

<p>1 Friday, 24 March 2023 2 (10.30 am) 3 Housekeeping 4 THE CHAIR: Good morning. Thank you all for coming, whether 5 in person or remotely. I hope the remote arrangements 6 are as convenient as they sensibly can be. 7 This, as the parties know, is a further preliminary 8 hearing in a planned series. The objective of the 9 series is to manage the assembly of the evidence which 10 will be considered in this inquiry and especially it is 11 to manage the separation of that evidence into the part 12 which can be heard in public and the part which can't, 13 because the exposure of it would put people and national 14 security at risk. 15 The very reason why these proceedings take the form 16 of an inquiry under the Inquiries Act rather than the 17 more conventional inquest is that an inquest would be 18 disbarred from considering the confidential material at 19 all. An inquiry can consider it in closed sessions, but 20 it falls to be reviewed and assessed and to contribute 21 to conclusions. 22 So today and at subsequent similar preliminary 23 hearings, there will be more, we are about the business 24 of organising how the confidential evidence is to be 25 separated from the open evidence and then the business</p> <p style="text-align: center;">Page 1</p>	<p>1 in this inquiry, the inquiry that is into the death of 2 Dawn Sturgess. The previous open directions hearing 3 took place in November of last year. 4 If I may deal with just a few preliminary and 5 practical matters before turning to the agenda. 6 First, sir, as you've noted, this is a hybrid 7 hearing. All the advocates are here in court but there 8 are observers, including members of the family and other 9 core participants, who are following on the link. In 10 fact there are two links, one live-link and one with 11 a delay and I will come back to that in a moment. 12 At this stage may I simply emphasise that if anyone 13 who is following remotely has any difficulty with the 14 technology please alert us as soon as possible, the best 15 way to do that is by emailing ... or another member of 16 the inquiry legal team. 17 Sir, second, and in fact returning to the point 18 about the different links, since the last hearing you've 19 adopted a protocol on measures to protect or prevent the 20 disclosure of sensitive information at preliminary 21 hearings of the inquiry. I don't ask you to turn it up, 22 but for the record it's at tab 19 of the bundle. It was 23 circulated to core participants prior to you adopting 24 the protocol and there was no dissent from its 25 provisions. It will, I am sure, be published on the</p> <p style="text-align: center;">Page 3</p>
<p>1 of the provision of the open, as much as possible 2 without putting people at risk, to all the parties. 3 Working out how to achieve this without putting both 4 people and national security at risk is not, I'm afraid, 5 a superficial or a quick process. It takes a good deal 6 of care, but it has to be done and it has to be done as 7 speedily as it safely can. 8 Right, Mr O'Connor. 9 Submissions by MR O'CONNOR 10 MR O'CONNOR: Sir, I appear this morning as counsel to the 11 inquiry with my learned friends Ms Whitelaw and 12 Ms Pottle. 13 The family of Dawn Sturgess and also Charlie Rowley 14 are represented by Mr Mansfield King's Counsel, Mr Straw 15 King's Counsel and Mr Nicholls. 16 The Home Secretary and, more broadly, other 17 Government departments and agencies are represented by 18 Ms McGahey King's Counsel. 19 The Metropolitan Police Service are represented this 20 morning by Mr Moss, Ms Shrimpton and Mr Barth. 21 Thames Valley Police by Mr Beer King's Counsel and 22 Mr Goss. 23 Lastly, the Chief Constable of Wiltshire Police is 24 represented by Mr Beggs King's Counsel. 25 This is in fact the fourth open directions hearing</p> <p style="text-align: center;">Page 2</p>	<p>1 inquiry website in due course. 2 In summary, and in fact similar to the informal 3 measures you adopted at the last hearing, the important 4 points arising from the protocol, simply about how the 5 hearing is going to be conducted, are these. 6 First of all, members of the public and the media 7 who are following the hearing remotely will be doing so 8 by means of a link that is delayed by five minutes. 9 Core participants and legal representatives on the other 10 hand are following by means of a live-link. During the 11 hearing, members of the public and media who are present 12 in the hearing room may not communicate with anyone 13 outside the hearing room by phone, email, instant 14 messaging or any other electronic means. But that's all 15 I was going to say about the protocol. 16 THE CHAIR: I am sure that's understood. I can see that it 17 is, yes. 18 MR O'CONNOR: Moving on, you have received a series of 19 written submissions for this hearing that have been 20 prepared, firstly by us and then by core participants. 21 They are in your bundle at tabs 4 to 9. There is also 22 a note, a very short note, that we prepared I think it 23 was last week. I am told it is now in the bundle at 24 tab 4A. I will be referring to it in a few minutes 25 time.</p> <p style="text-align: center;">Page 4</p>

<p>1 THE CHAIR: All right.</p> <p>2 MR O'CONNOR: Sir, as with previous hearings it's our</p> <p>3 intention to publish all of these written submissions on</p> <p>4 the inquiry website following the hearing, so that</p> <p>5 those, for example, reading the transcript will be able</p> <p>6 to refer to the submissions and, as previously, if any</p> <p>7 one has any objection to any submissions or part of</p> <p>8 submissions being published, they are invited to raise</p> <p>9 that with you when they come to make their oral</p> <p>10 submissions this morning.</p> <p>11 THE CHAIR: Right.</p> <p>12 MR O'CONNOR: There is an agenda that's been prepared for</p> <p>13 this morning's hearing, it's behind tab 1 of your</p> <p>14 bundle. We anticipate that almost all of the oral</p> <p>15 submissions that you will hear this morning will in fact</p> <p>16 be directed towards the third item, which is entitled</p> <p>17 "Path to the substantive hearings". In other words, the</p> <p>18 directions or the completion of the disclosure exercise,</p> <p>19 particular restriction orders and consideration of when</p> <p>20 the substantive hearings may take place.</p> <p>21 And, because the other matters are short, when</p> <p>22 I come in a moment to address you, I am proposing to</p> <p>23 address you on all of agenda items together and then no</p> <p>24 doubt you will invite others to do the same.</p> <p>25 THE CHAIR: Yes, all right.</p> <p style="text-align: center;">Page 5</p>	<p>1 MR O'CONNOR: 19A is where it should be.</p> <p>2 THE CHAIR: 19A is where it is.</p> <p>3 MR O'CONNOR: Thank you.</p> <p>4 Just finally as regards closed hearings, it's right</p> <p>5 to say that arrangements have been made that would</p> <p>6 enable you to conduct a further closed hearing following</p> <p>7 this hearing if you consider it necessary. Certainly</p> <p>8 our working assumption has been that a further closed</p> <p>9 hearing won't be needed, precisely because you had one</p> <p>10 in advance of this hearing, but of course it's open to</p> <p>11 others to invite you to hold such a hearing, and in any</p> <p>12 event it's a matter for you as to whether you think it's</p> <p>13 appropriate in due course.</p> <p>14 That then leads me to the first two agenda items,</p> <p>15 which I propose to take together. That is compliance</p> <p>16 with the directions that you made after the last hearing</p> <p>17 and a disclosure update.</p> <p>18 The directions that you made at the conclusion of</p> <p>19 the November hearing have been published on the inquiry</p> <p>20 website. They are in tab 17 of the bundle. I don't ask</p> <p>21 you to turn them up. In summary those direction</p> <p>22 concerned various steps that were to be taken by HMG,</p> <p>23 Operation Verbasco and Wiltshire Police concerning the</p> <p>24 ongoing disclosure exercise. I am glad to say that</p> <p>25 those directed were all complied with and much more</p> <p style="text-align: center;">Page 7</p>
<p>1 MR O'CONNOR: The final preliminary matter relates to the</p> <p>2 closed hearing that all core participants are aware took</p> <p>3 place prior to this hearing. Previously, you have</p> <p>4 occasionally held short closed hearings following</p> <p>5 an open preliminary hearing so that any closed points</p> <p>6 relating to the matters that have been debated in open</p> <p>7 could be raised with you in that forum.</p> <p>8 On this occasion you considered that it would be</p> <p>9 helpful to hold a closed hearing before this open</p> <p>10 hearing and that was to ensure that you understood all</p> <p>11 of the closed points of detail relevant to the important</p> <p>12 case management decisions that are before you today. In</p> <p>13 other words, the purpose of holding the closed hearing</p> <p>14 was to enable today's hearing to be as effective as</p> <p>15 possible.</p> <p>16 Everyone will understand that much of what was said</p> <p>17 at the closed hearing can't be repeated at this hearing</p> <p>18 today. Having said that, it has been possible to</p> <p>19 prepare an open summary of what took place at the closed</p> <p>20 hearing. That was circulated to core participants a day</p> <p>21 or so ago and again we propose to publish that also on</p> <p>22 the inquiry website in due course, though I believe it's</p> <p>23 been added to your bundle at tab 19A. It's a document</p> <p>24 of two and a half pages.</p> <p>25 THE CHAIR: I know I've seen it, let me check I have it.</p> <p style="text-align: center;">Page 6</p>	<p>1 detail on the detail of that can be found in the</p> <p>2 respective written submissions. I don't go to that now.</p> <p>3 THE CHAIR: I've seen that.</p> <p>4 MR O'CONNOR: I am also pleased to say that what we've been</p> <p>5 describing it as the stage 1 disclosure exercise, in</p> <p>6 other words the provision of material, by HMG and the</p> <p>7 police largely, to your team for a relevance review,</p> <p>8 that process has progressed considerably in recent</p> <p>9 months since the last hearing.</p> <p>10 Again, there is considerable detail on that progress</p> <p>11 to be found in both our written submissions and in the</p> <p>12 written submissions that have been filed in particular</p> <p>13 by the police and by the government, but in summary</p> <p>14 since November of last year at the last hearing, so four</p> <p>15 months or so, stage 1 disclosure has moved from what</p> <p>16 might have been described as a standing start to near</p> <p>17 completion. The removal of the preliminary security</p> <p>18 review unblocked stage 1 disclosure, so that</p> <p>19 Operation Verbasco has been able to deliver all of its</p> <p>20 disclosure, barring some limited material concerning</p> <p>21 international permissions which no doubt Mr Beer will</p> <p>22 address you on separately. That material has been</p> <p>23 delivered in eight batches over the four-month period</p> <p>24 since the last hearing. 41,319 of the 66,000-odd items</p> <p>25 that Operation Verbasco have scheduled were delivered to</p> <p style="text-align: center;">Page 8</p>

<p>1 us for review by 2 March and a final batch with the</p> <p>2 remaining items has been delivered in the last few days.</p> <p>3 So the position there is they have completed --</p> <p>4 THE CHAIR: You now have all of that?</p> <p>5 MR O'CONNOR: We have, sir, other than that small --</p> <p>6 THE CHAIR: Apart from the international material, yes.</p> <p>7 MR O'CONNOR: Our relevance reviews for the first five</p> <p>8 batches of that material -- as I said, there have been</p> <p>9 eight batches. So the first five are already complete</p> <p>10 and the results of those -- that is our indication of</p> <p>11 which documents within those batches are relevant and</p> <p>12 which are not -- we have been returning to</p> <p>13 Operation Verbasco on a rolling basis over the last few</p> <p>14 months.</p> <p>15 During the same period we have been provided with</p> <p>16 over 5,000 documents by Wiltshire Police. Those have</p> <p>17 all been reviewed by us and again the results have been</p> <p>18 returned to Wiltshire Police.</p> <p>19 Again during the same period HMG have delivered</p> <p>20 large tranches of materials from various HMG departments</p> <p>21 for our review. That process is underway. Again we</p> <p>22 have been providing our decisions on that material on</p> <p>23 a rolling basis, in parallel with all that's been going</p> <p>24 on with the police material.</p> <p>25 On the current volume of material we anticipate</p> <p style="text-align: center;">Page 9</p>	<p>1 are required prior to the final hearings.</p> <p>2 As I have mentioned, you have received some detailed</p> <p>3 written submissions in advance of the hearing, initially</p> <p>4 we made submissions, you then had submissions from, if</p> <p>5 you like, the institutional core participants, the</p> <p>6 Government, Operation Verbasco, Wiltshire Police and so</p> <p>7 on. The directions were slightly varied to allow the</p> <p>8 family to receive those submissions and then make</p> <p>9 responsive submissions themselves.</p> <p>10 THE CHAIR: That was helpful.</p> <p>11 MR O'CONNOR: The written submissions you have from the</p> <p>12 family were drafted having seen --</p> <p>13 THE CHAIR: Are responsive.</p> <p>14 MR O'CONNOR: Exactly, they are responsive to those other</p> <p>15 submissions.</p> <p>16 As I have mentioned, we did put in that short note</p> <p>17 last week with the intention of focusing matters</p> <p>18 a little.</p> <p>19 As I have also said, you've had the benefit now of</p> <p>20 hearing closed oral submissions, both from HMG and from</p> <p>21 Operation Verbasco, about the proposed directions and as</p> <p>22 I have said the purpose of that hearing was to enable</p> <p>23 you to hear full open argument on those matters today</p> <p>24 and then to give directions.</p> <p>25 Sir, the written submissions raise of course</p> <p style="text-align: center;">Page 11</p>
<p>1 completing our relevance reviews for all core</p> <p>2 participant material three months after this hearing,</p> <p>3 that's the same period we gave in our submissions we</p> <p>4 filed a few weeks ago. That's roughly by the end of</p> <p>5 June this year.</p> <p>6 We've had a few hearings where there have been</p> <p>7 difficulties brought before you relating to stage 1</p> <p>8 process, but I am glad to say with considerable effort</p> <p>9 and good will on all parts, and I can certainly say</p> <p>10 a lot of work amongst the members of our team, the</p> <p>11 position is a lot rosier today than it has been at</p> <p>12 previous hearings.</p> <p>13 That then brings us to the third item on the agenda,</p> <p>14 which is entitled "Path to substantive hearings", which</p> <p>15 as I have also said is likely to be the focus of the</p> <p>16 submissions that you hear today.</p> <p>17 Sir, at the last hearing in November you made it</p> <p>18 clear that you intended at this hearing to give detailed</p> <p>19 directions for the remaining stages of the disclosure</p> <p>20 exercise and, if possible, to set a date for the</p> <p>21 substantive hearings.</p> <p>22 As I have just explained, since then good progress</p> <p>23 has been made with the stage 1 disclosure process and</p> <p>24 for that reason we submit you are well placed today to</p> <p>25 address stage 2 disclosure and indeed other steps that</p> <p style="text-align: center;">Page 10</p>	<p>1 a number of issues, most regarding the conduct of the</p> <p>2 restriction order process. Unlike in the closed</p> <p>3 hearing, all core participants who want to be are</p> <p>4 present in the room today and I propose to leave much of</p> <p>5 the detail of those points for them to address you on.</p> <p>6 I will though make a few introductory submissions.</p> <p>7 First, by way of context and then addressing the various</p> <p>8 stages that we identify in that further note of last</p> <p>9 week of the process.</p> <p>10 If I may just start with a few words about the</p> <p>11 context, sir, because there is no hiding from the fact,</p> <p>12 indeed we are all acutely aware of the fact that the</p> <p>13 disclosure process in this inquiry is taking an</p> <p>14 exceptionally long time. It is now nearly two years</p> <p>15 since the first pre-inquest hearing before Lady Hallett</p> <p>16 and there is still some way to go.</p> <p>17 On the timings suggested in the written submissions</p> <p>18 we will not be ready for substantive hearings until some</p> <p>19 time around the middle or even the end of next year.</p> <p>20 The impact of this delay on Dawn Sturgess's family</p> <p>21 is explained in the written submissions that have been</p> <p>22 served on their behalf and I am sure that Mr Mansfield</p> <p>23 will return to that theme in his oral submissions. All</p> <p>24 participants in this inquiry and I know you, sir,</p> <p>25 understand the family's desire to complete these</p> <p style="text-align: center;">Page 12</p>

