

**IN THE WILTSHIRE AND SWINDON CORONERS COURT
BEFORE THE RIGHT HONOURABLE THE BARONESS HALLETT DBE
IN THE MATTER OF THE INQUEST TOUCHING THE DEATH OF DAWN STURGESS**

**SUBMISSIONS ON BEHALF OF WILTSHIRE COUNCIL
FOR THE PRE-INQUEST HEARING ON 30 MARCH 2021**

Introductory

1. In written submissions dated 24 August 2021 Counsel to the Inquest (CTI) has identified the following issues as matters to be considered at the Pre-Inquest Review Hearing (PIR) on 22 September 2021.
 - a. Inquest or Public Inquiry?
 - b. Disclosure
 - c. Scope
 - d. Substantive hearings / venue / timings
 - e. Next PIR

2. Wiltshire Council advances the following submissions in response to those issues identified.

Inquest/Inquiry

3. Wiltshire Council notes the Coroner's clear view that the proceedings should now be converted into an inquiry for the reasons set out in her letter to the Secretary of State dated 29 July 2021. The Council would not oppose such a request should the Coroner, after hearing submissions, determine that that is the appropriate course.

4. Wiltshire Council has no submissions to make in respect of the draft terms of reference set out in paragraph 19 of the CTI's submissions.

Disclosure

5. Wiltshire Council is continuing to provide disclosure to the Inquest Legal Team. It is an involved process with a significant level of documentation needing to be sifted for relevance to the scope, checked for any security sensitivities, converted into an appropriate electronic format and indexed appropriately before being provided.
6. Due to the early identification of security sensitivities in the response - remediation - phases much of the Council's records were in hard copy and needed to be located and collated before the core work of assessment could begin. This took some time.
7. Whilst much of the relevant Council generated documents would normally fall within the "official sensitive" category and therefore disclosable, in this case, due to the close working relationships between all responders (including those dealing with security sensitive matters) all Council documents need to be checked to ensure minimisation of inadvertent disclosure of security sensitive information which Council Officers may have had imparted to them to allow them to carry out their duties.
8. Whilst the Council has assigned a team to conduct this disclosure work it has to be carried out alongside the normal day to day duties and therefore has taken longer than first anticipated.
9. However, the Council is hopeful that disclosure will be completed within the next two months.

Scope

10. Wiltshire Council has no comments to make in respect of the CTI submissions on scope.

Substantive hearings – venue/timing

11. Wiltshire Council notes the submissions as to venue and timings and has no comments to make.

FRANK CAIN
Head of Legal Services
Wiltshire Council

5 September 2021