates</b> 6:15	78:11	73:20,25 75:12	<b>backed</b> 40:7
<b>accident</b> 2:12 3:7	<b>affect</b> 54:24	<b>appear</b> 4:21 21:13	80:3,8	<b>background</b> 76:11
<b>accidental</b> 2:9,20	<b>afraid</b> 3:16 62:24	<b>appended</b> 29:17	<b>arrive</b> 22:20 77:6	<b>backstop</b> 31:13,17
<b>accommodate</b>	<b>agencies</b> 15:5	64:15	<b>asked</b> 41:12,16	<b>backwards</b> 77:17
78:23	50:20	<b>application</b> 6:3	44:15 49:6 61:18	82:17
<b>accompany</b> 29:6	<b>agenda</b> 8:6,10 9:21	28:17 49:8 52:5	82:5	<b>bare</b> 40:18
<b>account</b> 81:20	18:8 39:13	54:23 56:7 63:12	<b>asking</b> 18:16	<b>based</b> 66:10 73:4
<b>accounts</b> 12:3	<b>ago</b> 13:19 20:2	64:19 65:16	<b>asks</b> 49:15 55:24	75:14
<b>accurate</b> 33:6	32:24 39:9 41:12	<b>applications</b> 10:19	<b>aspects</b> 17:14 58:1	<b>basis</b> 26:10 28:14
<b>acknowledge</b>	66:8	16:10 17:14	<b>assert</b> 34:17	29:9 33:1
32:20	<b>agree</b> 34:24 35:10	26:11 27:15,23	<b>asserted</b> 66:8	<b>batch</b> 29:1,4,5,16
<b>acknowledging</b>	35:19,20 36:4,8	28:3,14 29:9	<b>assertion</b> 66:10	32:7 56:11,12,13
10:4 66:20	38:22 51:1 60:21	33:12 34:9,18,23	<b>assertions</b> 40:10	56:14 57:5 61:11
<b>Act</b> 20:5,10	63:18 77:10	35:23 36:2 51:5	<b>assimilate</b> 44:10	64:15 65:5
<b>acting</b> 2:6 17:1	80:13 82:8,11	54:12 59:9 60:24	<b>assist</b> 13:9 31:5	<b>batting</b> 47:25
21:1	<b>agreed</b> 27:25	<b>applied</b> 73:21,22	46:1 61:15 69:22	<b>bear</b> 16:4 64:2
<b>actual</b> 81:8	28:21 37:3 50:12	<b>applies</b> 22:7 63:9	<b>associated</b> 67:14	<b>Beggs</b> 5:9 62:15,16
<b>acutely</b> 66:20	58:25 59:2 65:4	<b>apply</b> 80:16	79:2 83:11	62:17,21,25 63:3
<b>add</b> 21:19 37:6,11	<b>agreement</b> 12:16	<b>appointed</b> 40:23	<b>assurance</b> 22:16	63:13 74:16,17
56:3 62:12 69:21	<b>ahead</b> 8:12 32:21	<b>appreciate</b> 39:5	23:1	82:5 84:8
74:14 77:24	<b>aid</b> 69:20	41:4 57:18	<b>attack</b> 48:8,9	<b>beginning</b> 37:9
80:24	<b>aiming</b> 78:8	<b>appreciated</b> 44:5	<b>attend</b> 71:16 76:4	39:3,25 46:22
<b>added</b> 17:8 42:16	<b>alerted</b> 1:22 4:2	<b>appreciates</b> 47:4	76:5	48:10
51:12	<b>alleviate</b> 73:19	<b>appreciating</b> 39:3	<b>attendance</b> 1:10	<b>beginnings</b> 40:18
<b>addition</b> 17:9	<b>allocation</b> 62:22	<b>apprized</b> 79:7	67:17	<b>begins</b> 50:14
35:11	<b>allow</b> 32:6	<b>approach</b> 12:9,9	<b>attendees</b> 71:18	<b>begun</b> 27:14
<b>address</b> 9:21 14:14	<b>alongside</b> 26:17	41:23	<b>attending</b> 1:9 3:13	<b>behalf</b> 44:9 47:11
18:7 21:12 23:5	44:5	<b>approached</b> 37:18	3:19 5:17 70:7	60:22
57:16 61:7	<b>alternative</b> 68:8	<b>approaching</b> 54:8	<b>attention</b> 17:20	<b>believe</b> 28:22 32:7
<b>addressed</b> 17:16	<b>alternatives</b> 68:12	<b>appropriate</b> 3:10	<b>attract</b> 43:19 44:2	54:8
18:14 47:12	<b>ambulance</b> 5:14	5:19 13:8 22:12	44:21	<b>best</b> 57:16 58:2
49:16 59:5	71:2,10 75:12,19	29:12 36:23 69:7	<b>August</b> 19:18	60:11 69:19
<b>addressing</b> 34:7	<b>amount</b> 15:23 39:5	71:8 79:11	40:25 41:8 64:14	<b>better</b> 58:8 62:23
<b>adduce</b> 18:15	41:15 43:23 44:8	<b>appropriately</b>	<b>authorisations</b>	63:5,5 74:21
	48:22 74:9	57:24	13:8	83:6
				<b>big</b> 75:24

<b>billeted</b> 75:5	<b>central</b> 46:16,17	62:23 63:2,8,14	<b>cohort</b> 65:18	<b>conclusions</b> 22:19
<b>bit</b> 47:13 53:11	<b>certain</b> 6:5 21:14	63:23 64:5,25	<b>collated</b> 50:5	<b>conduct</b> 1:14
<b>Blood</b> 42:20	26:23 38:12 39:9	65:11,20,22,24	<b>come</b> 8:3 18:7,22	18:21 29:13 67:4
<b>blue</b> 39:23	43:23	66:2,14,18,25	24:24 30:9 32:10	<b>conducted</b> 17:23
<b>board</b> 61:1 62:2	<b>certainly</b> 17:5	67:6,11 68:1,9,18	33:3,15 34:7	57:23 67:24
<b>borne</b> 70:14,17	22:24 27:1 30:10	68:20,24 69:23	46:16 48:20 60:6	<b>confidence</b> 69:20
<b>bottom</b> 45:4	34:25 51:22	70:9,20,25 71:5	64:6 66:25 82:25	<b>confident</b> 76:24
<b>bounced</b> 39:23	63:18 70:3,12,21	71:19,23 72:5,11	<b>comes</b> 1:19 23:7	<b>configured</b> 67:23
<b>bound</b> 2:3	<b>certainty</b> 66:23	72:15,18,20,25	40:19 43:8 49:12	<b>confirm</b> 9:15
<b>boundaries</b> 27:7	<b>chair</b> 1:3 4:7,20	73:2,6,18,21 74:3	<b>coming</b> 1:7 45:23	<b>connection</b> 6:21
<b>bracket</b> 45:18	5:3,11,18 6:1,8	74:9,13,16,19	53:6 80:1	<b>consensus</b> 68:14
<b>brand</b> 41:7	6:13,22 7:5,12,16	76:7,13 77:15,19	<b>commence</b> 34:5	<b>consent</b> 21:2
<b>brief</b> 32:2 78:1	7:22 8:5,16,23	77:21 78:3,7,14	<b>commencement</b>	<b>consequence</b> 16:17
<b>briefly</b> 7:8 15:19	9:11,18 10:7,23	78:19,24 79:8,13	76:17	55:11
59:4 61:6 81:2	12:3,7,11,22 13:3	79:19,25 80:10	<b>common</b> 12:16	<b>consider</b> 9:5 29:1
<b>broadly</b> 14:1	13:11,22 15:14	80:21,23 81:3,14	<b>commonplace</b>	34:20 35:6 37:15
67:22 68:14	15:21 16:1,19	81:17,22 82:1,3,5	77:15	42:13
<b>build</b> 82:20	17:5,18 18:1,10	83:8,16,19	<b>communicate</b> 3:16	<b>considerable</b>
<b>building</b> 75:25	18:25 19:3,7,9,13	<b>chairman</b> 23:3	3:20,22	12:21 17:2 26:4
<b>bundle</b> 7:8,13,21	19:22 20:3,12	<b>Chapman</b> 5:10	<b>comparison</b> 16:4	27:1 39:7 51:21
8:7 21:11,16	21:18,22 22:13	82:6	<b>competing</b> 67:15	54:14 73:11
34:14	22:16 23:1,7,11	<b>chapter</b> 40:6	<b>complete</b> 13:16	<b>consideration</b>
<b>business</b> 8:21	23:14,22 24:4,11	<b>charge</b> 62:23	24:2 28:11 53:24	25:23 45:7
	24:22 25:9 26:13	<b>Charlie</b> 4:23	54:24 55:1	<b>considerations</b>
	26:19,22 27:3,19	<b>checking</b> 50:11	<b>completed</b> 13:15	67:16,17,19
	28:5,25 29:20,25	<b>Chief</b> 5:8	28:18 51:10	<b>considered</b> 2:3,5
	30:6,12,19 31:10	<b>choose</b> 72:15	<b>completely</b> 42:23	26:8 76:16
	32:11 33:9,16	<b>circulate</b> 80:7,14	42:23 61:24	<b>considering</b> 22:10
	34:15 35:5,17,20	80:18	<b>completing</b> 24:20	38:17 81:18
	35:24 36:5,12,19	<b>circumstances</b> 2:1	78:12	<b>considers</b> 69:19
	36:25 37:7,24	68:5 69:16 70:6	<b>completion</b> 23:18	<b>Constable</b> 5:8
	39:1,11 40:5,9,12	73:16 74:24	26:17	<b>constantly</b> 17:8
	41:22 42:8 43:1	<b>classic</b> 17:17	<b>complex</b> 26:7	<b>constituent</b> 5:4
	43:4,6,9,12 44:12	<b>clear</b> 9:3 20:22	73:20	<b>constructive</b> 58:24
	44:17,19 46:9,12	33:5,20 35:18	<b>comply</b> 32:15	62:4
	46:19,23 47:23	60:9 64:23	<b>complying</b> 32:22	<b>consultation</b> 20:21
	48:2,22 49:5,13	<b>clearance</b> 13:8	78:13	<b>consuming</b> 18:3
	49:18,23 50:10	<b>clearly</b> 9:12 26:23	<b>comprehensive</b>	49:3 52:1
	51:3,6,14,17 52:2	29:23 34:24	46:7	<b>contact</b> 7:3
	52:14,20 53:1,8	48:17 72:2 76:10	<b>computer</b> 31:23	<b>contained</b> 28:8
	53:18 54:3,16,21	<b>clients</b> 50:23 55:17	<b>concentrate</b> 77:19	<b>contemplate</b> 75:16
	55:4,16,23 56:1,3	<b>closed</b> 2:3 5:25 9:1	<b>concept</b> 51:20	<b>contemplated</b>
	56:10,12,14,16	9:4,9,13 17:16	52:15	38:10