<p>1 proceedings in a timely way.</p> <p>2 It has been said before but it bears saying again:</p> <p>3 this process is taking an exceptionally long time</p> <p>4 because it involves an exceptionally difficult task,</p> <p>5 including dealing with exceptional sensitivities.</p> <p>6 There have, of course, been some disputes about</p> <p>7 precisely how to proceed and there will be more of those</p> <p>8 today. But we can attest to the fact that all involved,</p> <p>9 HMG, the police teams and your team are working hard and</p> <p>10 dedicating considerable resources to this inquiry.</p> <p>11 One way of speeding things up would be to allow</p> <p>12 compromises to be made to the thoroughness or to the</p> <p>13 openness of your investigation, but we know that that is</p> <p>14 something that neither you nor anyone else involved</p> <p>15 would wish.</p> <p>16 Sir, I am going now to turn to the detail and to the</p> <p>17 stages of the process going forward. For that reason,</p> <p>18 may I just ask you to glance at our note that we put in</p> <p>19 last week. It's at tab 4A of your bundle. You will see</p> <p>20 there, sir, that we hope it's helpful just to focus on</p> <p>21 four stages, A, B, C and D, that we set out.</p> <p>22 I am going to start with what I imagine again you</p> <p>23 are likely to hear most about this morning, which is the</p> <p>24 first of those stages, that is what we've described as</p> <p>25 first round of restriction order applications.</p> <p style="text-align: center;">Page 13</p>	<p>1 involved that in the broadest of terms the first round</p> <p>2 restriction order applications must comprise both</p> <p>3 an argument, an application relating to categories of</p> <p>4 sensitivity for you to consider but also, and</p> <p>5 critically, marked redactions in accompanying documents,</p> <p>6 so-called sample documents to demonstrate the</p> <p>7 application of those sensitivities. The way that it's</p> <p>8 put in the HMG submissions at paragraph 4 is so that the</p> <p>9 process can lead to a ruling by you on "the nature and</p> <p>10 category of acceptable redactions that can then be</p> <p>11 applied more generally to documents before stage 2</p> <p>12 disclosure".</p> <p>13 We submit that there are those quite important</p> <p>14 elements of agreement about the first round</p> <p>15 applications.</p> <p>16 The differences perhaps can be reduced to three</p> <p>17 issues.</p> <p>18 First of all, there is a question about the volume</p> <p>19 or the identity of the sample documents that are to be</p> <p>20 chosen.</p> <p>21 Secondly, there is an issue about the way in which</p> <p>22 the restriction order applications are to be made,</p> <p>23 specifically whether draft redacted documents will be</p> <p>24 shared with core participants, but particularly the</p> <p>25 family, at the time the restriction orders are made so</p> <p style="text-align: center;">Page 15</p>
<p>1 Sir, it's right to say at the outset that there is</p> <p>2 considerable common ground regarding this first round</p> <p>3 restriction order applications.</p> <p>4 First of all, we understand it to be accepted that</p> <p>5 the concept of having a first round and then a second</p> <p>6 round is an appropriate way forward. One of the</p> <p>7 purposes of the first round will be to enable</p> <p>8 a streamlined approach to be taken to the second round,</p> <p>9 in other words that we hope your ruling at round 1</p> <p>10 applications would allow a considerable degree of</p> <p>11 agreement about redactions and so on that are to be</p> <p>12 applied on further documents at the second round of</p> <p>13 applications.</p> <p>14 THE CHAIR: That will work providing that the first round is</p> <p>15 representative.</p> <p>16 MR O'CONNOR: Quite so. That's a point which has been made</p> <p>17 in the submissions and to which I will return.</p> <p>18 We also I think all agree that at that first round</p> <p>19 an inappropriate degree of duplication or unnecessary</p> <p>20 work should be avoided. I do though emphasise those</p> <p>21 initial words "an inappropriate degree", because it may</p> <p>22 be that some degree of either duplication or unnecessary</p> <p>23 work is something that we will just have to accept in</p> <p>24 order to make the sample process work.</p> <p>25 I think it's also agreed amongst all of those</p> <p style="text-align: center;">Page 14</p>	<p>1 that they can see passages that are not intended to be</p> <p>2 redacted.</p> <p>3 THE CHAIR: At the time of the application?</p> <p>4 MR O'CONNOR: At the time of the application, or whether at</p> <p>5 that stage all of the content of the documents will be</p> <p>6 treated as closed and indeed will be treated as closed</p> <p>7 until the end of the process.</p> <p>8 So that's the second issue.</p> <p>9 Then the third, which really follows and is very</p> <p>10 closely related to those first two, is the question of</p> <p>11 timing: when should the application be made and when</p> <p>12 should you determine it?</p> <p>13 Those are broadly the issues that we identify in our</p> <p>14 note under issue A. I will address you on those matters</p> <p>15 briefly, if I may.</p> <p>16 First of all, as far as the sample of documents is</p> <p>17 concerned, sir, as you put to me a few moments ago, it</p> <p>18 is critical if the round 1 approach is to achieve its</p> <p>19 purpose for the application to be supported by a set of</p> <p>20 marked-up documents demonstrating an approach to</p> <p>21 redaction which you can consider and then rule on.</p> <p>22 Of course, as I said, it's important to start with</p> <p>23 a statement of principle identifying areas of</p> <p>24 sensitivity, but while that statement of principle is</p> <p>25 valuable the difficulty in any restriction order or</p> <p style="text-align: center;">Page 16</p>

<p>1 similar process lies not in the judge or in this case 2 the chair of an inquiry determining whether a particular 3 assertion about whether a category of material is 4 sensitive or not, that's not the difficult stage, the 5 difficult stage is how to apply whatever decision is 6 reached to redacting particular documents. So that is 7 why a sample is important. It's also why the sample 8 needs to be sufficiently large and sufficiently varied 9 to be a valuable tool going forward.</p> <p>10 In other words, you need to make rulings about 11 a wide variety of documents, a wide variety of different 12 types of sensitivity to provide the best possible 13 assistance for the later process. This is a point which 14 is made in the family's submissions at paragraph 8 and 15 we entirely agree with what is said there.</p> <p>16 We submit it also follows really from what I have 17 said that precisely because it's important to get the 18 right sample, although of course in the end it is 19 a sample of documents which will be put forward by HMG 20 and Operation Verbasco, the task of selecting that 21 sample is one that we should be involved in as well on 22 your behalf to ensure that it is appropriate, and it 23 includes the right type of material.</p> <p>24 THE CHAIR: You are content to engage in that process 25 between now and whatever time I set?</p> <p style="text-align: center;">Page 17</p>	<p>1 subparagraphs, but I am looking particularly at (4), 2 which talks about volume being too large and so on.</p> <p>3 Sir, really, in summary, the objection is raised --</p> <p>4 THE CHAIR: They also of course say earlier don't they, at 5 paragraphs 5 and 6, that in effect not safe to proceed 6 very far, "far" I shall explore, but they say it's not 7 safe to proceed very far until the conclusion of your 8 relevance determination which is the end of June.</p> <p>9 MR O'CONNOR: Yes.</p> <p>10 THE CHAIR: The grounds for that are I think in their 11 paragraphs 4, 5 and 6 principally.</p> <p>12 MR O'CONNOR: That's right and that issue really attaches to 13 the point I was trying to come on to, which is the 14 question of how the application should be made rather 15 that --</p> <p>16 THE CHAIR: All right, take it in your own time.</p> <p>17 MR O'CONNOR: Just sticking for the moment with the issue of 18 what it should contain, some of the points made are that 19 were the sample to comprise everything that we suggested 20 it should it would be time consuming to prepare, because 21 voluminous and also there would be some element of 22 duplication or unnecessary work, because again some of 23 the documents, particularly included in batch 1, might 24 fall away and therefore work would have been done 25 unnecessarily.</p> <p style="text-align: center;">Page 19</p>
<p>1 MR O'CONNOR: Sir, entirely, yes.</p> <p>2 That brings me to the more direct question of what 3 documents should be included in the sample. In our 4 written submissions, this actually at paragraph 22.4 of 5 our submissions but I don't ask you to go to it, we 6 propose that the sample might include three things.</p> <p>7 The draft police report.</p> <p>8 The documents underlying the police report.</p> <p>9 And the documents referred to as batch 1 of the 10 Operation Verbasco material.</p> <p>11 One of the advantages of choosing this material was 12 that all of this material, to one extent or another, has 13 been considered by HMG and Op Verbasco for sensitivity 14 as a result of directions that you've made.</p> <p>15 The response from HMG raises some objections.</p> <p>16 First of all --</p> <p>17 THE CHAIR: Just show me where that is, will you?</p> <p>18 MR O'CONNOR: I am sorry, sir?</p> <p>19 THE CHAIR: Just show me where that is. It will be 20 tab 7 ...</p> <p>21 MR O'CONNOR: Yes.</p> <p>22 It's really, I think, paragraph 16 of their 23 submissions.</p> <p>24 THE CHAIR: Right.</p> <p>25 MR O'CONNOR: I am summarising what's in the series of</p> <p style="text-align: center;">Page 18</p>	<p>1 Sir, perhaps I can say now we do recognise that 2 there is some force in what HMG have said, in particular 3 it's right to say that batch 1 of the Verbasco material 4 is voluminous, it comprises many hundreds of documents.</p> <p>5 THE CHAIR: Yes.</p> <p>6 MR O'CONNOR: So our --</p> <p>7 THE CHAIR: The relevance exercise has been done in relation 8 to batch 1, hasn't it?</p> <p>9 MR O'CONNOR: Sir, what has been done in relation to batch 1 10 is, first of all, a relevance exercise, yes, and then 11 also HMG and Operation Verbasco as a result of 12 directions you made at the last hearing have reviewed 13 those documents for sensitivity.</p> <p>14 THE CHAIR: Right.</p> <p>15 MR O'CONNOR: What they have not done is actually physically 16 prepared redactions on them.</p> <p>17 THE CHAIR: No, I understand that.</p> <p>18 MR O'CONNOR: That's where the argument about timing and --</p> <p>19 THE CHAIR: I was thinking about the suggestion that some 20 might fall away.</p> <p>21 MR O'CONNOR: Yes, sir, but the point is --</p> <p>22 THE CHAIR: If, to the extent that they are included they 23 are included because they have passed the relevance 24 test, is there still a risk some may fall away?</p> <p>25 MR O'CONNOR: There is, sir, yes. It arises from the way in</p> <p style="text-align: center;">Page 20</p>

<p>1 which we've been conducting the work. Because -- we 2 make no criticism of this, it has been the most 3 efficient way to do it -- 4 THE CHAIR: Yes. 5 MR O'CONNOR: -- but because we've been seeing documents in 6 tranches, another way in which it's sometimes described 7 is drip fed, but of course I wouldn't use that term it's 8 more usually a term that's used against me rather than 9 by me. But, sir, because it's been done in that way 10 those on the inquiry team who have been looking at that 11 documents may well regard let's say in the first batch 12 ten documents as being relevant, and so they mark them 13 as being relevant. But then a month later they may see 14 one further document which is relevant but which means 15 that the first ten are no longer relevant. 16 THE CHAIR: You don't need the first ten. 17 MR O'CONNOR: There has to be a sort of process at the end 18 of the process, which as I indicated we have not reached 19 there yet, of if you like reconciling that work. 20 Although, sir, you are right to say of course the 21 starting point is: what we've said is relevant is 22 relevant. We do anticipate that once we have a complete 23 set of everything that we said is relevant we'll be able 24 to go back to determine that some can be withdrawn. 25 THE CHAIR: Some earlier documents may be superseded by</p> <p style="text-align: center;">Page 21</p>	<p>1 of great value to you and to this inquiry. The purpose 2 of it is to bring together, if you like, the fruits of 3 the police investigations into the events in Salisbury. 4 Secondly, it's true to say that work on the report 5 has been underway for some time now and those who are 6 following these proceedings will recall it's been 7 mentioned at number of these hearings, but I think it's 8 important for me to emphasise that there is no criticism 9 of the fact that it's still in draft at this stage. It 10 has deliberately been left unfinished so that further 11 material emerging from the disclosure process can be 12 added to it, because the intention is that it will in 13 the end be one document which covers as much as possible 14 of the material. 15 As to whether it should be included in the sample or 16 not, in summary the argument in favour of including it 17 is that precisely because it will be a core open 18 document where redactions are needed to it, quite likely 19 that similar issues will arise in other documents, 20 therefore it will be a useful addition to the sample. 21 On the other hand, it's said precisely because it's 22 still a draft there is a risk that the text will change, 23 though arguments about redactions to particular passages 24 in the current draft may become academic. As I say, 25 those are points which I imagine will be canvassed</p> <p style="text-align: center;">Page 23</p>
<p>1 later ones in effect? 2 MR O'CONNOR: They may be, sir. 3 In any event, as I said we do understand that there 4 is some force in what HMG say. That's why what we are 5 now proposing is that rather than including all of 6 batch 1 in the sample, rather we should select a sample 7 of documents from it. We anticipate a reasonably 8 sizeable sample, but a sample that can be led by 9 considerations of whether the documents contain material 10 that's going to be sort of a fruitful example for the 11 further exercise and also how confident we are that it's 12 a document that's actually going to remain relevant as 13 opposed to being overtaken by events. 14 Our current proposal, slightly modified from before, 15 is that the sample should include: the draft police 16 report, there's a little more to say about that, I'll 17 come back to it; the underlying documents to the draft 18 police report; and a sample of documents from batch 1 19 Operation Verbasco. 20 As I have just indicated there are some slightly 21 separate arguments about whether the draft police report 22 should be included. I am confident that Mr Beer and 23 I think probably also Ms McGahey will make submissions 24 to you on that. Let me just say first of all I think 25 everyone is agreed that this document will in the end be</p> <p style="text-align: center;">Page 22</p>	<p>1 before you. 2 Lastly on this, we certainly say that the arguments 3 against including the police report do not apply to the 4 underlying documents. They, in our submission, are core 5 documents and they will remain as part of this process 6 and so whether or not the police report is included in 7 the sample, the underlying documents in our submission 8 should be included. 9 Sir, I come to the point we touched on earlier, 10 which is leaving aside the question or leaving now the 11 question of what the sample should include and turning 12 to the question of the way in which the restriction 13 orders are to be made. I have mentioned the two 14 different ways which have been the subject of discussion 15 so far, including some debate at the closed hearing and 16 that is either at the time the restriction orders are 17 made the draft redacted documents are shared openly 18 among CPs, including the family. 19 THE CHAIR: It's not just when they are made, is it? It's 20 when the application is launched? 21 MR O'CONNOR: That's what I mean, so when the applications 22 are made and in particular at the hearing the draft 23 redacted documents are made available so that in 24 particular the family can see the passages over which 25 redactions are not sought.</p> <p style="text-align: center;">Page 24</p>

<p>1 THE CHAIR: Yes.</p> <p>2 MR O'CONNOR: That's one method.</p> <p>3 A second method is that all of the content of the</p> <p>4 document, that is both the proposed redacted passages</p> <p>5 but also the rest, are treated as closed at the time the</p> <p>6 application is made and ruled on and debated and indeed</p> <p>7 possibly further down the line than that.</p> <p>8 We know, I think, that HMG and Op Verbasco propose</p> <p>9 to adopt the second approach. You heard closed</p> <p>10 submissions about this, and I am sure they will be</p> <p>11 making open submissions explaining why they consider</p> <p>12 that to be the appropriate --</p> <p>13 THE CHAIR: The second approach there.</p> <p>14 MR O'CONNOR: The second approach, yes.</p> <p>15 There's one point of correction, sir, that I need to</p> <p>16 make. I wonder for these purposes whether I can ask you</p> <p>17 to look at the open note of the closed hearing, which</p> <p>18 should be at tab 19A of the bundle.</p> <p>19 THE CHAIR: 19A.</p> <p>20 MR O'CONNOR: It's paragraph 3(c) of that document. This</p> <p>21 a passage of the note which relates to this point,</p> <p>22 you'll see it says:</p> <p>23 "HMG and Op Verbasco propose that their restriction</p> <p>24 orders applications should not follow the inquiry's</p> <p>25 restriction order protocol, rather there would be no</p> <p style="text-align: center;">Page 25</p>	<p>1 important substantive question of which of the two</p> <p>2 approaches --</p> <p>3 THE CHAIR: Well, it does. Am I right that -- I have it in</p> <p>4 front of me now -- what the protocol actually says is</p> <p>5 that any application should include an open session that</p> <p>6 identifies the restriction order sought and provides as</p> <p>7 much detail about the application grounds as is possible</p> <p>8 without defeating the purpose of the application?</p> <p>9 MR O'CONNOR: Exactly, sir. That's one of the opening</p> <p>10 passages and later passages really follow the same</p> <p>11 theme. So it's broadly drafted and the question is at</p> <p>12 large, as it were, as to how much of the application</p> <p>13 should be made open or can be made open and how much has</p> <p>14 to remain in closed.</p> <p>15 As I have said, certainly it's broad enough to</p> <p>16 accommodate, were you to be satisfied with this, the</p> <p>17 second approach identified, where even the material</p> <p>18 which isn't --</p> <p>19 THE CHAIR: I were satisfied that there's good reason for</p> <p>20 it, which I shall have to hear the argument.</p> <p>21 MR O'CONNOR: I know Ms McGahey I am sure will address you</p> <p>22 further on that, sir.</p> <p>23 Sir, I am not going to go any further really in the</p> <p>24 territory of the necessity or desirability of adopting</p> <p>25 one or other approach. Clearly there are a number of</p> <p style="text-align: center;">Page 27</p>
<p>1 disclosure of any unredacted material accompanying the</p> <p>2 application."</p> <p>3 You will see that in the second sentence there the</p> <p>4 substance of the point is made, that the approach is to</p> <p>5 be the second of the two that I identify.</p> <p>6 THE CHAIR: Yes.</p> <p>7 MR O'CONNOR: The first sentence refers to the fact that</p> <p>8 that approach is not consistent with the inquiry</p> <p>9 restriction order protocol. That is indeed the way in</p> <p>10 which the debate went at the closed hearing.</p> <p>11 THE CHAIR: Yes, I remember.</p> <p>12 MR O'CONNOR: I think the starting point for that line of</p> <p>13 discussion was our assertion, my assertion, that that</p> <p>14 was so. In fact, we didn't have a copy of the</p> <p>15 restriction order protocol in front of us -- I say that</p> <p>16 by way of some defence -- and having reflected on this</p> <p>17 and in particular having looked back at precisely how</p> <p>18 the restriction order protocol is drafted, that isn't</p> <p>19 a fair way of putting the matter. The truth is that</p> <p>20 inquiry's restriction order protocol is fairly broadly</p> <p>21 drafted and so either of the two approaches I identified</p> <p>22 could be accommodated within it. So, sir, I think it's</p> <p>23 not helpful to pursue this issue of whether it's in</p> <p>24 breach of or compatible with restriction order protocol,</p> <p>25 the truth is both are. But that does leave you with the</p> <p style="text-align: center;">Page 26</p>	<p>1 issues and I am sure others will address you on them.</p> <p>2 But I do want to flag one very practical consideration</p> <p>3 which became apparent at the closed hearing, and that is</p> <p>4 the question of timing.</p> <p>5 Sir, if the first -- sorry, the no-documents</p> <p>6 approach, which is the second of the two --</p> <p>7 THE CHAIR: The second --</p> <p>8 MR O'CONNOR: -- approaches I suggested, if that approach is</p> <p>9 adopted, then first of all on our understanding you will</p> <p>10 hear that the restriction order application can be made</p> <p>11 sooner because there will be no concerns about</p> <p>12 inadvertent disclosure of sensitive information in the</p> <p>13 documents.</p> <p>14 THE CHAIR: Well, yes. I mean in theory at least and let</p> <p>15 others say what they need to, but in theory at least one</p> <p>16 can see that it's possible that an application which</p> <p>17 revealed as it were -- which showed where the redactions</p> <p>18 were proposed might in some circumstances give the game</p> <p>19 away.</p> <p>20 MR O'CONNOR: Yes. Well, sir, that is am sure the way --</p> <p>21 well, it's certainly the way in which it's put in the</p> <p>22 submissions, I imagine that is --</p> <p>23 THE CHAIR: Or as you put it, inadvertent disclosure of the</p> <p>24 topic.</p> <p>25 MR O'CONNOR: Yes, so, sir, I don't want to get into as</p> <p style="text-align: center;">Page 28</p>

7 (Pages 25 to 28)

