

<p>1 Friday, 25 March 2022</p> <p>2 (10.35 am)</p> <p>3 PRE-INQUIRY HEARING</p> <p>4 (Hearing held via video-link)</p> <p>5 Opening remarks</p> <p>6 THE CHAIRMAN: Good morning and welcome, everybody. As most</p> <p>7 of you will know, this is the first hearing of the</p> <p>8 public inquiry that has been established to investigate</p> <p>9 the circumstances of the death of Dawn Sturgess, who</p> <p>10 died in Salisbury in 2018.</p> <p>11 The circumstances are quite well known, she became</p> <p>12 ill suddenly, having sprayed what she thought was</p> <p>13 perfume on herself. She was taken to Salisbury District</p> <p>14 Hospital, where she was diagnosed as having been</p> <p>15 poisoned with Novichok, a nerve agent. She died in</p> <p>16 hospital on 8 July 2018.</p> <p>17 For those of you whom I have not encountered before,</p> <p>18 my name is Anthony Hughes. I retired as a judge in</p> <p>19 2018, having previously for 20-odd years sat in the</p> <p>20 Family and Queen's Bench divisions, the Court of Appeal</p> <p>21 and latterly in the Supreme Court. I am here at the</p> <p>22 request of the Home Secretary to chair this inquiry.</p> <p>23 Whilst it is a freshly set up inquiry, set up on</p> <p>24 17 March, just a few days ago, this is, as most will</p> <p>25 know, the direct successor to an inquest. Police</p> <p style="text-align: center;">Page 1</p>	<p>1 important thing to stress is that the work that has so</p> <p>2 far been done will be adopted in full by this inquiry.</p> <p>3 In other words, I shall start where it left off. The</p> <p>4 legal team is going to remain the same, so the time has</p> <p>5 not in any sense been wasted.</p> <p>6 I need to say a little in a minute about the inquiry</p> <p>7 and what I hope it will achieve. But I would like to</p> <p>8 start by expressing my, indeed our, enormous sympathy to</p> <p>9 Ms Sturgess's family and to Mr Charlie Rowley, who was</p> <p>10 her partner at the time of her death. I expect this</p> <p>11 inquiry will deal with very wide-ranging matters which</p> <p>12 will probably include international politics and complex</p> <p>13 science. But it is very important that we don't lose</p> <p>14 sight of the fact that at its heart is the death of</p> <p>15 a woman who had no international or security dimension</p> <p>16 to her life at all, she was simply dearly loved and she</p> <p>17 must I am sure be very much missed by her family and</p> <p>18 friends.</p> <p>19 I am also very conscious of the effect that the</p> <p>20 passing of time in these proceedings must have on the</p> <p>21 Sturgess family, I should be very surprised if they</p> <p>22 don't want the inquiry to move forward as quickly as</p> <p>23 possible and it is a wish that I share. I will come</p> <p>24 back to that in a moment.</p> <p>25 Formal matters.</p> <p style="text-align: center;">Page 3</p>
<p>1 inquiries began immediately of course, in 2018, and the</p> <p>2 inquest followed promptly before the senior coroner for</p> <p>3 Wiltshire in the first instance.</p> <p>4 From January 2021 the inquest was conducted before</p> <p>5 Baroness Hallett, sitting as a coroner. It was her</p> <p>6 decision that she could not conduct a full and fair</p> <p>7 investigation into the circumstances of Ms Sturgess's</p> <p>8 death within the confines of the inquest rules, and so</p> <p>9 that led her to request the Home Secretary to establish</p> <p>10 in its place this inquiry. In short, that is because</p> <p>11 an inquest cannot consider material unless it can be</p> <p>12 made fully public, and it is obvious that there is</p> <p>13 likely to be a good deal of that sort of material here</p> <p>14 which very closely affects national security, which</p> <p>15 cannot be made fully public. But an inquiry like this</p> <p>16 can and will consider it nevertheless, because it has</p> <p>17 the power which an inquest has not to look at such</p> <p>18 material in closed sessions. That means that it can be</p> <p>19 tested and adjudicated upon without, as it were,</p> <p>20 shooting the system in the foot by making it all public.</p> <p>21 Now, Baroness Hallett would of course have served as</p> <p>22 the chair to this inquiry, if she hadn't been asked by</p> <p>23 the Prime Minister to lead the Covid Inquiry. I should</p> <p>24 like to pay tribute to all the work that she has</p> <p>25 undertaken on this case over the past year. The</p> <p style="text-align: center;">Page 2</p>	<p>1 This is a public inquiry established by the Home</p> <p>2 Secretary under section 1 of the Inquiries Act 2005.</p> <p>3 The setting up date was, as I have said, 17 March, eight</p> <p>4 days ago. I have, as I have said, appointed the inquest</p> <p>5 legal team to assist me. The solicitors to the inquiry</p> <p>6 are Fieldfisher and counsel are Mr Andrew O'Connor,</p> <p>7 Queen's Counsel, Francesca Whitelaw and</p> <p>8 Ms Emilie Pottle. I have appointed as secretary to the</p> <p>9 inquiry, Mr Piers Harrison and there is an inquiry</p> <p>10 website, which went live yesterday. You will find it at</p> <p>11 www.DawnSturgess.independent-inquiry.UK and no doubt if</p> <p>12 you Google "Dawn Sturgess Inquiry" you will find it.</p> <p>13 I was very keen to hold a hearing as soon as</p> <p>14 possible after I was appointed. As well as dealing with</p> <p>15 formal matters today, such as the designation of core</p> <p>16 participants, I want to try and get a detailed</p> <p>17 understanding of the practicalities of the challenges</p> <p>18 that we face. There will in fact clearly have to be two</p> <p>19 hearings, this one, an open and public one, and, as soon</p> <p>20 as we can convene it, a closed hearing when I shall</p> <p>21 investigate the detail of the sensitive matters that</p> <p>22 cannot be canvassed in public.</p> <p>23 Today therefore was the earliest date after my</p> <p>24 appointment on which it was practicable to hold the</p> <p>25 first of those hearings. I had intended, of course,</p> <p style="text-align: center;">Page 4</p>

<p>1 that it would be a hearing in person in the courtroom 2 that you can see on the screen at the Royal Courts of 3 Justice. It is very frustrating that we are having to 4 do it remotely and it is more frustrating because the 5 reason is that it was I who managed to test positive for 6 Covid earlier this week. I am sorry about the 7 inconvenience. A remote hearing is second best, but it 8 is better than a postponement. I wanted to make sure 9 that we make progress as much as we can.</p> <p>10 I am very grateful to all who have made detailed 11 written submissions and those who have made them need 12 not think that they need simply to rehearse them. What 13 I should say is that because of the Covid complication 14 it hasn't been possible for me to read the closed 15 annexes that: Her Majesty's Government; the two 16 principal police forces, the Metropolitan force and 17 Thames Valley, sailing under the colours of Operation 18 Verbasco; and counsel to the inquiry, have added to 19 their submissions.</p> <p>20 I will do that of course before we convene a closed 21 hearing, but you need to know that I have not had 22 a chance to look at those.</p> <p>23 In a moment I will ask Mr O'Connor to take us 24 through the agenda, which I hope you have seen, but 25 before I do that, I would just like to say one or two</p> <p style="text-align: center;">Page 5</p>	<p>1 for it to be obvious that there are a number of 2 challenges about this. One of the purposes of this 3 hearing and the next one is to allow me to get a grip on 4 the difficulties properly. Speed, of course, cannot and 5 should not be achieved by sacrificing thoroughness, and 6 clearly national security cannot be put at risk.</p> <p>7 Even with those principles in mind, I do very much 8 hope that we can find ways to move the process forward 9 and I do expect that all involved will do whatever can 10 properly be asked of them to achieve that. At the 11 moment, I simply do not know when it will be possible to 12 hold substantive hearings of evidence.</p> <p>13 In their written submissions the legal team 14 expresses serious doubt about achieving the date of 15 February next year, which had previously been raised 16 when a timetable was discussed before Baroness Hallett.</p> <p>17 Well, we will see. I have an open mind about that 18 and may have more to say after these two hearings. But 19 the objective of this hearing and especially the closed 20 hearing to follow is, as far as I am concerned, to 21 establish and set a timetable as far as it can properly 22 be done. There is no point in setting a timetable which 23 is not achievable, but what is achievable needs to be 24 set out. I can say that when it comes to public 25 hearings, I share Baroness Hallett's view that it would</p> <p style="text-align: center;">Page 7</p>
<p>1 things about the aims and intentions of the conduct of 2 the inquiry. This has to be a full and thorough 3 investigation. The issues raised by the terms of 4 reference include those of the utmost gravity, including 5 the allegation which has been publicly made of Russian 6 state responsibility for the killing of Ms Sturgess 7 indirectly.</p> <p>8 Those issues call for and are going to receive 9 rigorous investigation. We cannot help but be conscious 10 that recent world events highlight the importance of the 11 conclusions being carefully arrived at, right and 12 authoritative.</p> <p>13 Secondly, although the whole purpose of establishing 14 this inquiry was to enable the classified material to be 15 considered in closed session, the object remains to hear 16 as much evidence as properly one can in open session. 17 When it comes to writing a report, likewise the 18 objective is to make public as many of my conclusions 19 and the reasons for them as is possible. I have 20 mentioned the impact of the passage of time on the 21 family. It is important for their sake and it is also 22 generally in the public interest that we move forward to 23 public hearings as quickly as we properly can. I have 24 seen enough from the material which was before 25 Baroness Hallett and in the submissions made for today</p> <p style="text-align: center;">Page 6</p>	<p>1 be appropriate to hold the public ones in Salisbury. 2 That will be convenient, I hope, for many witnesses. 3 But it will also reflect the impact that I know that 4 these events have had on this city.</p> <p>5 Now, mechanics. There is an impressive list of 6 participants. Because the system cannot display you 7 all, I shall have to ask you I am afraid to wait to be 8 called upon by name before you contribute. I will try 9 to do that in a sensible order, topic by topic, as we go 10 along.</p> <p>11 Mr O'Connor, we have an agenda, which I hope 12 everybody has seen. We will try and take it, please, 13 topic by topic. Do we start with the structural 14 questions of designated core participants and the 15 question of funding their legal work?</p> <p>16 MR O'CONNOR: Sir, yes, that is the first of the substantive 17 topics that I was proposing to invite you to consider.</p> <p>18 Before I address you on those matters, sir, I hope 19 it will be convenient if I simply deal with 20 representation and also make a couple of short 21 housekeeping points.</p> <p>22 THE CHAIRMAN: Please.</p> <p>23 Housekeeping</p> <p>24 MR O'CONNOR: As you have said, I appear as counsel to the 25 inquiry with Francesca Whitelaw and Emilie Pottle, who</p> <p style="text-align: center;">Page 8</p>

2 (Pages 5 to 8)

