

OPUS2

Fishmongers' Hall Pre-Inquest Review Hearing

Day 1

October 16, 2020

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1 Friday, 16 October 2020

2 (11.00 am)

3 (Proceedings delayed)

4 (11.13 am)

5 Opening remarks by HHJ LUCRAFT QC

6 HHJ LUCRAFT QC: Mr Hough, before we start the formal

7 proceedings, there are just one or two things that

8 I wanted to say.

9 Can I simply ask anyone who is following these

10 proceedings on CVP if they could please mute their own

11 microphones. That will help us all .

12 My name is Mark Lucraft. I am the Recorder of

13 London and the Chief Coroner of England and Wales. I am

14 the coroner hearing the inquests into the deaths

15 resulting from the attack at Fishmongers' Hall and

16 London Bridge on 29 November 2019. This inquest hearing

17 is taking place at the Central Criminal Court, or the

18 Old Bailey, as it is more commonly known. The events we

19 are to examine took place in the City of London, close

20 to this building.

21 An inquest is a process by which a court hears

22 evidence so that a coroner or a coroner with a jury can

23 make findings of fact and come to a determination about

24 a death. Formerly, a conclusion was known as a verdict,

25 but the word "determination" is now used to distinguish

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1 the inquest process from a criminal trial . Despite the

2 setting for this inquest hearing, nobody is on trial

3 here. An inquest does not decide matters of criminal or

4 civil liability . This inquest hearing is a way of

5 establishing the facts of each of the deaths.

6 The role of the coroner is to investigate violent or

7 unexplained death. In England and Wales, the office of

8 coroner has existed for almost 1,000 years.

9 Christopher Dorries notes in his book on Coroner's

10 Courts evidence of the office that dates back to the

11 reign of Richard I in 1194, but it may well have earlier

12 origins . As a Norman king, Richard was very interested

13 in his rights to Saxon England as a source of finance.

14 The Articles of Eyre, issued in September 1194, first

15 outlined the office of coroner. The role, the keeper of

16 the pleas of the Crown, became known as a crowner and

17 then coroner. The officeholder was responsible for

18 examining cases of sudden deaths, as well as many other

19 tasks.

20 The role of coroner has developed and changed over

21 many years. Initially the office was closely connected

22 to revenue—collecting on behalf of the monarch. As time

23 went on, it focused on the investigation of the cause of

24 death, including consideration of what can be done to

25 prevent future deaths.

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1 In England and Wales, there are approximately 120

2 full —time coroners and 300 part—time coroners in post.

3 Each is an independent judicial officeholder overseeing

4 investigations into deaths reported to them.

5 In 2019, the number of registered deaths in England

6 and Wales was 530,857. 210,900 of those deaths were

7 reported to the coroner in that year, which accounts for

8 about 40% of all deaths. Many cases reported to

9 a coroner are signed off after preliminary enquiries as

10 being deaths from natural causes. In these cases,

11 a formal investigation under the Coroners and

12 Justice Act 2009 is not required and therefore there is

13 no inquest.

14 Some 30,000 inquests were opened in 2019, and so one

15 can see that some investigation by a coroner resolves

16 the vast majority of issues around death without the

17 need for an inquest. Of those 30,000 inquests that were

18 opened, many will have taken just a few hours or a day

19 to resolve. A few involve complex questions and can

20 last days or even weeks. A relatively small number —

21 527 in 2019 — involve a coroner sitting with a jury.

22 England and Wales is now divided into 85 separate

23 coroner areas. Each coroner area is led by a senior

24 coroner. Many are assisted in their work by an area

25 coroner and a number of part—time assistant coroners, as

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1 well as dedicated coroner's officers . Many coroner's

2 officers have undertaken their tasks over a number of

3 years, and bring great experience to their role in

4 dealing with families and making enquiries on behalf of

5 the coroner.

6 Many countries around the world do not have

7 a coronial system. Some ask why we should retain the

8 system here. In many cases of unexplained or unlawful

9 death, a coronial inquest is the only opportunity for

10 the family of a deceased person to try to get answers to

11 questions they have surrounding the death of a family

12 member or close friend.

13 Where a death takes place in state detention or

14 through the deliberate act of a state agent, the process

15 of the coronial inquest has particular significance . An

16 independent judicial officeholder — the coroner — is

17 examining the actions of the state.

18 As I have already mentioned, an inquest is also an

19 opportunity for the coroner to consider the making of

20 a report to prevent future death, so that, in

21 appropriate cases, lessons can be learned from a death.

22 These particular inquest hearings are into three

23 deaths that occurred in November 2019. They concern the

24 tragic events that took place on 29 November 2019 at

25 Fishmongers' Hall and on London Bridge. The lives of

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1 many were deeply affected by what took place.
 2 This inquest will examine the key issues for
 3 a coroner: who died, when they died, where they died and
 4 how they died. I hope this process will provide answers
 5 to the obvious and understandable questions that the
 6 families of those who died will have. I hope that the
 7 key issues around how they died will be explored, and
 8 answers provided will give some comfort to the families
 9 of the deceased.

10 Jack Merritt and Saskia Jones were two of those
 11 attending a Learning Together event at Fishmongers' Hall
 12 on 29 November 2019. Learning Together is a national
 13 organisation founded in 2014 and dedicated to the
 14 rehabilitation and education of prisoners. It is
 15 associated with the University of Cambridge and runs
 16 courses in a number of prisons. The event on
 17 29 November was to be attended by a variety of people
 18 associated with the organisation, including supporters
 19 of the organisation, current and former university
 20 students and current and former prisoners. Saskia was
 21 a former Cambridge criminology student who sometimes
 22 came to Learning Together events, and Jack a former
 23 Cambridge undergraduate, who was employed by the
 24 university to work full time for Learning Together.

25 Jack and Saskia were both attacked by one of the

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1 other attendees at the event: Usman Khan, a former
 2 terrorism offender. Both Jack and Saskia received stab
 3 wounds that proved to be fatal. Two others were also
 4 attacked and seriously injured: Stephanie Szczotko and
 5 Isobel Rowbotham. They survived the attacks on them.

6 A number of those present set upon Khan, attacking
 7 him with items of furniture, a decorative pike, narwhal
 8 tusks and a fire extinguisher. Khan confronted
 9 a maintenance engineer and threatened him, forcing him
 10 to use his fob to allow Khan out of the building.

11 On London Bridge, Khan was attacked by members of
 12 the public, forcing him to the floor and kicking the
 13 knives he was holding from his grip. Armed police
 14 officers were soon on the scene and directed members of
 15 the public away. Khan was wearing what appeared to be
 16 a suicide vest. He was shot and tasered.

17 Those attacked in Fishmongers' Hall received first
 18 aid. This initially was from bystanders at the event
 19 and then from the emergency services. Despite all the
 20 efforts that were made, sadly both Jack and Saskia died.

21 I will pause there and invite all present to stand,
 22 if you're able, with me to observe a minute's silence.

23 (Pause)

24 Thank you.

25 This pre-inquest review is taking place in the midst

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1 of the COVID-19 pandemic. It is necessary for those
 2 present at this hearing to be split across two
 3 courtrooms in this building, and a number of other
 4 people present using the cloud video platform.

5 Mr Hough, there are a number of issues that we are
 6 going to deal with this morning. Because of the way
 7 these proceedings have to take place at this time, can
 8 I make clear at the outset that, in due course, I will
 9 give a written determination in respect of each of the
 10 issues which we will cover this morning. I am saying
 11 that now because, in my experience sitting in the other
 12 jurisdiction I have at this court, that has provided the
 13 best way going forward. Should a link break, should
 14 there be any difficulty in understanding, at least
 15 a written ruling makes it very clear as to what I have
 16 decided and why.

17 Again, I will simply make the request to those who
 18 are on the CVP link if they can please keep their
 19 microphones muted. When it is their opportunity to
 20 speak or to make any submissions, they will then be
 21 heard, but it will at least, I hope, cut down any
 22 interference we might otherwise have.

23 Submissions by MR HOUGH

24 MR HOUGH: Thank you, sir.

25 As you said, this is the first pre-inquest review

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1 hearing for these inquests of Jack Merritt and
 2 Saskia Jones who were killed in the attack on
 3 Fishmongers' Hall, and also concerning the inquest of
 4 the attacker, Usman Khan, who was shot and killed by
 5 police firearms officers.

6 As you have said, sir, there is a CVP live link
 7 going to a number of locations allowing people to
 8 participate remotely, and a live link to court 10. Each
 9 location to which there is such a link is in formal
 10 terms, sir, an extension of this court.

11 The hearing is also being audio-broadcast live for
 12 the press, and you, sir, made an order varying the
 13 ordinary effect of section 9 of the Contempt of Court
 14 Act 1981 to allow that official broadcast. That order
 15 has been provided to Interested Persons and to the
 16 press. Notwithstanding that order, it remains
 17 a contempt of court to photograph or make an audio or
 18 video recording of any part of this hearing.

19 May I now introduce the advocates, most of whom are
 20 in court.

21 I appear with Aaron Moss as Counsel to the Inquest,
 22 instructed by Sinéad Lester and Natasha Davis of BDB
 23 Pitmans, solicitors to the inquest.

24 For the family of Saskia Jones, Henry Pitchers QC
 25 and Philip Rule.

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1 For the family of Jack Merritt, Nick Armstrong.
 2 For the family of Usman Khan, Jude Bunting.
 3 For the Metropolitan Police Service, Matthew Butt
 4 QC.
 5 For the City of London Police, Fiona Barton QC.
 6 For the British Transport Police, Elliot Gold.
 7 For Staffordshire Police, Gerrard Boyle QC.
 8 Attending remotely for West Midlands Police,
 9 Jason Beer QC.
 10 For the Secretary of State for the Home Department
 11 and Secretary of State for Justice, Neil Sheldon QC and
 12 Francesca Whitelaw.
 13 For the London Ambulance Service, Gemma Brannigan.
 14 For Barts Health NHS Trust, attending remotely,
 15 Liam Duffy.
 16 For Cambridge University, Nicholas Griffin QC.
 17 For the Fishmongers' Company, attending remotely,
 18 Sarah Le Fevre.
 19 For the City of London Corporation, Stephen Morley.
 20 For Staffordshire Police Prevent team officers,
 21 Kevin Baumber.
 22 Representing the IOPC, Danny Simpson.
 23 And for BBC, ITN and Associated News,
 24 Angela Patrick.
 25 I hope I haven't missed anybody out.

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1 Now, I have been asked on behalf of the transcribers
 2 that all advocates give their names at the start of
 3 their submissions, which will also assist the press
 4 listening to the broadcast.
 5 So, by way of background, a first PIR hearing in
 6 these inquests had been due to take place on
 7 24 April 2020, but that was vacated because of the
 8 pandemic. Steps were taken to make as much progress as
 9 possible by written submissions and directions. On
 10 7 April we circulated initial submissions giving
 11 a summary of investigations into the attack and the work
 12 of your team and addressing various procedural issues.
 13 Interested Persons provided written submissions in
 14 response.
 15 On 5 June, you issued a ruling and directions which
 16 in the main dealt with matters on which there was no or
 17 little controversy. Appended to that ruling were
 18 directions and an indicative scope document setting out
 19 the topic areas for the inquest. The ruling, directions
 20 and indicative scope are all available on the inquest's
 21 website.
 22 The purpose of this hearing is to provide a further
 23 update and to address procedural issues, some of which
 24 couldn't properly be determined on paper in June.
 25 Last week, BDB Pitmans issued an agenda for today's

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1 hearing. On Monday, we circulated quite detailed
 2 written submissions to Interested Persons addressing the
 3 agenda items and those submissions have been made
 4 available to the press.
 5 Sir, with your permission, what I propose to do at
 6 this stage is to set out in summary our submissions on
 7 the agenda items, addressing in places only briefly
 8 submissions where others will be making applications.
 9 After I've spoken, I respectfully suggest that you
 10 hear from those Interested Persons on those applications
 11 and all other agenda items.
 12 Finally, I intend to reply briefly on any points
 13 requiring a response. Sir, would that approach be
 14 convenient?
 15 HHJ LUCRAFT QC: Very much so, thank you.
 16 MR HOUGH: May I begin, then, with item 1 of the agenda,
 17 pages 2 to 6 of our submissions, the organisation of the
 18 inquests.
 19 Sir, as to the organisation of these inquests, we
 20 propose that there should be two hearings. First of
 21 all, a hearing of the inquests of Saskia Jones and
 22 Jack Merritt, which would consider the attack at
 23 Fishmongers' Hall and the background to that attack.
 24 Secondly, immediately afterwards, a shorter hearing of
 25 the inquest of Usman Khan, which would primarily concern

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1 events on London Bridge and the confrontation in which
 2 he was killed. There will be different juries for the
 3 two hearings.
 4 As we understand it, most Interested Persons support
 5 that approach. However, the Khan family has argued for
 6 a single hearing of all three inquests and, because that
 7 remains their primary submission, I should briefly
 8 explain the reasons for our proposal.
 9 First, the families of both the victims of the
 10 attack strongly prefer the proposed separation of the
 11 two hearings and for good reasons. Their wishes should
 12 be given weight, as were the equivalent wishes of the
 13 families of the terror attack victims in the London
 14 Bombings' Inquests, the Westminster Bridge Inquests and
 15 the London Bridge Inquests.
 16 For the Merritt family, the point is made that
 17 separate hearings would help the juries focus on the
 18 issues specific to each hearing. For the Jones family,
 19 the point is made that it would be distressing for the
 20 families to sit through the detailed investigation of
 21 the confrontation in which Usman Khan was shot.
 22 Secondly, the inquest of the two victims will
 23 address different issues and have a different focus from
 24 that of the attacker. Simplifying greatly, the victims'
 25 inquest will concentrate on how the attack at

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1 Fishmongers' Hall took place and whether opportunities
 2 were lost to prevent it or take better security
 3 measures. The inquest for the attacker will concentrate
 4 on how he came to be shot, including the reasonableness
 5 and the lawfulness of the armed officers' conduct.