<p>1 I say the arguments for and against.  2 THE CHAIR: If that happens, it can be done sooner.  3 MR O'CONNOR: On that approach, it means because there is no  4 risk then of publishing the material or showing it to  5 the family, then it can be done more quickly. But at  6 the other end of the process it means that the family  7 are not going to see even parts of the documents as the  8 process unfolds.  9 THE CHAIR: Until some time later.  10 MR O'CONNOR: It means when they do finally see them, of  11 course they will need to have enough time first of all  12 assimilate them but then to make consequential  13 applications, which otherwise they might have been able  14 to make earlier.  15 That's one way of looking at the timing.  16 The other way of looking at it is that if the other  17 approach were to be adopted, that is the first of the  18 two alternatives, then it's really saying the same thing  19 the other way round, the family would see the documents  20 during the process, but as we understand it HMG and  21 Op Verbasco's submission will be that there will need to  22 be a delay, perhaps a considerable delay, before the  23 process can start so that they can satisfy themselves  24 that there are no sensitivities in --  25 THE CHAIR: Inadvertent disclosure.</p> <p style="text-align: center;">Page 29</p>	<p>1 were the applications to be made in May, were the  2 hearing to be in July, then we would start the autumn  3 with a ruling from you and we would be that much further  4 ahead than if the hearing was only to take place in  5 September.  6 Of course you'll need to -- this is very much  7 a question for HMG and Op Verbasco to address you on,  8 because it is they that will be doing the work of  9 putting the applications together. The question is,  10 bluntly: do they need two months or do they need four?  11 THE CHAIR: Now you mean? Counting from now?  12 MR O'CONNOR: Yes.  13 THE CHAIR: Yes.  14 MR O'CONNOR: Sir, that's all I was proposing to say -- just  15 glancing back at our note -- about the first of the  16 stages. As I have said, there's far more to say about  17 that than the others, I will just catch up if I may to  18 cover the final stages rather more briefly.  19 First of all, looking at the second stage what we  20 have said is stage B, which is the completion of the  21 restriction order process. I have already made the  22 point that the intention, and I think this is really  23 common ground, is that at that stage we will attempt to  24 deal with the remaining documents, in other words those  25 that have not been directly included in the first round</p> <p style="text-align: center;">Page 31</p>
<p>1 MR O'CONNOR: Yes.  2 The timing points are important. They have  3 implications for the later stages of the process and  4 I am sure you will want to hear submissions on those  5 that are as full as possible.  6 Sir, the last point about the first round of  7 restriction order applications that I mentioned at the  8 outset is the timing point. As I have said, if the  9 second approach, what I have described as the  10 no-documents approach, is adopted, then in short the  11 options before you are an application in July with  12 a hearing in September, that is the approach suggested  13 in the HMG submissions and I think the Verbasco  14 submissions as well. Or, and this is a matter we  15 canvassed in the closed hearings, the question is: is it  16 possible to accelerate that process and have  17 applications in May with a hearing in July?  18 Those are the two alternatives that perhaps should  19 be focused on, that's certainly --  20 THE CHAIR: May is also canvassed, isn't it, in  21 Mr Mansfield's submissions?  22 MR O'CONNOR: It is, so that's one of the reasons we  23 mentioned in the closed hearing, but the question  24 is: can the making of the applications be accelerated?  25 The advantage to be gained is perhaps obvious, because</p> <p style="text-align: center;">Page 30</p>	<p>1 of restriction order applications, in some form of  2 streamlined process, which is very much guided by the  3 ruling you've given at the first stage. I don't want to  4 be too prescriptive about that at this point, I suspect  5 that once we've had the first round of restriction order  6 applications, once you've ruled on them, it will be, if  7 not obvious, I hope more clear than it is now what the  8 best way to proceed is.  9 THE CHAIR: We live in hope.  10 MR O'CONNOR: I suspect -- yes -- that taking stock once  11 we've been round the first stage, the right way --  12 THE CHAIR: I understand the principle.  13 MR O'CONNOR: Having said that, one can't be too vague and  14 for the sake of planning it will be necessary, we  15 submit, really at least to identify an indicative date  16 for the final hearing on the restriction orders.  17 THE CHAIR: Yes.  18 MR O'CONNOR: And what is likely to be a later date for the  19 very completion of stage 2 disclosure, in other words  20 once all the orders have been made and redactions have  21 been applied and so on and then for disclosure to be  22 made to the family.  23 Sir, you will recall that at the closed hearing,  24 this is something that's covered in the open note, the  25 submission made by Ms McGahey on behalf of HMG was that</p> <p style="text-align: center;">Page 32</p>



<p>1 that process could be completed and redacted documents, 2 she thought, provided to the inquiry by the end of 3 April. Of course, once the documents have been provided 4 to the inquiry there would then still be some time 5 before they were all uploaded on to Relativity, but we 6 would hope that that wouldn't take too long and we would 7 hope it would be a rolling process.</p> <p>8 THE CHAIR: There's no reason why it all has to be done at 9 once?</p> <p>10 MR O'CONNOR: Well, no. There's some uncertainty about 11 that, but certainly we would hope not to receive 12 absolutely all of the documents at the one time. So to 13 some extent it can be done as a rolling exercise.</p> <p>14 THE CHAIR: Yes.</p> <p>15 MR O'CONNOR: As we understood that prediction of the end of 16 April, that was on the basis of a hearing in September, 17 and of course on a sort of no-documents approach, but 18 perhaps Ms McGahey will confirm that when she makes her 19 oral submissions.</p> <p>20 Of course it's right of course that we and I am sure 21 you are grateful for that indication, but we have to 22 recognise that Ms McGahey is doing the best she can but 23 there are many contingencies between now and then and so 24 it isn't a firm date, it's the best estimate that can be 25 given at the moment. It perhaps follows from that that</p> <p style="text-align: center;">Page 33</p>	<p>1 make submissions about the material that emerges from 2 it.</p> <p>3 In fact, all of the core participants in their 4 written submissions have identified steps that they 5 envisage taking during this period on behalf of the 6 family making applications consequent on their review of 7 the documents --</p> <p>8 THE CHAIR: Right.</p> <p>9 MR O'CONNOR: -- and others, special measures applications, 10 arrangements for security at the hearings and so on.</p> <p>11 It's plainly very difficult to estimate how much 12 time will be needed to complete all of these different 13 and various tasks. Doing the best we can and reviewing 14 the submissions that have been made in writing, it would 15 seem that a period of about six months, which is the 16 period identified in the family's submissions, should be 17 allowed.</p> <p>18 THE CHAIR: That's the figure that's suggested in their 19 submissions, isn't it?</p> <p>20 MR O'CONNOR: It is, I am not sure if they actually say but 21 certainly if you look at the timings --</p> <p>22 THE CHAIR: That's what it boils down to.</p> <p>23 MR O'CONNOR: I will be corrected, but I think that is the 24 period they had in mind.</p> <p>25 On that basis and on the dates that I have mentioned</p> <p style="text-align: center;">Page 35</p>
<p>1 if it is possible to have an earlier hearing then that 2 will simply provide a bit more flexibility in the 3 timetable.</p> <p>4 The third stage in our note, stage C, is the process 5 from the completion of stage 2 disclosure until the 6 final hearing.</p> <p>7 Sir, the first and most important point to make here 8 is that if, and obviously this is a matter that's still 9 at large, the approach to the restriction order process 10 has been that applications are made on what I've 11 described as the no-documents approach, then this is 12 going to be the first moment that the family will have 13 to review and to consider the bulk of the disclosure.</p> <p>14 It may be -- we would certainly hope that some of 15 material will be made available, some of course already 16 has been, but really a tiny fraction of it. Sir, I am 17 sure you will hear further submissions on this on behalf 18 of the family, but of course, sir, it is vital that the 19 family have the time that they need to ensure their 20 effective participation in the process.</p> <p>21 I mentioned at the outset the exceptional amount of 22 time that the disclosure process has already taken and 23 will take until it's finished and it would plainly be 24 quite wrong if at the end of that process the family 25 were not given the time that they need to review and</p> <p style="text-align: center;">Page 34</p>	<p>1 conclusion of the stage 2 disclosure process by the end 2 of April, so that would suggest that you may consider 3 listing the open substantive hearings in October.</p> <p>4 I should say that we've put ourself to the task of 5 giving an estimate of the length of the substantive 6 hearings so that that can be factored into this process.</p> <p>7 Of course it is extremely early to be making an estimate 8 of that time, we haven't even finished reviewing the 9 disclosure yet, but our current estimate, as I have said 10 necessarily provisional, is that open hearings will last 11 for something like four to six weeks.</p> <p>12 Perhaps I can just say one more time that is 13 extremely provisional, but it seems to us that some sort 14 of guide would be of assistance in thinking about 15 listing the final hearings.</p> <p>16 THE CHAIR: Yes.</p> <p>17 MR O'CONNOR: Sir, that's all I want to say on that third 18 issue on the agenda.</p> <p>19 May I now just deal very briefly indeed with the 20 last two matters, the penultimate matter is the venue 21 for the substantive hearings. At the last preliminary 22 hearing, so in November, you indicated that some of the 23 open hearings would be held in Salisbury focusing on the 24 evidence particularly relating to the immediate 25 circumstances of Dawn Sturgess's death and that the</p> <p style="text-align: center;">Page 36</p>

<p>1 remaining open evidence would be heard in London, with 2 a video link to a venue in Salisbury. 3 Just by way of update, the inquiry's secretariat has 4 been undertaking work to make provisional arrangements 5 for possible venues for open hearings and all the 6 associated practical arrangements that need to be made 7 and once final hearing dates are set there will be 8 confirmation of venues. 9 THE CHAIR: Yes. 10 MR O'CONNOR: As far as the next preliminary hearing is 11 concerned, that's the last matter on the agenda, really 12 that's bound up with the questions relating to the 13 restriction order process. 14 THE CHAIR: July or September, by the sounds of it. 15 MR O'CONNOR: Sir, certainly if we settle on a hearing in 16 July, then my submission it's unlikely we'll need 17 a hearing before then. If you decide that the hearing 18 of the restriction order application should be in 19 September, well it may be that another hearing before 20 then would be useful. But, sir, perhaps that's 21 something we can keep under review but certainly the 22 main point is -- 23 THE CHAIR: Yes, I might want to be reassured about what was 24 happening. 25 MR O'CONNOR: You might be, sir. That's certainly something</p> <p style="text-align: center;">Page 37</p>	<p>1 That's for three main reasons. 2 Firstly, it is obviously hoped that this inquiry may 3 lead to lessons being learnt for the future and if 4 that's to happen then the sooner those lessons can be 5 learned, identified and acted upon the better. 6 Secondly, it's obviously important that the family 7 should have as early a resolution as they can. 8 Thirdly, any public inquiry requires a huge input on 9 the part of the staff involved. In this inquiry, many 10 of the HMG individuals who are involved in disclosure, 11 providing witness evidence, are highly qualified 12 specialists in their field and they have day jobs that 13 involve work that keeps us all safe. They want to do as 14 good a job as they possibly can for this inquiry, while 15 also maintaining their day-to-day work and it is 16 100 per cent in their interests to do whatever work is 17 needed as efficiently as they can. 18 All of us on the HMG team understand completely the 19 frustration that the family must feel because they've 20 seen very little evidence of progress so far, but the 21 fact that they've not seen that progress absolutely does 22 not mean either that no progress has been made or that 23 things are being withheld from them that should not be 24 withheld. 25 As counsel to the inquiry has already indicated, the</p> <p style="text-align: center;">Page 39</p>
<p>1 for consideration. 2 THE CHAIR: Yes. All right. 3 MR O'CONNOR: As ever, my short introductory submissions 4 seem to have gone on for some time. I wonder whether 5 now would be a convenient moment to have a break for the 6 transcriber before we come back on other submissions. 7 THE CHAIR: Yes, if the transcriber needs it. 8 Just before we do that, Mr Mansfield you are very 9 welcome to go next if you want, but I suspect you might 10 prefer, and I would certainly prefer, to hear from what 11 I will call the disclosing parties first. 12 MR MANSFIELD: I would do, sir. 13 THE CHAIR: It will be Ms McGahey and Mr Beer and then 14 Mr Beggs. All right. Half past, please. 15 (11.26 am) 16 (A short break) 17 (11.32 am) 18 THE CHAIR: Yes, Ms McGahey. 19 Submissions by MR MCGAHEY 20 MS MCGAHEY: Sir, I would like to emphasise at the outset 21 that all Government departments and agencies are 22 100 per cent committed to completing all of their work 23 for the inquiry as soon as they possibly can and they 24 are equally committed to the inquiry's final hearings 25 taking place as soon as possible.</p> <p style="text-align: center;">Page 38</p>	<p>1 disclosure process is now very far advanced. The 2 Inquiry Legal Team estimates that it will have seen all 3 the material that it wants to see from all sources 4 including HMG and will have identified everything 5 relevant probably by around the end of June of this 6 year. 7 THE CHAIR: Yes. 8 MS MCGAHEY: So that's about 12 weeks' time. That's been 9 an absolutely mammoth task, both for those involved in 10 providing disclosure and for those on the inquiry team 11 who have had to analyse the material that they've been 12 sent. 13 Of course we understand why the family are asking 14 why things are taking so long and there is a number of 15 reasons. 16 Firstly, although it's before your involvement, sir, 17 after Ms Sturgess's death the Wiltshire coroner 18 initially decided that the inquest should be a very 19 limited one with a very narrow focus. The family 20 challenged that decision in the High Court, which heard 21 the case in July 2020, and it wasn't until March 2021 22 that the provisional scope of the widened inquest, now 23 this inquiry, actually became formalised. 24 THE CHAIR: Yes, all right, so start in March 2021. I am 25 not so concerned, to be honest Ms McGahey, with going</p> <p style="text-align: center;">Page 40</p>

<p>1 over why it's taken time until now, although it would 2 have been agreeable if it had been faster, I am much 3 more concerned with looking forward than looking back. 4 MS MCGAHEY: Certainly, sir. I mention the history only in 5 an attempt to try to reassure the family who say, "Why 6 on earth when you've had all this material for 7 five years, and know that you are going to use it, why 8 haven't we seen it?" 9 And of course for the first three we were looking 10 at -- for the first two we were looking at a much 11 narrower investigation. 12 THE CHAIR: Yes, all right. So start spring 2021, do we? 13 MS MCGAHEY: Yes. Also the sensitivities around this 14 inquiry are greater than those in the vast majority of 15 inquests and inquiries. Investigations into deaths 16 caused by terrorist atrocities often involve a lot of 17 sensitive material that has to be protected, but the 18 terrorists who threaten the safety of the UK and who 19 might exploit sensitive information if it's disclosed by 20 mistake have absolutely nothing like the sophistication 21 of a hostile state that is Russia. 22 THE CHAIR: Or any other hostile state. 23 MS MCGAHEY: Indeed. 24 So we have to assume that anything that we put onto 25 any open system is no longer secure.</p> <p style="text-align: center;">Page 41</p>	<p>1 ones in respect of which no redactions are likely to be 2 sought? 3 MS MCGAHEY: Sir, yes. 4 THE CHAIR: So there's bound to be -- one of the first 5 questions is: well, can we have those now? The reason 6 why you say they can't is what? 7 MS MCGAHEY: The reason, sir, the key word is "likely" and 8 this is to do with the mosaic or the jigsaw effect. We 9 simply do not know in respect of the majority of those 10 documents. We have not identified yet any redactions 11 that may be necessary. There are some documents that 12 could go out now. 13 THE CHAIR: Yes, there must be. 14 MS MCGAHEY: There are, but they are small in number and we 15 would not want to give any false expectations to the 16 family, the reason it would be safe to disclose them is 17 that they are so anodyne they are very unlikely to be of 18 any significant help. So examples are the staff rosters 19 for Zizzi and maps of the local area, which are not 20 going to advance anybody's knowledge on any of the 21 issues that you are investigating. 22 THE CHAIR: Scarcely relevant, I suspect. 23 MS MCGAHEY: Indeed, they've been identified as relevant so 24 far by the inquiry team. 25 THE CHAIR: Yes, all right.</p> <p style="text-align: center;">Page 43</p>
<p>1 THE CHAIR: Yes. 2 MS MCGAHEY: So the reason for not publishing anything until 3 either HMG or this inquiry can be sure it carries no 4 more than a manageable risk has nothing to do with any 5 wish to withhold anything from the family and nothing to 6 do with any wish on the part of anyone to cause delay. 7 May I turn now, sir, more specifically to the 8 reasons for which we ask that the restriction order 9 applications should be dealt with in the way that 10 Mr O'Connor has summarised HMG's application. 11 THE CHAIR: This is the form of the application, is it? 12 Yes, go on. 13 MS MCGAHEY: The family say, completely understandably, that 14 we must already have some material that the inquiry 15 legal team have identified as relevant and that they 16 should see it now and that they should see material on 17 a rolling basis and we understand why they say that. 18 THE CHAIR: Yes. 19 MS MCGAHEY: There are two main reasons for documents not 20 going out in redacted or any other form to the family 21 now. 22 THE CHAIR: There are some documents aren't they, 23 Ms McGahey, in respect of which you and I think also 24 Operation Verbasco have in response to directions that 25 I was invited to give some time ago identified them as</p> <p style="text-align: center;">Page 42</p>	<p>1 MS MCGAHEY: Mr O'Connor has already explained why 2 categories of relevance may shrink as the inquiry's 3 knowledge develops. But one thing that it's crucial for 4 me to explain to the family is that HMG has to check 5 everything before it is sent out. So, for example, 6 anything that might give a hint as to where the Skripals 7 are now or that might help Russia to work out how and 8 when the perpetrators of the attack were identified must 9 not be public. 10 THE CHAIR: Well, those are two rather different questions. 11 Present whereabouts of the -- as an example you give, 12 yes. The other you suggest being as to how or when the 13 alleged perpetrators were identified. 14 MS MCGAHEY: Or the means by which that was achieved. 15 THE CHAIR: Well, that's a different question. 16 MS MCGAHEY: It's possible even that dates will be 17 sensitive. But HMG experts have to check not only their 18 own material but all relevant documents disclosed by the 19 police and by other core participants. 20 THE CHAIR: Yes. 21 MS MCGAHEY: The police investigation generated thousands of 22 documents. The Inquiry Legal Team are still working 23 through them and they are identifying relevant material. 24 THE CHAIR: They are nearly there. 25 MS MCGAHEY: They are, but the relevant material is then</p> <p style="text-align: center;">Page 44</p>