	56:20 57:1,5,9	22:5,21 25:23	<b>concern</b> 37:21	<b>contemplating</b>
	58:22 59:6,10,13	27:7 28:3 42:24	57:17,17,19	29:20
	59:22,24 60:5,8	45:19 67:7 74:7	<b>concerned</b> 36:14	<b>content</b> 17:7 50:17
	60:20,25 61:12	79:1,5,15 83:11	39:16 54:4 67:3	59:11 62:10 63:9
	61:14,17 62:1,6	<b>closely</b> 12:13	73:4 75:13	<b>contentious</b> 27:10
	62:10,12,15,20	15:17	<b>concluded</b> 84:1	<b>contents</b> 25:21
<b>C</b>				
<b>cache</b> 60:3				
<b>calendar</b> 24:3				
<b>call</b> 21:17 42:5,17				
42:22 45:1 60:2				
<b>calling</b> 75:10				
<b>calls</b> 82:21				
<b>canvassed</b> 6:4 78:5				
<b>capacity</b> 13:6				
<b>care</b> 26:8				
<b>careful</b> 48:15				
57:13				
<b>carefully</b> 63:25				
76:16				
<b>carping</b> 41:18				
<b>case</b> 10:20 16:18				
17:14 23:25 26:2				
72:2 77:15				
<b>cases</b> 22:1 26:4				
53:2				
<b>categories</b> 45:4				
61:3				
<b>category</b> 43:19				
48:20				
<b>cause</b> 23:2				
<b>causes</b> 24:9				

<p><b>context</b> 15:18 37:17 41:5 76:20</p> <p><b>contextual</b> 40:14</p> <p><b>continue</b> 53:20 55:20</p> <p><b>continued</b> 18:4</p> <p><b>continues</b> 15:10 18:6</p> <p><b>continuous</b> 29:22</p> <p><b>contrast</b> 20:19</p> <p><b>convenient</b> 1:11 76:2</p> <p><b>conveniently</b> 82:21</p> <p><b>conversations</b> 46:1</p> <p><b>converted</b> 1:25</p> <p><b>copies</b> 64:9</p> <p><b>copy</b> 7:10,11,12 19:23</p> <p><b>core</b> 5:13 6:17 7:9 7:19 8:2,14 9:16 9:23 10:22 14:23 15:25 16:6,15 17:12 19:25 20:18,22 25:3,15 34:19 35:7,22 45:1 72:2 79:8 80:14,18</p> <p><b>correctly</b> 73:23</p> <p><b>correspondence</b> 14:23 21:9,15,20 22:14,25</p> <p><b>Council</b> 5:13 14:8 14:16 69:6,10,11 69:12,19,21</p> <p><b>Council's</b> 68:21</p> <p><b>counsel</b> 4:21 7:17 18:15 49:20 57:13 59:12 69:13 73:13</p> <p><b>counted</b> 11:25 12:1</p> <p><b>County</b> 68:21</p> <p><b>couple</b> 16:21 34:11</p> <p><b>course</b> 1:16 3:20 6:9 7:25 8:1,4 9:15,15 10:5 12:24 14:25 16:2 18:18,23 19:4,9</p>	<p>20:16 22:11 24:14 25:19 27:14 28:6 30:21 31:5 33:5 34:7 35:21 40:1,6,19 40:24 41:11,24 43:24 44:20 47:2 49:17 57:18,25 60:10,25 63:25 65:9,11 66:20 67:7 73:13 76:15 77:11,12 78:11 81:3</p> <p><b>court</b> 2:9 3:5,15,18 40:21 78:22</p> <p><b>courtroom</b> 2:22</p> <p><b>cover</b> 10:16</p> <p><b>covering</b> 10:14 15:4 80:11</p> <p><b>covers</b> 20:24 21:4 80:22</p> <p><b>CPs</b> 24:20 43:17</p> <p><b>create</b> 50:23</p> <p><b>creating</b> 28:24</p> <p><b>cumulatively</b> 9:21</p> <p><b>current</b> 9:7</p> <p><b>currently</b> 16:5 51:8</p> <p><b>cut</b> 2:21</p> <hr/> <p style="text-align: center;"><b>D</b></p> <hr/> <p><b>dancing</b> 39:18</p> <p><b>dark</b> 39:19 47:25</p> <p><b>dashboard</b> 15:11</p> <p><b>database</b> 25:19</p> <p><b>date</b> 13:17 19:24 27:24 28:1 29:24 31:2,13,17 32:1 33:4,14 35:9 38:9,22,24 39:8 56:4 58:6 64:22 66:25 76:17,25 77:16 78:17,21 78:22 80:24 82:9 82:12,14,17 83:1</p> <p><b>dated</b> 19:20</p> <p><b>dates</b> 28:2 55:4 58:4 79:21</p> <p><b>Dawn</b> 1:5,24 4:23 10:6 66:22 67:18</p>	<p>68:5 69:17 73:16</p> <p><b>days</b> 13:19</p> <p><b>deadline</b> 60:19 63:7</p> <p><b>deadly</b> 48:9</p> <p><b>deal</b> 2:2 8:7,18 38:5 51:17 52:16 64:6 74:19 83:22</p> <p><b>dealing</b> 26:14 37:18 38:18,19 75:20</p> <p><b>dealt</b> 17:15 27:16 74:25</p> <p><b>death</b> 1:5,24 68:5 69:17 73:17 74:24</p> <p><b>debate</b> 63:18</p> <p><b>debated</b> 77:5</p> <p><b>decide</b> 19:9 41:3 44:8 70:14</p> <p><b>decided</b> 40:15</p> <p><b>deciding</b> 44:4</p> <p><b>decision</b> 9:13 20:17 22:2,3 41:9 53:11 70:23 72:1 79:11</p> <p><b>decisions</b> 14:11 27:6</p> <p><b>deemed</b> 25:16</p> <p><b>degree</b> 27:1 60:13</p> <p><b>degrees</b> 47:16,17 61:3</p> <p><b>delay</b> 2:17 3:14 10:4 37:14 48:13 59:21 70:16</p> <p><b>delayed</b> 11:8 80:4</p> <p><b>delivered</b> 13:14,19</p> <p><b>deluged</b> 47:19</p> <p><b>department</b> 4:25 11:10 19:19</p> <p><b>departments</b> 2:7 5:1 15:4 50:20</p> <p><b>dependent</b> 60:12</p> <p><b>depending</b> 32:12</p> <p><b>describe</b> 29:16</p> <p><b>described</b> 8:12 10:17,18 11:8,23 29:3 42:13 45:3</p> <p><b>describing</b> 16:23</p>	<p><b>desirable</b> 38:21</p> <p><b>detail</b> 11:5 31:14 33:7 36:6 74:6</p> <p><b>detailed</b> 11:2 20:9 30:16 33:20 34:3 50:13 57:14</p> <p><b>detect</b> 62:6</p> <p><b>determination</b> 20:11 34:18 35:15 61:20</p> <p><b>determinations</b> 20:13</p> <p><b>determine</b> 43:13</p> <p><b>determined</b> 16:8 17:13 28:4 42:7 45:16 67:9 81:6</p> <p><b>determining</b> 17:22 34:23</p> <p><b>detract</b> 28:10</p> <p><b>developing</b> 30:15 68:15</p> <p><b>development</b> 12:23</p> <p><b>developments</b> 10:15</p> <p><b>devices</b> 3:16</p> <p><b>devise</b> 26:14</p> <p><b>devoted</b> 57:22</p> <p><b>died</b> 1:5</p> <p><b>difference</b> 12:3,8 20:15,16</p> <p><b>different</b> 6:23 28:16 41:23 43:24 45:12,13 46:9,13 47:3 55:4 66:12 67:7</p> <p><b>difficult</b> 33:14</p> <p><b>difficulties</b> 6:21 7:3 23:2 31:23 32:17 47:25</p> <p><b>difficulty</b> 9:25 60:18 70:7</p> <p><b>direct</b> 24:17 30:24 80:6</p> <p><b>directed</b> 29:13</p> <p><b>directing</b> 80:3</p> <p><b>direction</b> 17:24 29:23 30:20,23 30:23 31:11,11</p>	<p>31:18,24 32:16 32:20 62:18 63:9 71:21</p> <p><b>directions</b> 5:22,23 6:5,6 10:10 11:13 27:24 29:15 32:3,25 33:2,19,22,24 34:17 35:12,15 55:23 57:6 58:13 64:4,8 74:18 78:13,15 84:9,14</p> <p><b>disclose</b> 16:15 34:22 59:21</p> <p><b>disclosed</b> 16:6 17:12 24:19 26:8 44:8,11 48:7,11 48:19 63:24 67:10</p> <p><b>disclosure</b> 8:11 9:22,25 10:12,17 10:20,21,22,25 11:7 13:25 15:2 15:4,9,16,19,24 16:10 17:8,10 23:18,21,24 24:1 24:15,21 25:10 25:14 26:18 28:11,23 29:16 36:22 39:22 48:5 48:14 49:25 52:7 53:23 54:9,25 55:8,9 57:20,23 58:8 59:1 65:24 78:12</p> <p><b>discreet</b> 53:3</p> <p><b>discuss</b> 15:7 30:5 43:17 70:24</p> <p><b>discussed</b> 16:12 21:1 30:2 50:24 63:20 64:2</p> <p><b>discussing</b> 59:14</p> <p><b>discussion</b> 62:8</p> <p><b>discussions</b> 28:19 31:6 34:3,4 38:1 46:15 49:21 50:13</p> <p><b>dispose</b> 37:2</p> <p><b>distinction</b> 12:14</p>
---	---	---	--	---