6 We accept there will be some overlap in subject
 7 matter. Both hearings will receive evidence about the
 8 life and background of Usman Khan. However, it will
 9 necessarily be more extensive in the first hearing,
 10 which will consider how he was managed as an offender
 11 and monitored in the period leading up to the attack.

12 Some of the witnesses called in the first hearing
 13 will give evidence extending to events on the bridge.
 14 There is certainly no difficulty about that, since the
 15 second hearing will consider events on the bridge in
 16 more detail without recalling the same witnesses from
 17 the first hearing.

18 The second hearing will require some introductory
 19 evidence about the attack in the Hall in order to set
 20 the scene. However, that need not be lengthy or
 21 controversial, and the jury in that hearing will not be
 22 reaching conclusions about the events in the Hall.

23 Thirdly, sir, there is no logistical difficulty or
 24 unfairness about our proposed arrangement. Each hearing
 25 will involve full, direct evidence on the matters of

1 central importance to that hearing. There will be
 2 limited duplication of evidence, and little or no
 3 duplication of witnesses between the two hearings. All
 4 Interested Persons involved will receive comprehensive
 5 disclosure, and their rights to disclosure should not be
 6 affected by this arrangement.

7 Our proposal will not infringe the Khan's family
 8 Article 2 right to participation in the state's
 9 investigation into the death of Usman Khan, since there
 10 will be a rigorous public investigation into how he was
 11 killed and the lawfulness of police action in which they
 12 will participate fully. That, in our submission, for
 13 reasons given in more detail in our document, will
 14 satisfy the requirements of Article 2.

15 If I then turn to item 2, the application of the
 16 Khan family for Interested Person status. Appropriate
 17 members of the Khan family have been accorded Interested
 18 Person status in the inquest of Usman Khan. The effect
 19 is that their legal team will receive full disclosure of
 20 documents and will be entitled to examine all witnesses
 21 in the inquest of Usman Khan. There will only be very
 22 few documents relating to the inquest of the victims
 23 which will not be disclosed to the Khan family,
 24 principally post-mortem reports and any medical material
 25 relevant to the victims.

1 The Khan family have nevertheless applied for
 2 Interested Person status in the inquests of Jack Merritt
 3 and Saskia Jones, primarily because there are witnesses
 4 in those inquests of whom they may wish to ask
 5 questions.

6 In our submission, the Khan family members don't
 7 fall into any of the categories of person who are
 8 entitled as a right to recognition as Interested
 9 Persons. Although reliance was at one stage placed on
 10 section 47(2)(f) of the Coroners and Justice Act, that
 11 sub-subsection only relates to individuals who may
 12 themselves have caused or contributed to the death of
 13 the deceased or whose employees may have done so.

14 In those circumstances, given that neither that nor
 15 any other mandatory rule applies, the Khan family can
 16 only seek Interested Person status by seeking an order
 17 under your residual discretion, section 47(2)(m).

18 Our position is they have not made a case for
 19 recognition as Interested Persons in the victims'
 20 inquest because their substantial interest is in the
 21 investigation into the death of Usman Khan. Put simply,
 22 the family of the killer is not normally to be accorded
 23 Interested Person status in the victim's inquest.

24 They do not have a substantial general interest,
 25 which has been referred to in authorities such as the

1 Ex Parte Driscoll case, required for Interested Person
 2 status. However, we recognise and accept that the Khan
 3 family have some interest in aspects of the evidence
 4 which will be heard in the victims' inquests. Sir, that
 5 is the case for many, many witnesses in inquests.

6 In our submission, what ought to happen is that the
 7 Khan family should be allowed to participate to an
 8 extent in the inquests of the victims, but without being
 9 recognised as Interested Persons.

10 First of all, if any of the Khan family are called
 11 to give evidence, their counsel must have the right to
 12 question them. That right is specifically recognised
 13 for the representative of a witness in Rule 21(c) of the
 14 Coroners (Inquests) Rules. In that regard, we agree
 15 with what Mr Bunting says at paragraph 7(a) of the
 16 submissions that you should confirm the Khan family may
 17 be represented for that purpose while they are giving
 18 evidence.

19 Secondly, since their evidence is that Usman Khan
 20 gave no sign to them that he might be about to commit
 21 such an attack, we understand that the family members
 22 may wish to highlight evidence of others who also knew
 23 him and likewise say that they saw no warning sign. In
 24 our submission, they can properly ask questions of such
 25 witnesses during the inquest of the victims. As we have

1 submitted, and as Mr Bunting agrees, they will not
 2 require recognition as Interested Persons simply for the
 3 purpose of asking such questions.
 4 Mr Bunting makes a fair point at paragraph 7(b) of
 5 his submissions that he shouldn't be expected to review
 6 the daily transcripts and then have to make applications
 7 to recall witnesses after their evidence has finished.
 8 What we propose is a rather simple process, that
 9 Mr Bunting should attend parts of the hearing which are
 10 of interest to his clients. He should be given
 11 a position in the order of counsel to examine witnesses.
 12 If he wants to question a witness, he can state his
 13 interest briefly and then you can decide whether to
 14 permit him to do so.
 15 Sir, we wouldn't advocate the family being given
 16 Interested Person status, nor, I should add, should the
 17 court determine at this stage what witnesses they might
 18 reasonably want to question. That would of course
 19 depend on what the witnesses are likely to say and may,
 20 in some cases, depend on what they've said.
 21 May I turn then to item 3, which is Article 2 of the
 22 ECHR, and comes from page 8 of our submissions. The
 23 question of law which has to be considered in many
 24 inquests is whether or not the obligation of the state
 25 to establish an independent investigation under the

1 procedures of Article 2 is engaged in relation to
 2 a death. A finding that a procedural obligation is
 3 engaged has an effect on the legal approach to
 4 determinations at the end of the inquest. If it is
 5 engaged, they must answer the question how the deceased
 6 came by his or her death in a broader sense, or by what
 7 means and in what circumstances the deceased came to
 8 die, rather than in the narrower sense of by what means
 9 only.
 10 Whether the procedural obligation is engaged usually
 11 depends on whether there is an arguable case on the
 12 presently available material that the state or its
 13 agents breached one or more of the substantive duties
 14 named under Article 2.
 15 There are some parts of the case where the
 16 procedural obligation is automatically engaged,
 17 including where agents of the state have used lethal
 18 force, even if with complete justification. That's why
 19 the Article 2 procedural obligation is engaged in the
 20 inquest of Usman Khan.
 21 However, the Article 2 obligation is only engaged in
 22 the inquests of Jack Merritt and Saskia Jones if you can
 23 say that there is an arguable case on the material you
 24 have that the state or its agents breached Article 2
 25 duties owed to them.

1 We acknowledge that the threshold test is one of
 2 arguable breach rather than actual breach. Even the
 3 conclusion at the end of the inquest cannot determine
 4 actual breach of Article 2 duties because that would be
 5 a finding of civil liability which is prohibited by
 6 section 10 of the Act.
 7 However, the requirement to establish arguable
 8 breach is not a question the court can fudge. Finding
 9 that the obligation is engaged without proper legal
 10 basis on the facts is reviewable. Our submission is
 11 that the court cannot, at this moment, say that there is
 12 an arguable case that the state or its agents breached
 13 the specific Article 2 legal duties in relation to the
 14 deaths of the victims of this attack. We readily
 15 acknowledge that it may be possible to establish such an
 16 arguable case when further evidence has been gathered or
 17 after evidence has been heard in the inquest.
 18 We therefore submit that the decision on Article 2
 19 engagement should be deferred and can be considered
 20 either at the next pre-inquest review hearing or,
 21 indeed, during the inquest. If you accede to that
 22 submission, sir, the inquest will be just as rigorous
 23 and comprehensive as if you had held that Article 2 was
 24 engaged. You've made it clear in your ruling that that
 25 will be your approach in any event. We accept the scope

1 of the inquiry in terms which are more than sufficient
 2 to satisfy the demands of Article 2.
 3 In order to establish that Article 2 is engaged, you
 4 would have to find that there was an arguable case that
 5 one of two kinds of duty has been breached.
 6 First, the state's general duty to put in place a
 7 legislative and administrative framework designed to
 8 deter threats to life, set out at paragraph 13(a) of our
 9 submissions. That duty is concerned with the adequacy
 10 of high-level systems and procedures, and not with the
 11 conduct of individuals.
 12 Second is the carefully defined and limited Osman
 13 duty, which requires the authorities to take reasonable
 14 action if and when they know or ought to know there's
 15 a real and immediate risk that an individual will commit
 16 a lethal attack. This is paragraph 13(b) of our
 17 submissions.
 18 When applying that duty, it is necessary to exclude
 19 hindsight and consider whether the risk of a fatal
 20 attack should have been appreciated as a realistic and
 21 present prospect at a particular time such that
 22 countermeasures should have been taken at that time
 23 which would have had a realistic chance of preventing
 24 the attack.
 25 In our submission, the evidence we have at present

1 doesn't enable one to say that either of those duties
 2 was arguably breached, although further evidence might
 3 do so.
 4 To address some specific points which have been
 5 made, first of all, security arrangements at
 6 Fishmongers' Hall, it is certainly possible to say that
 7 there could have been further security measures at the
 8 Hall, additional security checks or a metal detector.
 9 However, the Fishmongers' Company isn't an emanation of
 10 the state and didn't owe Convention obligations.
 11 Security systems were also the subject of structured
 12 risk assessment involving external consultants. To our
 13 knowledge, its personnel were not aware of Usman Khan's
 14 background.
 15 Secondly, the position of Cambridge University. On
 16 the evidence at present, we can't see an arguable case
 17 that the university's safeguarding procedures weren't
 18 effective, although that will of course be kept under
 19 consideration. Nor does the present evidence provide
 20 the basis of a test that the university personnel knew
 21 or should have appreciated a real and immediate risk of
 22 a murderous attack, even if the university could have an
 23 Osman-type duty, which is itself a moot legal point.
 24 Thirdly, warning signs from Khan. The point has
 25 been made that there were some signs that Usman Khan had

1 spells of depression or withdrawal from the probation
 2 staff and Prevent officers who managed him as a former
 3 terrorist offender. However, in our submission, such
 4 signs on their own don't provide the basis for an
 5 arguable case that those officers should have
 6 appreciated a real risk of him committing an attack and
 7 prevented him travelling or changed the arrangements.
 8 Fourthly, offender management of Khan. There were
 9 on any view extensive systems in place in managing Khan
 10 in the community: significant restrictions on his
 11 movements; electronic tagging; regular meetings with
 12 probation staff, Prevent officers and mentors; oversight
 13 involving regular MAPPA meetings; and reporting. There
 14 were numerous management systems.
 15 As to the operational duty, it wouldn't be safe at
 16 this stage to say that there is an arguable case that
 17 those involved in managing Khan should, at a particular
 18 point in time, have appreciated the risk of an attack
 19 and taken action. Much more evidence is required to
 20 form a judgment on that.
 21 Fifthly, monitoring Khan. Similar points can be
 22 made in relation to the monitoring of Khan by the
 23 security services following his release from prison.
 24 The inquest will receive as much relevant evidence as
 25 possible on this subject, but that evidence has yet to