<p>1 are here with me.</p> <p>2 The family of Ms Sturgess, including</p> <p>3 Mr Charlie Rowley, are represented by Michael Mansfield</p> <p>4 Queen's Counsel and Adam Straw Queen's Counsel with</p> <p>5 Jesse Nicholls.</p> <p>6 The Metropolitan Police Commissioner is represented</p> <p>7 by Julian Blake.</p> <p>8 The Chief Constable of Thames Valley Police is</p> <p>9 represented by Jason Beer Queen's Counsel.</p> <p>10 The Chief Constable of Wiltshire Police is</p> <p>11 represented by John Beggs Queen's Counsel.</p> <p>12 The Secretary of State for the Home Department, both</p> <p>13 on her own behalf and also, as we shall hear, in</p> <p>14 a representative capacity for other Government</p> <p>15 departments and agencies is represented by</p> <p>16 Cathryn McGahey Queen's Counsel, Ben Watson Queen's</p> <p>17 Counsel and also Georgina Wolfe.</p> <p>18 The South West Ambulance Service NHS Foundation</p> <p>19 Trust is represented by Bridget Dolan Queen's Counsel.</p> <p>20 Lastly, Wiltshire Council is represented by</p> <p>21 John Bethell.</p> <p>22 THE CHAIRMAN: Thank you.</p> <p>23 MR O'CONNOR: You have referred to the agenda, which I hope</p> <p>24 all involved have seen. As you have indicated, sir, it</p> <p>25 seems to us that it will be most straightforward if we</p> <p style="text-align: center;">Page 9</p>	<p>1 until that moment.</p> <p>2 I understand that when each individual advocate is</p> <p>3 invited to speak, it would be helpful if advocates could</p> <p>4 simply pause for a moment to allow the clerk in court</p> <p>5 time to unmute their microphone. Once that has</p> <p>6 happened, if they could simply identify themselves for</p> <p>7 the benefit of the transcript, before starting their</p> <p>8 submissions.</p> <p>9 The practice we have adopted previously on these</p> <p>10 remote hearings, if any advocate wishes to address you</p> <p>11 on any issue upon which they have not been invited to</p> <p>12 speak, or perhaps out of turn, the best procedure is if</p> <p>13 they send an email to Mr Smith, who as we can see is in</p> <p>14 court, and he will facilitate this, amongst other</p> <p>15 things, by letting you know and no doubt they will take</p> <p>16 the same course if they have any technical difficulties</p> <p>17 during the hearing.</p> <p>18 Discussion of agenda items</p> <p>19 MR O'CONNOR: That brings me to the first of the issues on</p> <p>20 the agenda, which is that of core participant</p> <p>21 applications and we will take the matter of funding with</p> <p>22 it, as you have suggested.</p> <p>23 Sir, one of the powers you have as chair of this</p> <p>24 inquiry is to designate persons and entities as</p> <p>25 so-called core participants in the inquiry. The core</p> <p style="text-align: center;">Page 11</p>
<p>1 take the agenda in sections, as it were.</p> <p>2 What I was proposing was first of all, as you have</p> <p>3 suggested, to deal first with the issue of core</p> <p>4 participant applications and funding.</p> <p>5 Secondly, to deal with the issue of disclosure.</p> <p>6 Then, thirdly, to deal with the remaining issues of</p> <p>7 witness evidence, restriction orders and notices and the</p> <p>8 question of the next hearing.</p> <p>9 For each of those three sections the intention is</p> <p>10 that I will make submissions first and thereafter, as</p> <p>11 you have said, we propose that you invite submissions</p> <p>12 from each of the parties in turn.</p> <p>13 As you have mentioned, and as those of us who are on</p> <p>14 the call can see, the video technology for this hearing</p> <p>15 is being controlled from Court 1 of the Royal Courts of</p> <p>16 Justice. The proceedings are being shown live in that</p> <p>17 court to, I believe, a number of members of the press</p> <p>18 and public who are in that courtroom. As we know,</p> <p>19 everyone else is joining remotely and if I can ask that,</p> <p>20 in order to reduce feedback and facilitate the smooth</p> <p>21 running of the hearing, all participants should have</p> <p>22 their microphones muted.</p> <p>23 In fact I think they may be automatically muted by</p> <p>24 the RCJ staff until they are invited to speak, and it</p> <p>25 will help if they have their cameras turned off as well</p> <p style="text-align: center;">Page 10</p>	<p>1 participants have certain procedural rights to take part</p> <p>2 in the work of the inquiry, such as receiving disclosure</p> <p>3 and making opening and closing statements when we come</p> <p>4 to the substantive hearings. The position of a core</p> <p>5 participant in an inquiry is similar but not identical</p> <p>6 to that of an interested person in an inquest. The</p> <p>7 formal test for designation as a core participant is to</p> <p>8 be found in rule 5(1) of the Inquiry Rules 2006. We</p> <p>9 have set out those provisions at paragraph 10 of our</p> <p>10 written submissions.</p> <p>11 I don't propose to read them in full now. In</p> <p>12 summary, the question is whether the person has</p> <p>13 a sufficient legal interest in the matters that the</p> <p>14 inquiry will be investigating. As you have already</p> <p>15 explained, sir, this inquiry is a direct successor to</p> <p>16 the inquest proceedings. With that in mind, in written</p> <p>17 submissions that we made in the inquest proceedings</p> <p>18 towards the end of last year, we proposed that, subject</p> <p>19 to the agreement of those concerned, the chair of the</p> <p>20 inquiry, now appointed -- you -- ought to designate all</p> <p>21 those who had been recognised as interested persons in</p> <p>22 the inquest as core participants in the first instance</p> <p>23 without the need for a formal application.</p> <p>24 In the submissions that you have now received for</p> <p>25 this hearing, all those who had interested person status</p> <p style="text-align: center;">Page 12</p>

<p>1 in the inquest have given their consent to being 2 designated as core participants in the inquiry. 3 Two other matters arise. 4 First, one of the individuals who had interested 5 person status in the inquest and who we propose you 6 should make a core participant in the inquiry is 7 Dawn Sturgess's daughter, who is a child. In the 8 inquest proceedings, as you will have seen, Lady Hallett 9 ordered that she be referred to as GS, rather than by 10 her full name, on the grounds of her age and because her 11 full name was unlikely to have any relevance in itself 12 to the proceedings. You will have seen from their 13 submissions that the family invite you to make a similar 14 order in the inquiry and we support that application. 15 Second, sir, the solicitor to the inquiry has 16 received, as you know, a letter from legal 17 representatives of Sergei and Yulia Skripal, 18 representing their designation as core participants in 19 the inquiry. They had not sought interested person 20 status in the inquest. 21 In any event, since the terms of reference for this 22 inquiry expressly require you to investigate the events 23 surrounding their poisoning, we submit that their 24 significant interest in the matters to which the inquiry 25 relates is self evident and, accordingly, we support the</p> <p style="text-align: center;">Page 13</p>	<p>1 that matter of core participant status, but that is all 2 I was proposing to say about that issue. 3 Moving on to the associated question of funding, you 4 have responsibility within the inquiry for expenditure 5 in accordance with section 40 of the 2005 Act and also 6 rules 20 to 34 of the 2006 rules. That power, as we 7 have set out in our written submissions, is subject to 8 certain conditions or qualifications as may be 9 determined by the Minister. 10 That power of funding, relevantly for these 11 purposes, extends to granting funding for legal costs 12 for core participants. As you know, an application for 13 funding has been made by the representatives of the 14 family of Dawn Sturgess, which includes funding for 15 a separate Queen's Counsel to represent Charlie Rowley. 16 You have seen the grounds on which that application is 17 made and I am sure Mr Mansfield or Mr Straw will address 18 you on that in a moment. 19 May I simply say at this stage that we submit that 20 the grounds for Mr Rowley to be separately represented 21 to this extent are, in our submission, cogent and we 22 support that part of the application that has been made. 23 Sir, it will be necessary for the inquiry to produce 24 a costs protocol before any final awards are made. For 25 that reason we don't invite you to rule finally on the</p> <p style="text-align: center;">Page 15</p>
<p>1 application that they have made. 2 Sir, we have set out at paragraph 14 of our written 3 submissions a list of those who in our submission should 4 be designated as core participants and it may assist if 5 I simply read that out. 6 The proposed core participants are as follows: 7 Ms Sturgess's mother, Caroline Sturgess; Ms Sturgess's 8 father, Stephen Stanley Sturgess; Ms Sturgess's elder 9 son Aidan Hope; and her younger son Ewan Hope; 10 Ms Sturgess's daughter, to whom I have referred, who 11 I will describe for the moment as GS; Ms Sturgess's 12 partner, to whom we have referred, Mr Charlie Rowley; 13 the Secretary of State for the Home Department on her 14 own behalf and also in a representative capacity for the 15 following branches of Government, as we understand it, 16 the Cabinet Office, GO-Science, Defra, the FCDO, the 17 Ministry of Defence, the Department for Leveling Up, 18 Housing and Communities and the Department for Health 19 and Social Care; also, South West Ambulance Service NHS 20 Foundation Trust; Wiltshire Council; the Chief Constable 21 of Wiltshire Police, the Commissioner of the 22 Metropolitan Police, the Chief Constable of Thames 23 Valley Police; and finally, as I have said, Sergei and 24 Yulia Skripal. 25 Sir, I know that others will wish to address you on</p> <p style="text-align: center;">Page 14</p>	<p>1 application at present. To ensure that the family's 2 legal representatives are not prejudiced by the short 3 delay, we invite you to indicate that applications for 4 funding in respect of expenditure incurred since the set 5 up date but before the award will not be refused on the 6 grounds that they were incurred prior to that date. 7 Sir, in essence, we invite you to determine the 8 family's application once the costs protocol is in place 9 on the basis of the written submissions you have 10 received and no doubt the supplementary oral submissions 11 that will be made to you today. 12 Sir, that covers those first two issues of core 13 participant status and funding. Unless there are any 14 other matters I can assist you with, those are my 15 submissions on those two matters. 16 THE CHAIRMAN: Thank you very much, Mr O'Connor. 17 I will ask others concerned to say what they need to 18 but you should understand that I am currently minded to 19 designate as core participants all those who are listed 20 in paragraph 14 of Mr O'Connor's written submissions. 21 I am minded to direct as previously that 22 Ms Sturgess's daughter is referred to in these 23 proceedings only by her initials GS, for the reasons 24 that Mr O'Connor has just adumbrated. 25 Thirdly, when it comes to funding, unless dissuaded,</p> <p style="text-align: center;">Page 16</p>