18:22 59:4 <b>document</b> 12:2,14 17:17,23 26:7 27:12 52:11 53:10,13 <b>documentation</b> 22:8 43:23 60:7 <b>documents</b> 11:11 11:19,22,25 12:17,19 13:9,13 13:17,21,25 14:1 14:5,20 15:1,6,12 15:24 16:4,13,15 16:25 17:12 18:13 21:5,6 24:13 25:16,18 25:21,22 26:9,12 27:22,25 28:10 29:6,17,19 31:1 31:13,16 32:7,8 32:15 33:21 40:7 40:17 41:13,17 42:4 45:7,8 50:1 50:4,7,15,19 51:9 51:12,24,25 52:22 54:24 56:5 56:8,22 59:4,16 59:21 60:2,11,14 60:16 63:11,21 64:12,15,18,22 64:24 65:2,5,13 65:19,21 78:15 <b>doing</b> 8:1 23:13 58:20 <b>domain</b> 40:17 <b>doubt</b> 17:3 36:13 64:5 66:6 70:22 82:7 83:23 <b>downside</b> 69:2 <b>draft</b> 17:7 28:17 29:7,18 30:25 31:25 35:11 46:18,21 47:8 51:8 64:9,17 65:12 80:7,13 <b>drafted</b> 31:5 <b>draw</b> 18:22 <b>drawn</b> 27:8 <b>drew</b> 17:20	<b>dual</b> 77:1 <b>due</b> 1:15 8:4 9:15 19:9 31:5 33:5 71:15 <hr/> <b>E</b> <hr/> <b>e</b> 42:16 43:5,6,7 <b>earlier</b> 5:22 9:1 14:2 24:13 31:16 47:13,18 77:13 <b>earliest</b> 82:14 <b>early</b> 25:2,5 29:7 30:5,14 32:15 34:2 38:5,8 43:14 53:10 66:23 75:20 <b>ease</b> 67:17 <b>easily</b> 74:4 <b>Easter</b> 78:19 <b>effect</b> 11:15 20:11 22:24 23:8 52:13 53:15 <b>effective</b> 38:9 77:14 <b>Effectively</b> 33:9 <b>efficient</b> 26:15 31:8 54:8 60:1 <b>efforts</b> 28:10 50:3 <b>either</b> 4:10 7:3 22:10 23:13 41:16 60:19 71:21 82:5 <b>electronic</b> 3:16 7:13 <b>electronically</b> 7:10 <b>element</b> 36:22 44:23 <b>elements</b> 51:2 <b>email</b> 7:4 <b>emanating</b> 11:11 <b>embryonic</b> 40:18 <b>emerge</b> 63:19 <b>emphasis</b> 32:25 <b>emphasise</b> 14:19 39:6 <b>emphasised</b> 22:6 <b>emphasising</b> 21:25 <b>employed</b> 45:22 <b>enable</b> 28:3 32:15 <b>enabling</b> 10:21	<b>encourage</b> 7:2 <b>endeavoured</b> 15:2 <b>ended</b> 11:14 <b>engage</b> 12:13 30:4 <b>engaged</b> 14:21 39:21 <b>engaging</b> 14:22 <b>enormous</b> 74:9 <b>ensure</b> 13:6 31:12 57:23 <b>entail</b> 35:11 <b>entire</b> 66:5 <b>entirely</b> 35:19 36:17 41:25 77:10 <b>entirety</b> 27:5 <b>entries</b> 12:1 <b>equally</b> 17:21 34:3 73:10 74:25 <b>equivalent</b> 22:22 <b>essence</b> 2:16 <b>essential</b> 10:21 82:10,16 <b>essentially</b> 20:20 75:3 <b>event</b> 35:6 39:3 67:9 75:21 <b>everybody</b> 1:19 4:13 37:21 38:13 38:14 52:15,17 58:25 82:25 <b>everybody's</b> 55:18 64:7 83:19 <b>evidence</b> 1:15,18 17:15 22:3,11 23:10 36:10 40:9 66:10,12 68:4,6 69:15,15,17 71:16 73:16 74:23 75:2,14 <b>evolved</b> 2:15 <b>exact</b> 39:20 <b>exactly</b> 33:10 44:22 61:13 76:22 79:10 <b>examining</b> 66:11 <b>example</b> 12:1 17:17 27:16 43:13,22 44:7	46:3 51:2 58:5 67:17 78:22 81:5 <b>exceptional</b> 21:25 <b>excluded</b> 35:2 <b>excused</b> 5:18 <b>exercise</b> 17:24 23:24,25 24:15 25:18 26:17 31:4 35:5 41:6,8 49:25 53:22 57:23 81:7 <b>exercising</b> 34:21 68:24 <b>exhibited</b> 16:13 <b>expand</b> 24:8 <b>expect</b> 4:3 <b>expectations</b> 54:7 <b>expected</b> 51:18,19 <b>expense</b> 75:7 <b>expert</b> 54:14 <b>expertise</b> 54:18 <b>experts</b> 50:16 <b>explained</b> 46:13 <b>express</b> 61:19 <b>extend</b> 18:16 <b>extensive</b> 26:11 37:25 58:21 73:20 <b>extensively</b> 14:21 <b>extent</b> 24:9 75:2 75:13 <b>extra</b> 77:13 <b>extremely</b> 21:5 58:23 <b>eyes</b> 42:12 <hr/> <b>F</b> <hr/> <b>facilitate</b> 15:8 <b>facility</b> 42:18 <b>fact</b> 16:14 17:20 18:8 20:6 38:1 42:21 59:14 64:23 70:15 <b>factor</b> 71:21 <b>factors</b> 70:17 <b>factual</b> 10:24 <b>fair</b> 18:21 44:9 <b>fairly</b> 11:2 <b>fairness</b> 27:9 <b>falls</b> 20:14	<b>false</b> 54:7 <b>familiar</b> 20:9 <b>families</b> 53:14 <b>family</b> 1:12 4:22 6:18 10:6 13:1 17:3,4 21:8,13 36:1 37:19 39:4 41:20 44:9 48:6 57:17 60:22 66:22 67:18 70:2 70:24 72:9 74:23 76:2 81:4 <b>family's</b> 34:16 57:19 <b>far</b> 16:1 23:20 36:13 37:8 39:16 49:2 62:6 67:3 71:6 75:12 <b>fashion</b> 1:16 <b>favoured</b> 39:18 68:21 72:8,23 <b>fears</b> 81:4,8 <b>feature</b> 10:1 <b>features</b> 10:3 <b>February</b> 29:19,21 30:18,19 31:2 32:2 51:10,15 56:4 57:5 59:22 63:7 64:20 65:17 78:16 <b>February/March</b> 78:9 <b>feed</b> 2:18,21 75:23 76:1 <b>feel</b> 27:5 <b>feet</b> 9:19 82:7 <b>figures</b> 66:7 <b>filed</b> 5:15 7:18 68:12 69:6 <b>files</b> 14:11,12,16 14:17 <b>filing</b> 28:20 <b>final</b> 27:6,12 33:22 62:25 82:9,15 83:2 <b>finally</b> 21:23 <b>financial</b> 67:16 <b>find</b> 32:17 40:12 55:13 78:22
--	--	---	---	--

<b>finding</b> 69:22	<b>former</b> 12:9	<b>gists</b> 51:1	<b>guard</b> 2:8 41:14	8:19,20 9:1,2,24
<b>fine</b> 53:10	<b>forth</b> 75:17	<b>give</b> 1:9 33:22 40:6		16:12 22:21 28:3
<b>finish</b> 25:7 55:19	<b>fortnight</b> 65:8	49:3 55:24 71:16	<b>H</b>	32:10 33:4,15
<b>finite</b> 56:18	<b>fortnightly</b> 15:10	75:14 79:3	<b>hand</b> 75:16	37:23 38:10
<b>firm</b> 83:1	<b>forward</b> 10:18	<b>given</b> 3:18 13:4	<b>handed</b> 49:10	42:18,18 57:19
<b>first</b> 2:17 5:5 6:14	25:25 30:13	14:13 18:11 21:2	<b>handle</b> 2:14	57:20 66:17,24
7:3 8:10,18	49:22 55:6 64:3	21:14 33:23	<b>happen</b> 3:7 55:11	67:5,7,14,23,24
10:14,24 14:6	<b>found</b> 21:10,16	44:11	<b>happened</b> 25:6	68:2,3,8,16,17
23:17 26:1 27:24	<b>Foundation</b> 5:14	<b>go</b> 8:16 11:4 19:16	66:8	69:25 70:4,15
29:1,15 30:20	71:11	25:25 34:13 40:1	<b>happening</b> 47:7	71:5,13,17 73:10
31:11 32:4 33:11	<b>four</b> 63:4	40:16,17 50:23	54:5 62:7 79:9	73:14 74:1,21,22
36:1,22 39:14	<b>fourth</b> 13:19	53:10,22 55:12	<b>happens</b> 29:21	75:11,21 76:18
41:20 42:1 44:24	<b>framework</b> 45:12	55:16 61:5 76:23	72:12	76:25 77:10 80:6
45:5,7 50:15	45:12	78:21	<b>happily</b> 74:7	80:10,11,12,12
52:21,24 54:10	<b>Friday</b> 1:1	<b>goes</b> 83:5	<b>happy</b> 30:8 50:6	80:17 81:8,10,12
57:19 61:10,11	<b>friend</b> 5:2,6 37:9	<b>going</b> 3:23 10:14	62:5 69:21	81:19 82:15,22
64:11 66:25 67:3	38:2 47:10	11:4 12:13 18:7	<b>hard</b> 7:11,12 55:18	<b>held</b> 15:12 16:9
67:24 77:2 78:4	<b>friends</b> 4:22,24	19:16 23:16 26:2	55:20 78:11	25:2 42:19
78:19 82:8	<b>frustrating</b> 66:4	30:13 31:14	<b>head</b> 19:4	<b>help</b> 34:12 47:22
<b>Firstly</b> 62:17	<b>full</b> 18:21 33:1	37:16,20,22	<b>hear</b> 30:21 59:3	48:7 62:22 77:6
<b>five</b> 3:14	<b>fully</b> 79:6	42:17 44:2,7	69:14 71:1	83:21
<b>fix</b> 33:14 61:21	<b>function</b> 40:12	45:9 48:17 53:20	<b>heard</b> 1:15 9:6	<b>helpful</b> 18:10
82:9,12,17,18	<b>further</b> 10:17 13:6	53:25 61:9,23	20:18 39:8 49:19	19:15 31:9 55:22
83:2	14:6,17 21:9	64:3 73:25 75:5	55:23 61:19 65:9	<b>helpfully</b> 7:19
<b>fixing</b> 33:4	23:5 24:24 25:1	76:23,23,24	68:6 69:18 72:11	<b>High</b> 40:21
<b>floated</b> 77:1	25:23 32:3 35:25	78:17,24 79:1	76:12	<b>highest</b> 45:6
<b>focus</b> 10:19 49:25	47:22 51:11 53:6	81:6,9 83:23	<b>hearing</b> 1:4,14,18	<b>highly</b> 2:2 44:25
50:3 62:22 73:15	53:21 58:18	<b>good</b> 2:2 5:11	3:2,6,13,17,19,23	<b>hills</b> 41:5 45:3
78:12	66:15 70:24 83:8	13:12 52:16	5:16,22,25 6:2,15	<b>hint</b> 38:25
<b>focused</b> 68:3 69:15	84:10	59:24 62:7,12	6:16,20,24 7:8,24	<b>history</b> 75:20
78:25	<b>future</b> 1:14 4:9	63:8,23 74:25	8:6,8,22 9:4,5,9	<b>HMG</b> 14:10,24,25
<b>follow</b> 24:2 27:8	9:22 23:16,17	83:22	9:10,14,14,16,17	15:3,18 17:2
27:10 29:9 36:3	80:5,10,11,11	<b>Goss</b> 5:8 62:12,14	10:8,11,11,16	18:4 21:2,7 22:8
77:7 79:18		73:5 74:13,15	11:6,7,13,17	23:21 24:18
<b>followed</b> 5:24 9:1	<b>G</b>	82:3,4	14:10 15:25	25:12 27:10,22
68:16	<b>gained</b> 34:1	<b>government</b> 2:7	19:25 20:8 21:11	28:1,6,9,19 29:1