1 be prepared. It would be premature and unfair, in our
 2 submission, to say that there was an arguable deficiency
 3 in monitoring systems or that those responsible for Khan
 4 should arguably have seen a real and immediate risk of
 5 a lethal attack.
 6 Sixthly, and finally, acceptance of Khan into the
 7 Learning Together programme. In their written
 8 submissions for this hearing, the Merritt family also
 9 submit that Khan was a prisoner who had exhibited poor
 10 behaviour before being accepted into the
 11 Learning Together programme in 2017, while he was in
 12 prison. Sir, in our submission, that may be so, but we
 13 can't at present see that it raises an arguable case of
 14 breach by the state or agents of the state of Article 2
 15 duties in relation to the attack he committed over
 16 two years later.
 17 We would like to emphasise that we are not seeking
 18 to defend any individual or state agencies. The inquest
 19 may ultimately find a basis for criticising systems or
 20 decisions, as happened in both the Westminster Bridge
 21 and the London Bridge inquests. That is not saying the
 22 same that Article 2 should now be found to be engaged as
 23 a legal matter.
 24 HHJ LUCRAFT QC: Mr Hough, I'm going to suggest that we --
 25 I think that's brought to an end your synopsis or

1 summary of the written submissions on Article 2. I was
 2 told that there is one slight technical issue which
 3 relates to some members of the press who were hoping to
 4 listen to this hearing by phone that needs to be put in
 5 place. What I'm going to suggest is we just rise for
 6 a few minutes. The phone can be then set up.
 7 Can I simply apologise, although they can't hear the
 8 apology, to those who haven't been able to hear so far,
 9 but I'm fairly happy myself that anything that you've
 10 said so far is clearly set out in the written
 11 submissions that they will have seen and have been made
 12 available. But it seemed to me that's the time to take
 13 the break, before there are any submissions made by
 14 others in reply that may add to what is in the written
 15 documents.
 16 MR HOUGH: Yes, sir. Of course, the press will receive the
 17 transcript --
 18 HHJ LUCRAFT QC: They will get a transcript in any event.
 19 MR HOUGH: -- after this hearing. I should say I'm a little
 20 more than halfway through.
 21 HHJ LUCRAFT QC: That's fine. I don't think it will take us
 22 very long, but I'll just rise while we put the phone in
 23 place.
 24 (11.47 am)
 25 (A short break)

1 (12.05 pm)
 2 MR HOUGH: Sir, may I begin by apologising both to those in
 3 court 10 and also to the press listening over the audio
 4 broadcast for difficulties of sound. I hope those have
 5 been resolved by the microphone which has been placed on
 6 my desk. I suggest that others, after I have finished,
 7 make their submissions from where I'm standing and
 8 I shall move to the desk next to me.

9 HHJ LUCRAFT QC: Thank you.
 10 MR HOUGH: Sir, may I then turn to item 4 which is
 11 applications of the Khan family for special measures,
 12 dealt with from page 13 of our submissions.

13 Members of the Khan family originally applied to be
 14 anonymised in the inquests and for various special
 15 measures to be taken if they are called as witnesses,
 16 notably the use of screens. We set out in our written
 17 submissions the legal principles that govern these
 18 applications, paragraph 21, and our position on them,
 19 paragraph 22.

20 Mr Bunting for the Khan family has now modified the
 21 application. He no longer seeks orders anonymising any
 22 family members subject, in the case of some family
 23 members, to the court granting screening. The orders he
 24 now seeks are ones which we can broadly support.

25 First of all, he asks for a direction that any of

1 the family members who is called as a witness should be
 2 screened from the press and the public. We support that
 3 request for reasons given in our written submissions.

4 The media organisations put in submissions yesterday
 5 which addressed this topic. As to screening, we agree
 6 with their proposition that screening involves a degree
 7 of intrusion on open justice, and that the principle of
 8 open justice must be carefully weighed in the balance
 9 against the competing interests before making any
 10 direction to screen a witness.

11 Here, our submission is that the two countervailing
 12 considerations justify a screening order when they are
 13 weighed in the balance. First are the anxieties and
 14 vulnerabilities which are detailed in the witness
 15 statement of Usman Khan's brother. I don't, for obvious
 16 reasons, intend to go into detail about those now, but
 17 suffice it to say that they would be acute if the
 18 individuals concerned were called to give evidence.

19 Secondly, and relatedly, there would be obvious
 20 benefit to this important inquiry if the witnesses
 21 giving evidence were able to do so with unnecessary
 22 distress and stress avoided and, therefore, to improve
 23 the quality of their evidence to the greatest degree
 24 possible.

25 Sir, it is quite right that the open justice

1 principle is important and must be weighed against those
 2 matters.

3 Secondly, Mr Bunting asks for a direction that, in
 4 the event of any family members being called as
 5 a witness, there should be special arrangements for them
 6 to arrive at and leave court without unwelcome
 7 attention. We advocated that direction in our document
 8 and we don't understand there to be any opposition.

9 Thirdly, in our document, we'd urged you to make an
 10 order that none of the children of Usman Khan's siblings
 11 should be mentioned by name in the inquest, except after
 12 application on notice. Mr Bunting supports that
 13 proposal, but he also asks that a similar order be made
 14 in relation to the sisters of Usman Khan and in relation
 15 to the spouses of all of Usman Khan's siblings. His
 16 submission, in a nutshell, is that these individuals are
 17 simply irrelevant to the narrative and will probably
 18 never need to be mentioned. He says it's pointless to
 19 argue about anonymising a person who will very likely
 20 never be named.

21 What we propose is that you make the direction now
 22 in relation to the children, and that you defer
 23 consideration of Mr Bunting's request to extend the
 24 direction until closer to the inquest hearing, perhaps
 25 the next PIR hearing. By then it should be clear

1 whether any of the sisters or spouses does feature in
 2 the narrative.

3 Sir, may I then turn to items 5 and 6 together.
 4 HHJ LUCRAFT QC: Yes.

5 MR HOUGH: Those are enquiries being pursued by the inquest
 6 team and disclosure to Interested Persons, and they're
 7 addressed from page 19 of our submissions.

8 In pursuing the enquiries I shall mention, your team
 9 have been closely working with the Operation Bemadam
 10 team of SO15, the Metropolitan Police counter-terrorism
 11 command led by DCI Dan Brown. Nearly two weeks ago we
 12 circulated an update note to Interested Persons
 13 detailing the enquiries made on your behalf to further
 14 the enquiry and the plan for disclosure of material to
 15 Interested Persons.

16 Let me summarise the main points for those watching
 17 and listening.

18 First, Ms Lester's team have made requests for the
 19 relevant documents from a wide range of organisations
 20 who may have material relevant to the event at
 21 Fishmongers' Hall, relevant to the emergency response to
 22 the attack and relevant to the involvement of state
 23 agencies with Usman Khan. In some cases, targeted
 24 requests and follow-up requests for more documents have
 25 also been made. These have yielded a large amount of

1 material already, some of which has been disclosed to
 2 Interested Persons via the Opus platform, and more will
 3 be disclosed after review for relevance.
 4 In some cases, your team has to liaise with state
 5 bodies about proposed redactions or limitations on
 6 disclosure, the aim being to determine whether
 7 limitations can be justified on grounds of relevance
 8 alone, and whether any PII applications will be needed.
 9 Secondly, the SO15 team have taken a large number of
 10 statements from relevant witnesses. At the time of our
 11 update note, 263 of those statements had been disclosed
 12 along with exhibits. That tally represents the large
 13 majority of substantive statements taken by the police
 14 team. All other statements we have should be disclosed
 15 within the next two to three weeks.
 16 Thirdly, requests have been made for substantial
 17 institutional statements from organisations and state
 18 bodies whose procedures and conduct will be examined in
 19 the inquest.
 20 Fourthly, we've been working with the Computer Aided
 21 Modelling Bureau of the Metropolitan Police with a view
 22 to preparing schematics of the area of the attack and
 23 video presentations for the inquest. First drafts have
 24 just been produced for us and, when they are ready in
 25 final form, they will be disclosed.

1 Fifthly, we prioritised the disclosure of some of
 2 the most relevant CCTV footage of events on the bridge.
 3 Meanwhile, the SO15 team have assembled and reviewed
 4 a vast amount of footage generally: CCTV, footage from
 5 vehicles, officers' body-worn video footage and videos
 6 recorded by the public. A series of compilations are
 7 being prepared, including of Usman Khan's movements in
 8 the weeks before the attack, his journey to London,
 9 events on the day of the attack, movements of the two
 10 victims and first aid provided to them. We viewed
 11 preliminary drafts of the main compilations earlier this
 12 week. We should point out that while there is a lot of
 13 footage of events in the open, there is no footage of
 14 the actual attack in the hall.
 15 Sixthly, crime scene photographs have been assembled
 16 and will be disclosed.
 17 Seventhly, post-mortem reports have been prepared on
 18 all of the deceased by Dr Fegan—Earl, who has produced
 19 also addendum reports answering questions we raised.
 20 The reports relating to Jack Merritt and Saskia Jones
 21 have been provided to the families, along with detailed
 22 police reports on the circumstances of their deaths.
 23 All that material is being disclosed to all Interested
 24 Persons in the relevant inquest.
 25 There will also be disclosure of toxicology reports

1 on Usman Khan which indicate occasional use of cocaine
 2 over the period leading up to death.
 3 Finally, Mr Moss and I, who are both DV cleared,
 4 have reviewed the post-attack review report of the
 5 security service, and we have begun discussions about
 6 the best means of providing Interested Persons with as
 7 much relevant evidence as possible about the services'
 8 knowledge of Usman Khan. We have set out in our initial
 9 submissions the approach we are taking to
 10 security-sensitive documents, which is well established
 11 as a matter of law. As always, the aim will be to
 12 conduct as open and rigorous an investigation as
 13 possible, while not undermining the efforts of the
 14 security service to combat terrorism in future.
 15 The submissions of the Merritt family quite
 16 reasonably express concern to obtain disclosure of
 17 documents relevant to the risk Khan posed while in
 18 prison and thereafter. We should stress that the fact
 19 that we're obtaining institutional statements shouldn't
 20 be taken as any indication that the underlying documents
 21 are not being sought for disclosure. We are concerned
 22 to prioritise the disclosure of prison material as well
 23 as documents regarding Usman Khan's management as an
 24 offender in the community.
 25 The inquest team received the bulk of the prison

1 material in July and August and have been engaged in
 2 reviewing it. We took on an additional junior counsel
 3 to assist with review work. There have also been
 4 discussions with the Government Legal Department about
 5 redactions.
 6 As Interested Persons are aware, we disclosed the
 7 substantial NOMIS prison records earlier this month. We
 8 anticipate disclosing the bulk of the remaining prison
 9 and probation material by the end of November, provided
 10 in some cases that comments on disclosure can be
 11 provided by state bodies reasonably quickly.
 12 The task will be made a little easier by the
 13 resolution of the Khan family's request for anonymity,
 14 since we're likely no longer to have to laboriously
 15 cypher all the Khan family names.
 16 By the end of this month specifically, we expect to
 17 disclose the following prison materials: the Healthy
 18 Identity Intervention report; the Thinking Skills
 19 post-programme report and workbook, along with staff
 20 notes; prison adjudication documents we've received;
 21 category A review decisions; and prison risk assessments
 22 of Khan, including escape risk assessments.
 23 We also expect to disclose by the end of this month
 24 the exhibits to the Prevent officers' statements and,
 25 subject to approval by Staffordshire Constabulary, the

1 ERG reports on Khan, including that of the psychologist,
 2 leva Cechaviciute.
 3 By the end of November, we expect to disclose the
 4 following prisons material: segregation records, prison
 5 call monitoring records, security information reports,
 6 pro forma reviews of Khan including managing challenging
 7 behaviour reviews, documents relating to mail received
 8 by Usman Khan, prison transfer paperwork, records of
 9 sentence plan objectives and person escort record forms.
 10 We also expect to disclose the following probation
 11 records by the end of November: approved premises
 12 documents, mentor reports, documents from the probation
 13 case management system, OASIS assessments from 2012 to
 14 2018 and the probation case file.
 15 That is all, of course, subject to review by the
 16 security authorities.
 17 There are some important documents which we are
 18 concerned to disclose but for which we are now waiting
 19 on review by the Government Legal Department. These
 20 include in particular the Mercury prison intelligence
 21 record and the MAPPA minutes. It may be helpful if
 22 Mr Sheldon could assist with progress in considering
 23 that material.
 24 For the benefit of state agencies reviewing material
 25 for sensitivities, we should stress that we expect that