<p>1 I am inclined to make the orders that Mr O'Connor has 2 outlined and to accept the case for separate counsel 3 representation for Mr Rowley. 4 That may be of some assistance. 5 Mr Mansfield? 6 You will have to wait until they unmute you, 7 Mr Mansfield, I am afraid. My lipreading is poor. 8 (Pause) 9 THE CLERK OF THE COURT: Mr Mansfield, you can speak now. 10 Thank you. 11 MR MANSFIELD: Yes, thank you very much. 12 May I just initially on behalf of the Sturgess 13 family thank you for your observations today. I don't 14 elaborate on them at all. For the purposes of today, 15 I am representing the five members of the Sturgess 16 family and my colleague Adam Straw is representing 17 Charlie Rowley. As far as I am concerned, you have the 18 written submissions, you have indicated your intention, 19 I have nothing to add to any of that, I just thank you 20 for your concern. 21 THE CHAIRMAN: Thank you very much indeed, Mr Mansfield. 22 Admirably brief. 23 Mr Straw? 24 MR STRAW: I will wait until I am unmuted. 25 THE CHAIRMAN: You are.</p> <p style="text-align: center;">Page 17</p>	<p>1 award will be included in the award. 2 Right, thank you very much indeed. That is, as it 3 were, point 1. 4 We are onto point 2. 5 The next issue is labelled "Disclosure". I see that 6 as largely a question of assembling the material on 7 which the inquiry will have to make its decision. 8 Disclosure is clearly part of it. 9 Yes, Mr O'Connor. 10 MR O'CONNOR: Sir, in fact, apologies, before I do come on 11 to disclosure, may I simply mention one further point, 12 which is canvassed in our written submissions, which 13 relates more to the core participant issue. In fact it 14 relates to people who are not on the list, rather than 15 those who are. They are the three Russian nationals who 16 are named in the terms of reference as having possible 17 involvement in the poisoning of Sergei and 18 Yulia Skripal, and of course as you know are also 19 subject to charges in relation to that event by the CPS. 20 Two of those men, sir, Mr Alexander Petrov and 21 Mr Ruslan Boshirov, are individuals who appeared in the 22 now well-known CCTV footage taken in Salisbury. The 23 third of those men, a man known as Denis Sergeev, all 24 three of them, as I have said, subject to charges from 25 the CPS.</p> <p style="text-align: center;">Page 19</p>
<p>1 MR STRAW: Thank you. 2 I also have nothing to add to the written 3 submissions, thank you very much. 4 THE CHAIRMAN: Thank you very much indeed. 5 Those are the only parties who are directly affected 6 by these issues. Is there any other party who wishes to 7 make any kind of submission or representation about the 8 issues thus far discussed? 9 No indication received. It is not too late if 10 subsequently I find that you have, but you will have to 11 do it quite soon. No? Right. 12 Very well, Mr O'Connor, I designate core participant 13 to all those listed in paragraph 14 of your written 14 submissions and outlined to me orally just now. 15 As to the deceased's daughter, I direct that in 16 these proceedings she is to be referred only by her 17 initials GS, on the grounds that she is a child and that 18 her precise name is irrelevant to the proceedings. 19 As to funding, I give the indication that I have 20 that in due course awards will be considered for the 21 family and that will include separate representation, by 22 counsel though not solicitors, for Mr Rowley. Although 23 I can't at the moment make such awards, I indicate that 24 the expenses incurred between the setting up of this 25 inquiry and the time when it is possible to make the</p> <p style="text-align: center;">Page 18</p>	<p>1 Sir, the first two of those men, Mr Petrov and 2 Mr Boshirov, were in fact recognised as interested 3 persons by the Salisbury coroner, Mr Ridley, in the 4 first instance and that status was withdrawn in March of 5 last year by Lady Hallett, since neither of them had 6 responded to an invitation made on her behalf to 7 participate in the inquest. Their names were initially 8 included in the scope of the inquest, now the terms of 9 reference for the inquiry, and Mr Sergeev's name was 10 added at the time that the CPS authorised charges 11 against him. 12 Sir, of course all three men could have applied to 13 you for CP status, just as the other persons and 14 entities who we have mentioned have. They haven't done 15 so. It may be that it is unlikely, given world events, 16 that they will do so. But, sir, we simply make the 17 submission now, and we are aware that this is a matter 18 that concerns you, that notwithstanding the fact that 19 they are not core participants and haven't applied for 20 that status, it is important to ensure that the 21 inquiry's investigation takes full account of the 22 explanations that have been provided, both by Mr Petrov 23 and Mr Boshirov in the public domain, and indeed by the 24 Russian Embassy for the men's presence in London and 25 Salisbury and what has been said about those matters.</p> <p style="text-align: center;">Page 20</p>

5 (Pages 17 to 20)

<p>1 Sir, our submission is that it would be appropriate 2 in these circumstances to task one member of our team -- 3 that is Ms Pottle -- with responsibility for ensuring 4 that the inquiry takes all reasonable steps to test the 5 evidence connecting those Russian nationals to 6 Ms Sturgess's death. I do emphasise that the role we 7 propose that Ms Pottle undertakes does not involve her 8 actually representing those three individuals at the 9 inquiry, rather taking particular account of their 10 interests and that is a different thing and, of course, 11 the Russian men to whom I have referred will remain 12 entitled to apply to be designated as core participants 13 and to appoint their own legal representatives in these 14 proceedings if they so wish.</p> <p>15 Sir, that is a matter that we mentioned in our 16 written submissions but I thought it appropriate to 17 canvass it publicly with you today.</p> <p>18 THE CHAIRMAN: Thank you for raising it now, Mr O'Connor, 19 I was going to raise it either now or later. It is 20 a matter I think of some importance.</p> <p>21 The accusations that have been made against these 22 three people have been made very publicly and they have 23 been made both at a high political level and at a legal 24 level -- they have been charged. An inquiry like this 25 does not conduct a trial, it cannot convict anybody of</p> <p style="text-align: center;">Page 21</p>	<p>1 the named suspects, it will mean from time to time 2 putting on, as it were, the hat of the interests of 3 those three people and ensuring that any point which any 4 of them could properly take is considered.</p> <p>5 There has been a public rebuttal issued by the 6 Russian Embassy, amongst other things it says it raises 7 a number of specific questions, so part of Ms Pottle's 8 function will be to ensure that those questions are 9 properly addressed, there may be answers or there may 10 not. Along with any others which emerge as the inquiry 11 proceeds. Her function would also involve, if 12 improbably, at any point there were to be detectable 13 a conflict of interest between this part of her task and 14 the functions of the inquiry legal team generally, then 15 I should rely on her duty as an advocate to alert me to 16 it.</p> <p>17 Is there anybody who wants to say anything about 18 that at this stage before I make that enquiry of 19 Ms Pottle?</p> <p>20 Mr Smith tells me that none of you has indicated 21 a wish to speak on that topic.</p> <p>22 I will pause just for a moment in case somebody is 23 struggling with the technology, but otherwise I will 24 proceed to address Ms Pottle. (Pause)</p> <p>25 Ms Pottle, are you there, please?</p> <p style="text-align: center;">Page 23</p>
<p>1 anything. But it will be necessary, as I see it, to 2 consider whether the facts alleged are proved or are 3 not. In our system, whether or not a named suspect such 4 as these chooses to take part in the process, it is 5 axiomatic that attention must be paid to his interests 6 as the evidence is investigated.</p> <p>7 I am minded to accept the suggestion not simply that 8 the legal team has that in mind, but much more, that one 9 of its members is designated to make it her particular 10 responsibility to put on the hat serving the interests 11 of those who have been publicly accused.</p> <p>12 In a moment, subject to anything that anybody else 13 may say, I want to ask Ms Pottle whether she is prepared 14 to take on that task, as I imagine she must be, but if 15 anybody else wants to say anything about this issue, now 16 is the time to do it. The best way of making known your 17 wish to do so, if it arises -- it may not -- is to email 18 Mr Smith, the solicitor, indicating that you would like 19 me to call on you.</p> <p>20 I will pause for a moment while you do that, and 21 just say this, while you are thinking about it, that 22 what I am proposing to point out to Ms Pottle is that 23 this will mean a distinct legal task for her, part of 24 course of what the inquiry legal team generally has 25 responsibility for, but it will mean particular focus on</p> <p style="text-align: center;">Page 22</p>	<p>1 MS POTTLE: Yes, can you see and hear me? 2 THE CHAIRMAN: I can if I alter the screen a little, yes. 3 Thank you very much indeed.</p> <p>4 You have heard what has been said, Ms Pottle. It is 5 not a formal task, it is the substantive one. Have you 6 heard what I have said about what it necessarily 7 involves? I don't suppose it comes as a surprise, but 8 have you heard what I have said publicly?</p> <p>9 MS POTTLE: Yes, yes, I have heard, I have made a note and 10 I have heard, thank you.</p> <p>11 THE CHAIRMAN: Are you willing to take that on? 12 MS POTTLE: Yes, I am willing to take that on.</p> <p>13 I mean as set out in our submissions, I think it is 14 important just to state publicly of course that the 15 three men have of course the right to apply for core 16 participant status and to have representatives and of 17 course I wouldn't be a formal representative and 18 I wouldn't have instructions from them, so that's just, 19 I think, important that it is publicly known that 20 I wouldn't have that sort of confidential relationship 21 with them as a representative would have, but in the 22 course of the inquiry, the role that you have described 23 is of course one that would sit comfortably within the 24 counsel to the inquiry's normal remit.</p> <p>25 THE CHAIRMAN: You have frozen briefly, but had you</p> <p style="text-align: center;">Page 24</p>

<p>1 finished, Ms Pottle?</p> <p>2 MS POTTLE: Yes, I had finished, yes.</p> <p>3 THE CHAIRMAN: Thank you. You are exactly right and, of</p> <p>4 course, if at any stage any of these three wishes to</p> <p>5 become a core participant, the application will be</p> <p>6 properly considered when and if it is made. It is</p> <p>7 precisely because it hasn't been made that it is</p> <p>8 necessary in any UK system that we pay special attention</p> <p>9 to the need to protect the interests of those who have</p> <p>10 been publicly accused. I am grateful. In the unlikely</p> <p>11 event there proves to be any conflict between that role</p> <p>12 and the role of counsel to the inquiry generally, I rely</p> <p>13 on your duty as advocate to bring that to my attention.</p> <p>14 MS POTTLE: Yes, of course.</p> <p>15 MR O'CONNOR: Sir, I am grateful. Having dealt with that</p> <p>16 matter, I will now turn to the next item on the agenda,</p> <p>17 which is one of the respects in which this inquiry, as</p> <p>18 you have said, inherits and progresses the work</p> <p>19 previously done by the inquest.</p> <p>20 We have used the term "Disclosure". You, sir, have</p> <p>21 described it as assembling material and it is absolutely</p> <p>22 right to say the task that the faces us is not the same</p> <p>23 as a disclosure exercise in criminal law civil</p> <p>24 proceedings, it is far more complicated than that. It</p> <p>25 may be that other language is helpful.</p> <p style="text-align: center;">Page 25</p>	<p>1 of this hearing and I know that others will want to</p> <p>2 address you on it when I have finished.</p> <p>3 I should add that there will of course be some</p> <p>4 matters of detail going to the particular issues</p> <p>5 relating to disclosure that cannot be canvassed in this</p> <p>6 public hearing. As you have already indicated, that is</p> <p>7 absolutely one of the matters which I know you propose</p> <p>8 to explore further at the closed hearing that is to be</p> <p>9 held in due course.</p> <p>10 Sir, with all that in mind, I am proposing now to</p> <p>11 address you, I hope fairly briefly, on four sub topics,</p> <p>12 as it were.</p> <p>13 Firstly, simply a brief summary of the position we</p> <p>14 have reached.</p> <p>15 Secondly and thirdly two possible routes forward,</p> <p>16 the first a suggestion that has been made by HMG and the</p> <p>17 second a suggestion that we have made in our written</p> <p>18 submissions.</p> <p>19 Finally, and very briefly, just one practical matter</p> <p>20 that arises relating to undertakings.</p> <p>21 First of all, a brief summary. It, sir, has been</p> <p>22 a theme of the submissions during the course of the</p> <p>23 inquest and now the inquiry that the special</p> <p>24 sensitivities of this case have required and will</p> <p>25 continue to require an unusually complicated and</p> <p style="text-align: center;">Page 27</p>
<p>1 We have used the terms of stage 1 and stage 2</p> <p>2 disclosure.</p> <p>3 Stage 1 being the provision of documents to you, by</p> <p>4 those who hold relevant material.</p> <p>5 Stage 2 being the onward provision of documents by</p> <p>6 you to core participants.</p> <p>7 Now we are an inquiry rather than an inquest, that</p> <p>8 stage 2 will be divided into open and closed material.</p> <p>9 The open material being disclosed to all core</p> <p>10 participants and being deployed openly in public</p> <p>11 hearings.</p> <p>12 The closed material, authorised by either</p> <p>13 restriction order or restriction notice, being held more</p> <p>14 narrowly and in broad terms being dealt with at closed</p> <p>15 hearings.</p> <p>16 Sir, I know that you have read into the legal</p> <p>17 proceedings that took place in the inquest, rulings,</p> <p>18 submissions and so on. It is no secret and no surprise</p> <p>19 to you, therefore, that the disclosure issues in this</p> <p>20 case are very complex and likely, we submit, to be the</p> <p>21 most significant factor in determining when we can move</p> <p>22 to holding substantive hearings. You have, as I have</p> <p>23 said, read something of the (Inaudible) on this issue</p> <p>24 that took place before Lady Hallett. You have also</p> <p>25 received detailed written submissions for the purposes</p> <p style="text-align: center;">Page 26</p>	<p>1 therefore time-consuming disclosure process, both at</p> <p>2 stage 1 and stage 2. It is apparent from the written</p> <p>3 submissions served by HMG for this hearing that those</p> <p>4 sensitivities have been made more pressing and more</p> <p>5 complex by the outbreak of war in Ukraine. I am sure</p> <p>6 this is a matter that Ms McGahey will address on you</p> <p>7 further, but in summary the HMG submissions assert that</p> <p>8 the need to protect the United Kingdom from the threat</p> <p>9 posed by Russia and other hostile agents has never been</p> <p>10 more acute and that HMG's priority is protecting the</p> <p>11 United Kingdom from imminent threats. It is further</p> <p>12 stated that the overlap between those working across the</p> <p>13 Government to assist the inquiry and those who are</p> <p>14 working on the real-time threat posed by the Russian</p> <p>15 state has impacted, and we infer will continue to</p> <p>16 impact, on the timetable for disclosure.</p> <p>17 Sir, even given these complexities, which, as I have</p> <p>18 said, have always been present and perhaps, we are told,</p> <p>19 have worsened in recent weeks and months, it is</p> <p>20 striking, and we submit regrettable, that nearly a year</p> <p>21 into the disclosure process there is still very much</p> <p>22 work to do. Even the completion of stage 1 disclosure</p> <p>23 for most material providers remains a distant prospect.</p> <p>24 Operation Verbasco, to which you have already</p> <p>25 referred, which is the combined effort of the</p> <p style="text-align: center;">Page 28</p>