<b>following</b> 6:2,19	<b>gather</b> 3:24 4:1	5:1 11:10 14:7,8	24:25 25:1 27:16	29:5,15 30:4,10
9:5,9 10:11	<b>general</b> 25:25	19:18 20:20	29:10 33:3,8,13	31:7,13 34:1,5
11:13 20:8 21:2	<b>generically</b> 42:17	22:17 48:4,18	33:22 35:15 38:5	49:20 50:3,6,15
29:14 50:13	<b>Giovanetti</b> 5:7	50:22 51:7 52:5	38:7 42:22,25	50:18,20 52:8
73:13	57:10,11,12	55:17 59:19	43:16 44:6 45:10	54:7,24 72:23
<b>follows</b> 3:12 33:17	58:23 59:6,7,11	60:12 64:11 65:6	48:10 58:6,13	78:10
36:14 70:4,5	59:14,23,25 60:6	<b>grateful</b> 4:8,18 7:5	61:21 67:21 69:5	<b>HMG's</b> 27:4
77:7	60:9,21 61:1,13	36:17 47:23	77:2 78:6,18	<b>hold</b> 15:6
<b>foot</b> 41:5 45:3	61:15,17,24 62:2	49:13 50:7 57:12	79:1,5,6,15,18,22	<b>holding</b> 14:22 15:1
<b>force</b> 73:11	62:9 65:3,10	58:23 62:8 63:16	80:15,16,20 82:9	<b>Home</b> 4:25 19:20
<b>form</b> 21:3 24:19	73:6,7,8,19 74:2	65:23 76:6 83:21	82:10,16,17 83:2	<b>Honestly</b> 59:6
29:8 41:7 47:9	74:5,10,11 82:1,2	<b>great</b> 58:1	83:8,9,11 84:1	<b>hope</b> 1:18 4:3,13
<b>formal</b> 52:4	84:7,13	<b>greater</b> 49:4	<b>hearings</b> 2:3,8 4:9	6:24 30:3,15
	<b>gisting</b> 53:4		5:23,24 7:25 8:9	

32:17 43:20 47:24 55:2 57:21 61:13,19 75:13 77:3,7 <b>hoped</b> 50:25 <b>hopeful</b> 38:20 <b>hopes</b> 54:7 <b>hoping</b> 59:7 <b>hostile</b> 48:8 <b>hour</b> 76:21 <b>housekeeping</b> 1:20 1:21 6:11 8:24 84:3 <b>huge</b> 53:25 <b>hugely</b> 48:7 <b>human</b> 77:11 <b>hybrid</b> 6:15 42:22 71:17 72:9 73:12 81:20 82:22 <b>hypothetically</b> 79:14	<b>imperative</b> 33:6 <b>implicit</b> 61:13 <b>importance</b> 38:19 58:1 66:21 71:14 <b>important</b> 10:1 12:15 14:19 17:21 18:25 20:16 22:13 25:3 25:6 40:19 42:11 45:15 48:7 53:13 53:16 54:6 72:2 75:8,9 <b>importantly</b> 25:20 <b>impose</b> 23:9 70:6 <b>improved</b> 7:6 <b>inadvertently</b> 2:13 <b>inaudible</b> 76:21 <b>incident</b> 39:25 47:5 <b>include</b> 63:20 66:9 75:19 <b>includes</b> 1:7 16:11 <b>including</b> 6:17 8:21 37:4 <b>incomplete</b> 28:14 <b>inconsiderable</b> 75:7 <b>inconsistency</b> 11:21,24 <b>increasing</b> 16:7 <b>indicate</b> 8:7 38:17 81:11 82:14 <b>indicated</b> 5:16 6:14 23:23 24:16 28:9 33:25 62:18 67:4,21 76:15,18 <b>indication</b> 14:13 47:18 50:8 <b>inevitable</b> 2:2 55:7 55:11 <b>inevitably</b> 55:15 67:15 79:1 <b>Infected</b> 42:20 <b>inflicting</b> 68:25 <b>influenced</b> 47:15 <b>information</b> 52:9 52:12 53:17 79:17 <b>inhibition</b> 75:10	<b>initial</b> 68:15 <b>innocuous</b> 52:11 <b>input</b> 15:5 17:2 <b>inquest</b> 1:25 2:4 40:22 43:22 <b>inquiries</b> 2:14 20:5 20:10 25:17 42:19 47:1 80:9 <b>inquiry</b> 1:5,15,25 4:21 5:22 6:7 7:18,24 9:2 10:1 10:3,5 11:18 18:15 19:19,24 20:12,15 21:7,21 24:19 27:13 29:2 33:5 34:21 36:15 38:18 41:4,9 49:20 50:1,4,12 50:24 52:6 53:19 53:25 54:10 55:21 57:13 58:7 58:23 59:12 60:13 64:12 65:14 66:5 67:5 67:12 69:11,14 69:20 70:15 71:13 73:14 80:7 <b>inquiry's</b> 36:3 50:2 69:13 <b>inquisitorial</b> 18:18 19:5 <b>insist</b> 62:24 <b>instance</b> 7:3 30:4 61:10 <b>instances</b> 51:4 <b>instigation</b> 27:13 <b>instruction</b> 20:20 <b>instructions</b> 49:11 56:9,17 61:6 <b>intended</b> 35:1 77:6 <b>intention</b> 8:17 30:1 50:3,22 67:4 80:15 <b>inter</b> 62:8 <b>interest</b> 10:5 68:25 <b>interests</b> 55:18 <b>interfere</b> 47:14 <b>interlude</b> 40:20 <b>internationally</b>	47:7 <b>internet</b> 70:16 <b>introduce</b> 2:17 44:23 <b>introduced</b> 45:9 <b>investigated</b> 55:15 <b>investigation</b> 1:24 16:24 18:21 <b>invite</b> 3:25 8:2,14 24:17 29:14 30:20,24 31:24 32:19 36:23 64:8 <b>invited</b> 32:16 <b>invoked</b> 56:24 57:2 <b>involve</b> 26:5 34:2 <b>involved</b> 33:20 40:25 47:1 66:21 81:11 <b>involves</b> 18:3 <b>involving</b> 34:4 <b>ironed</b> 32:13 <b>irrelevant</b> 51:2 <b>issue</b> 25:4 36:24 <b>issued</b> 6:2 <b>issues</b> 8:9 26:15,25 27:14 39:4 63:4 <b>item</b> 12:15 18:8 39:13 <b>itemised</b> 42:2 <b>items</b> 8:10 12:2 13:18 42:3 58:7 58:15 59:4 <b>iterative</b> 30:3	<b>kept</b> 53:17 <b>key</b> 16:24 66:4 71:14 <b>kind</b> 3:8 5:18 45:21 48:24 <b>kindly</b> 62:18 <b>kinds</b> 38:15 <b>knew</b> 55:11 <b>know</b> 1:11,23 7:10 20:23 21:8 24:22 24:23,23 31:15 39:19 41:1,1 42:6 43:22 44:22 45:17,23 46:23 54:1 55:5 57:17 59:3 70:5 74:20 76:22 82:24 <b>known</b> 37:13 51:23 <b>knows</b> 47:2
<b>I</b>				<b>L</b>
<b>idea</b> 29:8 56:18 72:11 79:10 <b>identification</b> 63:21 <b>identified</b> 29:4 45:2 48:16 50:1 51:9 52:6,24 56:6 57:2 58:18 59:18,19 60:3,14 <b>identify</b> 49:7 50:20 53:21 54:10 55:21 56:4,22 60:1 63:10,10 65:13 <b>identifying</b> 27:21 28:9 61:10 76:24 <b>ILT</b> 69:22 <b>imagination</b> 74:10 <b>imagine</b> 56:9 <b>immediate</b> 68:4 69:16 73:16 74:23 <b>immediately</b> 16:3 27:21 <b>immensely</b> 48:15 52:11 55:18,22 <b>impact</b> 10:4 51:12				<b>lady's</b> 74:24 <b>landed</b> 56:19 <b>lapse</b> 39:6 <b>large</b> 39:24 41:1 42:2 51:11 69:1 75:1,4 <b>largely</b> 10:10,16 <b>largest</b> 23:20 <b>lastly</b> 5:12 8:20,24 35:25 65:12 <b>late</b> 28:17 <b>lead</b> 77:14 <b>leads</b> 76:7 <b>leapt</b> 82:6 <b>learned</b> 4:22,24 5:2,6 37:9 38:1 47:10 <b>leave</b> 18:10 21:23 23:14 24:8 54:3 <b>led</b> 16:25 <b>left</b> 38:11 <b>legal</b> 3:18 6:17 11:18 19:18 21:7 29:2 50:1,4,13,24 52:6 53:19,25 54:10 55:21 56:5 58:24 60:13 62:3 64:13 65:14
			<b>J</b>	
			<b>January</b> 28:17 78:11 <b>jigsaw</b> 52:13,14 53:15 <b>judgment</b> 30:7 <b>judicial</b> 22:3 <b>July</b> 1:6 5:23 6:2 11:6 15:25 19:21	
			<b>K</b>	
			<b>KC</b> 4:24 5:2,7,9 <b>keen</b> 1:9 17:4 <b>keep</b> 82:24 <b>keeping</b> 63:7	

72:16 76:3 80:7 <b>length</b> 9:25 33:7 57:15 <b>let's</b> 23:14 <b>level</b> 11:4 13:8 62:7 <b>lever</b> 14:11 <b>liaise</b> 55:20 <b>liaising</b> 62:3 <b>liaison</b> 55:22 58:24 83:22 <b>life</b> 41:25 <b>light</b> 31:19 47:6 78:15 <b>limited</b> 14:4,20 15:23 16:1 22:7 48:22 <b>limits</b> 13:5 <b>line</b> 26:9,9 53:6 <b>link</b> 3:3,14,20 6:19 7:1 68:7,10 69:18,25 70:1,8 70:12,18 72:12 80:4 <b>list</b> 50:23 51:8,19 64:17 <b>listened</b> 63:25 <b>listening</b> 1:9 <b>little</b> 47:13 <b>live</b> 3:3,19 70:10 <b>local</b> 68:25 70:11 76:4 <b>locality</b> 69:1 <b>locally</b> 70:10 75:14 <b>location</b> 67:8 75:22,23 <b>log</b> 12:1 <b>logic</b> 44:24 <b>logical</b> 41:24,25 <b>logistical</b> 25:17 67:16 <b>logistics</b> 71:20 75:4 <b>logs</b> 12:8 <b>London</b> 68:6,8,17 69:12,18 70:1 71:16,20 72:13 73:10 74:4,5 75:3,22	<b>long</b> 48:12 54:2 59:18 66:7 75:6 76:23 <b>longer</b> 55:3 <b>look</b> 22:18 39:15 50:17 75:22 <b>looking</b> 50:14 <b>lot</b> 36:19 40:3 48:25 <b>lurking</b> 76:11 <hr/> <b>M</b> <hr/> <b>main</b> 39:12 45:23 47:21 <b>Majesty's</b> 14:7,7 22:17 48:4,18 59:19 60:11 64:11 65:6 <b>majority</b> 11:11 15:1 