<p>1 passed to HMG for checking and some of that has not even 2 reached us yet and that will all be material we have to 3 take into account. 4 THE CHAIR: Yes. 5 MS MCGAHEY: The family ask, again understandably, why HMG 6 hasn't reviewed all of its own material for sensitivity 7 from the outset. So we've identified material as 8 potentially relevant. Why haven't we done our 9 sensitivity review? 10 The answer is that that is because of a volume of 11 material involved. HMG has applied a wide test of 12 relevance in identifying material for disclosure to the 13 inquiry. We had to do that in order to be as sure as we 14 possibly could that everything that actually was 15 relevant was included. But the inquiry on receipt of 16 our material is selecting an ever-decreasing percentage 17 of that material for onward disclosure. So initially we 18 found the key documents, most of those are relevant. As 19 we go further down the process that percentage is 20 getting smaller and smaller. 21 If we had started reviewing and redacting all of our 22 material a vast amount of work would have been wasted 23 because the documents simply would not -- 24 THE CHAIR: In principle you don't have to persuade me at 25 least, Ms McGahey, that the disclosure process is an</p> <p style="text-align: center;">Page 45</p>	<p>1 The question is, in relation to that: what has been 2 happening over the last year? Anyway, well have you 3 done it? Have you started on -- have you made your 4 draft redactions in relation to that? I imagine you 5 probably have. 6 MS MCGAHEY: In relation to some of that material, some, of 7 course the application will be that the entirety of the 8 document should -- 9 THE CHAIR: Yes, that may well be. 10 MS MCGAHEY: But of course -- 11 THE CHAIR: But your very skilled team must have been 12 thinking about this and I don't want to guess you see, 13 Ms McGahey, I want to know what's actually happened, but 14 if it be the case that to some extent the exercise in 15 saying what needs to be redacted in our submission has 16 been done, then we are partway through this process 17 already. 18 MS MCGAHEY: Yes, we certainly are. 19 THE CHAIR: Good. Right. 20 MS MCGAHEY: First, that has to be done and that is ongoing. 21 Secondly, having identified those redactions or 22 those documents that we say should stay completely in 23 closed, HMG has to compile a damage assessment to 24 persuade you and explain to you why we make the 25 application that we do.</p> <p style="text-align: center;">Page 47</p>
<p>1 ever-shrinking one, in other words the obligation on the 2 holder initially is broad and it may be limited by 3 subsequent decisions about relevance. But there must be 4 some material which is so obviously central that it's 5 bound on any sensible assessment to figure in the 6 eventual evidence that I have to hear, whether open or 7 closed, and I think the question that I want to ask, 8 never mind anybody else, is whether any start has been 9 made on that? 10 MS MCGAHEY: Absolutely. 11 THE CHAIR: The draft redactions are ready, are they? 12 MS MCGAHEY: The inquiry experts have identified 13 sensitivities in over 1,000 documents so far. 14 THE CHAIR: Yes, I am asking about looking at it from your 15 point of view. 16 MS MCGAHEY: Yes. 17 THE CHAIR: I quite take the point that you will have had to 18 disclose things which may or may not ever figure. 19 MS MCGAHEY: Yes. 20 THE CHAIR: But there must be, and I think you agree but 21 tell me if you don't, a central core of material which 22 any sensible prediction can only say: this is bound to 23 figure. 24 MS MCGAHEY: Yes. 25 THE CHAIR: Right.</p> <p style="text-align: center;">Page 46</p>	<p>1 THE CHAIR: Yes. 2 MS MCGAHEY: Then we have to consider -- we have to put 3 together the formal application itself and we are 4 working hard at looking at alternative ways in which as 5 much sensitive information as possible can be made 6 public in a safe form, whether that's through limited 7 redaction, gisting or summarising in a witness 8 statement. 9 THE CHAIR: Yes. 10 MS MCGAHEY: The work to draft witness statements is going 11 on in parallel so that as much sensitive information can 12 be made available that way as possible ... can be made 13 available in that way as well. 14 THE CHAIR: Limited redactions, gisting, witness statements 15 as means of achieving the maximum safe disclosure, is 16 it? 17 MS MCGAHEY: Yes. 18 THE CHAIR: I have it. 19 MS MCGAHEY: That's the explanation for HMG not being ready 20 right now at this very minute. 21 THE CHAIR: Yes, but it's also as I understand it from you, 22 Ms McGahey, and I would expect nothing less, 23 an assertion that this work is underway and has been for 24 some time. Right. 25 MS MCGAHEY: That brings me to the second reason, simply the</p> <p style="text-align: center;">Page 48</p>

<p>1 fact that the task is not yet complete and there are 2 several elements to it, but the second reason for not 3 disclosing everything now even in redacted form, it is 4 of course possible for HMG to make at least provisional 5 redactions -- 6 THE CHAIR: Yes. 7 MS MCGAHEY: -- for the purposes of a restriction order 8 application in respect of some of the documents 9 identified as relevant, because even though the 10 relevance review is shrinking there are some, as you 11 said, sir, that are so obviously going to be relevant. 12 As Mr O'Connor has suggested, and HMG agrees, for 13 application purposes the best way forward is to select 14 a sample of those documents. 15 THE CHAIR: Yes. 16 MS MCGAHEY: As broad a sample -- 17 THE CHAIR: You agree about that, do you? 18 MS MCGAHEY: Absolutely, both in terms of the range of 19 sensitivities and also the level of sensitivity. 20 Everything from the truly obvious to the phrase from 21 which something sensitive might be inferred. 22 THE CHAIR: Which is the point that's been made throughout 23 by the family? 24 MS MCGAHEY: Yes, and careful selection of that sample we 25 hope will go a very long way to making sure that</p> <p style="text-align: center;">Page 49</p>	<p>1 MS MCGAHEY: We are certain that would be the best way 2 forward. 3 THE CHAIR: The next question is over which period should 4 that be done? I could between now and May, as I think 5 the family suggest, or May and July as Mr O'Connor has 6 as it were as a backup possibility or are you suggesting 7 some other period? 8 MS MCGAHEY: No, sir, my submission is that it should be 9 done by July. 10 THE CHAIR: Why not May? 11 MS MCGAHEY: Because of the amount of work involved and the 12 fact that ultimately it is more time efficient to get it 13 right, to make the sample as wide as possible, as 14 comprehensive as possible and also to avoid mistakes, 15 because it's so much better in my submission to do -- 16 THE CHAIR: Well, on that principle we could extend it for 17 another five years couldn't we, Ms McGahey? That won't 18 do. 19 MS MCGAHEY: Not at all. Because a lot of the time taken 20 will depend on the sample, the size of the sample, the 21 size of the documents. 22 THE CHAIR: Yes, it will. 23 MS MCGAHEY: So it will be HMG's submission, again possibly 24 better done by liaison, that the draft 25 Operation Verbasco report not be selected --</p> <p style="text-align: center;">Page 51</p>
<p>1 an application you rule on on this basis can be -- 2 THE CHAIR: It would effectively be a series of sample 3 applications? 4 MS MCGAHEY: It will, it may be that the principles that can 5 be applied to that sample are readily applicable then to 6 other documents. 7 THE CHAIR: Yes. 8 MS MCGAHEY: That is what we are hoping for. 9 THE CHAIR: When you say that you agree with the principle 10 of a sample set, as it were, of restriction order 11 applications, are you contemplating or not applications 12 in respect of specific sample documents? 13 MS MCGAHEY: Yes. 14 THE CHAIR: Right, with proposed redactions, gisting or any 15 other appropriate mechanism to achieve the maximum 16 disclosure without putting people or national security 17 at risk? 18 MS MCGAHEY: Yes sir. 19 THE CHAIR: Right. Then its a question of when those can be 20 selected -- well the next question, I think, is you have 21 an offer from Mr O'Connor and his team to liaise in the 22 process of selecting representative samples. Would that 23 be a useful exercise? 24 MS MCGAHEY: Absolutely, sir. 25 THE CHAIR: That's the next stage.</p> <p style="text-align: center;">Page 50</p>	<p>1 THE CHAIR: Come back to the police report, that's 2 a different question. 3 MS MCGAHEY: But we have to do this properly and thoroughly. 4 THE CHAIR: Yes. 5 MS MCGAHEY: It is in my submission so much better to allow 6 enough time to do a proper job than to make mistakes or 7 worse say, yes, we'll try for May and then fail because 8 that then really does damage the timetable that's been 9 put in place. 10 THE CHAIR: Yes. Equally, the work tends to expand to fill 11 the time available, it's a fact of life. 12 MS MCGAHEY: I think not in our team, sir. I think we are 13 under more pressure. 14 THE CHAIR: The end of May is eight weeks from now, isn't it 15 effectively? 16 MS MCGAHEY: Yes. 17 THE CHAIR: The end of July another nine or ten weeks after 18 that? 19 MS MCGAHEY: Another nine. 20 THE CHAIR: Right. 21 MS MCGAHEY: There is, of course, Easter in the middle of 22 April and then three bank holidays in May, which does 23 not help. 24 THE CHAIR: Yes. 25 MS MCGAHEY: But in my submission it would be right to</p> <p style="text-align: center;">Page 52</p>

<p>1 choose July. It's the best estimate we can give for the 2 time that the work will take. Trying to accommodate 3 a shorter timetable may mean we have to ask to use fewer 4 documents, because clearly the fewer documents we have 5 the shorter the process will be and that may very well 6 not be in the long-term interests of anyone at all. 7 THE CHAIR: On what format of application is this discussion 8 premised, Ms McGahey? Are we talking about applications 9 which are made available to all core participants 10 showing the open material and where the redactions 11 appear or are we talking about something else? 12 MS MCGAHEY: Something else, sir. 13 THE CHAIR: The something else is? 14 MS MCGAHEY: There would be an open element to the 15 application, which would provide as much information as 16 we could about the sensitivities that we sought to 17 protect. I can't give details that moment as to what 18 that would look like, but it would be as open as we 19 could make it while keeping sensitive material safe. 20 THE CHAIR: What you might be able to do is, by May even if 21 not the rest, use at any rate a sample. You see I don't 22 at the moment understand what this going to look like 23 and, more to the point, nor will anybody else. 24 MS MCGAHEY: It might very well -- 25 THE CHAIR: Until you sit down with a pencil it's no good to</p> <p style="text-align: center;">Page 53</p>	<p>1 a more generic level. 2 THE CHAIR: That I am not so sure about. 3 MS MCGAHEY: Certainly in open. 4 THE CHAIR: All right, anyway that's your submission, yes. 5 MS MCGAHEY: Yes, and the key reason for that is the mosaic 6 or the jigsaw effect, us saying that it would not be 7 appropriate or safe now to put into open documents that 8 have those redactions on them, because any application 9 that we make at this stage in respect of any document as 10 part of this sample will be provisional and it will be 11 provisional because of the jigsaw effect. 12 THE CHAIR: Provisional until when? 13 MS MCGAHEY: Provisional until the entirety of the relevant 14 material to be disclosed, or certainly the vast 15 majority, of it is known. 16 THE CHAIR: Well, no provisional from your point of view at 17 best until the conclusion of the inquiry team's 18 relevance review is communicated to you. 19 MS MCGAHEY: Yes. 20 THE CHAIR: I mean I understand the principle of mosaic, 21 I am not at all sure how great the risk is, but I do 22 understand the submission that even if the risk is 23 slight the potential damage may be great. In other 24 words even if the incidence of the risk is slight, the 25 potential damage might be great. But the theoretical</p> <p style="text-align: center;">Page 55</p>
<p>1 try to draft it on the hoof and I am not asking you to 2 do it, but what I might ask you to do or at least what 3 I perhaps might consider asking you to do, Ms McGahey, 4 is to produce at any rate one or two pretty soon so that 5 the format can be seen. 6 MS MCGAHEY: You've seen something along what probably would 7 be the format, sir, in the names restriction order 8 application. 9 THE CHAIR: Yes, I saw that, certainly. 10 MS MCGAHEY: It may very well be that something like that, 11 in which a limited amount of information can be given. 12 THE CHAIR: I'm afraid what I am thinking of is a proper 13 restriction order application in respect of a particular 14 document or documents as an example of what it would 15 look like. 16 MS MCGAHEY: That could end up being quite time-consuming in 17 itself, sir, because we would need a full damage 18 assessment -- 19 THE CHAIR: Yes, it probably would. 20 MS MCGAHEY: -- because if we chose a document that had six 21 or seven sensitivities in it we would end up focusing on 22 a damage assessment for that, it may be preferable -- 23 THE CHAIR: You are going to have to do that sooner or later 24 anyway. 25 MS MCGAHEY: Yes, but it may be preferable to have it at</p> <p style="text-align: center;">Page 54</p>	<p>1 possibility of the mosaic revelation continues to exist 2 in effect ad infinitum, doesn't it? 3 MS MCGAHEY: No, sir, because once we know in its entirety 4 what material is to be disclosed, then our experts in 5 their particular fields can look at all the material in 6 each particular area and say, "It's safe to do X" or, 7 "it's not safe to do Y". 8 I mean, it's absolutely true that as we go through 9 this process we will try to pick up risky pieces of 10 information that put together might cause a problem. In 11 my submission, sir, the risk is a very real one and it 12 happens in real life. It happened -- very different 13 context in the case in which I was involved, it was 14 a fraud. That was a case of a fraudster who was 15 committing mortgage frauds and putting money into 16 bank accounts in different banks in different names in 17 towns on the south coast. Every day he was going into 18 each of these branches and taking out £500 in cash to 19 launder it, and he was a good-looking man and one day 20 there was a get together of bank cashiers on the south 21 coast and one woman said just part of a chat, "There's 22 a really fit bloke who comes into our bank every day and 23 takes out £500, I am going to ask him whether he has a 24 girlfriend". And another cashier, from a completely 25 different branch in a completely different town said,</p> <p style="text-align: center;">Page 56</p>

1 "We've got a chap who does exactly the same". And as  
 2 they discussed it they realised one of them knew him as  
 3 "Jones" and one of them knew him as "Smith" and he was  
 4 arrested very shortly afterwards.  
 5 THE CHAIR: Yes.  
 6 MS MCGAHEY: Each of those cashiers held information that  
 7 was entirely anodyne and harmless on its own, put  
 8 together it led to his prosecution. In the most  
 9 unlikely of circumstances the mosaic effect is very,  
 10 very real.  
 11 THE CHAIR: I am not sure how likely that is, but anyway go  
 12 on.  
 13 MS MCGAHEY: You've been given in closed further examples.  
 14 THE CHAIR: Yes, some.  
 15 MS MCGAHEY: The risk is a very significant one and also  
 16 trying to put it right if there's an accidental mosaic  
 17 identification is extraordinarily difficult.  
 18 THE CHAIR: You are nevertheless contemplating that by end  
 19 of July, mosaic effect notwithstanding, you can present  
 20 me with a representative sample of restriction order  
 21 applications, are you not?  
 22 MS MCGAHEY: Yes.  
 23 THE CHAIR: Which must mean that by then, at least in  
 24 relation to all those documents, your team will have  
 25 been able to eliminate the risk of the mosaic risk, to

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1 the extent that it can be?  
 2 MS MCGAHEY: Only as against those documents, the concern is  
 3 the mosaic effect with a document we have not yet seen.  
 4 So one of the documents that we put in identifies the  
 5 bank account holder as Smith, we don't know about the  
 6 one that identifies him as Jones, because we have not  
 7 yet seen it.  
 8 THE CHAIR: Right.  
 9 MS MCGAHEY: The submission would be that we would be ready  
 10 to make in July an application that was fully closed for  
 11 that reason, with as great an element in generic terms  
 12 as we could make in open.  
 13 THE CHAIR: All right, just let's think this through,  
 14 Ms McGahey. Supposing that were to be accepted, at what  
 15 point subsequently is the application in its semi-open  
 16 form revealing whatever is not redacted to be available  
 17 to everybody?  
 18 MS MCGAHEY: Once the relevance review is complete --  
 19 THE CHAIR: Yes.  
 20 MS MCGAHEY: -- and essentially once the restriction order  
 21 applications have been made over all documents that are  
 22 necessary.  
 23 THE CHAIR: Not until every single restriction order  
 24 application has been made, you really say that?  
 25 MS MCGAHEY: Yes, because that's the point at which we know

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1 for certain about the mosaic effect. It's for that  
 2 reason we say it will take, we think, doing the best we  
 3 can until the end of April 2024 to have a bundle of  
 4 documents that can safely be put into the public domain.  
 5 THE CHAIR: All right, well I understand that.  
 6 MS MCGAHEY: There's also another reason, sir, for not doing  
 7 this, not putting out into open any documents with  
 8 proposed redactions, because you may be against us. You  
 9 may decide that something that we flagged for redaction  
 10 should be made open or perhaps should be gisted or  
 11 perhaps there's some other way that we've not thought of  
 12 of making it public. If we have put a blacked-out  
 13 version into the public domain and we then have to  
 14 change that document for an open one we are putting  
 15 a huge flag onto that opened material.  
 16 THE CHAIR: Well, forgive me, if I were to be against you it  
 17 would be because there wasn't a risk, it's a blacked-out  
 18 document wouldn't it.  
 19 MS MCGAHEY: It may be because you felt that the public  
 20 interest in disclosure outweighed the risk.  
 21 THE CHAIR: Yes, it might, but that's a ruling you are going  
 22 to have to live with I'm afraid, isn't it? If it  
 23 happens.  
 24 MS MCGAHEY: If it happens. But if the document has not  
 25 been made public there will be no particular focus on

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1 that sentence you have ordered should be unredacted, it  
 2 will going to public domain and any hostile actor  
 3 looking at it won't realise there is anything special  
 4 about it, but if it has once been redacted the -- we  
 5 have to think about the knowledgeable, informed and  
 6 hostile actor who thinks to him or herself why were they  
 7 bothered about this in the first place.  
 8 THE CHAIR: It would signal anxiety, I see.  
 9 Given the sophistication of the perhaps hypothetical  
 10 hostile bodies, should one not assume that they would be  
 11 likely to be able to deduce anything they wanted from  
 12 the open material or any material I added on this  
 13 hypothesis resolved should be open in any event?  
 14 MS MCGAHEY: We would not want to make the job easier.  
 15 THE CHAIR: Right.  
 16 MS MCGAHEY: Of course we can understand why the family  
 17 would want to see as much as they possibly can as soon  
 18 as they possibly can.  
 19 THE CHAIR: All right. Thank you for explaining it. You  
 20 say in effect April 2024?  
 21 MS MCGAHEY: Also that the family would not actually gain  
 22 a material advantage by seeing it earlier, because it's  
 23 staggeringly difficult to try to work out what's under  
 24 a redaction because frankly if you can work it out we've  
 25 done a bad job.