1 redactions will only be proposed on one of the usual
 2 three grounds: first of all, that material is irrelevant
 3 to the inquest; secondly, that material is relevant but
 4 that all relevant content can be communicated by
 5 a specific gist; or, thirdly, that the material is
 6 relevant but subject to public interest immunity, in
 7 which case an application supported by a certificate
 8 will be made in due course. It creates difficulties for
 9 the inquest team if we receive objections based on
 10 unspecified sensitivity, only to discover later that
 11 a formal PII claim would not be made.
 12 In the coming weeks and months, the BDB Pitmans team
 13 will continue to provide updates about material being
 14 disclosed on the Opus platform, and we would encourage
 15 Interested Persons to keep that platform under review.
 16 We then turn, sir, to item 7, which concerns the
 17 criminal investigation and any possible prosecutions,
 18 page 21 and following of our submissions.
 19 The SO15 team of the Metropolitan Police were
 20 responsible for the criminal investigation of the attack
 21 itself. Their current view is that nobody other than
 22 Usman Khan was involved in planning or executing the
 23 attack. Separate from that investigation is a criminal
 24 investigation into other aspects of the events at
 25 Fishmongers' Hall, including whether any offences were

1 committed in arrangements for the event. That
 2 investigation is led by the City of London Police, and
 3 the City of London Corporation, as the health and safety
 4 enforcement authority for the area, is also involved.
 5 There are good communications between your team and
 6 the City of London Police and the Corporation. Material
 7 gathered for the inquest can properly be used in the
 8 criminal investigation.
 9 Nevertheless we have one particular issue to raise
 10 in this hearing. Sir, as you know, if anyone is to be
 11 prosecuted for a homicide offence in relation to
 12 a death, it is usual for that prosecution to happen
 13 before the inquest. That's because of concerns that the
 14 inquest process should not have any adverse effect on
 15 criminal proceedings. There are provisions in schedule
 16 1 to the Coroners and Justice Act which enable
 17 prosecuting authorities to request the suspension of an
 18 inquest pending a prosecution, as set out in
 19 paragraph 30 of our submissions.
 20 As matters stand, there has been no request for
 21 these inquests to be suspended and no indication that
 22 such a request will be made in future.
 23 In accordance with your ruling of June 2020, these
 24 inquests are scheduled to take place from early April to
 25 late May or early June of 2021. It would of course be

1 a cause of distress to many involved and a huge waste of
 2 money if there were requests for the inquests to be
 3 suspended in the months immediately preceding the start
 4 date. Accordingly, we submit that it's imperative that
 5 investigating and prosecuting authorities give good
 6 notice if there is any chance at all that there may be
 7 such a request. As we understand it, the bereaved
 8 families support that position.
 9 The investigating authorities are represented here
 10 today. We gave the CPS advance notice of the hearing
 11 and notice that the point would be addressed.
 12 The Corporation has helpfully indicated that it has
 13 no intention of requesting a suspension for any health
 14 and safety prosecution. In any event, such
 15 prosecutions, as distinct from homicide prosecutions,
 16 often happen after inquests.
 17 The City of London Police has also addressed the
 18 topic in a helpful way in the submissions of
 19 Ms Barton QC. While it doesn't rule out the prospect of
 20 a request for suspension in the future, the force
 21 acknowledges the importance of certainty about the
 22 timing of these inquests and undertakes to reach and
 23 communicate any decision without delay. Ms Barton may
 24 of course expand on that when it comes to her
 25 submissions.

1 Turning then to item 8 in the agenda: logistical
 2 arrangements for the inquest hearing and arrangements
 3 for further pre-inquest review hearings. That's from
 4 page 22 of our submissions.
 5 In those submissions, we have suggested that the
 6 start date for the inquest be fixed at 12 April 2021,
 7 and we understand that most are content with that
 8 proposal.
 9 As regards venue for the hearings, the intention is
 10 that the Central Criminal Court should be used. Given
 11 the requirement of the inquest for a central London
 12 location with good jury facilities, it is difficult to
 13 imagine a better option.
 14 Your team are working closely with court managers to
 15 plan for hearings which comply with government guidance
 16 and requirements, including for social distancing. The
 17 court authorities have become well used to such
 18 arrangements for criminal trials. The details of which
 19 courtroom should be used and what remote links are
 20 established will of course depend on the restrictions in
 21 place in April and on the technical facilities.
 22 As to that, we can see today that the CVP system is
 23 in use and appears to be working well. The media
 24 representatives have raised the issue of access of the
 25 media to the hearings, and I understand there may be

1 a point raised about the potential for media
 2 representatives to have access via CVP to further
 3 hearings. In our submission, that is a matter that you,
 4 sir, should keep under review. It would be legally
 5 permissible, although there are difficulties with it as
 6 setting a precedent and difficulties of practicality.
 7 But it's a matter that we suggest should be kept under
 8 consideration, taking account of what the limitations
 9 are for future hearings.
 10 HHJ LUCRAFT QC: Perhaps on that topic, Mr Hough, just to
 11 change the approach we're taking, obviously CVP is
 12 a facility which has been made available to the Crown
 13 Courts. It's not generally available to a Coroner's
 14 Court but, because we are conducting these hearings at
 15 the Old Bailey, where we have used CVP extensively since
 16 it was rolled out during the pandemic, it may well be
 17 the position is different.
 18 But certainly, if this helps the media in any way,
 19 shape or form, access generally to coroner's proceedings
 20 is something which, wearing my Chief Coroner's hat,
 21 I have to keep under review. There is a guidance
 22 note -- I think it's guidance note number 38 -- which
 23 deals with how coroners should seek to try and conduct
 24 inquest hearings during this time, and inevitably it is
 25 a subject which I have to keep under review for that

1 purpose.
 2 So, certainly, if I can give some comfort to the
 3 media present and those listening, it is certainly
 4 something that I will keep very much under review to
 5 make sure that they can participate as fully as possible
 6 in reporting these important inquest hearings.
 7 MR HOUGH: Yes, sir. And once again, we apologise for
 8 difficulties in sound transmission earlier in this
 9 hearing.
 10 HHJ LUCRAFT QC: Yes.
 11 MR HOUGH: Turning to the topic of future PIR hearings, we
 12 anticipate that one hearing will be needed in early
 13 2021, and if any public interest immunity applications
 14 are needed, they might be heard either with that hearing
 15 or separately.
 16 Finally, item 9, any other business, from page 23 of
 17 our submissions.
 18 First of all, the process of selecting appropriate
 19 witnesses for the inquests has begun. A draft witness
 20 list was circulated to Interested Persons at the end
 21 of July and we've recently received submissions in
 22 response. Those are being considered and a revised
 23 draft list will be issued shortly. We hope and expect
 24 that issues about which witnesses should be called can
 25 be resolved by written communications.

1 Although some of the written submissions for today
 2 address particular witnesses, I don't propose to respond
 3 to those in detail, because we're still working on our
 4 revised list and it will make best sense to deal with
 5 all the representations in the round by producing that
 6 further list.
 7 Secondly, in our submissions at paragraph 38, we've
 8 addressed some issues raised by the Khan family about
 9 the independence of two expert witnesses and the scope
 10 of opinion evidence to be given by firearms training
 11 witnesses. Again, I don't propose to develop those
 12 points now, but shall respond as necessary in reply.
 13 Sir, unless I can be of further assistance at this
 14 stage, those are our submissions on the agenda items.
 15 HHJ LUCRAFT QC: That's very helpful. Thank you very much
 16 indeed, Mr Hough.
 17 I think the sensible thing is for me to go through
 18 the items on the agenda now in turn, not really for
 19 people to repeat the written submissions which I've got,
 20 but really just to elaborate on anything that they wish
 21 me to have in mind before I make the determination.
 22 Starting with the organisation of the inquests,
 23 Mr Bunting, I'm looking at you first because I think to
 24 some extent the observations and submissions made by
 25 Mr Hough are accepted by everyone, I think, save for

1 you, so it may be easiest if you want to deal with
 2 point 1 first of all, and I suspect also it may be
 3 sensible for you to deal with point 2 as well at the
 4 same time. I'm just thinking, rather than you moving
 5 backwards and forwards, if you want to deal with those
 6 two points and anything else on the agenda at the same
 7 time, it will save too much toing and froing.

8 Submissions by MR BUNTING

9 MR BUNTING: Very good.
 10 Sir, for the media's benefit, my name is
 11 Jude Bunting and I appear on behalf of Parveen Begum,
 12 who is the mother of Usman Khan.

13 Sir, can I start my submissions by saying that
 14 Mrs Begum and her family were deeply shocked by the
 15 events of 29 November. It was and is a tragedy that
 16 Jack Merritt and Saskia Jones were killed and that
 17 others were injured, and that fear and distress was
 18 caused.

19 As a mother herself, Mrs Begum still finds it hard
 20 to believe that such terrible damage could have been
 21 caused by her son. She and her whole family would like
 22 to convey their deepest sympathies to the families of
 23 the victims, and they condemn Usman Khan's actions
 24 unreservedly.

25 They also wish to make it clear that they were not

1 aware of Usman's apparent mindset and his apparent
 2 intentions before the incident. They are not
 3 professionals. Had there been any indication at all,
 4 they would have brought those indications to the
 5 attention of the relevant authorities.

6 Their motivation in seeking to play a role in these
 7 inquests follows on from that sense of shock and
 8 sadness. It is twofold, if I can put it like this.

9 First, they want to ensure that this type of incident
 10 does not happen again, that lessons are learned and that
 11 no other family has to go through the pain and anguish
 12 that the families of Saskia Jones and Jack Merritt are
 13 no doubt feeling.

14 Second, they want, as family members, to better
 15 understand how this tragic incident happened, how the
 16 family member who appeared to them to have been reformed
 17 could have committed this type of atrocity.

18 Mrs Begum's submission in writing, sir, as you will
 19 have seen, is that the best way of helping to ensure
 20 that lessons are learned, and that she can help answers
 21 to be obtained, is for the inquests to be heard
 22 together.

23 However, for today's purposes, I am no longer
 24 advancing the submission that the three inquests should
 25 be joined. Instead, her submission today is the more

1 limited one which is set out in her skeleton argument at
 2 paragraph 7, namely that she be granted Interested
 3 Person status in respect of a part of the first
 4 inquests.

5 So the difference between Mr Hough Queen's Counsel
 6 and Mrs Begum's position is a slight one. Mr Hough
 7 suggests that Mrs Begum can attend, ask questions upon
 8 receipt of permission from you, sir, after individual
 9 witnesses, and Mrs Begum's position is to take that one
 10 stage further and to give her the formal recognition of
 11 Interested Person status in respect of categories of
 12 evidence.

13 The reason for making that more narrow submission,
 14 sir, is that Mrs Begum has no interest at all in adding
 15 to the distress and pain which has been suffered by the
 16 families of the victims. She also has no interest at
 17 all in exploring matters which are of particular
 18 personal privacy to them, be they medical, cause of
 19 death or otherwise.

20 Can I structure my submissions on this narrow point
 21 in the following way: firstly, by addressing the
 22 question of scope of the three inquests; secondly, by
 23 setting out briefly what the relevant test is for
 24 Interested Person status; thirdly, the reasons why
 25 Mrs Begum meets that test; and then, fourthly, the steps

1 she will take to try and minimise and avoid further
 2 distress of the families of the victims.

3 Sir, taking that first submission first, because
 4 a lot of this is very clearly established, you have
 5 given an indicative ruling on scope. It's available on
 6 the inquest's website, and it says at (a) that for all
 7 of the inquests, for all three inquests, it will be
 8 appropriate to consider some evidence about the
 9 background to the attacks, in particular the following
 10 matters, and those matters include the life and
 11 background of Usman Khan, the management of Khan after
 12 his release by probation officers and others, any
 13 monitoring of Khan by the police and the security
 14 service.

15 Those matters, sir, have been formally ruled to be
 16 in scope not just of Jack Merritt's and Saskia Jones'
 17 inquests, but also in Usman Khan's inquest. It's
 18 a topic that broadly relates to what Usman did, what the
 19 authorities knew about it and whether his attack could
 20 have been prevented. It's precisely the issue that
 21 Mrs Begum seeks Interested Person status in respect of.
 22 You have been clear that those issues are within the
 23 scope of all three inquests.

24 I emphasise that point, sir, because it has been
 25 suggested in some of the written submissions that the

1 sole issue in Usman Khan's inquest is the narrow one of
2 whether officers honestly believe that he posed a threat
3 and whether they responded reasonably in shooting him.