7 (Pages 25 to 28)

<p>1 Metropolitan Police and the Thames Valley Police, and 2 GLD -- Government Legal Department -- acting for the 3 central departments and agencies of Her Majesty's 4 Government, sir, those two, Operation Verbasco and HMG, 5 which between them hold the greatest volume of material 6 disclosure, have indicated in their written submissions 7 they don't anticipate completing stage 1 disclosure 8 until the end of this year.</p> <p>9 That is the HMG submissions at paragraph 18 or in 10 the case of Operation Verbasco don't expect to have 11 scheduled the relevant material until then -- that is at 12 paragraph 13 of their submissions.</p> <p>13 Operation Verbasco estimates that the total number 14 of documents held is in the region of 55,000, with only 15 40 per cent of those having been scheduled to date and 16 only 3,500, that is 6 per cent, having been shared with 17 the inquiry as stage 1 disclosure to date.</p> <p>18 Wiltshire Police have scheduled a little over 3,000 19 documents, with more than 10,000 documents still to be 20 retrieved.</p> <p>21 Sir, I don't wish to suggest for a moment, 22 notwithstanding that rather gloomy prognosis, that all 23 involved have not been working hard. We can certainly 24 attest that they have. They have been working hard on 25 their own account and they have also been actively</p> <p style="text-align: center;">Page 29</p>	<p>1 a substantive response to that request, although the 2 details of those requests have been discussed in the 3 meetings to which I have referred. That is a matter 4 I will return to in due course.</p> <p>5 Sir, given the long timescales to which I have 6 referred envisaged for the completion of stage 1 7 disclosure, we have said in our written submissions that 8 it does appear to be most unlikely that it will be 9 possible to commence substantive hearings in 10 February 2023, as had been hoped for at one stage.</p> <p>11 Sir, we hear what you say --</p> <p>12 THE CHAIRMAN: I am aware of that. Can you just remind me 13 where and when? When that estimate came from and when 14 it was given? It was given to Baroness Hallett, wasn't 15 it?</p> <p>16 MR O'CONNOR: Yes, it was an indication made by us on 17 Lady Hallett's behalf in submissions made towards the 18 end of last year.</p> <p>19 THE CHAIRMAN: Thank you.</p> <p>20 MR O'CONNOR: Sir, we have heard what you have said about 21 your open mind on that subject and we are conscious of 22 the fact that you wish to gain a much better 23 understanding of where we are with disclosure before 24 expressing a view about any date for a final hearing. 25 Sir, that was simply the brief summary I hope</p> <p style="text-align: center;">Page 31</p>
<p>1 engaging with us in attempting to move the disclosure 2 process forward. We have -- that is your inquiry legal 3 team -- continued throughout this period to conduct 4 regular meetings and video conferences and to engage in 5 correspondence with those holding relevant material, in 6 particular with the Government Legal Department and 7 Operation Verbasco. We have in particular been working 8 closely in recent months with the Verbasco team towards 9 producing a corporate statement or report which provides 10 a chronological account of the police investigations and 11 which cross refers to significant documents held by 12 Operation Verbasco. It was our intention, to be clear, 13 that this exercise would be a means of focusing the 14 Operation Verbasco disclosure exercise, enabling them to 15 prioritise material likely to be of greater relevance.</p> <p>16 As far as the HMG documents are concerned, following 17 a preliminary inspection of documents by members of our 18 team, the solicitor to the inquiry, then the inquest, 19 made a series of requests for stage 1 disclosure of 20 documents that had been subject to review.</p> <p>21 In total, three such requests for disclosure have 22 been made. They were made in fact in October last year, 23 November last year, and February this year. Taken 24 together, those requests relate to a significant number 25 of documents. To date, we have not received</p> <p style="text-align: center;">Page 30</p>	<p>1 assists in terms of where we have reached and where we 2 have not reached with disclosure.</p> <p>3 I mentioned then two suggestions that have been made 4 as a way forward. Her Majesty's Government in their 5 written submissions have invited you to consider 6 addressing the problem, in effect, by conducting the 7 inquiry in two stages. Again, I am sure Ms McGahey will 8 address you on this in a few moments but as we 9 understand it, and in summary, what is proposed is 10 an open stage of hearings first, to take place before 11 disclosure issues relating to sensitive documents have 12 been dealt with. Then to be followed later, as we 13 understand it, by a closed set of hearings.</p> <p>14 Sir, you have written submissions from us addressing 15 this point, and this is at paragraphs 8 and 28 of our 16 submissions. In summary, our preliminary view is that 17 this proposal is not one that you should adopt. Sir, 18 the reasons we have, again, in summary, are that there 19 is a risk that proceeding with a substantive hearing -- 20 that is the first of the substantive hearings that we 21 understand is proposed -- when only part of the 22 evidential picture is known, will undermine an effective 23 and thorough investigation. Sir, as you indicated in 24 your remarks at the start of this hearing, that, as you 25 have said, must be the fundamental priority for this</p> <p style="text-align: center;">Page 32</p>

<p>1 inquiry. That is: conducting an effective and thorough 2 investigation.</p> <p>3 Sir, by way of further detail on that point, the 4 very process which is taking so much time in disclosure, 5 which is addressing the sensitivities in documents, 6 working through what can and cannot be dealt with in 7 open hearings, that process is bound to lead to further 8 material making its way into the open side of the case, 9 if I can put it that way. One very practical example is 10 the police report or narrative, to which I have already 11 referred, which at the moment is being dealt with as 12 a closed document because of the sensitivities relating 13 to it, but we are sure that in due course, we hope, 14 considerable parts of that will become open evidence. 15 I hope that illustrates what we see as the difficulty of 16 the suggestion that open hearings should be held in 17 advance of that disclosure process having been worked 18 through because, necessarily, we submit, they will 19 therefore be incomplete hearings and will lead the 20 inquiry to be addressing these crucial matters on the 21 basis of only part of the open evidence.</p> <p>22 Sir, we also submit that the dual/two-stage hearing 23 proposal would lead to a loss of focus on the 24 preparation of sensitive material for disclosure. In 25 other words, everyone's mind would switch to preparing</p> <p style="text-align: center;">Page 33</p>	<p>1 possible to complete those stages within the next few 2 weeks and enable you then to review the position on 3 an informed basis at a further hearing that we have 4 suggested be held in or about June of this year.</p> <p>5 First, we invite you direct HMG to provide 6 stage 1 disclosure of all the documents that are the 7 subject of the outstanding written requests to which 8 I have already referred, that were made by the ILT, 9 dating back to October/November last year. For the 10 avoidance of doubt, what we envisage is that your team 11 will be provided with not just the documents that are 12 the subject of the request, but a set of those documents 13 which have been marked up to show which elements of 14 those documents on HMG's submission can and cannot be 15 disclosed openly to core participants when we reach the 16 stage of stage 2 disclosure.</p> <p>17 That will enable, as I say, an informed view to be 18 taken, for example, to issues relating to restriction 19 orders and restriction notices in due course. Sir, our 20 proposal -- you have heard that those letters are now of 21 some age, and we have had discussions with HMG, we know 22 that work has been underway relating to those requests 23 for some time. In those circumstances we suggest the 24 direction that stage 1 disclosure of that material be 25 given by 29 April.</p> <p style="text-align: center;">Page 35</p>
<p>1 for the first of those two hearings and inevitably we 2 would then lose focus and momentum on actually getting 3 through the work of disclosure. That is particularly 4 perhaps a concern given what we have been told about the 5 difficulty in drafting in additional resources to assist 6 on the HMG team with the disclosure exercise.</p> <p>7 In that, we suggest that really leads to the 8 proposition that in fact the two-stage proposal would 9 probably lead to the total time spent on this inquiry 10 being elongated and therefore not only concerns about 11 an inadequate or insufficient investigation but in fact 12 a separate concern about a gross delay, ultimately, in 13 conclusion to the inquiry and the production of your 14 report.</p> <p>15 Sir, as I say, I am sure you will hear more about 16 this in due course, but in summary, those are our 17 concern about this proposal.</p> <p>18 Sir, we have made -- this is the third of the four 19 points I wanted to make -- in our written submissions 20 a more limited, but we hope helpful, suggestion as to 21 directions you could give today to at least move the 22 process forward.</p> <p>23 In effect, what we have described are two parcels of 24 disclosure, as to which work is already underway, and we 25 hope that if you make these directions it will be</p> <p style="text-align: center;">Page 34</p>	<p>1 Sir, the second parcel of material is the one to 2 which I have already referred, regarding Operation 3 Verbasco and the chronological narrative statement or 4 report that they are in the process of preparing. Our 5 proposal is that they should be directed to provide that 6 document that the report, if necessary, in draft or in 7 advanced draft -- we understand that there is a concern 8 on their part that because of the work that they are 9 doing on other documents there may need to be amendments 10 to the report in due course. In any event, we propose 11 that they should be directed to provide the most 12 up-to-date version of that document, together with all 13 of the supporting documents to which it refers, which as 14 I have explained are the core narrative documents as we 15 understand it held by the police. Again, marked up to 16 show the content that is said to be on the one hand open 17 and on the other hand closed.</p> <p>18 We suggest, sir, that you make a direction, then, 19 that stage 1 disclosure of that material is provided by 20 1 June 2022. I am sure those representing Operation 21 Verbasco -- I think it is Mr Beer who will be taking the 22 lead in that regard -- will wish to address you on that 23 proposal in a moment.</p> <p>24 Sir, those are the two proposals that I wish to 25 address you on, both HMG's and ours.</p> <p style="text-align: center;">Page 36</p>