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<p>1 THE CHAIR: No, no, no, it's not a question of working out 2 what's under the redaction, that's the whole point about 3 the redaction, Ms McGahey. 4 MS MCGAHEY: Yes. 5 THE CHAIR: The question is not whether someone can work out 6 what's under the redaction, the question is whether they 7 can see what is not under the redaction. 8 MS MCGAHEY: Yes, in order to inform a submission, because 9 they say we can guess from the context that the subject 10 must be X and therefore -- 11 THE CHAIR: No, it's simply because it's information which 12 is insensitive and which ought to be in the possession 13 of everybody concerned. 14 MS MCGAHEY: In that case, sir, you have my submissions on 15 the reasons which -- 16 THE CHAIR: I am grateful to understand it. All right. 17 MS MCGAHEY: There is a further reason, which is that if 18 partially redacted documents are made available now, it 19 may ultimately lead to less useful disclosure being 20 given to the family, because if we have put in something 21 that is really anodyne and not of great assistance, 22 later we come across something we think the family 23 should know we may not be able to disclose that latter 24 piece of information because of the mosaic effect with 25 the earlier one that really didn't matter.</p> <p style="text-align: center;">Page 61</p>	<p>1 THE CHAIR: In what way? 2 MS MCGAHEY: -- in order to create as great a breadth as we 3 can we also wish to include some of the HMG material 4 disclosed in tranches 1 to 3. 5 THE CHAIR: Yes, in respect of which, as I understand it, 6 you have already applied your minds to the question of 7 which sensitivities apply, although you have not gone on 8 at any rate universally to propose redactions or 9 alternative solutions? 10 MS MCGAHEY: That's right, sir, yes. 11 THE CHAIR: So, batch 1 underlying police report documents. 12 MS MCGAHEY: Yes, and possibly not all of them, but again 13 a representative -- a useful sample because the point of 14 this exercise would be to give you the best sample 15 possible -- 16 THE CHAIR: Yes, it depends what they are. 17 MS MCGAHEY: Yes. 18 THE CHAIR: But it might well be quite a lot of those, 19 I suspect. Samples from tranches 1 to 3, isn't it? 20 Anything else? 21 MS MCGAHEY: No, sir, on the samples. 22 THE CHAIR: That you suggest by July? 23 MS MCGAHEY: Yes. It's perhaps worth emphasising, sir, that 24 I don't represent just one Government department, there 25 are 12 working on this.</p> <p style="text-align: center;">Page 63</p>
<p>1 THE CHAIR: Yes, you say that in your written submission 2 I think either paragraph 5 or 6, yes. 3 MS MCGAHEY: HMG does understand, sir, that we are asking 4 you to allow us a lot of time to do something with a lot 5 of care, but that is because of the importance of what 6 we are doing. 7 THE CHAIR: All right -- sorry, go on. 8 MS MCGAHEY: Careful management of disclosure is absolutely 9 key. 10 THE CHAIR: Central to the whole business of this exercise. 11 MS MCGAHEY: Yes, and it would be disastrous if an inquiry 12 intended to learn lessons actually led to us making 13 a mistake that made us less safe than we are now. 14 THE CHAIR: Yes. 15 Can I ask about the sampling process that you are 16 comfortable with within the limits that you have 17 explained. The suggestion that is canvassed that 18 I should consider is that it should apply to a selection 19 from batch 1, everybody knows what I mean by that 20 I hope, yes, and at least the supporting documents, the 21 underlying documents, which are exhibited to the police 22 report. Do you want to say anything about that as a, as 23 it were, target area? 24 MS MCGAHEY: No, sir. In fact we would probably seek to 25 expand it slightly, because --</p> <p style="text-align: center;">Page 62</p>	<p>1 THE CHAIR: Yes, well that must be a special pleasure for 2 you, Ms McGahey. 3 MS MCGAHEY: It involves an awful lot of liaison with 4 an awful lot of interests at stake. 5 THE CHAIR: Yes, I take the point. 6 MS MCGAHEY: Including overlapping ones, so it's not even as 7 though we just take one bunch of documents to one 8 client. 9 THE CHAIR: It's a complex business, I know. 10 MS MCGAHEY: It really is. That's just one of the reasons 11 which we ask for the time that we do. 12 THE CHAIR: Right. 13 MS MCGAHEY: May come to the timetable more generally? 14 THE CHAIR: Please. 15 MS MCGAHEY: We would hope that all material would be 16 available to the family by end of April 2024. It's of 17 course right that once we have compiled the whole 18 picture and taken out all mosaic redactions that we 19 think necessary, and the inquiry agrees are necessary, 20 you've ruled are necessary, it may very well be possible 21 to start disclosure on a rolling basis, simply as we go 22 through the physical process of putting the redactions 23 in. 24 THE CHAIR: Absolutely, you are likely to get a direction to 25 that effect. When you say by April 2024, you mean</p> <p style="text-align: center;">Page 64</p>



<p>1 completed by April 2024 having been a rolling process?</p> <p>2 MS MCGAHEY: Yes, by the end of April 2024.</p> <p>3 THE CHAIR: Sorry, did I say something else?</p> <p>4 MS MCGAHEY: No, not at all, I think I was just asking for</p> <p>5 the extra four weeks by the end of April.</p> <p>6 THE CHAIR: Yes, I am so sorry. Yes, all right. Yes.</p> <p>7 MS MCGAHEY: We have always recognised that the family would</p> <p>8 need a period of several months between the end of that</p> <p>9 process and the hearings. In our written submissions we</p> <p>10 suggested that the process might be completed by the</p> <p>11 summer with hearings in late autumn, so we had in mind</p> <p>12 around four months. So we didn't suggest a period of</p> <p>13 two months and we are sorry if anybody interpreted our</p> <p>14 proposed timetable in that way.</p> <p>15 THE CHAIR: All right. They are going to need quite</p> <p>16 a period, aren't they?</p> <p>17 MS MCGAHEY: I am sorry, sir?</p> <p>18 THE CHAIR: They are going to need a decent -- a necessary</p> <p>19 period to absorb the material, make any applications</p> <p>20 they need to make for themselves and prepare generally</p> <p>21 for the hearing. Where does that take us to as</p> <p>22 a practical time to begin the hearing?</p> <p>23 MS MCGAHEY: In my submission, sir, October or</p> <p>24 November 2024.</p> <p>25 THE CHAIR: Yes. October/November 2024.</p> <p style="text-align: center;">Page 65</p>	<p>1 sample restriction order applications by the end of May</p> <p>2 or the middle of June if you like so that principally</p> <p>3 I but also the team can see the kind of format that it</p> <p>4 will adopt?</p> <p>5 MS MCGAHEY: In my submission, sir, preparing a sample of</p> <p>6 the sample on a formal basis would be a distraction that</p> <p>7 would take up time.</p> <p>8 THE CHAIR: It takes up time, I see.</p> <p>9 MS MCGAHEY: This is an iterative process and we've worked</p> <p>10 very cooperatively with the inquiry legal team so far,</p> <p>11 so I would hope that in the period between now and July</p> <p>12 we could work with them to come up with a format that</p> <p>13 was acceptable.</p> <p>14 THE CHAIR: Right.</p> <p>15 The alternative is that if you are obliged by</p> <p>16 direction to make all restriction order applications in</p> <p>17 a form which discloses all the open material, what</p> <p>18 effect does that have, do you say, on the timetable?</p> <p>19 MS MCGAHEY: It probably wouldn't have an effect on the</p> <p>20 timetable, sir, because we'd be doing the same work in</p> <p>21 any event. It might add something in terms of the</p> <p>22 consideration that had to be given as to what was put</p> <p>23 into open. But overall I can't see that it would affect</p> <p>24 the timetable.</p> <p>25 THE CHAIR: Well, if one of the reasons for wanting to make</p> <p style="text-align: center;">Page 67</p>
<p>1 MS MCGAHEY: It's perhaps more a matter for Mr Mansfield to</p> <p>2 address you rather than me on the length of time he</p> <p>3 would like and we wouldn't in any way seek to curtail</p> <p>4 the time the family say they need.</p> <p>5 THE CHAIR: Either way, certainly if it was October and</p> <p>6 October happens to be the beginning of the legal year,</p> <p>7 if it was fairly early in October, plenty of time to</p> <p>8 complete it before Christmas, wouldn't there?</p> <p>9 Not so long ago that I think I was being told this</p> <p>10 was going to be happening in October 2023, never mind --</p> <p>11 MS MCGAHEY: Always the way with inquiries, sir.</p> <p>12 THE CHAIR: That doesn't solve the problem, Ms McGahey,</p> <p>13 whether it's true or not.</p> <p>14 MS MCGAHEY: It doesn't, but it is because disclosure always</p> <p>15 causes these difficulties and this particular inquiry --</p> <p>16 THE CHAIR: No, I have that point.</p> <p>17 All right, anyway that's your timing?</p> <p>18 MS MCGAHEY: Yes.</p> <p>19 THE CHAIR: Anything else proposed in your submissions which</p> <p>20 I ought to be considering at this point?</p> <p>21 MS MCGAHEY: I don't think so. Thank you, sir. You have</p> <p>22 our written submissions and I hope I have addressed the</p> <p>23 key points now.</p> <p>24 THE CHAIR: Yes. Just tell me again what the difficulty</p> <p>25 would be about creating at any rate one or two of your</p> <p style="text-align: center;">Page 66</p>	<p>1 the restriction order applications in the form that you</p> <p>2 are suggesting is the risk of mosaic accidental</p> <p>3 disclosure, then, as I understood it, your point about</p> <p>4 that was that until you'd had time to digest all the</p> <p>5 material that the inquiry team has said would be</p> <p>6 relevant you can't eliminate that particular risk. But</p> <p>7 the time will come when you can.</p> <p>8 MS MCGAHEY: Yes.</p> <p>9 THE CHAIR: By then, you would be in a position, wouldn't</p> <p>10 you, to make restriction order applications in, as it</p> <p>11 were, the open form?</p> <p>12 MS MCGAHEY: I am sorry, sir, I had misunderstood your</p> <p>13 question, I had assumed you were thinking of a sample</p> <p>14 basis but just make it open not closed.</p> <p>15 Yes, we would still probably have the concern about</p> <p>16 the chance you would say -- you would reject</p> <p>17 an application and putting a flag on something.</p> <p>18 THE CHAIR: I didn't find that very persuasive ...</p> <p>19 MS MCGAHEY: We have thought about this and I will take</p> <p>20 instructions again, but I understand we think we could</p> <p>21 probably do that by the end of the year.</p> <p>22 THE CHAIR: Yes, okay.</p> <p>23 MS MCGAHEY: Because that's a very, very time-consuming</p> <p>24 process to get that 100 per cent right on the mosaic</p> <p>25 effect.</p> <p style="text-align: center;">Page 68</p>

<p>1 THE CHAIR: Right, and in that event where are we with the 2 final hearing? 3 MS MCGAHEY: It shouldn't make any difference, sir. 4 THE CHAIR: No, exactly. 5 MS MCGAHEY: I am instructed that we think December of this 6 year at the earliest, but assuming the restriction order 7 application were made over everything then, and you 8 ruled say at the end of January, that would allow -- 9 it's very difficult to work, because we have no idea of 10 the volume of material, but that would allow then say 11 three months to do all the redactions or undo 12 redactions, put everything on to Relativity. 13 THE CHAIR: You are still talking about Easter-ish next year 14 for full disclosure? 15 MS MCGAHEY: I don't think it would make a significant 16 difference. 17 THE CHAIR: In which case the remaining timetable question 18 is how long others need to absorb what is disclosed. 19 All right. I think I understand that. 20 Now I have conducted this rather Socratically, 21 Ms McGahey. Don't let me stop you -- if I just keep 22 quiet for a moment, is there anything else you want to 23 say? 24 MS MCGAHEY: No, thank you. 25 THE CHAIR: Are you sure?</p> <p style="text-align: center;">Page 69</p>	<p>1 your team, not 66,000 and I should just explain briefly 2 the difference. 3 There are a number of duplicates that accounts for 4 the vast majority of the 16,000-odd difference between 5 the figures and other reasons, irrelevant systems data 6 things like that. 7 The headline figure of disclosure that we have given 8 is 48,438. 9 The international material. 10 THE CHAIR: Yes. 11 MR BEER: This is mentioned in our submissions. It's picked 12 up by the family and we've informed everyone that the 13 international material has not presently been disclosed 14 to your team and your team is aware of the rules of law 15 which presently prohibit us from disclosing it to them. 16 In their submissions the family ask what are the rule or 17 rules of law which prevent disclosure of the 18 international material to the ILT. 19 There are three rules that prevent it, each arises 20 in respect of different documents. 21 Firstly, evidence obtained following an ILOR, an 22 international letter of request. Where evidence is 23 obtained from a foreign law enforcement agency under 24 an ILOR, section 9.2 of the Crime International 25 Cooperation Act 2003, CICA, sets out the following</p> <p style="text-align: center;">Page 71</p>
<p>1 MS MCGAHEY: Yes, thank you very much. 2 THE CHAIR: Thank you very much. 3 Mr Beer. 4 Submissions by MR BEER 5 MR BEER: I am speaking today on behalf of 6 Operation Verbasco, ie both forces. 7 Can I deal with some less interesting issues first. 8 I know you will be itching to get on to the matters that 9 you have just discussed with Ms McGahey, but they have 10 been raised in other DP submissions and were mentioned 11 by Mr O'Connor earlier and so I think I should deal with 12 them straight away. 13 You will have seen from our submissions, sir, in 14 tab 6 of your bundle that we have complied with all of 15 the directions that you set on 11 November and all in 16 good time too. 17 THE CHAIR: Yes. 18 MR BEER: We've delivered all of the stage 1 disclosure to 19 the ILT, except for the international material which 20 I will come to in a moment. 21 Just to make one point clear, we say in paragraph 7 22 of our submissions that we scheduled 66,000 documents 23 and by that time we had delivered 41,000 of them to the 24 Inquiry Legal Team. Stage 1 disclosure has been 25 completed now, 48,438 documents have been delivered to</p> <p style="text-align: center;">Page 70</p>	<p>1 prohibition on its use: 2 "The evidence may not, without the consent of the 3 appropriate overseas authority, be used for any purpose 4 other than that specified in the request." 5 That binds both the police and the inquiry itself. 6 Evidence may not be disclosed to the inquiry by the 7 police or even if it were disclosed to the inquiry, 8 disclosed onwards to core participants because each of 9 those would constitute a use that was not included 10 within the ILOR. 11 THE CHAIR: Right. 12 MR BEER: Secondly, material obtained under an EIO, 13 a European investigation order. Directive 2014/41 EU of 14 the European Parliament -- 15 THE CHAIR: 20? 16 MR BEER: 2014/41 EU. 17 THE CHAIR: Thank you. 18 MR BEER: On European investigation orders in criminal 19 matters makes provision for EIOs and Article 19 20 requires: 21 "The issuing authority shall, in accordance with its 22 national law, guarantee confidentiality of the facts and 23 substance of the EIO, except to the extent necessary to 24 execute the investigative measure and shall not, in 25 accordance with its national law and unless otherwise</p> <p style="text-align: center;">Page 72</p>