4 But, sir, of course, you have also ruled that the
5 scope of his inquest includes that wider point about
6 avoidability, and your ruling was, in my respectful
7 submission, correct on that point.

8 But even if Usman Khan's death and the issues in his
9 inquest were limited to the legality of the use of
10 force, then that still requires consideration of what
11 the officers knew, what they ought to have known when
12 force was used, whether alternatives to the use of fatal
13 force were available, whether the authorities knew about
14 Usman Khan's plans and whether they could have avoided
15 those plans and thereby avoided the use of fatal force
16 against him.

17 So, sir, to conclude on my first point, whether we
18 take it on the basis of your indicative ruling on scope,
19 or whether we look through the prism of the legality of
20 the use of force, the same issue remains in Usman Khan's
21 inquest, namely whether or not the attack could have
22 been avoided.

23 What that means, sir, is that that issue will be
24 explored in detail in the first two inquests and will
25 not be explored in the same detail in Usman Khan's

1 inquest, notwithstanding the fact that it is within
2 scope. That is the starting point in my application for
3 Interested Person status on that point. It is
4 a recognition that Mrs Begum has a real and genuine
5 interest in exploring an issue which is within scope in
6 her son's inquest, albeit will be determined largely in
7 the other inquests.

8 Turning then to my second point, sir, the test which
9 is to be applied, and for the avoidance of any doubt,
10 Mrs Begum relies solely on section 47(2)(m). She agrees
11 that that gives you a broad discretion, she agrees that
12 you will be looking in particular at whether she has an
13 interest which is more than trivial or contrived, that
14 is reasonable and substantial. Of course, that test
15 comes from the case of Driscoll and Platts, two
16 authorities which you will be very familiar with, and
17 which you have been provided with in any event.

18 Without going through those authorities in any
19 detail, sir, my submission is that they set out
20 a reasonably low threshold. It's reasonable and
21 substantial, not trivial. It's a link to the
22 circumstances of death. It's in particular a link to
23 the scope of the inquests. It is not a link to the
24 deceased. So a number of other Interested Persons have
25 sought to distinguish Driscoll and Platts on the basis

1 that Mrs Begum doesn't have a direct personal
2 relationship with the families of the victims. That's
3 correct, but it elevates the facts of Driscoll and
4 Platts to the principle that they establish.

5 So applying that low threshold, can I turn to my
6 third point, and that is that Mrs Begum meets that test.
7 As I've already set out, the scope of the first two
8 inquests includes that issue about the avoidability of
9 death. Mrs Begum has a reasonable and a substantial
10 interest in exploring those issues. That is because
11 those issues also form part of the scope of Usman Khan's
12 death in which she is recognised to be an Interested
13 Person, and it is also for the human reason that she has
14 a genuine and pressing concern to explore those matters
15 because those are the key questions to which she wants
16 answers. Exploring those questions will also help her
17 to assist you in ensuring that lessons are learned from
18 this horrific incident.

19 Mrs Begum, turning a stage further, has relevant
20 evidence to give and has relevant questions to explore.
21 She is not just a mere witness. She has seen some of
22 the witness statements which have been added on Opus
23 Magnum, she has instructed expert solicitors in
24 counter-terrorism, in particular in Islamist
25 counter-terrorism, and she can assist you in your

1 enquiry on those points.

2 Thirdly, sir, the point which Mr Hough Queen's
3 Counsel has already made, that it may be that her
4 version of events and the version of events set out in
5 some of the other family witness statements will be
6 challenged. They may be challenged by other witnesses,
7 and she needs to have the opportunity to ask questions
8 of those other witnesses so as to ensure fairness to her
9 and her family.

10 So those are the reasons of principle why the
11 application should be applied, and, in my respectful
12 submission, the initially attractive approach suggested
13 by Mr Hough doesn't quite go far enough in ensuring
14 fairness to Mrs Begum and also the quality of your
15 inquest.

16 If Mrs Begum is permitted to ask questions
17 effectively in that other guise, she will, after each
18 witness, be popping up to ask for permission to ask
19 questions and then asking questions once you have ruled.
20 That is likely to lead to disruption to the inquest,
21 which could be avoided by simply naming her as an
22 Interested Person for the purpose of those aspects of
23 the inquest.

24 Secondly, in terms of the rights which follow from
25 Interested Person status, those too are important,

1 because they will ensure that she receives relevant
 2 disclosure on those points and therefore is able to
 3 assist counsel in suggesting further issues of
 4 investigation .
 5 So all that remains then, sir , on this aspect of my
 6 application is to address the very really concern which
 7 has been expressed by the families of the victims that
 8 the presence of Mrs Begum or even Mrs Begum's legal
 9 representatives in their inquest will cause them
 10 a degree of distress and concern. We recognise that.
 11 Mrs Begum does not intend to attend any of the
 12 inquest hearings. She will not attend unless she is
 13 required to do so as a witness. The same goes for other
 14 members of her family, who have said as much in the
 15 witness statements which were added to the system
 16 yesterday. She has instructed legal representatives who
 17 will ensure that her interests are advanced in the most
 18 sensitive and responsible way that they can manage.
 19 They will seek to avoid any duplication of questioning.
 20 They're used to working with her legal representatives
 21 to achieve similar goals.
 22 Of course, when judging the distress that may be
 23 caused by their presence, of course we recognise also
 24 that there will be parts of this inquest at which
 25 Mrs Begum's family will have to attend in any event,

1 namely if they're called to give evidence. As Mr Hough
 2 correctly recognises, Rule 21 would allow them, at those
 3 parts of the inquests, to be properly represented.
 4 For those reasons, sir , the fact that the test is
 5 low, that she has a direct personal interest , and that
 6 it's really just one relatively minor stage further than
 7 the approach suggested by Mr Hough, I respectfully
 8 invite you to grant Mrs Begum Interested Person status
 9 in respect of category A, ie category A of your
 10 indicative ruling on scope.
 11 That deals with the first two items on the agenda,
 12 sir .
 13 HHJ LUCRAFT QC: Yes.
 14 MR BUNTING: Anonymity and special measures I can take more
 15 briefly , because there's nothing really between Mr Hough
 16 and I, and because we've reviewed very carefully our
 17 position in the light of the powerful submissions made
 18 by Ms Patrick on behalf of the three media
 19 organisations .
 20 Mr Hough has summarised our position correctly, and
 21 the result of that will mean that there is very limited ,
 22 if any, interference with open justice. Where we will
 23 be left , if the approach advocated by Mrs Begum is
 24 adopted, is that the only family member who is an
 25 Interested Person, Mrs Begum herself, will be named and

1 can be named in the media. All evidence of family
 2 members when they come to give evidence will be given in
 3 open court and can be reported fully. Journalists and
 4 members of the public will be able to hear family
 5 members giving evidence. The media in any reports will
 6 be able to use the names of family members when
 7 reporting the case. Effectively , all that would result
 8 would be that members of the family, when giving
 9 evidence, would be screened and, when coming and going
 10 into court, would achieve a degree of protection from
 11 the inevitable gauntlet of press interest .
 12 That, in my respectful submission, is a limited
 13 interference with open justice, and we recognise the
 14 powerful imperative of open justice in this case.
 15 Weighing against that the special measures would have
 16 real benefits, as Mr Hough has already set out, and
 17 I don't intend to take that point any further, sir ,
 18 unless you need me to.
 19 The final category of final members, those who are
 20 neither witnesses nor Interested Persons, are the other
 21 sisters who haven't yet given witness statements, one
 22 other brother who hasn't given a witness statement,
 23 their spouses, the spouses of Usman Khan's siblings, and
 24 Mrs Begum's grandchildren. As Mr Hough has summarised
 25 my submission again correctly, it is our position that

1 their identities are of no relevance to this inquest
 2 and, indeed, are unlikely to be published in any event
 3 even if they were, and we recognise Ms Patrick's point
 4 that the media is regulated by codes of conduct which
 5 prevent them from identifying those who are not
 6 genuinely relevant to a story in any event. In those
 7 circumstances, it is our position that there is no
 8 justification for naming them.
 9 For today's purposes, I'm content for that matter to
 10 be hived off and to be returned to if and when we've
 11 seen further evidence, but I would be grateful for the
 12 opportunity to make submissions on that before their
 13 identities are revealed more widely.
 14 Therefore, sir , in respect of all of the other
 15 matters, I'm not going to address you at all.
 16 HHJ LUCRAFT QC: No.
 17 MR BUNTING: Those are matters for determination at a later
 18 date. In particular , Mr Hough has flagged up a dispute
 19 between us in respect of expert evidence and in respect
 20 of the scope of opinion evidence by those who provided
 21 training to police firearms officers . Those are points
 22 on which I will have submissions to make, but I don't
 23 propose to make those submissions today unless you need
 24 me to.
 25 HHJ LUCRAFT QC: I think those are for a later time.

1 MR BUNTING: I'm very grateful. Can I assist you any
 2 further, sir?
 3 HHJ LUCRAFT QC: No, thank you.
 4 Mr Pitchers, I'm looking at you next. It may be
 5 sensible if you don't mind adopting the same process.
 6 I appreciate it means we're jumping around a bit,
 7 Mr Pitchers, but I think it's probably the easiest way
 8 to do it, partly because it will make it easier for
 9 those who are listening on a telephone line, rather than
 10 jumping around the court, but also in terms of trying to
 11 comply as best we can with the COVID requirements of not
 12 having too much cross-fertilisation.
 13 MR PITCHERS: So, sir, you would like me to continue into
 14 the Article 2 matters as well?
 15 HHJ LUCRAFT QC: In a sense, Mr Pitchers, what I would
 16 suggest you do is if there are particular things on the
 17 agenda which you wish to address me on, to do it as
 18 a piece. But in relation to the point I suggested
 19 Mr Bunting started with, which is whether there should
 20 be one or separate inquests, I think you accept and
 21 adopt all of the arguments that Mr Hough has set out
 22 very helpfully, both in the written documents and this
 23 morning, as to why he is submitting to me that there
 24 ought to be separate inquests for the victims and
 25 a separate inquest for Usman Khan.

1 Submissions by MR PITCHERS
 2 MR PITCHERS: Yes.
 3 Could I perhaps just start by introducing Saskia's
 4 mother, who sits in the public gallery, and Saskia's two
 5 uncles and aunt.
 6 Sir, you have some written submissions from us, and
 7 I would, as you would hope, avoid repetition of those.
 8 You also have a position statement which reflects the
 9 position of Saskia's family today.
 10 In relation to that first issue, the organisation of
 11 the inquests, as you've indicated, we do endorse what
 12 you've read and what you've heard from Mr Hough in that
 13 regard and, as I understand the position of the family
 14 of Usman Khan today, they don't press you to join his
 15 inquest.
 16 HHJ LUCRAFT QC: Yes.
 17 MR PITCHERS: For that reason, I won't address you further,
 18 save to say that, if that application is resurrected, it
 19 will be strongly resisted by Saskia's family.
 20 HHJ LUCRAFT QC: Yes.
 21 MR PITCHERS: It is though, I submit, right to acknowledge
 22 the feelings of Saskia's family in relation to any sort
 23 of formal involvement of Khan's family in the inquest of
 24 their daughter. Although the position has been modified
 25 somewhat, Saskia's family remain in objection and would

1 repeat that this will be a source of real significant
 2 and persistent distress throughout the course of the
 3 inquest if you accede to the submissions of Mr Bunting.
 4 In relation, though, to the specific matters that
 5 are before you to determine in that regard, and that is
 6 whether or not Interested Party status should be given,
 7 we agree with and adopt what you've heard from Mr Hough
 8 in relation to that narrow point; that is that you
 9 should refuse the application for Interested Party
 10 status.
 11 But we do actually diverge from what you've heard so
 12 far in relation to any alternatives. You've heard
 13 reference made to Rule 21 of the Coroners (Inquests)
 14 Rules of 2013, and the position of Saskia's family is
 15 that that doesn't in itself give a witness the right to
 16 have legal representation. What that rule provides, if
 17 one considers it on its face, is the sequence of
 18 questioning which should follow where a witness has
 19 given evidence but has legal representation. So that
 20 rule in itself does not confer on any witness in itself
 21 a right to have representation.
 22 Our concern with the alternative that has been put
 23 forward that might lead to some input by counsel in the
 24 course of Saskia's inquest is that it circumvents the
 25 requirements in relation to Interested Party status and,

1 frankly, if the family of Usman Khan can't satisfy you
 2 as to that test, then you should make no further orders.
 3 If some matter arises specifically in due course or
 4 in the course of the inquest, of course a specific
 5 application could be raised, but we certainly resist any
 6 suggestion that, in the abstract, there should be some
 7 permission granted for there to be legal representation
 8 in the inquests of Saskia and Jack.
 9 If I can move on to Article 2.
 10 HHJ LUCRAFT QC: Yes.
 11 MR PITCHERS: The family's position is this: firstly, that
 12 there are sufficient grounds today, based upon the
 13 information and evidence that has been provided, to
 14 declare that Article 2 is engaged. We also submit that
 15 it's preferable to do it now rather than to leave it to
 16 the next pre-inquest hearing or even to the inquest
 17 itself.
 18 Obviously, if you're not with us on the primary
 19 submissions, we would look to resume these submissions
 20 at the next pre-inquest hearing, and we do acknowledge
 21 that, by then, we will have been provided with
 22 substantially more information.
 23 There is no dispute as to the applicable legal
 24 structure, but it is worth, in my submission,
 25 emphasising a few points.