52:7 72:24 <b>making</b> 7:14 13:12 25:15 28:16 39:13 52:4 62:4 77:13 <b>manage</b> 1:14 <b>managed</b> 13:6 75:8 <b>management</b> 77:15 <b>managing</b> 2:15 <b>Manchester</b> 42:20 <b>Mansfield</b> 4:6,7,24 21:12 23:5 34:8 36:25 37:1,2,8,25 39:2,12 40:5,8,11 40:14 41:23 42:9 43:1,2,5,7,10,13 44:16,18,20 46:11,14,20,25 47:23 48:1,24 49:15 60:22 64:1 72:6,7,8,14,17,19 80:23 81:1,2,4,16 81:18 82:21 83:18 84:5,11,16 <b>Mansfield's</b> 34:13 51:17 77:10 <b>March</b> 5:23 58:12 78:17 79:23 82:11,16,25 83:9	<b>March/beginning</b> 81:5 <b>mark</b> 1:3 <b>marked</b> 64:12 <b>matching</b> 51:23 <b>material</b> 2:2,10,15 11:1 12:20,24 13:4,13 14:6,9,10 14:13,15,16 15:9 16:8 18:17 19:6 20:14,23,24,25 22:4,10,18 23:10 23:20 24:1 25:12 27:6 28:15,18 29:2 30:9 31:21 31:21 32:1 34:22 44:1,1,3,3,13,21 47:19 48:16,19 49:2,7,12 52:7 53:21,22 54:1,10 54:13 56:19 58:19 64:13 <b>matter</b> 1:21 9:12 21:1 33:15 35:14 36:14 38:11 39:15,24 40:14 52:22 69:4 72:1 76:10 80:1 81:18 <b>matters</b> 6:11 8:13 8:15,21 9:20 21:12,17 34:25 37:3,11,12 38:5 38:18 40:21 47:12 64:1 78:1 79:23 81:6 <b>maximum</b> 1:10 <b>McGahey</b> 5:2 23:5 48:2,3,4 49:2,11 49:17,19,24 50:11 51:4,7,16 51:22 52:3,15,18 52:21 53:2,9,19 54:4,6,16,20,22 55:5,7,17,25 56:2 56:8,11,13,15,17 56:25 57:4,8 61:18 62:10,11 72:20,22,23 73:1 81:24,25 84:6,12	<b>meaning</b> 45:25 <b>means</b> 3:14 4:3 26:14 30:15 53:15,16 <b>measure</b> 21:25 22:7 <b>media</b> 3:13,15 80:18,19 <b>meet</b> 83:1 <b>meeting</b> 33:9 60:19 81:21 82:25 <b>meetings</b> 14:13,22 15:6 78:9 <b>members</b> 2:18 3:15,21 13:7 67:18 <b>mention</b> 2:9,20 5:12 8:25 29:11 31:22 78:2 <b>mentioned</b> 2:13 5:21 6:18 8:25 16:11,20 31:20 37:9 69:5 80:2 <b>merit</b> 79:4 <b>met</b> 41:16 51:13 <b>method</b> 46:5 <b>metrics</b> 15:11 <b>metropolitan</b> 5:6 73:4 <b>middle</b> 75:25 <b>mind</b> 34:25 51:21 61:4 64:3,7 68:24 69:4 70:4 70:14,17 <b>mindful</b> 18:24 <b>minds</b> 39:25 62:22 73:23 77:19 <b>minister</b> 20:20 <b>minor</b> 45:20 <b>minute</b> 3:14 71:2 <b>minutes</b> 2:17 39:9 <b>mistake</b> 48:11 <b>Mm-hm</b> 6:1,13 7:16 23:22 28:5 30:19 50:10 53:8 53:18 62:20 67:6 68:1,18 <b>model</b> 47:14,15	73:12 <b>modification</b> 35:11 <b>modified</b> 4:11 <b>moment</b> 4:5 15:16 23:15 29:11 30:9 31:22 47:7 48:21 50:2 54:4,19 75:17 <b>moments</b> 32:24 <b>month</b> 50:9 <b>monthly</b> 24:17 <b>months</b> 11:17 18:4 38:8 41:12,15 <b>morning</b> 6:10 11:5 12:14 76:12 77:5 <b>Moss</b> 5:7 <b>motivation</b> 77:13 <b>move</b> 23:16 24:14 55:5 59:8 66:16 <b>moving</b> 10:12 <hr/> <b>N</b> <hr/> <b>name</b> 26:5 <b>names</b> 6:4 27:15 <b>national</b> 38:19 39:4 50:16 <b>natural</b> 63:19 <b>nature</b> 16:3,18 77:11 <b>near</b> 70:1 75:6,24 76:1 83:20 <b>nearly</b> 41:11 <b>necessarily</b> 12:8 45:8 75:23 <b>necessary</b> 2:23 4:13 9:5,9 12:13 22:19 27:5 31:6 35:7 42:21 54:18 69:24 72:12 76:3 76:5 82:20 83:3 <b>neck</b> 54:5 <b>need</b> 3:21 18:21 19:6 26:8 35:14 36:12 38:4,16,17 44:10 48:5 53:4 56:17 70:18 73:19 75:11 76:3 83:10,12 <b>needed</b> 9:14 35:4
--	---	--	--	---

82:7 <b>needlessly</b> 48:14 <b>needn't</b> 40:1 72:9 <b>needs</b> 4:4 26:23 29:24 30:3 37:14 59:20 70:13 82:11 <b>neutral</b> 69:11 <b>never</b> 48:17 49:8 <b>nevertheless</b> 75:11 <b>new</b> 41:7 46:17 <b>news</b> 10:9 <b>NHS</b> 5:14 71:11 <b>Nichols</b> 4:24 7:4 <b>nine</b> 14:11 <b>non-relevant</b> 61:10 <b>non-sensitive</b> 60:2 61:11,12,12 <b>note</b> 14:5 18:2 63:1 64:10 74:7 <b>noted</b> 15:22 <b>notice</b> 8:11 18:9 19:16,20,23 20:4 20:10,19,21,24 21:4,21,24 22:6 22:18 23:1,8 <b>noting</b> 13:23 <b>notwithstanding</b> 22:17 <b>November</b> 1:1 13:14,20 31:14 60:12 65:7 <b>number</b> 6:16 15:11 21:6 32:8 39:24 40:2 45:1 46:25 51:4 60:15 61:9 69:1 <b>numbered</b> 7:14 <b>numbers</b> 11:21,23 12:19 16:3 51:11 73:3 75:4	12:6,8,12,23 13:4 13:12,23 15:15 15:22 16:2,20 17:6,19 18:2,18 19:2,4,8,12,17,23 20:4 21:18,19,23 22:13,15,24 23:4 23:8,12,16,23 24:5,12,24 25:10 26:14,21,23 27:4 27:20 28:6 29:1 29:23 30:1,8,13 30:20 31:11 32:12 33:10,17 34:16 35:13,18 35:21,25 36:6,13 36:17,21 39:17 40:24 46:12 49:14,19 50:12 52:4 55:24 61:19 62:17 63:15,16 63:24 64:5,23 65:9,18,21,23,25 66:1,13,15,16,19 67:2,7,12 68:2,10 68:19,23 69:3 70:3,12,21 71:4,8 71:22,24 74:19 76:6,9,10,14 77:18,20,25 78:4 78:8,15,20 79:3 79:10,14,20 80:1 80:11,22 83:7,14 83:15 84:4,10,15 <b>O'Connor's</b> 57:13 62:2 <b>obeyed</b> 82:18 <b>objection</b> 37:10 48:19 <b>objections</b> 8:1,3 <b>obliged</b> 37:2 <b>observed</b> 9:23,24 <b>observers</b> 6:16 <b>observing</b> 1:3 2:19 21:24 <b>obtained</b> 13:7 <b>obvious</b> 2:1 3:17 68:25 72:10 74:8 <b>obviously</b> 2:25	24:9 32:18 41:10 44:22 45:19 51:10 53:20 60:12,21 61:9 63:5 71:21 73:2 73:24 83:22 <b>occasionally</b> 37:14 <b>occur</b> 3:9 <b>occurs</b> 38:12 <b>October</b> 7:19,20 <b>officers</b> 69:21 <b>Oh</b> 19:7 29:25 51:22 52:18 <b>once</b> 2:12 33:23 34:9 47:19 50:18 52:6 70:22 77:8 77:12 <b>ones</b> 37:4 <b>onus</b> 12:24 <b>Op</b> 34:1 <b>open</b> 4:16 5:21,22 9:6 17:15 22:4 25:22 26:8 27:7 28:2 36:11,15 42:23 67:4,13,23 67:24 68:2,6,8,16 69:15,17 70:4 71:5,13 73:10,14 73:25 74:22 75:2 75:10 78:18 79:6 79:18,22 <b>Operation</b> 5:4 11:17,21,23 12:9 12:17,19 13:14 13:18,24 14:24 14:25 15:7,9,17 17:1,7 18:3 23:21,25 24:18 25:12 27:22 28:1 28:7,15,20 29:12 29:16 30:24 31:7 31:12 34:5 57:21 64:14,21 65:1,4 78:10 <b>opportunity</b> 1:17 19:11 34:10 35:21 69:9 72:3 80:17 <b>opposite</b> 38:13	<b>optimistic</b> 51:7 <b>option</b> 68:15 69:13 72:23 73:9 82:24 <b>oral</b> 8:3,8 11:5 34:10 67:24 68:8 <b>orally</b> 34:8 <b>order</b> 3:11 4:8 10:19 12:4 16:10 16:16 18:21 19:8 20:12,17 22:19 22:22 26:3,11,24 27:15 29:9 30:17 31:8 33:2,8,12,23 34:4,9,18,23 35:23 36:2,4,7 41:3 43:11,13,17 44:14 48:18 49:9 49:10 51:5 52:4 54:12,23 56:7,23 59:9,11 60:24 61:22 63:12,22 64:19 65:16 76:22 77:4 78:25 82:19 <b>orderly</b> 1:16 <b>orders</b> 6:4 10:20 25:11 27:23 28:2 35:16 81:7 <b>organisation</b> 53:6 <b>organisations</b> 23:19,23 <b>originally</b> 38:24 <b>ought</b> 3:25 22:1 57:2 66:3 75:2 75:14 <b>outcome</b> 16:24 <b>outlined</b> 49:14,22 50:12 52:3 55:9 <b>outset</b> 69:5 80:2 <b>outside</b> 2:22 <b>overall</b> 28:12 <b>overarching</b> 28:17	<b>paragraphs</b> 17:19 51:25 <b>parallel</b> 17:23 27:2 52:12 <b>part</b> 9:17 12:12 25:18 40:12 44:4 49:13 57:6 59:18 63:22 65:10 69:24 71:13 72:16 75:20 78:17 83:9 <b>partes</b> 62:8 <b>participants</b> 3:18 5:13 6:17 7:9,19 8:2,14 9:16,24 10:22 14:23 15:25 16:7,16 17:12 20:1,19,22 24:23 25:3,15 34:20 35:7,22 72:3 79:8 80:14 80:18 82:13 <b>participation</b> 69:20 <b>particular</b> 10:5 14:24 22:6 25:4 25:11 26:6 34:1 37:17 66:22 68:20 70:18 73:15 79:21 <b>particularly</b> 24:12 39:17 42:15 47:6 68:4 69:16 70:2 70:9 73:21,22 78:24 <b>parties</b> 1:16 19:5 19:10 31:7 36:24 38:8 <b>parts</b> 5:4 17:22 26:22 <b>party</b> 18:16 70:25 <b>pass</b> 37:12 <b>passed</b> 48:23 <b>pause</b> 43:20 61:8 <b>pending</b> 16:10 <b>people</b> 38:21 45:8 46:25 47:5 64:9 69:1 70:10 71:14 75:4 76:4