<p>1 Finally from me, I mention one further issue, a very 2 practical point relating to undertakings. We have 3 addressed it briefly in our written submissions. It 4 simply relates to the need to ensure that documents that 5 are disclosed at stage 2 -- that process has begun, 6 albeit still in the foothills. That documents that are 7 disclosed to core participants are held by them only for 8 the purpose of this inquiry. For the purpose of the 9 inquest process, those who were then interested persons 10 provided at our request undertakings made to 11 Lady Hallett requiring them only to use documents for 12 that purpose. So our simple submission, I am sure it 13 will not be controversial, is that since we are now 14 an inquiry, and since you are now the chair of the 15 inquiry, those previous undertakings need to be replaced 16 by further undertakings given to you by core 17 participants to the same effect.</p> <p>18 That is a matter which I am sure the solicitor to 19 the inquiry can deal with. I raise it now in case 20 anyone has anything to say about it, I doubt that they 21 will.</p> <p>22 Sir, those are the four matters I wanted to address 23 you on relating to what we have described as disclosure. 24 Unless there is anything more I can help you with at 25 this stage, that is all I wish to say.</p> <p style="text-align: center;">Page 37</p>	<p>1 inquiry to the family of Ms Sturgess and to Mr Rowley, 2 and we also recognise that this inquiry must be thorough 3 and that it should proceed as quickly as it possibly 4 can.</p> <p>5 The reason we suggested a two-stage process was that 6 we hoped to make a constructive suggestion for one way 7 forward, bearing in mind that we were very, very aware 8 of the disclosure difficulties that the Government was 9 now facing.</p> <p>10 One key advantage, we thought, of a two-stage 11 process might be that certain witnesses would be able to 12 give evidence before memories fade further and that it 13 might be possible, for example, for this inquiry to 14 investigate the facts of what happened that led to 15 Ms Sturgess spraying herself with what she thought to be 16 perfume. It may be possible, for example, to address 17 medical treatment.</p> <p>18 It may very well be that the difficulties to which 19 Mr O'Connor has referred would materialise. One 20 suggestion I have now, sir, is it may be it's something 21 you would like to keep under review. It may be possible 22 within the next few weeks or months to identify areas 23 within the terms of reference that you do think you 24 could or would wish to investigate publicly at 25 an earlier stage than others. But we don't press it as</p> <p style="text-align: center;">Page 39</p>
<p>1 THE CHAIRMAN: No, thank you very much, Mr O'Connor. I have 2 it, I think.</p> <p>3 The principal contribution to this process is 4 inevitably coming from the government. Ms McGahey we 5 will start with you, please.</p> <p>6 MS MCGAHEY: Sir, can you see and hear me?</p> <p>7 THE CHAIRMAN: I can hear you very well, Ms McGahey, at the 8 moment I cannot see you but I expect it will happen 9 soon.</p> <p>10 MS MCGAHEY: My camera is on, sir, but I can't see myself 11 either on the small screen. Are you happy for me to 12 continue?</p> <p>13 THE CHAIRMAN: Yes, you should continue but I would be 14 grateful if those who are pressing the buttons would 15 please reveal Ms McGahey to us all.</p> <p>16 MS MCGAHEY: Thank you, sir.</p> <p>17 THE CHAIRMAN: Off you go.</p> <p>18 MS MCGAHEY: Sir, as you know, I represent the Home 19 Secretary and all the other departments listed in 20 paragraph 14 of our written submissions. May I deal 21 first with the two-stage process that HMG suggested in 22 our submissions.</p> <p>23 THE CHAIRMAN: Yes.</p> <p>24 MS MCGAHEY: First of all, I should emphasise that the 25 government recognises absolutely the importance of this</p> <p style="text-align: center;">Page 38</p>	<p>1 a suggestion, sir, we were simply trying to be helpful 2 in putting it forward as an option.</p> <p>3 THE CHAIRMAN: Yes, understood.</p> <p>4 MS MCGAHEY: As far as the timetable is concerned, sir, as 5 you have said, there is obviously no point in setting 6 a timetable that is not achievable. The Government 7 understands completely its disclosure obligations and 8 I should emphasise, as Mr O'Connor already has done, 9 that work is continuing. A large number of departments 10 and agencies are reviewing very large quantities of 11 material. But however, as you will understand, some of 12 these units are operating under unusual and very 13 considerable strain at the moment, because of the 14 situation in Ukraine.</p> <p>15 THE CHAIRMAN: Yes.</p> <p>16 MS MCGAHEY: In some departments shift working has been 17 introduced. In others, people are working very long 18 hours and for a minimum of six days a week. We just 19 cannot impose impossible pressures on staff who are 20 already working exceptionally hard, and that is 21 especially true when the work that they are doing, which 22 includes work for this inquiry, is work in which they 23 just cannot afford to make mistakes.</p> <p>24 The complexity and the length of time taken to do 25 this work is, I know, very well known to the inquiry</p> <p style="text-align: center;">Page 40</p>

10 (Pages 37 to 40)

<p>1 legal team and it is very well understood by them. As 2 just one illustration, the Government provided some 3 disclosure to the inquiry legal team in July and August 4 of last year and the inquiry team considered it with 5 great thoroughness, but it took that team between two 6 and three months to identify from within that disclosure 7 the material that they considered to be relevant. It is 8 not an easy process and it really does take time.</p> <p>9 The Government is doing its work with similar care 10 and we have thought and we have given great 11 consideration to the timetable that has been suggested 12 by Mr O'Connor -- it was obviously in the written 13 submissions, so we have had time to think about it. 14 I am afraid, sir, we do not believe that the Government 15 can meet the suggested deadline of 29 April for stage 1 16 disclosure. All the Government departments that 17 I represent have been involved in discussions --</p> <p>18 THE CHAIRMAN: It is not stage 1 disclosure generally, is 19 it, Ms McGahey? Put simply, it is the limited material 20 for which specific requests have already been made, is 21 that right?</p> <p>22 MS MCGAHEY: It is right, sir, yes but I am afraid we do not 23 believe we can meet the suggested timetable.</p> <p>24 THE CHAIRMAN: All right.</p> <p>25 MS MCGAHEY: We believe that realistically and assuming that</p> <p style="text-align: center;">Page 41</p>	<p>1 to the new reader, which is what I am.</p> <p>2 First of all, it is not remotely difficult to see 3 that many documents which are relevant to this inquiry 4 may have very deep security implications. They may be 5 of the kind which cannot be made public and the security 6 implications I completely understand may not be obvious 7 and may need thinking about by specialists.</p> <p>8 Secondly, I don't for a moment doubt that the number 9 of specialists who can do it is limited and you hardly 10 need say that people with that kind of specialism are 11 likely to be under a good deal of pressure in relation 12 to current events, and what you say about their working 13 arrangements at the moment occasions no surprise.</p> <p>14 You ought, I think, to make the assumption that 15 I make, that everyone is doing his best to progress this 16 inquiry as soon as possible. Indeed, the Home Secretary 17 has herself particularly asked for that to happen.</p> <p>18 Could I ask you just to look at the Operation 19 Verbasco written submissions, tab 6, paragraph 6.</p> <p>20 That describes, I take it accurately -- but you must 21 tell me -- the process which is being undertaken at 6(i) 22 onwards. Take a moment, but is that correct?</p> <p>23 MS MCGAHEY: Sir, I don't have a detailed knowledge of the 24 Operation Verbasco process. I don't doubt it for one 25 moment.</p> <p style="text-align: center;">Page 43</p>
<p>1 the situation in Ukraine does not deteriorate 2 significantly, we could provide the material by the end 3 of June 2022. I understand that that is not something 4 that you are going to want to hear, sir, but again, 5 there is no point in my making a promise or giving 6 an indication that I don't think we can actually keep, 7 however hard we try.</p> <p>8 If you would like further information about the 9 reasons for the proposed timetable, I can address you 10 further in a closed session but not in this one.</p> <p>11 THE CHAIRMAN: Yes.</p> <p>12 MS MCGAHEY: Provisionally, sir, our suggestion might be 13 that we would provide disclosure of this material by the 14 end of June 2022, possibly with a further open hearing 15 towards the end of July.</p> <p>16 THE CHAIRMAN: Right.</p> <p>17 MS MCGAHEY: Sir, unless I can assist you further now --</p> <p>18 THE CHAIRMAN: I think you might a little, Ms McGahey.</p> <p>19 You need to remember that I haven't seen the closed 20 submissions, and I am very conscious that they may 21 contain answers, some of the answers or partial answers, 22 to some of the questions that I am about to flag up, 23 which are going to have to be met at some stage. Nor do 24 I expect them to be answered here. But I think it is 25 perhaps worth just saying what seems to be the position</p> <p style="text-align: center;">Page 42</p>	<p>1 THE CHAIRMAN: The important thing is that what is 2 happening, according to that -- it is conveniently 3 subdivided -- is that every document is being reviewed 4 for security sensitivity before there is any question of 5 even identifying it to the inquiry. Is that right?</p> <p>6 MS MCGAHEY: Yes. That is certainly right on our team and 7 I am sure it is in the Verbasco team.</p> <p>8 THE CHAIRMAN: Yes, all right.</p> <p>9 That prompts this question, which you need not 10 answer necessarily -- you may not be able to answer in 11 an open hearing, but is one to which the inquiry is 12 going to have to have an answer. Which is: given the 13 importance of security sensitivity, why does it come 14 before relevance? If the documents are not relevant, 15 they will not figure and the need for a security 16 assessment will not arise. Does it follow, perhaps it 17 doesn't, that there is a risk that this very thorough 18 security review, undertaken not before documents are 19 made public -- there is no question of that at this 20 stage -- all that's in question is the document being 21 provided to an inquiry, to me effectively?</p> <p>22 You have made the point that assessing their 23 relevance has taken in the past a little time by the 24 inquiry team. The sooner they get started, the better. 25 What I need some help with at some stage is why it is</p> <p style="text-align: center;">Page 44</p>