1 As you've heard, the test is for arguable breach,
 2 and this is acknowledged to be a low threshold and, sir,
 3 you acknowledged it yourself in your rulings on the
 4 London Bridge Inquest at paragraph 37.
 5 The other points of law that I would like to
 6 emphasise in relation to the operational duty, and
 7 adopting a formulation in Osman, is it's not simply
 8 a question of whether those involved knew that there was
 9 a real and immediate risk of a violent attack, but also
 10 whether they ought to have known. So it's not, as has
 11 been said in the written submissions of Counsel to the
 12 Inquest, a question of whether those concerned, be they
 13 probation or Prevent officers, had an inkling this was
 14 going to happen, they may or may not have had an
 15 inkling; the question is whether they should have had an
 16 inkling.
 17 Also, in relation to the definition of "real", you
 18 will of course acknowledge that that is defined simply
 19 as "more than remote or fanciful". And importantly, in
 20 relation to "immediate", it perhaps doesn't have the
 21 colloquial meaning that could be applied to that term;
 22 it means "present and continuing". It doesn't
 23 necessarily mean "imminent". As I say, all we have to
 24 do is show that there is an arguable breach, applying
 25 those tests.

1 Just briefly in relation to the facts of this matter
 2 from the evidence that has been provided and the
 3 summaries which have been given, we know that Usman Khan
 4 was a convicted terrorist. We know that he had been
 5 released from prison in late December 2018, so had been
 6 out of prison for less than a year when this attack
 7 occurred. We know, and it won't be disputed, that he
 8 was subject to statutory MAPPA supervision. He was also
 9 supervised by the probation services, and you've seen
 10 from the witness statements that have already been
 11 disclosed the relatively frequent contact that they had
 12 with him. As I understand it, he was screened prior to
 13 his release by the West Midlands Police and assessed as
 14 the highest level of risk. He had 22 licence conditions
 15 attached to his release.
 16 We say -- and these are just preliminary
 17 observations -- that, looking at the evidence that we've
 18 seen, his last unannounced visit, it would seem, by
 19 police officers was on 14 November 2019, so just over
 20 two weeks before the attack. They arrived at midday.
 21 They found the flat to be dark. It would seem that
 22 Mr Khan wasn't happy about them taking photographs of
 23 his Xbox games. He said he wanted to speak to his
 24 solicitor and he asked the officers to leave, and they
 25 complied with his request.

1 We know also that, at the time of his attack, he
 2 lived alone, he wasn't working, there was no mentoring
 3 being provided, the mentoring having ceased
 4 in August 2019, and what we would say is this was hardly
 5 a reassuring profile.
 6 Yet we know as well from the evidence that has
 7 already been released that his attendance at this event
 8 was expressly authorised. It wasn't somehow slipping
 9 between the terms or conditions that had been applied to
 10 the way that he lived; he was given express permission
 11 to attend and, on the evidence that I've seen, those who
 12 were involved in giving that permission did nothing
 13 further to notify the Metropolitan Police or the City of
 14 London Police, the Fishmongers' Company who of course
 15 own the hall where the event took place, nor
 16 specifically to make contact with the organisers of
 17 Learning Together, who organised the event. As you've
 18 already indicated, there was no security check at the
 19 door, not even a rudimentary bag-check, no sort of metal
 20 detection by one or otherwise.
 21 So, pulling these together, whatever further
 22 evidence comes out, the position of Saskia's family is
 23 that there is more than sufficient material to determine
 24 an arguable breach of Article 2.
 25 Those are my submissions in relation to Article 2.

1 I can move quickly through the other items on the
 2 agenda.
 3 We have no further observations to make in relation
 4 to item 4, matters of anonymity.
 5 We note at 5 the enquiries which are being pursued.
 6 No submissions in relation to disclosure to
 7 Interested Persons. No submissions in relation to the
 8 criminal investigations other than obviously, as I'm
 9 sure all Interested Parties, we would like to find out
 10 sooner rather than later if there are to be charges
 11 brought.
 12 In relation to logistical arrangements, you will see
 13 in the position statement that my junior has
 14 a professional commitment that would be in jeopardy if
 15 the start date is put back a week. I appreciate you're
 16 juggling lots of interests --
 17 HHJ LUCRAFT QC: Yes. I mean, I have great sympathy, and
 18 you'll understand, Mr Pitchers, in my other job, I often
 19 have to disappoint counsel, particularly at the moment,
 20 because it's more important that a case gets on than
 21 necessarily people's own diaries. I would be very sorry
 22 if it meant that your junior had to forego another
 23 professional engagement, but I think the wider picture
 24 of the number of people involved in this, I'm afraid
 25 that may have to be one of those decisions that actually

1 is difficult for him, but it's one of those things.
 2 MR PITCHERS: Sir, I accept that.
 3 HHJ LUCRAFT QC: I know you're doing your very best to
 4 support his practice, but I'm afraid there are many
 5 other moving parts in this position.
 6 MR PITCHERS: Yes. You have the observation. I wasn't
 7 putting it any higher than that.
 8 HHJ LUCRAFT QC: Absolutely.
 9 MR PITCHERS: I also address in the written submissions the
 10 understandable feelings, particularly of Saskia's
 11 mother, about photographic and video evidence. I'm not
 12 going to rehearse those now, but I would invite you to
 13 consider those. As I said in the written document, it's
 14 not meant to imply there has been any lack of sympathy
 15 in how the family have been dealt with, it is just to
 16 lay that marker: that there are some difficult things
 17 that they'll have to deal with coming in preparation for
 18 this inquest.
 19 HHJ LUCRAFT QC: Yes, and I entirely understand that,
 20 Mr Pitchers. I'm sure we will do everything we possibly
 21 can to make that as painless as it possibly can be.
 22 MR PITCHERS: I'm grateful.
 23 Sir, unless I can assist you further ...?
 24 HHJ LUCRAFT QC: No, that's very helpful. Thank you.
 25 Mr Armstrong, it may be sensible for you to go next,

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1 as it were, because I suspect to some extent many of the
 2 points that Mr Pitchers has set out orally and set out
 3 in the written documents are ones that you adopt.
 4 Submissions by MR ARMSTRONG
 5 MR ARMSTRONG: Yes, they will be, sir. I've got some points
 6 by way of development, but I'll make those as briefly as
 7 I can.
 8 HHJ LUCRAFT QC: Yes. Do you want to move to the — so you
 9 can be more easily heard.
 10 MR ARMSTRONG: I will.
 11 Sir, can I just emphasise again, for all those in
 12 the room, I act for Jack Merritt's family. They are not
 13 here today but they are here virtually. Mother and
 14 father, Dave and Anne Merritt, are on the CVP link, and
 15 I also appear with Kate Maynard of Hickman & Rose, who
 16 is in courtroom 10.
 17 Can I start with the question of IP, of Interested
 18 Person or participation, and I do adopt the submissions
 19 of Mr Pitchers in this respect.
 20 With regard to whether or not they are an Interested
 21 Person, I also adopt the submissions and position by my
 22 learned friend Mr Hough, but I also resist going where
 23 he goes, which is in relation to the following.
 24 It is now suggested that what might happen is that
 25 Mr Bunting, on behalf of the Khan family, would be

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1 sitting in, keeping an eye on what is being said, and
 2 then, subject to an application before you, asking
 3 questions, and Mr Hough finds that on Rule 21, as
 4 Mr Pitchers has referred to. I adopt his submissions on
 5 that.
 6 Sir, my submission is you're an IP or you're not.
 7 Rule 21 doesn't give you a right to representation and
 8 to ask questions. That is section 47 of the Act and
 9 Rule 19 of the Rules. What Rule 21 does is, if you are
 10 in and asking questions, so if you are an IP and
 11 a witness, then it sets out the order in which you ask
 12 questions. It doesn't confer that. It doesn't confer
 13 that right.
 14 Can I also emphasise the following, because then you
 15 get back into whether or not you're an IP or not, or, if
 16 there's any broader discretion beyond that, which I say
 17 there isn't, but if there is, what you have are the
 18 following factors.
 19 First is I hear what Mr Bunting says about the fact
 20 it would be just him and not the family, but the reality
 21 is that if he is here, he may need his clients here
 22 because he will need to take instructions on relevant
 23 matters and ask them questions if matters have arisen in
 24 the oral evidence which they can contradict or otherwise
 25 have comments on.

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1 Now, it is not addressed by Mr Hough as to how that
 2 might work and how Mr Bunting might be able to get those
 3 instructions without having them here in some form or
 4 another, and the reality is, in my submission, that what
 5 that would be doing is opening the door to something
 6 that everybody accepts would be very distressing to my
 7 clients, no doubt to Mr Pitchers' clients, and has been
 8 distressing and therefore resisted in every other
 9 inquest of this kind, with which I know that you are
 10 familiar.
 11 The question then becomes, when you look at that,
 12 what is the justification for it, bearing in mind that
 13 this is either at the broad discretion or the exercise
 14 of broad discretion through 47(2)(m). I just wanted to
 15 emphasise that.
 16 It is said by Mr Bunting: she is interested, she has
 17 assistance that she can give you. But if you look at
 18 the evidence that has so far been served from the Khan
 19 family, the witness statements that I think were
 20 uploaded to Opus yesterday, and on the basis of what
 21 Mr Bunting has said himself this morning, they have very
 22 little to offer. They saw nothing, they are not
 23 experts. That's it. It's difficult in those
 24 circumstances to see that there would be any material
 25 contribution that they can make, particularly in

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1 circumstances where you're already going to have the
 2 assistance of all the other legal teams, including
 3 Mr Hough, including Mr Pitchers' team, including our
 4 team and others in the room.
 5 So we say the justification isn't there at the
 6 moment.
 7 I do also, however, agree with Mr Pitchers that the
 8 position is that if something specific comes up, if the
 9 facts change as we get down the line, revisit it. But
 10 we're not at that stage yet. If there is something we
 11 don't yet know about that suggests that we might need
 12 them in to make a contribution, then, fine, at that
 13 stage we can revisit it then, but we're not there now.
 14 Those are my submissions in relation to that.
 15 Generally I would say that having Mr Bunting in --
 16 what that is doing is eroding the primary position,
 17 which is the separation of the inquests.
 18 Unless I can assist you further with that, sir, can
 19 I move on to Article 2?
 20 HHJ LUCRAFT QC: Yes. I'm just going to say that once
 21 you've finished, Mr Armstrong, we will take a break for
 22 lunch. That's not to entice you to speed up or slow
 23 down, it's just I'm sure other people would be keen to
 24 know whether we're going to sit through, but we will
 25 take a break.