<p>1 indicated, disclose any evidence or information provided</p> <p>2 by the executing authority except to the extent that its</p> <p>3 disclosure is necessary or the investigations or</p> <p>4 proceedings in the EIO."</p> <p>5 THE CHAIR: It's confined to use in the investigation?</p> <p>6 MR BEER: Yes, that's carried into effect by our own</p> <p>7 regulations. I won't trouble you with how it's carried</p> <p>8 into effect.</p> <p>9 THE CHAIR: No, I remember, yes.</p> <p>10 MR BEER: Again, it would bind both the police and the</p> <p>11 inquiry.</p> <p>12 THE CHAIR: Yes.</p> <p>13 MR BEER: Thirdly, what I describe and what is described in</p> <p>14 police parlance at least as police-to-police material.</p> <p>15 This is material that is received from foreign law</p> <p>16 enforcement agencies on a more informal basis, often on</p> <p>17 an intelligence basis and is sometimes a precursor to</p> <p>18 either of the other measures that I have just mentioned.</p> <p>19 That's not therefore subject to a formal letter of</p> <p>20 request or the other statutory schemes.</p> <p>21 But the material is an indicator of the strength of</p> <p>22 our relationships with those other four foreign law</p> <p>23 enforcement agencies, relationships on which we and the</p> <p>24 United Kingdom generally rely to protect our national</p> <p>25 security through the free flow of important sensitive</p> <p style="text-align: center;">Page 73</p>	<p>1 mind that the explanation that must be given to the</p> <p>2 foreign state is not necessarily a simple one, not every</p> <p>3 country has a tradition of public inquiries. Certainly</p> <p>4 not with a facility to hold closed evidential hearings.</p> <p>5 All of this has to be explained and understood by the</p> <p>6 authorities in the countries concerned.</p> <p>7 I should say that in the interests of seeking to</p> <p>8 move the process along at a fast pace, a number of</p> <p>9 months ago now we tried an alternative process with your</p> <p>10 team, with their agreement we summarised all of the</p> <p>11 international material document by document. We did it</p> <p>12 in a way which we thought would not contravene any of</p> <p>13 the rules of law I have mentioned. We invited your team</p> <p>14 to view the summaries that we had prepared to determine</p> <p>15 which of the documents were sufficiently relevant to the</p> <p>16 inquiry to trigger us to make a request to a foreign</p> <p>17 state to seek permission for collateral use.</p> <p>18 That would have narrowed down the large number of</p> <p>19 documents very considerably. Your team viewed the</p> <p>20 summaries and did not feel able to decide whether</p> <p>21 a document was or was not relevant from the summary. No</p> <p>22 criticism is intended of them whatsoever --</p> <p>23 THE CHAIR: Yes, I see.</p> <p>24 MR BEER: -- there, it was simply the limit of the material</p> <p>25 that we could disclose meant that they were unable to</p> <p style="text-align: center;">Page 75</p>
<p>1 intelligence. So to disclose that material to the</p> <p>2 inquiry in breach of the conditions under which it was</p> <p>3 supplied to us or for the inquiry then to disclose it to</p> <p>4 core participants --</p> <p>5 THE CHAIR: Is it conventionally disclosed under specific</p> <p>6 conditions?</p> <p>7 MR BEER: Yes.</p> <p>8 THE CHAIR: It is I imagine, yes.</p> <p>9 MR BEER: In any event, if we did not forewarn our foreign</p> <p>10 partners and obtain their consent to this unusual use,</p> <p>11 it would risk jeopardising those vital relationships.</p> <p>12 THE CHAIR: Of Binyam Mohamed.</p> <p>13 MR BEER: Yes, a variant of that, comity among law</p> <p>14 enforcement agencies.</p> <p>15 As I have said already, it's often the precursor to</p> <p>16 the first two that I have mentioned.</p> <p>17 THE CHAIR: Thank you. All right so those three --</p> <p>18 MR BEER: Are really the bases.</p> <p>19 THE CHAIR: What's happening, Mr Beer, are you asking them</p> <p>20 for permission to disclose this material into the</p> <p>21 inquiry?</p> <p>22 MR BEER: Yes, I can say that there are a large number of</p> <p>23 countries concerned. Ms Giovanetti addressed you</p> <p>24 further in closed in relation to that matter. I think</p> <p>25 it's important to emphasise and for everyone to bear in</p> <p style="text-align: center;">Page 74</p>	<p>1 make a decision. What it does mean is that we are going</p> <p>2 through this process in relation to documents that are</p> <p>3 going to be irrelevant.</p> <p>4 THE CHAIR: Yes.</p> <p>5 MR BEER: We have prioritised the approach to countries in</p> <p>6 accordance with your inquiry team's prioritisation list.</p> <p>7 THE CHAIR: Thank you.</p> <p>8 MR BEER: That's the international material.</p> <p>9 THE CHAIR: Yes, thank you.</p> <p>10 MR BEER: Can I turn then to the more substantive issues</p> <p>11 that I know you will be wanting get on to, the</p> <p>12 restriction order applications.</p> <p>13 Can I deal with them in the way that Mr O'Connor</p> <p>14 did, content first, methodology second, timing third.</p> <p>15 THE CHAIR: Yes.</p> <p>16 MR BEER: Content, what should the sample include, over what</p> <p>17 material should it span? We accept that batch 1</p> <p>18 material should be included and the material underlying</p> <p>19 the police report should be included. But we do not</p> <p>20 consider that it would be right or proper to include the</p> <p>21 draft police report in this initial set of applications.</p> <p>22 Indeed, as well as it not being right and proper it</p> <p>23 would be an inefficient and not a useful exercise.</p> <p>24 We've addressed this briefly in paragraph 11(f) of our</p> <p>25 submissions, but I need to expand on them.</p> <p style="text-align: center;">Page 76</p>

<p>1 In order to expand on them I am afraid it's 2 necessary to spend a few minutes looking at the 3 aetiology of the police report. 4 In early 2022 a version of what I am going to call 5 "the document" was informally requested by your team as 6 an aid to making initial relevance decisions by them in 7 the stage 1 disclosure process. It was an aid for them. 8 That request was made at a time when the scheduling 9 of the relevant material was not advanced, still less 10 complete. 11 THE CHAIR: When there was still the preliminary security 12 review going on? 13 MR BEER: Yes, but from our perspective we hadn't got 14 through the scheduling looking at what the material was, 15 we were writing a report on the basis of material we had 16 not yet read. Therefore key documents were not 17 available to the authors of it. So in producing that 18 initial draft of the document, counsel for 19 Operation Verbasco had to rely primarily on summary 20 documents that had previously been prepared for the 21 purposes of, for example, the criminal proceedings. So 22 it's a synthesis of what somebody else has thought about 23 some primary material. 24 Following the hearing of March last year we were 25 directed to provide what was described as "an advanced</p> <p style="text-align: center;">Page 77</p>	<p>1 described as queries to us, including suggestions for 2 topics to be included in the police report in due 3 course. This is an iterative process. 4 When they raise a query, we create a draft topic 5 summary in stand-alone form so that it can be amended 6 more easily in due course as further relevant material 7 to that query is identified. We've received hundreds of 8 queries from your team to date and we anticipate that 9 there will be many, many more. 10 Your team has informed us that we can expect 11 additional queries and suggestions as they progress 12 further through their relevance review. 13 THE CHAIR: Yes, because the document in question is no 14 longer simply an aid to identifying sensitivities but is 15 potentially a central document as part of the evidence 16 that I am going to be asked to consider, yes? 17 MR BEER: Yes. So these queries, the hundreds that have 18 come in, will be translated into text in the police 19 report. 20 THE CHAIR: Yes. 21 MR BEER: We will amalgamate the stand-alone responses and 22 produce a final document, one that is being capable of 23 being signed off by the police rather than being 24 a lawyer's draft, which is what it is at the moment. 25 In short --</p> <p style="text-align: center;">Page 79</p>
<p>1 draft statement of events" to identify potential 2 sensitivities. This was, as we understood it and 3 understand it, a way to focus minds on which the 4 restriction order process was to follow and to encourage 5 some precision in identifying the scope of 6 sensitivities. 7 I understand that's removing the rattle. 8 THE CHAIR: Thank you. 9 MR BEER: Thank you very much. 10 THE CHAIR: In March 23, direction to provide? 11 MR BEER: By June 2022 the advance statement of events and 12 the purpose had changed of the document here, from 13 an internal document to aid your team it had shifted to 14 be a document to encourage precision in identifying the 15 scope of sensitivities. In order to enable HMG to 16 participate in that process it was necessary not to add 17 substantive new sections to the document itself. 18 We produced an initial sensitivity review in 19 June 2022 and HMG provided a further review in 20 October 2022. Since that time, as scheduling and 21 disclosure has progressed, we've continued to make 22 progress to a more complete version of the document. 23 We've engaged in a collaborative process with your 24 counsel team, whereby following their review of the 25 underlying material that your counsel provide what are</p> <p style="text-align: center;">Page 78</p>	<p>1 THE CHAIR: Presumably somebody may need to speak to it? 2 MR BEER: Yes, but the important point, sir, is that the 3 document has changed shape and purpose -- 4 THE CHAIR: Yes. 5 MR BEER: -- in response to the different but proper 6 requests of your team. It started as a document to help 7 them make focused disclosure requests -- 8 THE CHAIR: Yes, I have that, Mr Beer. I am with you. 9 MR BEER: It's now to be applied for a rather different 10 purpose. 11 The reasons why the current version of the report 12 shouldn't form part of the first wave of restrict order 13 applications are as follows. 14 Firstly, the documents truly in draft. Nobody could 15 yet affirm its accuracy on behalf of Operation Verbasco. 16 On the contrary, the draft report may be inaccurate in 17 material respects because of the early reliance on 18 summary resources. 19 Secondly, the document is likely to change 20 significantly in its structure and content. It is not 21 the case that the final version will simply reflect the 22 current draft with some more added to it. 23 Third, the current draft does not contain any of the 24 ILOR material. 25 THE CHAIR: Yes.</p> <p style="text-align: center;">Page 80</p>

<p>1 MR BEER: That cannot be addressed until we've received 2 relevant permissions from partner agencies in foreign 3 states. 4 Fourthly, reference to the underlying material will 5 provide a sufficient and better basis for these 6 preliminary restriction order applications than the 7 draft report. That's because the text of the current 8 draft does not knowingly contain reference to any of our 9 known sensitivities. We have not drafted it in a way to 10 include sensitive material. We have sought to progress 11 the draft as primarily an open document. It follows 12 that including the draft itself in a preliminary 13 restriction order application -- 14 THE CHAIR: Wouldn't help. 15 MR BEER: -- wouldn't really assist in resolving the 16 approach to be taken in respect of police sensitivities. 17 It's fair to say that the current draft does contain 18 text which HMG has identified as being sensitive, but 19 that is reflected in the sensitivity of the underlying 20 material to which police report refers. Therefore, you 21 get the same value by looking at the underlying material 22 as you would in looking at the report. 23 THE CHAIR: Yes. 24 MR BEER: Fifthly, requiring a preliminary restriction order 25 application to be made at this stage in respect of the</p> <p style="text-align: center;">Page 81</p>	<p>1 HMG that there should be no disclosure of any material, 2 even material that has passed through the restriction 3 order process and has been the subject of a ruling by 4 you until all of the material has been considered by HMG 5 for disclosure, ie there has to be no disclosure until 6 the last document has passed through the process and 7 then there will be a very large volume of disclosure all 8 at once. 9 That's not to say we do not understand and respect 10 the reasons why HMG have taken that position. It's not 11 necessary having regard to our sensitivities for us to 12 do the same thing. We are arguing about a very 13 different thing, we are not saying wait until right to 14 the end and then give mass disclosure essentially, 15 because of the mosaic effect in particular. Instead, 16 our position is much narrower and it's whether the 17 marked-up versions should be disclosed as part of the 18 making of the application. We envisage that once you've 19 determined the application, then the documents over 20 which the application was made can then be disclosed. 21 THE CHAIR: I follow. 22 MR BEER: Essentially, the reasons why we say harm would be 23 caused by disclosing the material before the 24 applications are made are those given by Ms McGahey, 25 just to crystallise them from our perspective. Firstly,</p> <p style="text-align: center;">Page 83</p>
<p>1 document would result in a substantial duplication of 2 work if and when we have to go through the whole 3 exercise again when the report is finalised. That 4 applies both HMG and to Operation Verbasco, there will 5 be duplication for us and for them. 6 THE CHAIR: Right. 7 MR BEER: That's all I wish to say about the content, the 8 first issue that Mr O'Connor mentioned. 9 Could I turn to the issue of the methodology and in 10 particular whether the application for the restriction 11 order must include disclosure of the actual documents 12 over which the application is made to all core 13 participants. 14 THE CHAIR: I think the issue is whether -- it's certainly 15 not whether the application should include disclosure to 16 everybody of the unredacted form, it's a question of -- 17 MR BEER: Yes, the marked-up versions. 18 There were two issues. 19 Firstly, whether this was required by the inquiry's 20 protocol. That's fallen away because Mr O'Connor has 21 rightly suggested that the protocol can accommodate both 22 approaches. 23 Secondly, whether harm will be caused by including 24 marked-up documents in the application. I should make 25 it clear here that we do not adopt the same position as</p> <p style="text-align: center;">Page 82</p>	<p>1 by highlighting the material which the applicant asserts 2 is sensitive and which the applicant asserts would cause 3 serious harm to an important public interest, it's 4 placing a big red finger to the world at large alongside 5 the material. 6 We assume -- 7 THE CHAIR: That's likely to happen when the redacted 8 document is disclosed in any event, isn't it? 9 MR BEER: If the redaction is maintained, if you uphold our 10 application, they can't see what's underneath the 11 redaction and so it will be a red flag to nothing. But 12 this is in the event that you take a different view -- 13 THE CHAIR: I see, this is the failure point. Yes, I see. 14 MR BEER: Yes, and so it's not simply that you will have 15 determined, as I think you said in argument with 16 Ms McGahey, that there is no sensitivity, you will have 17 determined that on balance the public interests in 18 disclosure outweigh the interests relied upon by the 19 discloser for non-disclosure. 20 THE CHAIR: Yes. 21 MR BEER: But that is a big red finger pointed. It will 22 make it easier for any hostile state actor to identify 23 the material which the state believes is sensitive, even 24 if it loses the application. It's very similar to 25 collecting together the list of names of the police</p> <p style="text-align: center;">Page 84</p>

<p>1 officers and disclosing them on mass; it makes the jobs 2 of others with a malign intent that much easier. 3 There's an additional point. If one imagines a page 4 with the redaction on it, we are talking about 5 disclosure of the rest of the page without the 6 redaction, that material is either irrelevant to the 7 determination of what's under the blacked out passage, 8 in which case there's no point in having it at this 9 stage, or it's material that might point towards what is 10 underneath the blacked out passage and is therefore 11 something which may provide some assistance in the 12 determination of the application for a restriction 13 order, in which case that is material that should not be 14 disclosed. 15 The third point I would make on this is that there 16 is a reason that we have a public inquiry into 17 Dawn Sturgess's death. It's because the machinery that 18 the public inquiry brings to bear on the exercise 19 includes the appointment of counsel to the inquiry, who 20 may be DVed. They are the bulwark here, they are the 21 protection, because they are the ones who know what is 22 underneath the redactions, as will you, and can fully 23 test the state's assertion of public interest immunity, 24 or whatever the harm is. 25 Lastly on this point, if you order that the</p> <p style="text-align: center;">Page 85</p>	<p>1 Option one, the subject matter of the application 2 would include batch 1 material and underlying documents. 3 You'll see that in the third column, not the police 4 report. But we can file an application in the first 5 week of June, leading to a hearing date by the end of 6 July. 7 Again, that's not to seek to undermine the position 8 that HMG has taken and how long it says that it needs in 9 order to file an application. But to be clear, we could 10 do it at a not dissimilar date to that suggested by the 11 family. You remember I think they said 23 May. We are 12 saying the first week of June. 13 THE CHAIR: So you can do batch 1 and the underlying 14 documents by then, but that's just you of course. 15 MR BEER: It is. It is. So that's just to be completely 16 clear. Previously we had heard how long somebody else 17 required and we simply said: yes, we can do it by then 18 too. This is being transparent as to how long we in 19 fact need. 20 THE CHAIR: Yes. 21 MR BEER: I am not going to spend time going through options 22 two and three because they may, in the light of what 23 Ms McGahey has said, not be realistic because HMG could 24 not do either of them. Option two includes all of the 25 batch 2 material.</p> <p style="text-align: center;">Page 87</p>
<p>1 documents are disclosed in their marked-up form and 2 Ms McGahey's additional tranches (her tranches one, two 3 and three) are included, then we would require 4 additional time if they are going to be disclosed as 5 open documents in order to view them and mark them up 6 for our own redactions. That's not an exercise that's 7 been undertaken to date. Whereas if they are going to 8 be disclosed on a closed basis, the marked up versions, 9 we would not require that time. 10 Can I turn to timing then, please. 11 THE CHAIR: Yes. 12 MR BEER: Can you turn up please I think it's tab 6A in your 13 bundle. 14 THE CHAIR: Yes. Yes, I have seen this. 15 MR BEER: You will recall that in our written submissions we 16 essentially fell into line and agreed with a date at 17 which the core participant who needed the most time, 18 HMG, namely the end of July, needed and was working to 19 in order to make their applications. We said 20 essentially if that's what HMG require, then we can do 21 things by then. 22 THE CHAIR: Yes. 23 MR BEER: But we have reflected on the position and you'll 24 see that we have set out three potential options, and 25 I am just looking at option one at the moment here.</p> <p style="text-align: center;">Page 86</p>	<p>1 THE CHAIR: Yes. 2 MR BEER: And, importantly, it includes the SIO (the Senior 3 Investigation Officer) logs which may contain material 4 of importance for the purposes of a restriction order 5 application and option three is essentially all of our 6 material which we could make an application over by 7 early October, so the whole lot. 8 Option three would take us to a final hearing much 9 sooner, even though the hearing date of the application 10 itself would be in December 2023 and so will be a little 11 distant from now. I just draw this to your attention to 12 say we could make an application by June 2023. 13 I am not going to address any of the follow-on 14 stages because I think they are largely -- I won't use 15 the word dictated, but affected more by others rather 16 than Operation Verbasco. 17 THE CHAIR: Yes. 18 MR BEER: Is there anything more broadly that I can assist 19 with? 20 THE CHAIR: No, that's very helpful. I am grateful. 21 Mr Beggs, do you want to add anything? 22 MR BEGGS: No, sir. We will effectively fall in line for 23 the reasons mentioned (audio distortion). In any event, 24 we are likely to have few, if any, documents that 25 require restriction orders.</p> <p style="text-align: center;">Page 88</p>