<p>1 necessary that there is a comprehensive security 2 assessment of everything, even before they are shown to 3 the inquiry. Not before a decision is made about 4 whether they are open or closed -- that obviously has to 5 happen -- but before they are even shown to the inquiry. 6 The purpose might be to flag up any likely need for 7 redaction, to flag up what is likely to be open and what 8 is likely to be closed, it might be to identify suitable 9 gisting which the owners of the document, with the 10 assistance of the specialists, want to suggest. That 11 too one can readily understand might be appropriate, but 12 it doesn't appear to be what is happening, because if 13 you look at the Verbasco chronology, as it were, you 14 will see that what is happening apparently is that the 15 initial security review is made, then the idea is that 16 the documents come to the inquiry team for a decision 17 about relevance. Then they go back, to the extent that 18 they are relevant, for consideration of gisting or 19 redaction. 20 That may be essential, but you are going to have to 21 persuade me why. 22 All that may not matter if, in the end, the time 23 involved is going to be the same and that may or may not 24 be so, but at some stage, and principally I imagine at 25 the closed hearing which is coming, I want to put you on</p> <p style="text-align: center;">Page 45</p>	<p>1 no closed material relating to a specific issue or 2 because such closed material as there was could be 3 prepared before you dealt with the particular topic in 4 open. 5 Again, sir, it was a very tentative suggestion and 6 I do recognise the practical implications of it. 7 THE CHAIRMAN: I would like you to keep it under review, as 8 I shall, because it is possible, perhaps to sever the 9 issues. The question which matters is whether by doing 10 so you make any saving of time. The further back the 11 inquiry goes, the more easy it may be to sever issues 12 but certainly insofar as what happened in Salisbury and 13 subsequently in Amesbury are concerned, at the moment 14 I am having real difficulty in seeing whether it would 15 help to deal with that first on open material and then 16 with the prospect of having to go back to do it again on 17 subsequently revealed closed material, but let's keep 18 that alive and open. 19 All right, is there anything else you want to say? 20 MS MCGAHEY: No, thank you, sir. 21 THE CHAIRMAN: Ms McGahey, thank you very much indeed. It 22 is appreciated, even if it leaves a lot of unresolved 23 questions. 24 Mr Beer? 25 MR BEER: Good morning, sir. Can you see and hear me?</p> <p style="text-align: center;">Page 47</p>
<p>1 notice, and I am going to need a very detailed 2 explanation of precisely why it is thought that nothing 3 can even be shown to me until there has been a thorough 4 sensitive security screening, as it were, because the 5 question of relevance, on the face of it, ought to be 6 capable of determination before that happens. 7 Do you want to say anything about that now or would 8 you rather wait? 9 MS MCGAHEY: Sir, thank you for that indication. I can say 10 that it is addressed in our closed submissions and I can 11 provide you with further details in a closed hearing. 12 THE CHAIRMAN: Right. Well, you are going to have to, 13 Ms McGahey but no doubt you have thought about it. 14 The other question is this question of possible 15 severance of issues. I am bound to say, on the face of 16 it, the idea of severing the issues so as to accelerate 17 the process has its attractions but it does seem, 18 doesn't it, very difficult to see how one could address 19 as it were exactly what happened, first by way of open 20 material, with a view to perhaps having to go back to it 21 in the light of subsequently revealed closed material. 22 That means you are going to have to do the thing twice, 23 doesn't it? 24 MS MCGAHEY: Sir, it may be that risk could be avoided in 25 respect of particular topics, either because there was</p> <p style="text-align: center;">Page 46</p>	<p>1 THE CHAIRMAN: Yes, thank you. 2 MR BEER: Excellent. 3 Could I address two issues then on behalf of 4 Operation Verbasco, which, as you know, is the joint 5 operation set up for the purposes of the inquest and now 6 the inquiry, between the MPS and Counter Terrorism 7 Policing South East, in particular to manage the process 8 of disclosure. 9 The two issues are, firstly, the progress that has 10 been made in disclosing material to the inquiry legal 11 team and in particular a partial response to the 12 question that you have just asked Ms McGahey. 13 Then, secondly, the production of a document at the 14 request of the inquiry legal team that sets out in 15 narrative format a sequence of events that is 16 cross-referenced to the underlying material. 17 THE CHAIRMAN: Yes, a police report, in other words? 18 MR BEER: Yes -- well, normally the police would write it 19 for themselves, but here there has been significant and 20 very helpful assistance by the inquiry legal team as to 21 the coverage of the document. 22 Can I address the things in two ways then, please. 23 Firstly, the progress on disclosure. We have set 24 out in paragraphs 6 to 13 of our written submissions, 25 insofar as we are able to do so in open, the disclosure</p> <p style="text-align: center;">Page 48</p>

<p>1 process which you have just highlighted in paragraph 2 6(i) to (vi), and then the progress that has been made 3 to date and then an estimate of how long it will take to 4 complete the first part of stage 1 of the process. 5 You will have seen that both forces recognised at 6 an early stage the need for unprecedented resources to 7 be deployed and earmarked for this investigation. And 8 in particular the disclosure exercise, the setting up of 9 Operation Verbasco, the recruitment of a very large 10 number of specialist and highly vetted officers to it. 11 When we came before Baroness Hallett in September of 12 last year, the number I think of the team stood at 35 13 and is now scheduled to grow to 60, because an extra 14 £1.3 million of money has been dedicated just to the 15 staffing costs. We will be able to tell you something 16 in closed as to the proportion of officers in Counter 17 Terrorism Policing South East that are given over to 18 assisting your inquiry, as opposed to protecting the 19 public from harm. 20 You will have seen some 22,000 of 55,000 documents 21 have already been scheduled by the team. It is on the 22 basis of that work that is already being done that we 23 have been able to forecast that it will take until the 24 end of the year to complete that part of stage 1. In 25 very frank terms, it took six months to do 40 per cent</p> <p style="text-align: center;">Page 49</p>	<p>1 MR BEER: The idea -- you will have seen that paragraph 6 2 contains the important words, "As approved by 3 Baroness Hallett and the inquiry legal team". Of course 4 there is no particular magic to that and that is not 5 a good enough reason not to have another look at whether 6 this was the right approach to take, but the idea was 7 that it would not be necessary for everything to have 8 the full panoply of review. 9 THE CHAIRMAN: Right. 10 MR BEER: Therefore one oughtn't to apply the whole process 11 to the whole of the data set. You will know, for 12 example, that we have disclosed 3,500 documents to your 13 inquiry legal team that have gone through the process 14 and your legal team have given onward disclosure of 200 15 of them. So the process has worked to the extent that 16 we have been able to disclose a relatively large volume 17 of material, and that is obviously awaiting processing 18 by your team. 19 There is a reason that I can give in open for this 20 process to be given. 21 There is a second reason that will have to await 22 closed submissions. 23 THE CHAIRMAN: I understand. 24 (Inaudible) but you have made it clear now, and I am 25 grateful.</p> <p style="text-align: center;">Page 51</p>
<p>1 and therefore it is going to take another eight or nine 2 months to do the remaining 60 per cent. 3 THE CHAIRMAN: That is making a list, is it? 4 MR BEER: No, it is beyond making a list. It may be that 5 (i) in paragraph 6, you have taken from that that it is 6 making a list. In fact, and this is a partial answer to 7 your question, which was: what are the reasons for 8 looking at sensitivity before relevance? Because 9 conventionally, one might do it the other way round. 10 There are two answers to it. One I can give in 11 open, the other which will have to await the closed 12 hearing. 13 The answer is this was three police investigations, 14 essentially, each conducted separately but with overlap 15 and obviously exchange of information between them, but 16 the fact that there were three police investigations has 17 gathered, required to gather together, disparate sources 18 of materials on different systems and in different 19 repositories. One task is cataloguing it, essentially, 20 listing it out, to know the sum of the whole. The 21 purpose of this exercise at this part of stage 1 also 22 includes: what material can have a very light touch 23 review for the purposes of onward disclosure? Is not 24 the subject of a full security review by HMG. 25 THE CHAIRMAN: Yes.</p> <p style="text-align: center;">Page 50</p>	<p>1 MR BEER: Can I turn now to the statement of events. 2 The production of a statement of events in narrative 3 format, supported by detailed cross-references to 4 underlying material, was the idea of your inquiry legal 5 team. It was initially described as a corporate witness 6 statement, the idea seemingly being to mirror the 7 approach taken in some other large inquests, by which 8 a senior investigating officer maps out for the court, 9 and in particular a jury, at the beginning of the 10 inquest the entire picture that is disclosed by the 11 documents and the witnesses before hearing evidence from 12 the individual witnesses themselves. That was in 13 particular at a stage when it was thought that this 14 might of necessity be a jury inquest. 15 The inquiry legal team have more recently accepted 16 that such a corporate witness statement isn't necessary 17 or appropriate in the inquiry, but have said that the 18 production of a document in report form would 19 nonetheless assist in the disclosure process, ie to use 20 the document as a vehicle to promote earlier disclosure, 21 ie to identify material that is of heightened relevance 22 and thereby ensure that it goes into the disclosure 23 process sooner rather than later. 24 There have been a series of meetings between the 25 inquiry legal team and Operation Verbasco over the last</p> <p style="text-align: center;">Page 52</p>

<p>1 six months, and in particular over the last few months, 2 led by counsel, the latest of which occurred on 3 Wednesday of this week. In the course of those 4 meetings, the inquiry legal team has reviewed iterative 5 drafts of the narrative report of events, as I am going 6 to call it, and made helpful suggestions, both as to the 7 issues covered and as to the format of the document. 8 It is well advanced, it goes into a good degree of 9 detail on the topics that we have been asked to cover 10 and is cross-referenced to underlying material by 11 hundreds of footnotes. 12 We have suggested in our written submission that the 13 report and the underlying material would be likely to be 14 in a form that could be submitted to you formally before 15 the summer vacation. We suggested 29 July as being that 16 date, but were of course happy for you to view, if you 17 wish, further iterative drafts as they developed. 18 We should say the inquiry ought to be aware that 19 there are some areas where the underlying material is 20 not yet in a state where it can be incorporated and 21 there are some areas where there are real concerns that 22 the ongoing disclosure exercise may undermine or put 23 a different colour on matters that are currently 24 asserted in the statement. 25 We must be obviously particularly careful, based on</p> <p style="text-align: center;">Page 53</p>	<p>1 Firstly, should the inquiry legal team take 2 a different turn and ask for additional or other issues 3 to be addressed in the report in the coming weeks, that 4 may affect the timescale of the delivery of even the 5 draft. 6 Secondly, and more importantly, the report and the 7 underlying material need to be reviewed by Ms McGahey's 8 clients before disclosure of it to the core participants 9 in the inquiry can occur, to determine which of the 10 information in the report and the underlying documents 11 ought in HMG's view to be open or closed. 12 That process, and how quickly it can be completed, 13 is a matter for HMG and not something over which 14 Operation Verbasco has any control. What I can say, 15 however, is that the team has already sent the footnoted 16 material to HMG, so that it can get on with the process 17 of considering whether it or some of it can be disclosed 18 openly. That has already occurred. The material that 19 sits behind the hundreds of footnotes. 20 Your team in their submissions suggested that both 21 processes, report and underlying material, be ready for 22 stage 1 disclosure by 1 June, not 29 July, ie two months 23 earlier. We had suggested 29 July because we 24 anticipated how long it might take HMG to process the 25 disclosure that was given to it. We can provide by way</p> <p style="text-align: center;">Page 55</p>
<p>1 past events, on the publication of a document, even if 2 it is produced by a British police service, which is 3 independent of Government, that other parties will seek 4 to allege inaccuracies or errors in it, as has happened 5 in the past. Therefore, we are particularly cautious to 6 ensure that the report is draft and provisional only 7 until the disclosure exercise has reached its end. 8 THE CHAIRMAN: I understand that perfectly well, Mr Beer, 9 but just pause there for a moment. That's a powerful 10 reason for not allowing the thing into the public domain 11 until it is finished -- 12 MR BEER: Yes. 13 THE CHAIRMAN: -- but is it a reason for not providing it to 14 the inquiry until then? 15 MR BEER: No, it is not. As I have said, we are very happy 16 to provide it and the underlying material, and we said 17 29 July -- I will come back to that date in a moment, 18 because we have a proposal or a submission to make to 19 you, sir. 20 THE CHAIRMAN: All right. 21 MR BEER: That was just a caveat as to the status of the 22 document, really, and to explain the caution as to the 23 treatment of some of the statements within it. The 24 timescale that I have proposed ought to be caveated in 25 two ways.</p> <p style="text-align: center;">Page 54</p>	<p>1 of stage 1 disclosure to you and your team the report by 2 that earlier date, 1 June, but we can't say that we can 3 provide the underlying documents, the footnoted 4 documents, because that is not a matter within our 5 control. 6 THE CHAIRMAN: Because of the Government's necessary 7 security review? 8 MR BEER: Exactly so. 9 THE CHAIRMAN: All right. 10 MR BEER: I hope that is helpful, sir. 11 As I have said, we have already provided the 12 documents to HMG, so we didn't wait for the outcome of 13 the hearing today. 14 THE CHAIRMAN: Thank you very much indeed. 15 Is there anything else you want to add, Mr Beer? 16 MR BEER: No, thank you very much, sir. 17 THE CHAIRMAN: That is very helpful. Thank you. 18 Mr Blake, do you want to add anything or do you 19 simply stand by what Mr Beer has told me? 20 MR BLAKE: You can take it that I agree with everything that 21 Mr Beer has said, and probably everything he hasn't 22 said. 23 THE CHAIRMAN: That is very delphic, thank you very much. 24 Mr Beggs, are you in a different position? 25 MR BEGGS: (Inaudible) and the necessary accounts, but all</p> <p style="text-align: center;">Page 56</p>