<b>O</b> <b>O'Connor</b> 4:15,16 4:17,18,21 5:4,12 5:20 6:2,9,14,23 7:8,13,17,23 8:6 8:16,17,24 9:12 9:20 10:8,24			<b>P</b> <b>page</b> 36:1 <b>paragraph</b> 15:22 24:16 34:16 36:1 36:7,8 42:15,15 43:3 55:10 58:13 58:18 71:9	

<p><b>peoples'</b> 39:24  <b>perfectly</b> 5:19  <b>performance</b>  15:10  <b>period</b> 25:4  <b>permit</b> 26:11  <b>perspective</b> 59:16  <b>persuaded</b> 3:10  <b>persuades</b> 57:6  <b>phrase</b> 39:19  <b>physically</b> 70:1  <b>picking</b> 64:8  <b>piece</b> 53:16  <b>pieces</b> 21:20  <b>place</b> 5:23 9:4,16  10:22 12:24 31:6  35:4 66:25 67:3  67:8 70:1,4  73:14  <b>placed</b> 38:13  <b>plate</b> 54:19  <b>please</b> 4:20 7:5  9:19 41:14 56:20  81:16,19 82:14  82:25  <b>pleased</b> 18:5 58:4  <b>pm</b> 83:25  <b>point</b> 12:15 22:21  23:6 25:24 28:12  31:3 32:8,23  36:6 39:12 41:18  45:10,24 46:16  46:17 52:10  54:17 62:10,25  77:11,25  <b>points</b> 10:13,16,17  11:2 21:14 32:3  32:24 34:11 35:2  35:9 38:2 57:16  62:17 63:17  <b>police</b> 5:6,7,8  11:12 13:13,24  14:5,18 15:8  16:11,20,23  17:11,16,21  27:18 29:1,6,17  31:19 32:5,21  41:12 50:4 62:19  64:16 65:12</p>	<p><b>politicians</b> 40:2  <b>posed</b> 68:13  <b>position</b> 28:16  38:9 40:3 61:21  71:25 72:4 77:3  77:6,9 80:5  81:11 82:12  <b>positive</b> 10:9  <b>possibility</b> 44:14  81:20 82:21  <b>possible</b> 1:10 2:5  12:25 20:23  26:16 28:13 31:9  31:15 32:12  33:20 34:6 35:5  36:10 43:15  44:12,13 47:18  51:1 52:5,18  53:2 56:21 57:3  57:21,25 66:23  66:23 67:13,22  75:15 76:16  81:14 82:9,19,23  83:20  <b>potential</b> 50:23  51:8  <b>potentially</b> 34:22  54:1 58:19 66:3  <b>Pottle</b> 4:22  <b>power</b> 34:21 35:5  <b>practicable</b> 49:6  <b>practical</b> 67:14,15  <b>practice</b> 14:22  <b>precede</b> 83:3  <b>precise</b> 78:21  <b>precisely</b> 20:11  35:17 83:11  <b>predecessor</b> 40:23  <b>predecessors</b> 1:13  <b>predictions</b> 33:7  <b>prefer</b> 71:12  <b>preference</b> 71:5,15  72:24  <b>preferred</b> 73:9  <b>preliminary</b> 1:4  1:13,21 6:11  8:22 9:1 11:8  18:13 25:1 78:6  78:18 80:12 83:9</p>	<p><b>preparation</b> 83:3  <b>preparatory</b> 27:17  <b>prepare</b> 1:17 48:8  <b>prepared</b> 7:9 17:9  78:16  <b>preparing</b> 16:22  17:21  <b>present</b> 19:14 46:4  72:3  <b>press</b> 2:19 70:11  <b>pressing</b> 48:6  <b>pressure</b> 38:13  39:7  <b>pressures</b> 41:20  <b>presumably</b> 48:24  71:7 75:20  <b>presuming</b> 60:17  <b>pretty</b> 16:1  <b>prevent</b> 22:9 23:13  52:16  <b>previous</b> 7:25 9:24  11:6 16:12 32:10  <b>previously</b> 10:13  23:23 67:4  <b>principle</b> 35:20  36:14 70:23  <b>principled</b> 56:21  <b>priorities</b> 55:21  <b>prioritise</b> 13:25  <b>priority</b> 45:6,16  <b>prism</b> 39:14  <b>private</b> 42:25  43:16 53:17  81:20 82:22  <b>probable</b> 54:22  <b>probably</b> 66:3  75:25  <b>problem</b> 2:10 4:2  <b>problems</b> 6:25 7:1  32:13,18,21  39:20  <b>proceed</b> 57:19  65:7  <b>proceeding</b> 59:21  <b>proceedings</b> 2:19  4:16 20:9 22:4  25:7 42:14  <b>proceeds</b> 83:13  <b>process</b> 9:25 10:12  11:7,14,15 14:1  15:16,20 16:16  18:19 19:5 20:15  24:12 25:14,24  26:3,5,24,25  29:13,22 30:3,6  30:13,17 31:8  33:3,8,12,23 34:4  40:15 42:1 43:11  43:25 45:2 47:10  47:20 48:12,14  48:23 49:14  50:11,14,14,25  53:23 54:2,13  55:8,13,19 56:23  59:1,18 61:5,22  63:20,22 65:6,10  66:5,12 76:22  77:4 78:25 82:19  <b>processes</b> 77:14  79:5  <b>produce</b> 29:7  33:10 40:9  <b>produced</b> 46:18  58:7  <b>productive</b> 28:19  <b>progress</b> 10:15  13:12 15:2,7  18:5 23:17 24:20  26:16 28:12,23  32:14 45:24 59:2  62:4  <b>promptly</b> 24:2  <b>properly</b> 1:17 4:11  17:16 25:8 75:9  <b>proportion</b> 16:14  21:5 22:8 49:4  75:1  <b>proportionate</b>  15:8  <b>proposal</b> 28:7,22  77:2  <b>proposals</b> 9:22  34:2  <b>propose</b> 3:11 7:23  8:7,9 11:3 14:14  <b>proposed</b> 32:4  35:12 46:9,12  54:9 58:4 59:11  59:15 62:18  73:13  <b>proposes</b> 9:18  <b>proposing</b> 21:19  <b>propositions</b> 26:1  <b>prospect</b> 56:7  63:12 64:18  65:15  <b>protocol</b> 36:4,7,9  42:14,25 43:1  80:8  <b>provide</b> 21:2 24:6  29:18 30:25  31:15,25 33:1  48:5 60:11,13  64:16 65:5,12  74:7  <b>provided</b> 7:19  11:1,12,18,22  12:17 14:10,12  14:21 15:3,5,12  15:24 21:6,7  24:18 31:12  36:11 42:14  60:17 64:14  69:25  <b>providing</b> 23:20  23:24 31:20  <b>provision</b> 10:25  30:9 34:19 70:12  <b>provisions</b> 20:6,10  <b>public</b> 1:4,25 2:18  3:13,15 40:3,5,16  40:17 43:16 48:6  53:14 66:7,7  67:18 69:20  75:24  <b>publication</b> 37:8  <b>publish</b> 7:23 11:3  21:20  <b>published</b> 6:6  19:24 20:8 36:4  <b>publishing</b> 3:5  <b>purpose</b> 1:14  32:25  <b>purposes</b> 8:8  <b>put</b> 39:5 40:20  46:4 47:14 49:20  58:12</p>
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<b>putting</b> 45:5	<b>reason</b> 1:23 3:17 26:19 36:16,20 48:12 56:3 74:25	<b>relating</b> 20:13 25:11 33:22 36:22 67:13 73:16	<b>repeat</b> 46:5 <b>reply</b> 63:17 <b>report</b> 15:8 16:11 16:20,23 17:4,6 17:11,17,21 18:5 22:12 23:12 27:18 29:6,17 41:12,12 64:16	<b>rest</b> 75:1 <b>restricted</b> 42:17 <b>restriction</b> 6:3 8:11 10:19,20 16:10,16 17:13 18:9 19:16,19 20:4,10,12,17,19 21:4,21,24 22:6 22:18,22 23:1,8 25:11 26:3,11 27:15,23 28:2 29:9 30:17 33:2 33:8,11,23 34:3,9 34:18,23 35:16 35:22 36:2,4,7 43:11 44:14 48:17 49:9 51:5 52:4 54:11,23 56:7,23 59:8 60:24 61:22 63:12,22 64:19 65:16 76:22 77:4 78:25 81:7 82:19