<p>1 THE CHAIR: Yes, all your documents have now been disclosed 2 in stage 1, haven't they? 3 MR BEGGS: That's correct. There's just a transmission 4 issue with relation to the emails, but that's being 5 resolved, I am confident of that, and so the answer is 6 yes. 7 THE CHAIR: Thank you very much indeed. 8 Is there anybody else concerned, other than 9 Mr Mansfield? I think not. 10 Mr Mansfield, it's 12.50, what do you want to do? 11 MR MANSFIELD: It might be sensible to break early for 12 lunch. 13 THE CHAIR: We can either have a break now or you have one 14 quite soon after you've started. 15 MR MANSFIELD: Yes. No, I think it would be -- if I may say 16 so now, and then we come back a bit earlier. 17 THE CHAIR: I wasn't going to offer an hour, I'm afraid. 18 MR MANSFIELD: No, that's all right. Whatever time you 19 think. 20 THE CHAIR: Does anybody have any difficulty in working 21 starting again at 1.30? Then let's do that. It's 22 Friday. It will help everybody I suspect. 23 Thank you very much, 1.30. 24 (12.47 pm) 25 (The luncheon adjournment)</p> <p style="text-align: center;">Page 89</p>	<p>1 to look forward, the problem we would suggest is this 2 which you put your finger on minutes later, which is 3 that, rather like Parkinson's law itself, time gets 4 filled and if latitude is given we say in fact it's not 5 just filled it's pushed back. 6 I just give one illustration of what's gone on here, 7 because when this matter was converted from an inquest 8 into an inquiry I have the reference so -- I am not 9 asking you to look it up, but it comes in fact in the 10 submissions made in December 2021 by your learned 11 counsel. It's worth just remembering what he said at 12 that time. Now I am not trying to be hypercritical, one 13 understands the problem, but one has to bear in mind 14 that the family have been, as it were, recipients of 15 these statements. At paragraph 7 of his submissions in 16 December 2021, and what he said then was: 17 "The coroner's intention is that substantive inquiry 18 hearings will commence in late February 2023." 19 I won't read the rest of the paragraph because it 20 deals with specific dates in 2022 as well as 2023. 21 As you pointed out this morning, at one time you 22 were being told about October 2023, but we are not in 23 2023, it's not going to be 2023 if we are lucky it might 24 be 2024 and the real risk here which the family are 25 really concerned about is that there will be more</p> <p style="text-align: center;">Page 91</p>
<p>1 (1.30 pm) 2 THE CHAIR: All right? Try, Mr Mansfield. If you set it 3 off we'll cope with -- 4 MR MANSFIELD: I hope I don't set that off, yes. Thank you. 5 Submissions by MR MANSFIELD 6 MR MANSFIELD: We have a division of labour, so that my 7 learned friend Mr Straw will be dealing with 8 post-disclosure matters. 9 THE CHAIR: Right. 10 MR MANSFIELD: But I have some more general points to make. 11 Obviously I don't want to occupy your time with matters 12 that may be regarded as irrelevant because it's matters 13 that are unrealistic so I really want to be of as much 14 assistance to you in this matter as can be. 15 May I just -- some of these points I will just put 16 them once and I think they are accepted points, I want 17 to start with the family itself because all of them, 18 I think watching today, have been, from the beginning, 19 exercising responsibility, patience and understanding. 20 THE CHAIR: Yes. 21 MR MANSFIELD: I think it's in that context that I move to 22 the question that arises next, which is the question of 23 timing. I am going to put that next because 24 I appreciate your observations this morning about not, 25 as it were, looking too much into the past but wanting</p> <p style="text-align: center;">Page 90</p>	<p>1 slippage and we will be in 2025, despite what everybody 2 says. 3 The first point is would you bear in mind that this 4 slippage has already happened and there has to be some 5 sort of line in the sand in which the family can rest 6 assured, because up till now very little -- that's also 7 accepted by all parties -- has been communicated to them 8 about the circumstances of the death, other than the 9 very obvious matters. We would say a target date for 10 the inquiry which hopefully is next year, not 2025, is 11 important to be adhered to in the longer run. 12 I appreciate the difficulties that provides for 13 some. 14 As far as the Government is concerned, they say they 15 understand all of that and they say it's an exceptional 16 case. But may we say it was known to be an exceptional 17 case back in 2021. I don't even venture into the darker 18 portals of the inquest that went before that, but once 19 it became an inquiry it's perfectly clear it was going 20 to be exceptional. 21 I am not placing any particular criticism at 22 anybody's particular door, because we don't know, but it 23 must have been possible in 2021, knowing that the 24 timescale then was 2023, for there to have been 25 a workforce of specialists and we can't scrutinise --</p> <p style="text-align: center;">Page 92</p>

<p>1 you can, and maybe you have already, it would be of 2 importance to know just how many people are actually 3 working on this aspect. Is it one or two, half a dozen 4 or what? Is it every day full-time or the situation 5 should be, we say, an exceptional case requiring 6 exceptional resources so that we are not put in this 7 parlous position of being told well we can't do anything 8 quicker than we are doing it.</p> <p>9 THE CHAIR: I understand all of that, Mr Mansfield.</p> <p>10 MR MANSFIELD: Yes.</p> <p>11 THE CHAIR: You, of course, have taken the point in the 12 past, and will no doubt understand it instantly, that 13 I don't know exact numbers and I haven't enquired, nor 14 at the moment do I intend to, but what is clearly right 15 is that there is a limited number of specialists in the 16 particular field of the asserted hostile state.</p> <p>17 MR MANSFIELD: Yes.</p> <p>18 THE CHAIR: And in that field, just at the moment, there are 19 a large number of rather pressing calls on their time.</p> <p>20 MR MANSFIELD: They interlink of course, because as has 21 already been said if the lessons out of this case are 22 not learned rather quickly, that's why we say --</p> <p>23 THE CHAIR: I've got that.</p> <p>24 MR MANSFIELD: -- it's an exceptional case requiring 25 exceptional resources.</p> <p style="text-align: center;">Page 93</p>	<p>1 We say that it's important because working backwards 2 again we don't know what the relevance priorities are 3 here, because there plainly are ... some topics are far 4 more relevant than other topics to the inquiry. In the 5 central ones, the really important ones, one would hope 6 that specialists who have been in this field not just 7 this year, not just when the Ukraine war started but 8 before that, they are specialists one assumes that have 9 been working in this arena for some time and therefore 10 they will be in a much stronger position than starting 11 from scratch.</p> <p>12 This is not the bank analogy whereby people are 13 putting things together in some office somewhere and 14 trying to marry up bank clerks' accounts of who came 15 into the bank and so on. These are people who have 16 continuity, the Russian experts have continuity, unless 17 I am going to be contradicted in a way that makes life 18 difficult. But the position is we assume that they do 19 and that therefore they will have made the connections 20 and will understand the risk of the mosaic effect, which 21 we say has become a kind of overriding, overweening 22 cloud over the whole of this and it's disproportionate, 23 disproportionate that that should become the determining 24 factor, that risk.</p> <p>25 In this context therefore the framework of</p> <p style="text-align: center;">Page 95</p>
<p>1 THE CHAIR: I understand that.</p> <p>2 MR MANSFIELD: I can't put it higher than that.</p> <p>3 In sequence therefore if one is looking at an end 4 date outcome of 2024, then one has to work back to some 5 extent. The working backwards comes to the family's 6 role -- if they are going to perform a meaningful role 7 in this inquiry they need the information that is not 8 going to put the state at risk, one appreciates that.</p> <p>9 If they are not going to get anything -- on one 10 interpretation of proceedings from now on they may not 11 get anything until the spring of next year and if the 12 inquiry is going to start, as we suggest it should, in 13 the same year, it's going to be extremely difficult for 14 them to mount the kind of enquiries they would 15 legitimately want to make. May I develop this a bit, 16 because we say that again the observations you've made 17 about what is central, and must have been obvious to 18 Her Majesty's Government was going to be central to this 19 inquiry from 2021 onwards so that you triage and 20 prioritise. What's central to the inquiry? What's 21 inevitably going to arise? Have you done a sensitivity 22 review? Well the answer to this morning was, if we may 23 say so, somewhat vague, yes, they've done it but how 24 much have they done? Where this proof of what they've 25 done? Again, we can't ask for that.</p> <p style="text-align: center;">Page 94</p>	<p>1 relevance, what's really central and what is not? Well, 2 I can deal with the what is not rather quickly because 3 I raised it last time in the hope that the logjam could 4 be, as it were, cut through. In other words, there must 5 be things that, say documents and people as well, 6 witnesses, for whom no restriction order is going to be 7 made.</p> <p>8 Now what the Government are saying, it would appear, 9 is:</p> <p>10 "Well, we have complied in the sense we've told you 11 what we intend not to do, but we can't give you a final 12 answer."</p> <p>13 So we are back into the same quagmire that no 14 progress is made so we don't know.</p> <p>15 But may I just in this particular context I have 16 asked that the ruling on scope, which I'm afraid isn't 17 in the papers --</p> <p>18 THE CHAIR: No, I remember it. I have seen it.</p> <p>19 MR MANSFIELD: I won't take time if you remember it.</p> <p>20 THE CHAIR: I remember it well enough, I think.</p> <p>21 MR MANSFIELD: Yes, what I wanted to just do is --</p> <p>22 THE CHAIR: Don't let me stop you, Mr Mansfield, but I am 23 not coming to it new, I have seen it.</p> <p>24 MR MANSFIELD: Yes, I am much obliged. The point about this 25 particular document, the ruling itself, is that there</p> <p style="text-align: center;">Page 96</p>



<p>1 are various headings which are of importance. For 2 example, the death of Dawn Sturgess if I read through 3 the four headings, is it really being said by 4 Her Majesty's Government that there is nothing more that 5 we can be shown at this minute, right now? We say there 6 must be more material that we can see, particularly, for 7 example, the second italicised or Roman numerals, 8 paragraph 32 under the heading of "Death, events from 9 beginning of June until 8 July 2018", I am going to 10 pause from that -- 11 THE CHAIR: Events from when? 12 MR MANSFIELD: It's from the poisoning itself. June 2018 to 13 8 July, which is the death of Dawn Sturgess. 14 I pause on that one, because it branches off into 15 another whole area I can give as an example of why 16 essentially the proposition I am coming to is we need 17 rolling disclosure if I can put it that way, rather than 18 waiting until the end and getting mass disclosure. I am 19 using the vernacular that's been adopted. 20 THE CHAIR: No, I understand. 21 MR MANSFIELD: Therefore under that heading what is of 22 interest to the family, not only what bears upon that 23 particular heading, but it also bears on the next group 24 of points under the poisoning. I pause for a moment 25 under this one, namely events between those two dates.</p> <p style="text-align: center;">Page 97</p>	<p>1 and the death of Dawn. 2 Then there's another area of time covered by CCTV, 3 which is the next section. 4 We say that that is an important area that we would 5 need to look at. Of course the police I assume have 6 done that, but we have nothing on that. One thing that 7 would help would be access to the CCTV now, because it's 8 going to take -- as you may appreciate -- a little time 9 to go through and see what is there. Of course this 10 bears upon the topic I have stopped at, which is 11 paragraph 2 of paragraph 30. That is this, that the 12 bottle is found, is said to have been found in a refuse 13 bin, one of those wheelie bins, a rather large one, 14 nearby a shop. The question is how -- obviously the 15 question is how did it get there, and CCTV could be, may 16 not be, important because it's a very long period for 17 a sealed bottle to finally find its way onto the top or 18 near the top of a bin -- 19 THE CHAIR: Several assumptions -- but I understand the 20 point. 21 MR MANSFIELD: They are assumptions, but they are 22 assumptions, some of them, based on what people say, in 23 other words evidence -- 24 THE CHAIR: Rather a lot of people have made a lot of 25 assertions in this case, that's one of the problems.</p> <p style="text-align: center;">Page 99</p>
<p>1 There is we know, because it's in the public domain 2 and it's obvious anyway, a mass of CCTV. This is 3 important because there is CCTV in Salisbury which 4 relates to the roads where the Skripals were living at 5 the time, people who are walking the roads, driving the 6 roads. Then there is CCTV in the centre of Salisbury in 7 quite a lot of different places named by people who were 8 present on the day and as well as Salisbury there is 9 CCTV in Amesbury, CCTV in London, which relates to 10 a hotel where ... there are now three suspects but at 11 least two of them were, there is CCTV in relation to 12 that. CCTV into other movements in London and then 13 outside London, Gatwick Airport. 14 This involves -- again I am not stating a state 15 secret here, there is an allegation in a film that's 16 been made about all of this that when they arrived at 17 Gatwick they were followed and Skripal himself was 18 followed. Now whether that's true I don't know. CCTV 19 would be relevant to all of that -- 20 THE CHAIR: When who arrived there? 21 MR MANSFIELD: When the daughter arrived for the weekend. 22 THE CHAIR: Oh then. 23 MR MANSFIELD: So that's tying in with the next section. So 24 there are two sections. 25 The section between the poisoning of the Skripals</p> <p style="text-align: center;">Page 98</p>	<p>1 The purpose of the inquiry is to find out what actually 2 happened. 3 MR MANSFIELD: Exactly, so we say with that in mind CCTV -- 4 THE CHAIR: I have the CCTV point. 5 MR MANSFIELD: Then there are other -- 6 THE CHAIR: I think it's helpful, Mr Mansfield, if you think 7 you can identify areas of potential evidence, like CCTV, 8 where you suggest it may well be that there is nothing 9 remotely controversial about it, with the possible 10 exception of the location of the cameras, for example. 11 MR MANSFIELD: Yes. 12 THE CHAIR: Then it may be helpful, I don't know whether it 13 will or not. This is coming fresh quite late in the 14 day. But I am not complaining about that. I think it's 15 quite useful if you do it, so CCTV I have. Anything 16 else? 17 MR MANSFIELD: Yes, another area -- I have only extracted 18 examples, there are more but anyway the next one is 19 telephonic evidence. In other words, it's in the public 20 domain that telephone numbers were known, not the 21 content, we don't know whether the authorities know 22 about the content of phone calls but this -- 23 THE CHAIR: Matrix of who called who? 24 MR MANSFIELD: Yes, exactly that or the metadata that goes 25 with the calls.</p> <p style="text-align: center;">Page 100</p>

<p>1 THE CHAIR: Comms data, yes, okay.</p> <p>2 MR MANSFIELD: It's that kind of material.</p> <p>3 Then again I am looking at the list that we have out</p> <p>4 of the scope issues, the novichok itself is of interest</p> <p>5 or may be of interest. Well, it's the central agent</p> <p>6 here. The question is the link between the novichok and</p> <p>7 where it was found in Salisbury in terms of where it was</p> <p>8 distributed, not the bottle, but where was it found on</p> <p>9 a door handle, on a car handle and so on, these are all</p> <p>10 matters of the distribution and it ties into is it --</p> <p>11 how does it compare with the bottle and the novichok?</p> <p>12 There is scientific evidence as we understand it, but we</p> <p>13 have not seen it.</p> <p>14 So may I just put it --</p> <p>15 THE CHAIR: The identity of the material?</p> <p>16 MR MANSFIELD: Yes, scientific evidence, which we can't</p> <p>17 imagine is subject to any kind of restriction order.</p> <p>18 THE CHAIR: I wouldn't be too sure about that, Mr Mansfield.</p> <p>19 MR MANSFIELD: In view of what was said publicly by various</p> <p>20 politicians, unless they have it wrong, which is</p> <p>21 possible.</p> <p>22 THE CHAIR: But the extent of the defensive knowledge,</p> <p>23 defensive corporate knowledge of potential dangerous</p> <p>24 agencies is highly sensitive potentially, isn't it?</p> <p>25 MR MANSFIELD: Well, potentially sensitive but actually</p> <p style="text-align: center;">Page 101</p>	<p>1 her Ladyship had a clear view on this and it's</p> <p>2 an important paragraph for what I am dealing with now:</p> <p>3 "On balance, and given the possible causal route</p> <p>4 connection between the attack on Mr Skripal and the</p> <p>5 poisoning of Ms Sturgess, I am satisfied the issue is</p> <p>6 potentially relevant to the question of how Ms Sturgess</p> <p>7 died. But at this stage [as I have already indicated</p> <p>8 this was in 2021] any request for disclosure on this</p> <p>9 issue must be reasonable and proportionate."</p> <p>10 With which we agree. The question is do we wait --</p> <p>11 well, I will put it twofold.</p> <p>12 First of all, there must be some material that can</p> <p>13 be released without sensitivity, some, for example that</p> <p>14 precautions are taken. Well, obviously it leads to</p> <p>15 further questions. But do we wait --</p> <p>16 THE CHAIR: Be realistic, you are talking about potential</p> <p>17 hostile state attacks, the availability and use of</p> <p>18 precautions is potentially high.</p> <p>19 MR MANSFIELD: Potentially. That's why I think it's that</p> <p>20 phrase that's important. What I am coming to is do</p> <p>21 we -- for this topic, there's another one, do we wait</p> <p>22 until the mass --</p> <p>23 THE CHAIR: Yes, okay.</p> <p>24 MR MANSFIELD: It's that one. And there are others which if</p> <p>25 would be of use, I am quite happy to provide a list of</p> <p style="text-align: center;">Page 103</p>
<p>1 there's quite -- again it might not be true, but there's</p> <p>2 quite a lot of material in the public domain about this.</p> <p>3 THE CHAIR: That's exactly right, it might not be true. It</p> <p>4 might be true yet highly sensitive and to confirm it</p> <p>5 might be a problem. Anyway.</p> <p>6 MR MANSFIELD: I am just identifying the areas.</p> <p>7 THE CHAIR: Yes, it's helpful.</p> <p>8 MR MANSFIELD: There is another very important area which</p> <p>9 isn't in the list as you may have it or remember it, but</p> <p>10 in this section of the ruling the paragraphs are I will</p> <p>11 give the exact paragraphs, yes, 40 onwards it's 40, 41,</p> <p>12 42.</p> <p>13 What was included in scope, again at our request,</p> <p>14 may I just read the relevant paragraphs and then you</p> <p>15 will have it in one, as it were:</p> <p>16 "The family invited me [your predecessor] to add one</p> <p>17 further issue to the provisional scope, namely whether</p> <p>18 the UK authorities took appropriate precautions in early</p> <p>19 2018 to protect Mr Skripal from being attacked. If</p> <p>20 there was a specific threat to Mr Skripal of Russian</p> <p>21 retaliation the family would wish to know whether any</p> <p>22 steps were taken to protect him or the public from</p> <p>23 collateral damage."</p> <p>24 There's then a long paragraph in between I don't</p> <p>25 read it. Then there's another paragraph indicating that</p> <p style="text-align: center;">Page 102</p>	<p>1 other topics now.</p> <p>2 THE CHAIR: It's better I think if you provide it to</p> <p>3 counsel.</p> <p>4 MR MANSFIELD: I will, yes.</p> <p>5 THE CHAIR: Then you can take time to consider exactly how</p> <p>6 you put it. You have given me good examples -- some</p> <p>7 examples, some may be good some may not be, but you've</p> <p>8 given me examples and I have the point.</p> <p>9 MR MANSFIELD: Therefore, just working backwards again, what</p> <p>10 we would ask for ... I am not repeating what we put in</p> <p>11 the note for directions, but essentially what we are</p> <p>12 saying is as far as the restriction order applications</p> <p>13 are concerned it's version number 1 not number 2, in</p> <p>14 other words it's not no information, nothing revealed at</p> <p>15 that point, we say at the point of the application it</p> <p>16 will be important where it is safe to do so for us to</p> <p>17 start the process of being provided with information</p> <p>18 which either is not subject to a restriction order or</p> <p>19 not likely to be, waiting to see whether some word or</p> <p>20 two in another document alerts one is we say</p> <p>21 disproportionate. So we would ask at that stage we get</p> <p>22 as much as we can, because again I don't know how much</p> <p>23 of what's in batch 1 -- I assume batch 1 covers most of</p> <p>24 the topics that are in this ruling on scope and includes</p> <p>25 the two paragraphs I have just read out, but I don't</p> <p style="text-align: center;">Page 104</p>