<p>1 the preparatory work is in process.</p> <p>2 If you want any more detail, sir, I can give it to</p> <p>3 you but I hope the written submissions satisfy you as to</p> <p>4 what has been done.</p> <p>5 THE CHAIRMAN: I can understand where you are from the</p> <p>6 written submissions, Mr Beggs. I missed the beginning</p> <p>7 of what -- the machine cut out the beginning of what you</p> <p>8 said, but I think I have enough, thank you very much.</p> <p>9 Unless there is any comment that you want to make on</p> <p>10 the conversations that there have been over the last</p> <p>11 half hour or so, I needn't trouble you any further.</p> <p>12 MR BEGGS: Thank you, sir.</p> <p>13 THE CHAIRMAN: Thank you very much indeed, Mr Begs.</p> <p>14 Ms Dolan, you will not be affected by this, I don't</p> <p>15 suppose. Do you want to say anything?</p> <p>16 MS DOLAN: My Lord, can you hear me?</p> <p>17 THE CHAIRMAN: Yes.</p> <p>18 MS DOLAN: My Lord, no, I don't need to say anything,</p> <p>19 I think my client is the only one who has completed</p> <p>20 phase 1 and phase 2 disclosure, so we have nothing more</p> <p>21 on disclosure and indeed you need not come back to me,</p> <p>22 we are neutral on how the inquiry proceeds and whether</p> <p>23 it is in stages, so I don't think I will need to trouble</p> <p>24 you with any submissions on any other matter, thank you.</p> <p>25 THE CHAIRMAN: You had better bask in your position,</p> <p style="text-align: center;">Page 57</p>	<p>1 position, because it goes without saying that there is</p> <p>2 an enormous delay here, and so in considering</p> <p>3 disclosure, as one is at the moment, one understands,</p> <p>4 the family understand, the security implications,</p> <p>5 understand the international pressures that are put upon</p> <p>6 Government at the moment. However, the original</p> <p>7 incident affecting their family was in 2018. 2018, you</p> <p>8 may remember, it is in the Government submissions, there</p> <p>9 was a flurry of activity by Government through documents</p> <p>10 and part of the product of that exercise, which only</p> <p>11 took three or four months in 2018, was in fact the</p> <p>12 Prime Minister's statement on 5 September 2018,</p> <p>13 a detailed and long statement to the House of Commons.</p> <p>14 It wasn't the only one, but it was the main one. It had</p> <p>15 a lot of detail in it. Some of it is reproduced in the</p> <p>16 Government's submissions at paragraph 8, and talks about</p> <p>17 the devastating toxic effect and so on and about the</p> <p>18 undermining of national security.</p> <p>19 We say there must have been, at a fairly early</p> <p>20 stage, an assembly of documents necessary to ensure that</p> <p>21 the Prime Minister was in a position to make a public</p> <p>22 statement without endangering national security.</p> <p>23 I appreciate that is a long time ago, before even</p> <p>24 the inquest, but they must have known then there was</p> <p>25 going to be an inquest and an inquest was opened.</p> <p style="text-align: center;">Page 59</p>
<p>1 Ms Dolan, thank you very much indeed. Understood.</p> <p>2 Mr Bethell, I don't suppose there is anything you</p> <p>3 want to contribute at this stage, is there?</p> <p>4 MR BETHELL: My Lord, if you can see and hear me, I have</p> <p>5 nothing further to add to our written submissions.</p> <p>6 THE CHAIRMAN: That is very helpful. Thank you very much</p> <p>7 indeed.</p> <p>8 All right, now, Mr Mansfield, whether there is</p> <p>9 anything that you can usefully say about this, I don't</p> <p>10 know, but here is your opportunity if you want to make</p> <p>11 short submissions.</p> <p>12 We are running fairly tight for time.</p> <p>13 MR MANSFIELD: Sir, yes, very aware. Can you hear, I am</p> <p>14 just waiting --</p> <p>15 THE CHAIRMAN: Yes, I have you larger than life,</p> <p>16 Mr Mansfield.</p> <p>17 MR MANSFIELD: I am not sure that is the best way to be,</p> <p>18 however, I will be brief.</p> <p>19 There are two issues upon which the family would</p> <p>20 wish to express a view at this point. They are both</p> <p>21 related, one is disclosure and one is severance of the</p> <p>22 issues.</p> <p>23 May we in short form endorse everything Mr O'Connor</p> <p>24 has said and endorse with thanks the observations you</p> <p>25 yourself have made this morning about the family's</p> <p style="text-align: center;">Page 58</p>	<p>1 Although now, after judicial review and so on, it has</p> <p>2 been converted into an inquiry, and they may not have</p> <p>3 foreseen all of that.</p> <p>4 However, the pressure to ensure that this matter is</p> <p>5 dealt with with alacrity, and may we adopt the</p> <p>6 approach: relevance first, not security. Of course</p> <p>7 I cannot speculate as to the reasons that might be given</p> <p>8 in the closed section, but nothing in the open section</p> <p>9 seems to be convincing in terms of why it is taking this</p> <p>10 length of time when, if it is necessary to brief</p> <p>11 a politician, it can happen much quicker.</p> <p>12 We say we do endorse the pressure being placed upon</p> <p>13 the Government and we are very grateful to your</p> <p>14 predecessor and to yourself, the family is, on that</p> <p>15 issue.</p> <p>16 I pass to the second issue, severance. We say,</p> <p>17 endorsing Mr O'Connor's approach, unworkable. We say it</p> <p>18 is unworkable for reason -- we understand the Government</p> <p>19 may wish to alleviate the problems facing the family.</p> <p>20 However, there may be other reasons and I will come to</p> <p>21 the other reasons in one moment. Primarily, one only</p> <p>22 has to look at the topics that they presently suggest</p> <p>23 could be dealt with in open session, first of all, based</p> <p>24 on open material, well that is going to lead to very</p> <p>25 interesting --</p> <p style="text-align: center;">Page 60</p>

<p>1 THE CHAIRMAN: Mr Mansfield, you may be pushing at an open 2 door. You have heard Ms McGahey take on board 3 Mr O'Connor's concerns about doing the exercise twice. 4 MR MANSFIELD: Yes, well then I am in a position to give 5 lots of examples of where as it were plough into the 6 ground the moment you start dealing with any of the 7 topics. 8 Can I just make a postscript then at this stage? 9 THE CHAIRMAN: Please. 10 MR MANSFIELD: The postscript is this, that actually when 11 you look at the Government's submissions, which are set 12 out in 23 onwards, what is interesting is the way in 13 which at paragraph 25 they extract a topic only for the 14 closed session. This is why we say one has to look very 15 carefully at what the Government may be doing here, and 16 the topic they withdraw from the open session is whether 17 the authorities took appropriate precaution before the 18 months in 2018. 19 That is of importance because that topic was 20 specifically raised by the family and added by your 21 predecessor to the scope, now terms of reference. If 22 you have a moment -- not now -- to look at her ruling on 23 8 April -- 24 THE CHAIRMAN: Yes, I have read it, Mr Mansfield. 25 MR MANSFIELD: -- she makes it very clear that she is</p> <p style="text-align: center;">Page 61</p>	<p>1 sort of thing happening again. 2 Her Majesty's Government have said in their 3 submissions that the need to protect the British public 4 from the threat posed by Russia has never been more 5 acute, and they say that in light of the Ukraine 6 invasion. 7 Since that risk, since that need to protect the 8 British public has never been more acute, there is 9 a corresponding pressing importance of this inquiry 10 making recommendations for changes which protect the 11 public. In our submission, we say that it is important 12 that this inquiry takes place promptly so that any 13 recommendations and changes that it prompts can be put 14 in place and can protect the public. 15 THE CHAIRMAN: Yes, thank you. There are lots of reasons 16 why we need to do it as promptly as we properly can. 17 The question we are on is: what can properly be done? 18 Thank you very much, Mr Straw, it is an important 19 point and I have it. 20 Very well, Mr O'Connor? 21 MR O'CONNOR: Sir, I am grateful. I am sure you have been 22 assisted by all of the submissions you have heard. 23 I don't want to reply in any detail, but perhaps just to 24 take stock of where we are regarding the two directions 25 that we invited you to make. In case there is any more</p> <p style="text-align: center;">Page 63</p>
<p>1 convinced by the argument that Dawn Sturgess effectively 2 is a member of the British public, who should have been 3 protected as much as the burghers of Salisbury and 4 Amesbury and a wider remit, which is particularly 5 important because this very morning Moscow is saying 6 that the United Kingdom is the number 1 target. 7 We say to withdraw that, when the inclusion came 8 from the family in the first place, is unfortunate and 9 we say one has to keep a very wary eye on what the 10 Government are trying to do here. I will say no more. 11 THE CHAIRMAN: No, you probably better not. I have the 12 point, thank you very much. 13 Mr Straw? 14 MR STRAW: Thank you, can you see and hear me? 15 THE CHAIRMAN: Just coming up I think, but I can hear you. 16 Go on, here we are. 17 MR STRAW: Thank you. 18 I would just like to add one quick point, which is 19 the family do not wish to sacrifice the thoroughness and 20 effectiveness of the inquiry for the purposes of speed. 21 However, one point that I am sure is at the top of your 22 mind, and one of reasons why it is important this 23 inquiry concludes as promptly as it possibly can do, is 24 that one of the primary purposes of the inquiry is to 25 make recommendations which protect the public from this</p> <p style="text-align: center;">Page 62</p>	<p>1 that can be said this morning, and in any event so that 2 we know where we start for the purposes of the closed 3 hearing. 4 Taking them in turn, sir, the first direction that 5 we proposed was that HMG should provide stage 1 6 disclosure and those marked-up documents, that were the 7 subject of the requests going back to October last year, 8 by the end of April. You have heard Ms McGahey say that 9 that will not be possible, it will take an extra two 10 months to the end of June. That is something that no 11 doubt you can consider further at the closed hearing. 12 Sir, I have a little more to say about the second 13 direction we proposed, just for the sake of clarity. 14 That, you will recall, referred to the police report -- 15 there are a number of different terms that have been 16 used but we all know what we mean. 17 Sir, we would suggest it is quite important for you 18 to really bear in mind the point that Mr Beer made about 19 the division of labour relating to that document. As 20 Mr Beer explained, it is Operation Verbasco's role, as 21 it were, to draft that report, with the suggestions that 22 we have been making and to drive that process to its 23 completion. Then it is a matter for HMG to review the 24 report itself and the underlying documents and determine 25 questions of sensitivity.</p> <p style="text-align: center;">Page 64</p>