<b>Q</b>	<b>reasonable</b> 13:1 <b>reasonably</b> 18:17 49:15 83:23 <b>reasons</b> 74:8 75:3 <b>reassurance</b> 21:14 <b>reassured</b> 57:21 <b>recall</b> 11:6 25:14 32:10 40:1 <b>receive</b> 50:8 <b>received</b> 2:6 7:10 13:1 14:6,17 20:21 67:20 <b>receiving</b> 12:18,20 <b>recognise</b> 53:24 <b>recognises</b> 38:11 48:4 <b>record</b> 32:20 <b>recurrence</b> 6:25 <b>redaction</b> 26:4 45:21 53:4 <b>redactions</b> 26:12 51:1 <b>reduce</b> 51:4 <b>reduced</b> 57:14 <b>refer</b> 22:20 23:12 37:17 <b>reference</b> 7:15 26:6 <b>referred</b> 20:24 21:15 28:13 29:5 37:4 67:19 <b>referring</b> 10:2 22:11 29:19 <b>reflected</b> 9:7 <b>refrain</b> 3:4 <b>regard</b> 18:6 24:6 <b>regarding</b> 6:3 14:14 34:9,17 69:8 80:3 <b>regretted</b> 53:12 <b>regular</b> 14:22 15:6 25:3 <b>regularised</b> 80:5 <b>relate</b> 32:4 <b>related</b> 68:4 69:16 <b>relates</b> 31:18 78:6	<b>relation</b> 2:25 3:1,3 4:9 6:4 17:24 30:22,24 31:1 35:9 40:21 43:10 43:25 44:24 63:11 64:22,24 65:2 69:25 81:7 <b>relaxation</b> 38:12 <b>relay</b> 79:17 <b>released</b> 42:4,6 <b>relevance</b> 13:10 16:5 18:12,13 27:12 39:22 41:6 43:18,19 44:24 45:4 47:17 53:20 <b>relevant</b> 14:2,11 16:9,15 18:17 19:10,13 20:5 25:16,21 29:4 42:7,12 43:14 44:1,3,4,13,20,25 45:6,16 47:16 49:7 50:2 52:7 53:22 54:1,10,12 55:14 56:5,6 58:19 60:4,15 61:12 63:11,21 64:12 65:5,15 <b>reliable</b> 28:14 33:11 <b>relied</b> 33:21 <b>remain</b> 22:5 <b>remained</b> 2:4 <b>remaining</b> 14:15 63:4 68:6 69:17 <b>remembered</b> 81:19 <b>remind</b> 39:20 <b>reminded</b> 40:24 <b>remote</b> 6:19,21 7:2 70:8 71:17 <b>remotely</b> 1:9,10 2:19 3:13,19 <b>removed</b> 25:22 <b>removing</b> 26:5	<b>represent</b> 21:5 <b>representation</b> 4:19 <b>representations</b> 80:19 <b>representatives</b> 3:18 6:17 <b>represented</b> 4:23 5:1,5,9,10 <b>representing</b> 17:4 <b>represents</b> 15:5 <b>request</b> 2:6 24:5 41:9 <b>requests</b> 51:11 <b>require</b> 3:4 45:20 <b>required</b> 30:16 32:6 <b>requirement</b> 11:9 <b>requirements</b> 23:9 <b>requires</b> 63:9 <b>resist</b> 56:1 62:21 <b>resolution</b> 63:3,6 <b>resolved</b> 32:18 40:21 <b>resource</b> 62:22 <b>resources</b> 13:2 38:15,16 41:17 56:18 57:22 60:1 <b>respect</b> 1:3 14:12 27:15 32:1 54:12 56:6,23 57:5 58:11 60:22,23 62:18 64:16,18 65:15,21 <b>response</b> 68:12 <b>responses</b> 28:7,8 34:19 35:10 <b>responsibility</b> 50:22 <b>responsive</b> 7:20	<b>returned</b> 48:11 <b>return</b> 6:9 31:3 <b>returns</b> 32:23 <b>revealed</b> 40:4 43:24 <b>revealing</b> 66:10 <b>review</b> 11:1,9,10 11:19 12:19,24 13:15 14:6 15:13 17:9,23 29:5,15 50:7,15,16 53:21 64:12 <b>reviewed</b> 13:17 14:2,9,15 16:5 27:12 29:2 41:3 48:20 50:19 <b>reviewing</b> 13:9 14:4,20 18:12 50:6 53:22 <b>reviews</b> 54:11 <b>Revisiting</b> 68:25 <b>right</b> 4:5,15 6:20 12:7,22 13:11,22 15:14 16:7 17:6
<b>R</b>				
<b>raise</b> 8:2 54:7 <b>raised</b> 21:8 31:3 34:12 38:6 42:11 70:21 <b>rapidly</b> 10:12 <b>rate</b> 49:7 <b>reach</b> 22:19 26:23 <b>reached</b> 76:19 <b>reaches</b> 2:22 <b>read</b> 7:22 22:14,25 36:9 52:17,23 69:7 71:9 <b>ready</b> 52:23 <b>real</b> 3:2,21 28:23 <b>realise</b> 43:10 <b>realistic</b> 58:3,16 63:6 76:17 77:21 78:17 83:22 <b>really</b> 27:9 32:24 37:18 39:19 45:14 48:15 53:12 54:6 72:10 76:21 77:1 78:4 80:4				

17:18 19:14 23:4 23:7,14 24:5 25:9 27:3 28:25 30:12 40:13 43:20 44:16,19 46:24 48:16 49:1 49:18,24 54:15 55:14,16 56:20 57:7 60:20 61:2 64:25 65:24 66:14,19 68:20 70:20 71:23 72:20 73:2 74:5 74:19 76:7 77:22 78:20 79:4,25 80:21 81:23 82:8 83:8 <b>rigorously</b> 57:24 <b>rise</b> 49:3 <b>risk</b> 2:9,16 39:8 53:9 <b>risks</b> 3:9 46:6 <b>robust</b> 33:19 <b>rolling</b> 30:13 53:23 <b>room</b> 6:16 47:1 <b>round</b> 52:9 <b>Rowley</b> 4:23 <b>Rule</b> 34:21 35:5 <b>rules</b> 34:22 <b>ruling</b> 6:3,6 17:13	48:25 57:18 66:6 83:5 <b>says</b> 51:18 53:10 <b>scale</b> 13:5 16:17 26:2 <b>scenes</b> 83:24 <b>schedule</b> 20:25 22:10 29:7,18 30:25,25 31:25 46:18,21 47:9 51:14,19 64:17 65:13 <b>scheduled</b> 15:12 58:15 <b>schedules</b> 31:4 33:17 38:6 <b>scheduling</b> 24:1 28:18 63:19 <b>scheme</b> 46:4,8,17 <b>schemes</b> 45:22 <b>scope</b> 1:10 2:23 <b>scoping</b> 67:13 <b>search</b> 55:12 <b>second</b> 18:8 26:14 30:23 32:23 44:20 53:16 68:15 <b>secondly</b> 28:1 35:25 36:6 64:21 67:1 68:2 71:15 82:10 <b>secretariat</b> 67:12 <b>Secretary</b> 4:25 19:20 22:2 <b>Section</b> 20:5,6 <b>secure</b> 33:1 67:8 <b>securities</b> 50:11 <b>security</b> 11:9,10 15:12 23:9 38:19 39:4 50:16 67:19 73:20,24 75:3,8 75:11 <b>see</b> 9:11 11:16 17:4 19:11 33:1 43:21 46:2 52:2 58:11 58:17 59:20 73:11 79:23 81:4 <b>seen</b> 7:22 11:20 20:1 21:18 27:4	28:6 68:11,13 73:8 74:6 76:14 <b>sees</b> 4:13 <b>sense</b> 4:13 48:13 78:1 <b>sensibly</b> 75:18 <b>sensitive</b> 2:2,10,15 2:21 17:22 20:14 25:21 41:2 45:14 45:18 50:17 51:20 52:12 <b>sensitivities</b> 11:11 16:18 26:1,7 29:8,18 31:1,25 33:18 45:13,18 46:18,22 47:2,6,9 49:4 50:21,24 51:9,14,24 59:17 59:20 62:5 64:17 65:13 <b>sensitivity</b> 13:4 39:22 41:6 43:20 44:2,21 45:13,15 45:20 47:3,17 54:11 61:3,4 <b>sent</b> 19:23 <b>separate</b> 31:21 65:18 <b>separately</b> 8:18 <b>sequential</b> 26:20 <b>Sergei</b> 5:9 <b>series</b> 12:1,2 41:2 <b>serious</b> 23:2 <b>serve</b> 44:13 <b>served</b> 19:19 20:1 44:5 <b>Service</b> 5:14 71:11 <b>session</b> 25:23 <b>set</b> 20:6 21:4 27:22 27:25 28:10 32:6 42:15 58:3 64:24 65:2 72:3 76:17 77:3,9,12 78:13 78:21 79:21 <b>share</b> 10:9 15:10 31:23 53:14 <b>shared</b> 50:18 <b>sheer</b> 9:25 71:19 <b>short</b> 12:18 49:10	71:9 76:19 <b>shortest</b> 18:19 <b>shorthand</b> 35:3 <b>shortly</b> 5:25 45:5 <b>sign</b> 38:20 <b>signed</b> 19:20 <b>significant</b> 11:15 18:5 <b>significantly</b> 57:14 59:1 <b>similar</b> 29:13 30:23,25 <b>simple</b> 46:20 75:4 <b>simply</b> 5:12 14:20 16:17 24:22 25:6 25:17 26:5 31:11 34:11,24 35:3 36:8 56:7 58:17 59:17 69:7 71:9 <b>single</b> 12:2 28:16 <b>sir</b> 4:18 5:4,12,20 5:21 6:18 7:8,23 8:6,13,17 9:12,20 9:23 10:10,24 11:20 12:6 14:19 16:2,14,20 18:7 18:18,22 19:2,17 20:4 21:8,11,15 21:19,23 22:9,24 23:4,16 24:16,24 25:13 26:21,23 27:4 28:19 29:14 29:23 30:8,20,23 31:2,11,15,18,19 32:2,23 33:10 34:7,16,24 35:13 36:11,17,21 37:2 37:10 44:18 47:21 48:4,10 49:2,11,17 51:16 51:22 54:6 55:7 56:2,8,17 57:4,8 57:12 59:15 61:16 62:11,14 62:17,25 63:13 63:16,24 64:23 65:9,18 66:1,16 66:20 67:2 68:11 68:19 69:3,3	70:12 71:4 72:8 72:23 73:5 74:17 78:20 79:3,10,10 79:20 80:6 81:25 83:7,15 <b>sits</b> 69:12 <b>sitting</b> 52:23 <b>situation</b> 37:17,19 <b>six</b> 24:4 41:12,15 <b>Skripal</b> 5:9 <b>slightly</b> 46:9,13 58:9,21 <b>slippage</b> 24:9 33:24 38:24 39:9 41:14 58:11,17 <b>slipped</b> 24:8 <b>slow</b> 28:11 54:13 <b>slowing</b> 56:22 <b>slowly</b> 42:10 <b>small</b> 12:19 16:14 16:14 21:4,5 22:7 <b>Smith</b> 7:4 <b>solicitor</b> 24:19 <b>solicitors'</b> 13:7 <b>solution</b> 68:21 <b>Somebody</b> 40:15 <b>somewhat</b> 28:15 <b>soon</b> 34:5 55:19 57:2 <b>sooner</b> 74:20 83:5 <b>sorry</b> 14:8 39:13 46:11 56:12 61:11 64:25 82:3 <b>sort</b> 29:24 45:11 <b>sorts</b> 47:12 <b>sotto</b> 59:14 <b>sought</b> 21:14 <b>South</b> 5:14 71:10 <b>speaking</b> 14:1 64:10 67:22 68:14 <b>special</b> 2:11 23:9 73:24 75:11 <b>specific</b> 49:15 51:24 63:17 <b>specifically</b> 65:4 <b>sped</b> 59:1 <b>speeded</b> 46:3
<b>S</b>				
<b>Sadly</b> 36:19 <b>sake</b> 9:2 <b>Salisbury</b> 67:5,25 68:2,7,10,16 69:12,15,19 70:2 70:5,19 71:6,12 71:14 73:12,15 74:22 75:6,6,15 75:18,23,24,25 76:2 <b>sample</b> 27:22,25 28:10 46:7 <b>sampling</b> 46:5,8 <b>satisfied</b> 74:21 75:1 83:19 <b>save</b> 71:24 <b>saying</b> 35:1 41:19				



<b>speedily</b> 32:18 60:18	<b>stock</b> 3:7	71:10 72:7,22	<b>support</b> 69:13 71:17	<b>teams</b> 14:24 15:3 15:18 30:2 50:18