1 MR ARMSTRONG: Yes, I'm grateful. I'm also very happy to
 2 break now if that helps you.
 3 HHJ LUCRAFT QC: It seemed to me that in relation to
 4 Article 2, you again may well be adopting what is set
 5 out by Mr Pitchers and what's in your written documents.
 6 MR ARMSTRONG: I do. I just want to make a couple of points
 7 about that.
 8 HHJ LUCRAFT QC: Yes.
 9 MR ARMSTRONG: Firstly, the concern that the Merritt family
 10 had earlier on is now not quite the same concern about
 11 declaring it, because we've resolved our funding
 12 position, so that position has moved. I do recognise
 13 that it may make little difference substantively, given
 14 that and given the fact that you're going to do the same
 15 intensive enquiry in any event. However, I do want to
 16 just say that the material is there, as Mr Pitchers
 17 says, and I want to add two points to what he said.
 18 One is Mr Hough said, in response to my written
 19 submission about how did Mr Khan get past the
 20 Learning Together in 2017 when he was behaving in the
 21 way that he appears to have been behaving in 2017, the
 22 answer to the causative response that Mr Hough makes is
 23 that that process is the foundation for all that comes
 24 afterwards. If you get the risk assessment process
 25 wrong in 2017, then it is still wrong in 2019 and that's

1 how it works back. We are at an early stage in relation
 2 to that, but that's the way it would work, and that's
 3 why we say that that material is relevant.
 4 But can I also emphasise this: as well as Article 2
 5 in its operational aspect, you have Article 2 in its
 6 general aspect and the Convention general duties, under
 7 whether it is Article 2 or 3 in fact, are about the
 8 establishment of high-level systems, yes, but that also
 9 embraces staff -- so you have to develop a system, but
 10 you have to staff it properly and you have to staff it
 11 with people who are trained properly. The Strasbourg
 12 court does regularly descend into quite high levels of
 13 detail about whether those obligations have been met and
 14 whether a system is appropriate in that respect.
 15 One of the key things I want to emphasise is that in
 16 this case, already on the material that has been
 17 produced, you have all of the Prevent officers from
 18 Staffordshire, or certainly the majority of the Prevent
 19 officers from Staffordshire, saying that they had no
 20 specific training in handling terrorist offenders. So
 21 far as we can see, it was handed over by the West
 22 Midlands counter-terrorism unit to the Staffordshire
 23 unit, for reasons that remain to be explored, and all of
 24 them are saying they had no specific training.
 25 Now, when one looks at that in the context of what

1 we know about offending behaviour work in the context of
 2 terrorism, which is a relatively undeveloped area of
 3 thinking about defendant behaviour work, if you have all
 4 of that force or the majority of that force saying that
 5 they were not trained in something that requires
 6 specific training, then you at least arguably have
 7 a system problem. That's why I make the position that
 8 I do, and if I'm right about that, even to the very low
 9 arguability threshold, then I say that this inquest
 10 should say so.
 11 One of the reasons why we say that is because it
 12 might just bring about the focus that I've talked about
 13 elsewhere in the submissions, which is getting the work
 14 done and communicating the concern that this court may
 15 have and the interest that this court may have in those
 16 matters. That's why I maintain that submission.
 17 Sir, I have nothing to add on anonymity, you will
 18 have seen what we say in the written submissions about
 19 that and we've maintained a position of neutrality on
 20 things like screening.
 21 In relation to disclosure, can I just add one thing?
 22 I am very grateful to Mr Hough for setting out, which he
 23 did to me in person before the hearing started, about
 24 the timetable for disclosure and that goes a long way to
 25 meeting some of our concerns that we want to essentially

1 speed — with great respect, we would like to speed that
 2 process up.
 3 HHJ LUCRAFT QC: Yes.
 4 MR ARMSTRONG: It's a big job, that area, and it's going to
 5 take some time. I just want to sound a slight note of
 6 concern, which is this: if it's going to be six weeks
 7 before we get that material, that's the beginning of
 8 December, we then need to review it. You can already
 9 see from our submissions that there's a real risk that
 10 things will be missing at that stage and it will start
 11 a train of enquiry and it will identify other documents
 12 that aren't in that first tranche, witnesses that need
 13 to be identified. By the time we've done that and
 14 communicated that, realistically, I can easily see
 15 that's going to go over Christmas until January, and if
 16 we've got an April start, it's beginning to get tight.
 17 The reason I'm flagging it at the moment is — and
 18 this is just based on experience of how large cases like
 19 this go — any slippage would need to be, in my
 20 submission, carefully watched by Counsel to the Inquest
 21 because slippage of that kind in that area, if we're not
 22 starting that process essentially until December, could
 23 potentially derail. So I'm just putting up a very
 24 gentle flag, if I might, about that. That's all I want
 25 to say about disclosure unless I can assist you further

1 on that.
 2 I would also, just finally, in relation to criminal
 3 investigation, I know that's a matter for City of London
 4 Police. Can I just emphasise the points that we make?
 5 The Merritt family does gently sound a note of
 6 scepticism about whether that's going to go anywhere.
 7 The last couple of cases with which Hickman & Rose and
 8 myself have been involved, where prosecutions of that
 9 kind have occurred, is those prosecutions have been
 10 explored, it has taken four years in both cases to
 11 explore them, only to say no at the end of that four
 12 years.
 13 HHJ LUCRAFT QC: Yes.
 14 MR ARMSTRONG: So there is a genuine concern and we would
 15 encourage CoLP to look carefully at whether that is
 16 a route to ... Because we doubt it.
 17 Unless I can assist you further, those are my
 18 submissions.
 19 HHJ LUCRAFT QC: No. Thank you very much, Mr Armstrong.
 20 What I'm going to suggest, Mr Hough, is that we
 21 resume, if we can, at 1.50. I hope that will give you
 22 all a chance for something of a break between now and
 23 then.
 24 Just picking up on one of the things you said,
 25 Mr Armstrong. One of the benefits of this hearing, and

1 the reason we started at 11 o'clock rather than earlier
 2 was the opportunity for counsel to have an opportunity
 3 to speak with each other. I'm sure some of the
 4 observations you've made in respect of disclosure,
 5 Mr Hough, I know, will take on board. And with the
 6 team, they will have very much in mind the fact that
 7 this needs to be kept on a very close timeframe because
 8 of the impact. As you say, if material comes to you
 9 late, then there's little chance to work through it and
 10 raise questions that you may have which then may have
 11 a knock-on effect to the proposed start time. So I have
 12 no doubt — and certainly from experience of previous
 13 inquests I've done where similar points were made fairly
 14 early on, if I can give you this comfort, and this is
 15 not to further boost Mr Hough but I know that he has
 16 those points very much in mind.
 17 Of course part of his role as counsel to these
 18 inquests is to second-guess some of the questions that
 19 might be asked by the families at that initial stage, so
 20 to be thinking of the points that you might otherwise
 21 have asked. I'm sure that review of the material will
 22 be very thorough but I do take on board your just
 23 putting down that marker about timing and slippage.
 24 MR ARMSTRONG: Yes. I am grateful, sir. Families do
 25 sometimes see things that the others don't see.

1 HHJ LUCRAFT QC: Absolutely, and that's entirely understood.
 2 Very well. I'll rise.
 3 (1.08 pm)
 4 (The short adjournment)
 5 (1.50 pm)
 6 HHJ LUCRAFT QC: I think, Mr Pitchers, your clients aren't
 7 in the public gallery. I mean no discourtesy to them,
 8 I was going to continue. If they come in in the
 9 interim, I hope they'll forgive me for having resumed.
 10 MR PITCHERS: I'm sure they'll forgive you, and they've
 11 probably heard the things which will have been of most
 12 direct interest.
 13 HHJ LUCRAFT QC: Absolutely, and of course they will see the
 14 transcript of anything that they don't hear anyway, but
 15 I'm conscious that we've got quite a few people either
 16 in court or on the link who may have some things to say,
 17 so I'll do that, if I may.
 18 Mr Hough, what I was going to do, having heard the
 19 submissions so far, was to invite, first of all,
 20 Mr Sheldon to respond to the particular points that you
 21 flagged on the agenda, and this is points 5 and 6. It's
 22 really just to give Mr Sheldon an opportunity to address
 23 those points that you made, if he wishes to. Then I was
 24 going to do the same with Ms Barton in respect of item
 25 7, because, again, that is a point which has been raised

1 by a number of people, both today and in their written
 2 observations. But I think if I do that first of all,
 3 and we can then look to any other of those present, as
 4 I say, either in person or remotely, who wish to make
 5 any observations about the agenda items.
 6 But, as I say, trying to cut down the number of
 7 movements around the courtroom, if I take it in that
 8 sequence first of all. Thank you.
 9 So, Mr Sheldon.
 10 Again, Mr Sheldon, by way of reminder, if I could
 11 simply ask you to identify yourself first of all, and
 12 then, as I say, it's really my suggestion that you go
 13 next and you deal with any points on the agenda that you
 14 wish to, obviously, but in particular to the issues that
 15 Mr Hough flagged up on items 5 and 6.
 16 MR SHELDON: Certainly, sir.
 17 For the benefit of those who may be listening, my
 18 name is Neil Sheldon, and I represent the Secretaries of
 19 State for Justice and the Home Department.
 20 Sir, as you've seen from our written submissions, we
 21 either expressly endorse Counsel to the Inquest's
 22 submissions on those matters that directly concern us or
 23 we make no submissions at all on those that don't.
 24 HHJ LUCRAFT QC: Yes.
 25 MR SHELDON: But as you've noted, I have been invited by

1 Mr Hough to update you on two aspects of the disclosure
 2 issue, and I am of course very happy to do that.
 3 Sir, the need for prompt disclosure of the two
 4 categories of material identified by Counsel to the
 5 Inquest, the Mercury intelligence reports and the MAPPA
 6 material, is clearly understood, and I will ensure that
 7 the need to expedite that process to the greatest extent
 8 possible is made clear to those who are dealing with it.
 9 As far as the Mercury intelligence records are
 10 concerned, that is, as you know, a very substantial body
 11 of material running to several thousand pages. That of
 12 course underlines the need for Interested Persons to
 13 have it in good time to prepare for the inquest hearing,
 14 but it also means that the process of considering the
 15 material for redaction has been a complex and extensive
 16 one. I'm pleased to say that that process will be
 17 completed very shortly and the material provided in
 18 a form which can be disclosed directly to the Interested
 19 Persons. I understand that the timescales in relation
 20 to that ought to be such that it will be able to be
 21 disclosed by the end of November, along with the other
 22 categories of material that Mr Hough has identified.
 23 Sir, as for the MAPPA material, we've been engaging
 24 directly with your legal team as to the format in which
 25 that material can most conveniently and appropriately be

1 disclosed to the Interested Persons. That material is
 2 now being finalised, and we anticipate that disclosure
 3 of those documents as well ought to be possible within
 4 the same timeframe.
 5 HHJ LUCRAFT QC: Thank you.
 6 MR SHELDON: Sir, I think that's all I can provide by way of
 7 update at the moment, other than the general reassurance
 8 that we are progressing matters as quickly as we can and
 9 we do understand the importance of getting on with it.
 10 HHJ LUCRAFT QC: That's very helpful, Mr Sheldon, and I've
 11 no doubt also that the point Mr Hough made about the
 12 need for clarity as to why things may be sensitive is
 13 very clear to you and to those working with you.
 14 MR SHELDON: Yes, sir. Thank you.
 15 HHJ LUCRAFT QC: Thank you.
 16 Ms Barton.
 17 Submissions by MS BARTON
 18 MS BARTON: Sir, thank you. I'm Fiona Barton
 19 Queen's Counsel, I represent the City of London Police
 20 in these inquests.
 21 Sir, insofar as issues directly affect the City of
 22 London Police, we have dealt with them in our written
 23 submissions and I don't propose to say anymore.
 24 HHJ LUCRAFT QC: Yes.
 25 MS BARTON: We largely agree with what is said by Counsel to

1 the Inquest.
 2 Dealing with the specific item with which City of
 3 London Police are concerned, which is item 7 on the
 4 agenda, the criminal investigation and potential
 5 prosecutions, as, sir, you are already aware, the City
 6 of London Police are conducting a criminal investigation
 7 into the facts leading up to the deaths. That criminal
 8 investigation includes, but is not limited to, the
 9 direct arrangements for the Learning Together event at
 10 Fishmongers' Hall.
 11 The stage that the investigation has reached is that
 12 the investigation file has recently been provided to the
 13 Crown Prosecution Service by the City of London Police,
 14 and it's routine in cases such as this that there is
 15 discussion between the investigating force and the Crown
 16 Prosecution Service concerning what offences are
 17 disclosed, if any, whether the relevant evidential tests
 18 are met or whether any further investigations are
 19 needed. The investigation, as I say, is currently at
 20 that stage and these discussions are ongoing.
 21 Sir, I should acknowledge immediately that the City
 22 of London Police are acutely aware of the need for the
 23 decision in this case to be expedited. This is because
 24 it is acknowledged that any delay in this process risks
 25 a knock-on effect to these inquests and that is the last

1 thing that any of us want.
 2 HHJ LUCRAFT QC: Yes.
 3 MS BARTON: And we acknowledge the increased stress and
 4 distress this will cause to the bereaved families and
 5 indeed to witnesses who are having to potentially relive
 6 these tragic events.
 7 So I can say, sir, that without undermining the
 8 integrity of the decision-making process in that
 9 investigation in any way, the decision will be expedited
 10 as far as possible, and both the Crown Prosecution
 11 Service and the City of London Police are working to
 12 those ends.
 13 HHJ LUCRAFT QC: Thank you very much.
 14 Mr Hough, what I was then going to suggest we do is
 15 we have a number of organisations and individuals who
 16 are on the link, and we've got a number who are present
 17 in court. I've got a list in front of me, and I was
 18 simply going to go down the list, really just to see if
 19 there is anyone who wishes to make any observations or
 20 submissions in addition to the written submissions which
 21 have been made. I will simply go down my list, but if
 22 you could remind me if there's anyone that I fail to
 23 call upon, that would be extremely helpful.
 24 To make life slightly easier, I'm going to suggest
 25 that, first of all, I go to those who are remotely on