<p>1 know.</p> <p>2 THE CHAIR: I don't think ...</p> <p>3 MR MANSFIELD: I realise I am dancing in the dark as usual,</p> <p>4 but it's a situation -- I think you have the point that</p> <p>5 we make. So we would ask therefore that -- and of</p> <p>6 course it applies to the second round as well, so</p> <p>7 I don't need to go through that. But we would welcome</p> <p>8 at any stage a form of rolling disclosure so that we</p> <p>9 don't get it all in one go. That's really what it comes</p> <p>10 to.</p> <p>11 Unless there is any other -- I have put it in</p> <p>12 general terms, but I hope that's helpful in terms of how</p> <p>13 we are thinking about it.</p> <p>14 THE CHAIR: That is extremely helpful, Mr Mansfield. If</p> <p>15 I were to adopt your approach which is a perfectly</p> <p>16 conventional case management approach starting with as</p> <p>17 it were start date --</p> <p>18 MR MANSFIELD: Yes.</p> <p>19 THE CHAIR: -- and working backwards, which to some extent</p> <p>20 case management always involves. If you were right that</p> <p>21 these hearings ought to begin in the autumn of 2024.</p> <p>22 MR MANSFIELD: Yes.</p> <p>23 THE CHAIR: Which I think you are saying to me.</p> <p>24 MR MANSFIELD: I am, yes.</p> <p>25 THE CHAIR: So if I am aiming at October, or conceivably the</p> <p style="text-align: center;">Page 105</p>	<p>1 MR MANSFIELD: The content.</p> <p>2 THE CHAIR: -- the format. Do you want to say anything</p> <p>3 about the suggestion that the way to do it is to get</p> <p>4 down to some examples?</p> <p>5 MR MANSFIELD: Absolutely, and I think your question to my</p> <p>6 learned friend about, "Well, have you done a review,</p> <p>7 either of sensitivity or security, of the central</p> <p>8 documents?" And we didn't get an answer to that, but</p> <p>9 there seems to be great difficulty in giving examples</p> <p>10 today of the sort of applications that are going to be</p> <p>11 made. So the answer to your question is, yes, there</p> <p>12 ought to be express examples of exactly what it is that</p> <p>13 they are worried about in terms of an overall -- because</p> <p>14 one document might have several levels of sensitivity.</p> <p>15 THE CHAIR: Absolutely.</p> <p>16 MR MANSFIELD: Just getting a sample may not be</p> <p>17 satisfactory, but we only know when we begin to see</p> <p>18 them.</p> <p>19 THE CHAIR: What's contemplated is that I should have</p> <p>20 samples, representative samples, to rule upon in late</p> <p>21 summer/early autumn of this year --</p> <p>22 MR MANSFIELD: Yes.</p> <p>23 THE CHAIR: -- and that thereafter that will accelerate and</p> <p>24 ease the subsequent resolution of more restriction order</p> <p>25 applications. Are you content with that as a general</p> <p style="text-align: center;">Page 107</p>
<p>1 beginning of November, in order to get it done by</p> <p>2 Christmas --</p> <p>3 MR MANSFIELD: Yes.</p> <p>4 THE CHAIR: -- for example, how long before that do -- do</p> <p>5 I correctly divine from the submissions which you have</p> <p>6 formulated for me and which I've seen that subject to</p> <p>7 your rolling disclosure point you are thinking in terms</p> <p>8 of at least about six months.</p> <p>9 MR MANSFIELD: As you put it, subject to the rulings, yes.</p> <p>10 THE CHAIR: Of course, subject to rulings and subject to the</p> <p>11 obvious advantages from your point of view of such</p> <p>12 rolling element of the disclosure as can be achieved.</p> <p>13 MR MANSFIELD: Yes, because if it's a mass version then</p> <p>14 I think it will be a little longer than six months.</p> <p>15 THE CHAIR: Right.</p> <p>16 Do you want to say anything, Mr Mansfield, about the</p> <p>17 type of procedure that has been ventilated, the</p> <p>18 suggestion is that I should encourage -- in fact not</p> <p>19 encourage, require --</p> <p>20 MR MANSFIELD: Yes.</p> <p>21 THE CHAIR: -- sample restriction order applications to be</p> <p>22 made some time this summer basically.</p> <p>23 MR MANSFIELD: Well, we certainly support the earliest</p> <p>24 possible date that that could happen.</p> <p>25 THE CHAIR: Never mind the date, it's --</p> <p style="text-align: center;">Page 106</p>	<p>1 approach or not?</p> <p>2 MR MANSFIELD: Can I put it this way, somewhat neutral</p> <p>3 because we really don't know whether that is</p> <p>4 satisfactory because we don't have the rest of the</p> <p>5 material to know whether the samples are really going to</p> <p>6 be a sensible workable way of doing it.</p> <p>7 THE CHAIR: You'll have to leave that, the selection of</p> <p>8 them, as indeed shall I, to them. All right. Thank you</p> <p>9 that's helpful. Thank you very much indeed.</p> <p>10 Mr Straw.</p> <p>11 Submissions by MR STRAW</p> <p>12 MR STRAW: If I may, I would like to talk about the</p> <p>13 mechanics of restriction orders.</p> <p>14 THE CHAIR: Yes.</p> <p>15 MR STRAW: Perhaps the key point which I would like to start</p> <p>16 on is the question as to whether nonsensitive parts of</p> <p>17 the documents that underlie the restriction orders will</p> <p>18 be disclosed to core participants.</p> <p>19 THE CHAIR: Yes.</p> <p>20 MR STRAW: The basic legal requirement that underlies all of</p> <p>21 this you've mentioned twice at least already, sir, today</p> <p>22 is that as much as possible of the application, the</p> <p>23 submissions and the evidence to which it relates must be</p> <p>24 disclosed without undermining the purpose of the</p> <p>25 application. I don't think there's any dispute about</p> <p style="text-align: center;">Page 108</p>

<p>1 that. That's the basic principle that is being applied 2 here.</p> <p>3 But there's very good reason for that principle, 4 which I think can be summarised in the basic point that 5 context is everything. It's incredibly difficult, as 6 everyone knows who makes these applications or considers 7 them, to do so effectively unless one sees the 8 documents.</p> <p>9 The first point I would like to draw attention to is 10 a conflict between the Government and Operation 11 Verbasco's approach.</p> <p>12 So Mr Beer has accepted that once you've made the 13 preliminary restriction order rulings then at least the 14 subject that you've identified as nonsensitive or that 15 you've identified as should be disclosed in accordance 16 with that restriction order can then be disclosed to 17 core participants.</p> <p>18 As I understand Ms McGahey's submissions, it still 19 can't be disclosed. It's only at very end of all the 20 process. That even that information that you've ruled 21 can be disclosed can't be disclosed. One only needs to 22 say it to see how that completely subverts the whole 23 process. If the Government wants something to be 24 withheld they have to apply to you for that to happen. 25 If you rule against them, then the information has to be</p> <p style="text-align: center;">Page 109</p>	<p>1 THE CHAIR: I'm afraid I think that's likely.</p> <p>2 MR STRAW: Maybe it comes to another point then, which is 3 that Mr Beer and Ms McGahey drew attention to the fact 4 that this a balancing exercise, but in reality if 5 national security interests are claimed over material if 6 you decide that material is sensitive and should be 7 withheld for reasons of national security, then that's 8 the end of the issue. So in reality in these cases if 9 you make a direction at least in respect of the majority 10 of the information, if you decide to reject 11 a restriction order application and something can be 12 disclosed that's because it's not sensitive.</p> <p>13 THE CHAIR: You mean that it's rather unlikely in the 14 context of this case that the ruling is likely to be 15 well, yes, there is risk to national security but it's 16 one which we can take?</p> <p>17 MR STRAW: Yes.</p> <p>18 THE CHAIR: I see all right.</p> <p>19 MR STRAW: In reality talking about nonsensitive or at least 20 the majority of this nonsensitive information, so the 21 red finger point doesn't really hold. Drawing attention 22 to something that is not sensitive doesn't matter.</p> <p>23 The next issue I would like to address, if I may, is 24 I think Mr Beer suggested that seeing the nonsensitive 25 parts of the document won't help us, won't help the</p> <p style="text-align: center;">Page 111</p>
<p>1 disclosed, pursuant to section 18, pursuant to open 2 justice principles and so on.</p> <p>3 We would respectfully submit that at the very least 4 this information should come to us and other core 5 participants once you've made your preliminary ruling, 6 insofar as you've ruled that it's something that can be 7 disclosed.</p> <p>8 That's a basic starting point. There's another 9 point though that I would like to address, which is the 10 red finger point. This is the concern that things 11 shouldn't be disclosed now because of the risk that you 12 may ultimately rule against the Government or the police 13 and that will put a red finger next to what the 14 information is.</p> <p>15 We would say that submission is flawed.</p> <p>16 Firstly, the information at this stage is only being 17 disclosed to core participants. So it's not being 18 disclosed to the general public.</p> <p>19 THE CHAIR: That's right, Mr Straw, but the mechanics of 20 disclosure will probably be digital and if there is 21 a genuine threat, hostile state threat, the digital 22 mechanics are unlikely to be proof against intrusion, 23 aren't they?</p> <p>24 MR STRAW: That's a matter out of my hands, I am happy to 25 accept that if that's the position.</p> <p style="text-align: center;">Page 110</p>	<p>1 family to make submissions. If that is what he was 2 saying, then it's plainly wrong. As I have said 3 everyone knows who make these applications that one 4 needs to see the documents. One needs to make 5 submissions about the importance of the particular 6 documents itself, the importance of the witness to the 7 inquiry in order to make these submissions. Then seeing 8 the document with a redaction in it helps understand the 9 relevance or the place in the inquiry's terms of 10 reference, even if one can't see what's under the 11 redaction. So this is something important.</p> <p>12 Mr Beer also drew attention to the role of counsel 13 to the inquiry and suggested that counsel to the inquiry 14 can make these submissions and the implication is the 15 family don't need to, but the problem with that is the 16 family have a right to participate in the process, 17 whether or not Mr O'Connor will be doing that.</p> <p>18 That's really all I would like to say about that 19 area, the nonsensitive part being disclosed to core 20 participants.</p> <p>21 I should briefly rule 12.4, we haven't made 22 submissions about rule 12.4 yet because we think it's 23 premature to do so, but we would be grateful once 24 applications have been made at least to have 25 an opportunity to make submissions about that.</p> <p style="text-align: center;">Page 112</p>

<p>1 THE CHAIR: Right.</p> <p>2 MR STRAW: The next topic is the suggestion that under the</p> <p>3 first restriction order applications at least a sample</p> <p>4 of documents will be given to you, sir, to enable you to</p> <p>5 consider the application. It seems now, thankfully,</p> <p>6 that everyone agrees that that sample should be as</p> <p>7 representative and as wide as possible. That was how</p> <p>8 I understood Ms McGahey put it.</p> <p>9 THE CHAIR: I think they do and I think to be fair,</p> <p>10 Mr Straw, the origins of the necessity for that are in</p> <p>11 your written submissions of some time ago.</p> <p>12 MR STRAW: Well, I am glad to see there's agreement on that.</p> <p>13 The only supplementary point is if the draft report</p> <p>14 isn't going to be --</p> <p>15 THE CHAIR: The draft police report.</p> <p>16 MR STRAW: Draft police report, sorry, yes, isn't going to</p> <p>17 be a subject of first restriction order application,</p> <p>18 then that makes it all the more important that the</p> <p>19 underlying documents is a broad and representative</p> <p>20 sample.</p> <p>21 THE CHAIR: Yes, I have that.</p> <p>22 MR STRAW: We would be grateful, if it can be revealed to</p> <p>23 us, that if at some point in the process what the</p> <p>24 documents were that fall within the sample is revealed</p> <p>25 to us.</p> <p style="text-align: center;">Page 113</p>	<p>1 open of why the Government have come to the conclusion</p> <p>2 that Russia was behind this, and he gave --</p> <p>3 THE CHAIR: He didn't say very much about why, did he? He</p> <p>4 certainly made the assertion.</p> <p>5 MR STRAW: I think I remember, if I remember rightly, he</p> <p>6 talked about four different categories, propensity and</p> <p>7 so on.</p> <p>8 THE CHAIR: Anyway, the point being that where does</p> <p>9 Sir Mark's letter fit into this submission?</p> <p>10 MR STRAW: The point being we would be grateful if possible</p> <p>11 if we can have opportunity to make comment on a closed</p> <p>12 list of issues before it's made. I appreciate that that</p> <p>13 will simply be us saying, "Please consider putting this</p> <p>14 in your closed list" and we won't be able to see the</p> <p>15 list itself.</p> <p>16 THE CHAIR: I see, to make submissions about inclusion?</p> <p>17 MR STRAW: Yes, but I don't suggest we should see the list</p> <p>18 or anything like that.</p> <p>19 THE CHAIR: I'm afraid not.</p> <p>20 MR STRAW: Obviously not.</p> <p>21 One final point about the closed note of the</p> <p>22 hearing.</p> <p>23 There are a couple of suggestion in it, and it's</p> <p>24 unclear whether this is correct or not, but there are</p> <p>25 some suggestions that if gists are being provided of</p> <p style="text-align: center;">Page 115</p>
<p>1 To some extent they won't be able to, because they</p> <p>2 will be sensitive but to the extent that they are not</p> <p>3 sensitive, so those documents where it's only part of</p> <p>4 the documents that's redacted we would be grateful if</p> <p>5 that could be revealed to us, because that may assist us</p> <p>6 later in the process. For example, if we want to make</p> <p>7 submissions that the restriction orders or redactions</p> <p>8 should be revisited or altered, then knowing what was</p> <p>9 before you at the early stage may assist us.</p> <p>10 I would like to move on, if I may, to the closed</p> <p>11 hearing notes, so the note that was produced at the</p> <p>12 closed hearing. For which we are grateful, it really</p> <p>13 helps focus submissions. That note referred to the</p> <p>14 potential of a closed list of issues. If a closed list</p> <p>15 of issues is going to be produced, then we would be</p> <p>16 grateful for an opportunity to make comments or</p> <p>17 suggestions about it. We are hugely inhibited from</p> <p>18 being able to do so, but we hope we may be able to make</p> <p>19 at least a few comments.</p> <p>20 THE CHAIR: I'm not sure that's not a contradiction in</p> <p>21 terms, Mr Straw.</p> <p>22 MR STRAW: To be specific, Sir Mark Sedwill's notes, we</p> <p>23 would draw attention to that and ask that those are</p> <p>24 included within the closed issues. So Sir Mark Sedwill</p> <p>25 addressed the security council and gave a description in</p> <p style="text-align: center;">Page 114</p>	<p>1 documents or if sensitive witness statements are being</p> <p>2 provided, then that's a substitute for the documents</p> <p>3 themselves so it's not necessary to provide or disclose</p> <p>4 the underlying document if they are being summarised in</p> <p>5 a witness statement.</p> <p>6 THE CHAIR: Right.</p> <p>7 MR STRAW: We would say that's wrong, that pursuant to the</p> <p>8 best evidence rule the underlying documents at least</p> <p>9 need to be disclosed to you, sir, and your team.</p> <p>10 THE CHAIR: No, no, you may assume that that will be done.</p> <p>11 The purpose of gisting in this context is to provide the</p> <p>12 parties who cannot see the closed material with as much</p> <p>13 information about it as can be achieved safely.</p> <p>14 MR STRAW: Of course if that's done pursuant to</p> <p>15 a restriction order then it's perfectly proper. It's</p> <p>16 the suggestion that it's just done even if there's no</p> <p>17 restriction order, the suggestion that a witness</p> <p>18 statement is enough, you don't need to see what's</p> <p>19 underlying.</p> <p>20 THE CHAIR: No, gisting needs authority, I agree. Right.</p> <p>21 MR STRAW: Thank you.</p> <p>22 The final point I hope to cover is just about</p> <p>23 international material. We are grateful for the</p> <p>24 explanation Mr Beer has given today about it. Again, we</p> <p>25 may not want to say anything about it, but if we can</p> <p style="text-align: center;">Page 116</p>

1 have an opportunity to provide something in writing  
 2 relating to that in the next couple of weeks.  
 3 THE CHAIR: Yes, certainly. If, on reflection, and indeed  
 4 after conversation with Mr Beer if necessary, because he  
 5 probably has rather more chapter and verse than he  
 6 volunteered in short submissions here, but, yes, if you  
 7 want to put in written submissions about the law  
 8 applicable to international material, of course you may  
 9 and I will include it in whatever directions I give.  
 10 Let me just make a note.  
 11 Three or four weeks, something like that?  
 12 MR STRAW: We'd hope two weeks.  
 13 THE CHAIR: Two weeks. Thank you very much indeed. Thank  
 14 you, Mr Straw.  
 15 Mr O'Connor, do you want to come back?  
 16 MR O'CONNOR: Sir, no, I have nothing that I wish to raise  
 17 in reply. Of course if there is anything I can assist  
 18 you with --  
 19 THE CHAIR: No, I don't think so. Thank you.  
 20 If I may say so, that's been a helpful exercise.  
 21 That doesn't mean that it won't have been frustrating on  
 22 both sides to some ... that's in the nature of the  
 23 beast. I don't propose to try to devise directions, as  
 24 it were, on the hoof now but what I will do is give  
 25 directions in writing as soon after today as I possibly

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1 can, I would hope before Easter.  
 2 On the assumption that nobody else has anything to  
 3 add, thank you very much for coming and for dealing with  
 4 it expeditiously. I am grateful.  
 5 (2.10 pm)  
 6 (The hearing concluded)  
 7  
 8 I N D E X  
 9 Housekeeping .....1  
 10 Submissions by MR O'CONNOR .....2  
 11 Submissions by MR MCGAHEY .....38  
 12 Submissions by MR BEER .....70  
 13 Submissions by MR MANSFIELD .....90  
 14 Submissions by MR STRAW .....108  
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