<b>speeding</b> 46:2	<b>straightaway</b> 38:21	73:7,9 74:6 76:9	<b>supporting</b> 36:10	<b>technique</b> 2:15 26:6
<b>spot</b> 31:19	<b>strains</b> 38:15	76:12,15,19 78:8	<b>suppose</b> 70:10	<b>technology</b> 7:6
<b>spring</b> 81:10,19	<b>strands</b> 52:9	81:1 82:13 84:4	72:21	<b>tell</b> 54:3 62:23 79:8
<b>staff</b> 71:7,15 75:14 75:19	<b>strategies</b> 15:4 55:9	84:5,6,7,8,10,11	<b>sure</b> 4:10,10 36:12	<b>tended</b> 55:5
<b>stage</b> 10:17,20,21 10:25 11:7 14:4	<b>streamed</b> 70:15	84:12,13,15,16	37:21 52:15 61:6	<b>tends</b> 77:19
15:15,19,23 16:9	<b>streamlined</b> 50:11 55:8,13	<b>submit</b> 22:3 27:1	62:4 79:11	<b>tense</b> 83:23
17:9 23:18,21,24	<b>stresses</b> 38:15	36:2 38:4 43:25	<b>surprise</b> 74:11	<b>tension</b> 57:25
24:15,21 25:7,8	<b>striking</b> 10:1	47:8 49:24 81:15	<b>surrounding</b> 26:1	<b>terminology</b> 13:18
25:10,14,16,20	<b>strong</b> 40:3	82:15	<b>suspect</b> 39:24	<b>terms</b> 8:24 23:17 36:3
26:17,18,24,24	<b>strongly</b> 71:12	<b>submitted</b> 69:8	<b>swiftly</b> 57:20,25	<b>terrorist</b> 48:8
26:25 27:11,13	<b>Sturgess</b> 1:5 4:23 6:19	<b>subsequent</b> 68:16 80:16	<b>switches</b> 31:18	<b>test</b> 18:14,20
27:14 28:11,23	<b>Sturgess's</b> 1:11,24 10:6 17:3 66:22	<b>subsequently</b> 28:6	<b>switching</b> 75:17	<b>Thames</b> 5:7
30:5 32:14 34:2	67:18 68:5 69:17	<b>substantial</b> 37:14 57:22 60:15	<b>system</b> 46:10	<b>thank</b> 1:3,7 4:6,7 4:15 7:22 19:14
35:18 37:19	73:17	<b>substantive</b> 8:19 8:20 33:4,14	<b>T</b>	19:15 36:25 37:7
39:16,16 40:18	<b>Sub-paragraph</b> 43:5	37:12,23 66:17	<b>tab</b> 8:6 21:11 34:13 42:16	43:9 48:1 57:7,8
40:22 42:1 43:14	<b>subject</b> 21:24 33:18 48:17	66:24 70:15	<b>tabs</b> 7:14,21 21:16	57:9,12 62:12,14
43:22,24 44:20	70:16	76:18,25 77:9	<b>take</b> 3:7 8:9 9:4,17	63:8,13,14,23
48:23 50:15	<b>submission</b> 27:4 35:8 53:3 60:21	80:12 81:8,12	10:22 13:20 31:6	71:23 72:19,20
54:25 58:8 59:1	69:24	<b>successfully</b> 57:1	35:4 39:13 42:10	73:1,2 74:11,13
76:20 78:12	<b>submissions</b> 4:1 4:17 5:16 6:10	<b>suddenly</b> 39:23	48:15 49:11 54:2	77:22 79:25
<b>stages</b> 37:15 42:10 83:3	7:15,17,18,20,23	<b>suffering</b> 7:2	56:9,17,20 57:15	80:21 81:22,23
<b>stand</b> 37:15 51:8 79:7	8:4,13,14 9:6,8	<b>sufficient</b> 13:2 32:14	61:6 62:2 66:25	81:25 82:2 83:18 83:24
<b>start</b> 4:18 10:2 26:16 30:6,8	11:3,5,16,22,24	<b>suggest</b> 9:18 33:25 45:23 78:16 80:6	67:8 69:25 70:4	<b>thing</b> 3:10 41:21 45:5 75:8
37:20 50:5,6	12:25 14:5 15:23	<b>suggested</b> 27:20 27:24 28:16	73:12,14 75:15	<b>things</b> 2:16 23:13 33:13 45:14 51:7
52:19 55:12	17:20 18:2 19:1	47:10,16 55:23	76:23 79:12	54:18 65:1,17 79:7
57:18 66:19	20:2,7,18 21:10	68:3 70:8,13	81:20	<b>think</b> 2:10 4:3,12 7:11 8:16 9:13
74:22 75:17	24:6,17,25 25:24	78:8	<b>taken</b> 3:9 9:16 41:9,24 61:1 75:2	12:12 18:17
77:16 81:12	27:20 28:9,21,21	<b>suggesting</b> 78:21 78:23 79:20	<b>takes</b> 22:2 48:12 54:14 55:15 74:9	22:11 27:9 29:12
<b>started</b> 39:2 47:4 80:2	30:21 32:9 34:8	<b>suggestion</b> 51:18 60:8 61:2 62:3 79:21	<b>talking</b> 66:11	35:3,14 37:18
<b>starting</b> 25:24 30:10 38:3	34:10,12,13,17	<b>suitable</b> 69:22 75:22	<b>target</b> 39:8	39:17 44:9 46:16
<b>starts</b> 40:14 52:21	35:2,22 36:1,21	<b>summarise</b> 73:23	<b>targets</b> 58:3	46:25 49:5,13
<b>state</b> 4:25 22:2 48:8	36:23 37:1,5	<b>summarised</b> 21:9	<b>task</b> 13:2,9 14:4 26:2 53:25 58:20	51:18 57:15
<b>stated</b> 24:7	46:6 47:21 48:3	<b>summary</b> 18:11 21:13	<b>team</b> 3:21 11:1,18 13:7 15:7 18:12	58:25 59:2,8,25
<b>statement</b> 16:23	49:21 55:10	<b>superimpose</b> 45:17	19:19 21:7 25:15	61:17 63:14,16
<b>statements</b> 40:3,5 43:23 66:7	57:11,14 58:5,14	<b>superimposed</b> 45:11	29:3 30:4 42:4	66:2,2 68:20
<b>step</b> 63:19	60:23 61:7 62:16		50:1,5,13,25 52:6	74:9,19,20 76:19
<b>steps</b> 35:4	63:25 66:15		53:20,25 54:10	80:23 81:22
<b>stipulating</b> 36:9	67:20,21 68:11		55:21,22 56:5	82:22 83:10
	68:13 69:7,10,14		58:24 60:13 62:4	
			64:13 65:14	
			72:16 80:7	



<p><b>writing</b> 14:12</p> <p><b>written</b> 4:1 5:15 7:17,18 11:2,16 15:23 17:19 20:2 20:7 21:10 24:5 24:16,25 27:20 28:8 32:9 34:12 34:13,19 37:5 46:6 49:20 58:5 58:14 67:20,21 68:11 69:6 73:8 76:14,18 78:8</p> <hr/> <p><b>X</b></p> <hr/> <p><b>Y</b></p> <hr/> <p><b>year</b> 5:24 17:25 19:18 24:3,14 25:2,5 29:7 30:14,14,18 31:14 32:15 38:5 38:8,20,22,23 39:3 40:23,25 41:8 46:22 51:10 55:1,3 58:15 81:9,13,13,15</p> <p><b>Yulia</b> 5:9</p> <hr/> <p><b>Z</b></p> <hr/> <p><b>zone</b> 78:23</p> <hr/> <p><b>0</b></p> <hr/> <p><b>1</b></p> <hr/> <p><b>1</b> 7:14 8:6 10:17,25 11:7 14:4 17:9 23:18,21,24 24:21 25:16 26:18,24 27:13 28:11 29:5,16 32:14 39:16 54:25 56:10,11 56:11,12,13,14 57:5 58:8 59:1 64:15 65:5 75:3 78:12 84:3</p> <p><b>1/stage</b> 37:19 42:1</p> <p><b>10</b> 7:21 15:22</p> <p><b>11</b> 1:1 34:16 55:10</p> <p><b>11.00</b> 1:2</p>	<p><b>12</b> 24:16 36:1</p> <p><b>12-month</b> 38:23</p> <p><b>12.3</b> 34:21 35:5</p> <p><b>12.57</b> 83:25</p> <p><b>13</b> 15:4</p> <p><b>15</b> 64:14</p> <p><b>15A</b> 42:16</p> <p><b>17</b> 7:19</p> <p><b>18</b> 21:16</p> <p><b>19</b> 17:19 20:5,6</p> <hr/> <p><b>2</b></p> <hr/> <p><b>2</b> 10:20,21 15:15 15:19,23 16:9 24:15 25:8,10,14 26:17,25 27:11 27:14 28:23 37:19 39:16 42:1 43:7 48:23 75:4</p> <p><b>2,000</b> 50:4 52:21 52:24 54:23 56:8</p> <p><b>20</b> 17:19</p> <p><b>20,000</b> 42:3</p> <p><b>2000-odd</b> 50:15</p> <p><b>2005</b> 20:5</p> <p><b>2018</b> 1:6</p> <p><b>2022</b> 1:1 19:21 58:12 64:14</p> <p><b>2023</b> 29:19 31:2 32:2</p> <p><b>21</b> 21:16</p> <p><b>23,000</b> 13:17</p> <p><b>25</b> 7:14</p> <p><b>27</b> 19:21 29:21</p> <p><b>28</b> 29:19 31:2 32:2 56:4 57:5 59:22 63:7 64:20 65:17</p> <p><b>28,000</b> 13:21</p> <p><b>28,885</b> 58:7</p> <p><b>29,200</b> 58:9</p> <hr/> <p><b>3</b></p> <hr/> <p><b>3</b> 64:16</p> <p><b>3(c)</b> 63:1</p> <p><b>30</b> 31:14 60:12 65:7</p> <p><b>31</b> 7:20</p> <p><b>37</b> 84:5</p> <hr/> <p><b>4</b></p> <hr/>	<p><b>4</b> 7:21 84:4</p> <p><b>4,000</b> 12:4</p> <p><b>40</b> 15:24 16:3</p> <p><b>48</b> 84:6</p> <hr/> <p><b>5</b></p> <hr/> <p><b>5</b> 21:11 34:13 36:7 58:13</p> <p><b>5(c)</b> 36:9</p> <p><b>5,000</b> 12:4</p> <p><b>55,000</b> 58:15</p> <p><b>57</b> 84:7</p> <hr/> <p><b>6</b></p> <hr/> <p><b>6</b> 42:15 43:3</p> <p><b>6,000</b> 32:8</p> <p><b>60,000</b> 12:4</p> <p><b>62</b> 84:8</p> <p><b>64</b> 84:9</p> <p><b>66</b> 84:10</p> <hr/> <p><b>7</b></p> <hr/> <p><b>72</b> 84:11,12</p> <p><b>73</b> 84:13</p> <p><b>74</b> 84:14</p> <p><b>76</b> 84:15</p> <hr/> <p><b>8</b></p> <hr/> <p><b>8</b> 13:14,20</p> <p><b>8,000</b> 52:23</p> <p><b>81</b> 84:16</p>		
---	---	---	--	--