<p>1 At one point Mr Beer said that we had envisaged in 2 our proposals that both of those two processes should be 3 finished by 1 June, which was the date we gave. That is 4 not quite right, because we understand that, in terms of 5 the Operation Verbasco part of that exercise, it is 6 an ongoing process, there will be amendments that are 7 made going forward, as they review their documents. So 8 we were not asking for the final report to be finished 9 by the end of June, which may be what Mr Beer had 10 intended he needed until the end of July to do. What we 11 said in our submissions was an advanced draft, indeed 12 an advanced draft such as, as you know, was provided to 13 us this week, together with the underlying documents.</p> <p>14 Really it seems to us that the work that needs to be 15 done in order to comply with the direction that we have 16 proposed is very largely work that needs to be conducted 17 by HMG, because the draft report is there or 18 thereabouts, the documents, as Mr Beer has said, have 19 already been provided to HMG. It was with that in mind, 20 I mean the position has been made a little clearer this 21 morning, but it was with that in mind that we 22 deliberately set the two dates in sequence rather than 23 at the same time. Whereas we had hoped that the HMG 24 material would be available by 29 April, we set 1 June 25 as the suggested deadline for the police material,</p> <p style="text-align: center;">Page 65</p>	<p>1 the precise terms of it matter. But, on the face of it, 2 unless there are powerful reasons for not doing it, 3 I would anticipate giving that direction in relation to 4 that material at the closed hearing.</p> <p>5 What direction is given in relation to the various 6 sections of documents for which you have made specific 7 requests to Her Majesty's Government will have to be 8 considered at that hearing as well, but I hope that we 9 shall be emerging from that hearing with clear 10 directions for a specific date for each of those two 11 categories of material.</p> <p>12 That, I think, is as far as we can take it now. 13 I have raised quite deliberately the concerns that 14 appear on the face of it to the new reader, and I wait 15 to hear in more detail, in the closed hearings, the 16 things which I can't be told now, but the overall time 17 span is a matter of concern, obviously.</p> <p>18 The next topic on the agenda is the restriction 19 orders of notices. That is further down the line, isn't 20 it?</p> <p>21 MR O'CONNOR: Yes, sir, that is right.</p> <p>22 There was one last section I proposed to deal with 23 and as you say, sir, we can deal with it much more 24 shortly. In fact I was going to mention briefly the 25 question of witness evidence, which is not formally on</p> <p style="text-align: center;">Page 67</p>
<p>1 conscious that the same HMG staff would be reviewing the 2 police material for sensitivity as had been doing their 3 own.</p> <p>4 I am sure you will wish to hear from Ms McGahey, 5 either this morning if she can or certainly in the 6 closed hearing, as to how long they will need to conduct 7 their part of the exercise, because as I understand it, 8 as I say, from Mr Beer, their input into preparing 9 an advanced draft and identifying the documents is not 10 something that they cannot do within that timescale. 11 There will be a question as to whether HMG can or not 12 and if they can't, how long they need.</p> <p>13 That really is important because the whole reason 14 that we have asked this document to be prepared and the 15 underlying documents to be gathered is that those are 16 the core factual documents. It was our intention, it is 17 our intention, that dealing with those documents first 18 will help to drive the whole process, and so that is why 19 those dates are important in our submission.</p> <p>20 THE CHAIRMAN: Right. I have taken on board Mr Beer's 21 indication that the Verbasco team can provide the 22 stage 1 draft report by 1 June. What I contemplate 23 doing is asking you to frame a suitable direction, so 24 that I can give that direction at the next closed 25 hearing. I don't want to do it on the hoof now, because</p> <p style="text-align: center;">Page 66</p>	<p>1 the agenda but it is within our written submissions, 2 simply to advert to the fact that we are proposing to 3 issue rule 9 of the Inquiry Rules requests for witness 4 evidence in the coming weeks. That is an exercise that 5 we hope will be well underway by the time of the next 6 hearing, so that it is something you can hear 7 submissions about at the next hearing.</p> <p>8 As you say, sir, and I have mentioned, we all know 9 that there is sensitive material in this case and 10 therefore that there will have to be a closed process. 11 The gateway, to use that word, to a closed process 12 provided under the Act can be either a restriction order 13 that you make or a restriction notice made by the 14 Secretary of State, either of which, as it were, 15 authorise a closed process in an inquiry.</p> <p>16 Exactly how in this inquiry that process is managed, 17 whether it is entirely by way of restriction order, 18 entirely by way of restriction notice or whether there 19 is a combination of the two, is something that we will 20 have to come to. Certainly restriction order 21 applications and your consideration and determination of 22 them will itself be a time consuming exercise, but as 23 you say, sir, really, until we have some material that 24 can be the subject of those orders or applications, it 25 is a little premature to discuss that matter at any</p> <p style="text-align: center;">Page 68</p>

<p>1 length.</p> <p>2 I hope it is obvious, that the directions that we</p> <p>3 propose you make for service of marked-up copies of the</p> <p>4 documents that we had requested and the police report</p> <p>5 and the underlying documents, were intended as it were</p> <p>6 as a staging post along the way, because once we have</p> <p>7 those materials it will be at least apparent what HMG is</p> <p>8 saying is suitably the subject of either restriction</p> <p>9 notice or restriction order, so it is at that stage that</p> <p>10 you can make directions requiring in effect either</p> <p>11 orders, applications for orders to be made or a notice</p> <p>12 to be made.</p> <p>13 THE CHAIRMAN: Yes.</p> <p>14 MR O'CONNOR: That is the way we see it, but it does seem to</p> <p>15 us, as you have suggested, that that is really a matter</p> <p>16 for another day, once we have gone a little bit further</p> <p>17 down the line.</p> <p>18 We do mention in paragraph 23 of our submissions,</p> <p>19 a generic issue of which we are aware relating to the</p> <p>20 extent to which the names of individuals in documents</p> <p>21 that are to be disclosed should be the subject of</p> <p>22 protection, redaction, or not. There is a limited</p> <p>23 amount I can say about that in open and I propose that</p> <p>24 we develop that more in the closed hearing, but I raise</p> <p>25 it now because it is possible, slightly as an exception</p> <p style="text-align: center;">Page 69</p>	<p>1 a decision on the date of the next hearing following the</p> <p>2 closed hearing.</p> <p>3 THE CHAIRMAN: Do I need to make a restriction order in</p> <p>4 order to cover the proceedings of the next closed</p> <p>5 hearing, which must take place within the next three or</p> <p>6 four weeks?</p> <p>7 MR O'CONNOR: My provisional answer to that question would</p> <p>8 be no, but perhaps you will allow us to give that some</p> <p>9 more thought and possibly discuss it with the other</p> <p>10 teams involved. We will certainly make sure that the</p> <p>11 matter is procedurally dealt with as it should be,</p> <p>12 but --</p> <p>13 THE CHAIRMAN: You can give that thought.</p> <p>14 I agree, I think, that beyond saying two things.</p> <p>15 That there must be a closed hearing as soon as</p> <p>16 possible -- I don't mean tomorrow, but within a matter</p> <p>17 of a few weeks -- and that at that we must investigate</p> <p>18 the vexed question of the assembly of material and the</p> <p>19 timetable.</p> <p>20 MR O'CONNOR: Yes.</p> <p>21 THE CHAIRMAN: Secondly, our target ought to be that there</p> <p>22 is a further open hearing in the summer, by which I mean</p> <p>23 June or July, if it proves to be futile then I shall not</p> <p>24 for a moment insist on everybody coming, but that is the</p> <p>25 aim and we will see how we get on.</p> <p style="text-align: center;">Page 71</p>
<p>1 to what I have just said, but it may be -- because that</p> <p>2 issue is a generic issue -- one that we can make at</p> <p>3 least some progress with, perhaps in parallel to the</p> <p>4 work I have already described. Again, I am sorry if</p> <p>5 that is also a little delphic, but it is a point I think</p> <p>6 it is important that we at least raise that issue in</p> <p>7 these open hearings, but it is a matter to be explored</p> <p>8 further in the closed hearing.</p> <p>9 THE CHAIRMAN: Yes, I understand that, Mr O'Connor. It is,</p> <p>10 as you say, both a specific and a generic issue in</p> <p>11 relation (Inaudible), and there may well generic</p> <p>12 directions that can be given.</p> <p>13 MR O'CONNOR: Yes.</p> <p>14 So the very last point --</p> <p>15 THE CHAIRMAN: Go on?</p> <p>16 MR O'CONNOR: I was going to mention our proposal is that</p> <p>17 there needs to be another hearing, the timing of that</p> <p>18 will depend entirely, I think, on the decisions you make</p> <p>19 about disclosure orders and so on, because the two need</p> <p>20 to be combined. We had suggested June, but there will</p> <p>21 be, perhaps, little point in having a hearing in June</p> <p>22 if, as Ms McGahey suggests, some of the work that was</p> <p>23 intended to lead into that hearing will not have been</p> <p>24 done by then. We propose, sir, that you simply leave</p> <p>25 that matter to one side for the moment and make</p> <p style="text-align: center;">Page 70</p>	<p>1 MR O'CONNOR: Sir, yes.</p> <p>2 THE CHAIRMAN: All right.</p> <p>3 Does anybody want to email Mr Smith with a request</p> <p>4 to add anything to what has proceeded, because as far as</p> <p>5 I can see we have dealt now with the matters which had</p> <p>6 to be dealt with this morning?</p> <p>7 I will pause to give you the chance to do that.</p> <p>8 While you are doing it, if you are, I want to say thank</p> <p>9 you to all of the people who have contributed this</p> <p>10 morning. It is extremely helpful to me and I hope it is</p> <p>11 helpful to those interested in the proceedings who have</p> <p>12 been following it. Some of it is inevitably a little</p> <p>13 bit delphic, but what is clear is that everybody is</p> <p>14 doing their best to make this happen. Insofar as I can</p> <p>15 contribute to that, I propose to make certain that they</p> <p>16 carry on doing so.</p> <p>17 Mr Smith reports that nobody is itching to make</p> <p>18 further submissions to me. With that, I will close the</p> <p>19 proceedings. Thank you very much indeed. I will see as</p> <p>20 many of you as I properly can in a closed hearing as</p> <p>21 soon as we can arrange it, and I shall hope to have</p> <p>22 a further open hearing in the summer.</p> <p>23 Thank you very much.</p> <p>24 MR O'CONNOR: Thank you, sir.</p> <p>25 (12.30 pm)</p> <p style="text-align: center;">Page 72</p>

<p>1 (The hearing concluded)</p> <p>2</p> <p>3</p> <p>4</p> <p>5</p> <p>6</p> <p>7</p> <p>8</p> <p>9</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p> <p>Page 73</p>	
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