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1 the link.
 2 So first of all, Barts NHS Trust, which I think is
 3 Liam Duffy, who is on the CVP link. My clerk is just
 4 going to make sure that we unmute the right person as we
 5 go through this process, so please just bear with us,
 6 but in a moment we should hopefully have Liam Duffy
 7 live.
 8 MR DUFFY: Are you able to hear me, sir?
 9 HHJ LUCRAFT QC: I am.
 10 Just a request, if everyone else can make sure that
 11 they are muted.
 12 (Feedback noise)
 13 MR DUFFY: If I try again, sir —
 14 HHJ LUCRAFT QC: Yes.
 15 (Feedback noise)
 16 Mr Duffy, I'm not sure you heard that but we think
 17 it may be at this end. If you bear with us one moment,
 18 we're just trying to mute court 10, which will
 19 hopefully ...
 20 (Feedback noise)
 21 (Pause for technical problem)
 22 I suspect there is someone who has a microphone on
 23 and may not realise it.
 24 What I think the sensible thing for me to do is in
 25 fact to take the people in this room first of all and

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1 hopefully come back to those who are elsewhere.
 2 I know Mr Butt is in the room, so I'm going to come
 3 to him. Mr Butt, if there are any observations or
 4 submissions you wish to —
 5 MR BUTT: No, thank you. We endorse the approach taken by
 6 Counsel to the Inquest, and also by the family in
 7 relation to the question of the Interested Person
 8 status. We made written submissions on 2 July and we
 9 have nothing more to add.
 10 HHJ LUCRAFT QC: Thank you very much, Mr Butt.
 11 Mr Boyle?
 12 MR BOYLE: Nothing to add, sir, to the submissions we've
 13 already advanced in writing.
 14 HHJ LUCRAFT QC: Thank you very much.
 15 Mr Griffin?
 16 MR GRIFFIN: Nothing, sir. Thank you.
 17 HHJ LUCRAFT QC: Thank you very much.
 18 Mr Baumber?
 19 MR BAUMBER: No, thank you, sir.
 20 HHJ LUCRAFT QC: Thank you.
 21 And I think Ms Brannigan, anything?
 22 MS BRANNIGAN: Nothing, sir.
 23 HHJ LUCRAFT QC: Thank you very much.
 24 Then I think Danny Simpson?
 25

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1 Submissions by MR SIMPSON
 2 MR SIMPSON: I represent the Independent Office for Police
 3 Conduct, and we're an Interested Person in relation to
 4 the inquest of Mr Khan only. Strictly, since the
 5 organisation is carrying out two investigations into —
 6 HHJ LUCRAFT QC: Can I just suggest that you might just
 7 come, Mr Simpson, because I'm conscious that, speaking
 8 where you are speaking from, you may not be picked up by
 9 the microphone. So if I could ask you just to come
 10 forward to the microphone, thank you.
 11 You were just explaining that you are for the
 12 Independent Office for Police Conduct, and you are an
 13 Interested Person solely in the inquest relating to
 14 Usman Khan.
 15 MR SIMPSON: Indeed. The organisation is carrying out two
 16 investigations under its duty to investigate death and
 17 serious injury incidents where there has been contact
 18 with the police. It's investigating in two discrete
 19 areas relating to the contact Mr Khan had with officers
 20 from Prevent in Staffordshire, and then with officers on
 21 London Bridge which led to his shooting. Those remain
 22 investigations under the death and serious injury
 23 jurisdiction, and whilst they could lead potentially to
 24 criminal investigations, they're at an advanced stage
 25 and there is a formal process to go through if those

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1 investigations were to become criminal or, indeed,
 2 misconduct investigations, and that threshold has not
 3 been reached in either. I'm instructed that there is no
 4 realistic prospect that they will do so, and I say that
 5 in respect of point 7 on the submissions and
 6 paragraph 33.
 7 HHJ LUCRAFT QC: Thank you very much indeed.
 8 Then I think Elliot Gold?
 9 MR GOLD: Nothing, sir.
 10 HHJ LUCRAFT QC: Thank you.
 11 And Mr Morley?
 12 MR MORLEY: Sir, nothing to add to our written submissions.
 13 HHJ LUCRAFT QC: Thank you very much.
 14 I think, Mr Hough, we've got three present on the
 15 link, and I think the only other individuals are the
 16 press, who I --
 17 MR HOUGH: Yes, the only other advocate present in court
 18 from whom you haven't heard is Ms Patrick.
 19 HHJ LUCRAFT QC: Yes. I was going to come to Ms Patrick at
 20 the end because it made sense to do that rather than in
 21 the middle of other people who are present.
 22 We can have another go at trying... So hopefully we
 23 can now hear from Mr Duffy.
 24 Mr Duffy, I think you should be live now.
 25 MR DUFFY: Are you able to hear me, sir?

1 HHJ LUCRAFT QC: Loud and clear. I'm very sorry for the
 2 problems earlier on.
 3 Mr Duffy, for the purposes of the recording, you
 4 represent Barts Health NHS Trust, and so it's really if
 5 there are observations or submissions you wish to make
 6 in respect of the various points on the agenda in
 7 addition or supplementing what you've provided to me by
 8 way of written document.
 9 MR DUFFY: I don't think anything has been provided in
 10 writing, sir. Could I say briefly that we endorse
 11 Mr Hough's submissions on items 1 and 3 on the agenda,
 12 namely organisation of the inquests and Article 2.
 13 HHJ LUCRAFT QC: Yes.
 14 MR DUFFY: And that we're neutral on all other matters, sir.
 15 HHJ LUCRAFT QC: Thank you.
 16 Next on my list, Ms Le Fevre, who represents
 17 Fishmongers' Company who, again, I think is on the CVP
 18 link, and we'll just see if we can hear from her.
 19 MS LE FEVRE: I don't know if you can hear me, sir?
 20 HHJ LUCRAFT QC: I can now hear you, thank you.
 21 MS LE FEVRE: Thank you very much, sir.
 22 HHJ LUCRAFT QC: Any observations or submissions you wish to
 23 make on any of the items on the agenda?
 24 MS LE FEVRE: Nothing to add, thank you.
 25 HHJ LUCRAFT QC: Thank you very much.

1 I think also on the link, Mr Beer for
 2 West Midlands Police. Just bear with us whilst we try
 3 to isolate him and unmute him from the system here.
 4 Good afternoon, Mr Beer. I hope you can hear us.
 5 As I say, you are representing West Midlands Police, and
 6 I hope you've been able to follow the proceedings on the
 7 CVP link. So it is your opportunity if there are any
 8 observations on the items of the agenda that you wish to
 9 make in addition to what you provided in written form.
 10 MR BEER: Good afternoon, sir. I hope you can see and hear
 11 me.
 12 HHJ LUCRAFT QC: I can indeed.
 13 MR BEER: Thank you for the opportunity to make submissions.
 14 In the event, we have no submissions to make.
 15 HHJ LUCRAFT QC: Thank you very much.
 16 Very well. Mr Hough, I'll now, as I say, deal with
 17 the submissions in respect of the press. I should say
 18 that I've got two sets of submissions, one of which came
 19 after the others, Ms Patrick, but I've got both sets.
 20 As I say, it's really your opportunity, if you wish, to
 21 add to them, supplement. But, again, I'm going to
 22 suggest that if you do, you wouldn't mind coming close
 23 to the microphone so that everyone can hear what it is
 24 you have to say.
 25 MS PATRICK: I hope --

1 MR BEER: Sorry to interrupt, sir. It's Jason Beer again.
 2 I'm afraid that when your clerk has switched me off,
 3 I don't think he has switched the sound for the
 4 courtroom back on, so none of those on the CVP can hear.
 5 HHJ LUCRAFT QC: Okay. Thank you for that.
 6 Ms Patrick, can I suggest you start, and we'll hope
 7 that everyone can hear. If people can't, then of course
 8 they'll have a transcript in due course.
 9 A. Yes, sir. My name is Angela Patrick and I appear on
 10 behalf of what is being called a group, the group, of
 11 media organisations --
 12 MR BEER: (?) If it helps, sir, we can hear the noises being
 13 made in the overflow room in court 10.
 14 HHJ LUCRAFT QC: Right.
 15 (Pause for technical problem)
 16 Ms Patrick, can I suggest that you carry on. My
 17 apologies in advance if anyone cannot see or hear, but
 18 again, like I say, I'm confident that what you say will
 19 be transcribed and that --
 20 MS PATRICK: I hope I can be incredibly quick, and I think
 21 that most of what I'm saying (inaudible) in written
 22 submissions. But I should clarify, as I said
 23 (inaudible), my name is Angela Patrick and I appear for
 24 the media organisations. That's not the whole of the
 25 press. I appear today for The Times Newspapers Limited,

1 and not (inaudible) Associated News; Independent
 2 Television News, that's ITN; and the BBC.
 3 As I said, you've had two sets of written
 4 submissions from the press, (inaudible) written
 5 submission of what's already been acknowledged by many
 6 others as the significant public interest in these
 7 inquests. And although I appear today to address the
 8 application for anonymity, screening, special measures,
 9 I shall address the fundamental principle of open
 10 justice (inaudible) to recognise the significance of
 11 these inquests for each of the bereaved families, and
 12 particularly for those who are present today.
 13 I've been asked to address two issues today which
 14 are covered in our written submissions: firstly, the
 15 application for anonymity and screening; and, secondly,
 16 to briefly make a short request in respect of logistics
 17 and planning for the hearing.
 18 In written submissions — the first point, the
 19 application for anonymity and special measures, we have
 20 moved on somewhat since July. And on anonymity first,
 21 we welcome the decision of Mrs Begum to withdraw her
 22 application for anonymity in respect of herself and her
 23 husband, and in respect of other family members we
 24 reiterate what we said about children. As far as we can
 25 see, in respect of children of family members it seems

1 that an order has been sought in respect of relatives
 2 (inaudible) anonymity.
 3 In respect of the children, the press have never
 4 objected to that direction being sought. In respect of
 5 (inaudible), our position has always been that we don't
 6 know enough about what the relatives are going to say,
 7 what the relatives of (inaudible) will be and
 8 (inaudible) been parked for another day. The press may
 9 wish to make submissions on another occasion.
 10 Moving now to questions on screening, I have two
 11 points that I'd like to put before you, sir: first, to
 12 clarify the position of the media organisations; and
 13 secondly, to reiterate what we say the legal principles
 14 you must apply will be.
 15 Firstly, the screening of any potential family
 16 witnesses was not supported or proposed or endorsed by
 17 the media organisations in written submissions. The
 18 submissions of (inaudible) and the family of Mrs Khan —
 19 sorry, Mrs Begum, I directed you to paragraph 34 of the
 20 media organisations' submissions. With respect, that
 21 must also be read with paragraph 52. (Inaudible) any
 22 special measures application must (inaudible) fact
 23 sensitive, and the media simply don't have the full
 24 picture of what is going on in this inquest in order to
 25 assist you fully at this point.

1 The media organisations would reiterate the
 2 submissions they have been able to make of the
 3 significant public interest that exists in these
 4 inquests and the relevance of the (inaudible) evidence
 5 to the family of Mr Khan as to who he was in life before
 6 the events which form the subject of these inquests.
 7 The media organisations' position is really that if
 8 the coroner is considering screening, it's for the
 9 coroner to be satisfied on the evidence that's been put
 10 before them in the application, and satisfied that the
 11 requirements of ruling here are met. Importantly, in
 12 those circumstances that the media organisations accept
 13 that special measures should be (inaudible) to
 14 anonymity. And in the circumstances, the coroner has
 15 been invited by the media organisations and is invited
 16 (inaudible) to subject the family application to close
 17 scrutiny.
 18 Secondly, moving briefly to the legal principles,
 19 I covered them in some details in our submissions.
 20 I simply want to be very brief on this. I don't ...
 21 (No audio feed)
 22 ... in dispute to the four key principles: the
 23 coroner must, and I think it is accepted that there will
 24 be an intrusion onto the fundamental principles of open
 25 justice by screening, the coroner must consider the

1 fundamental principle of open justice in determining
 2 whether to exercise the discretion for the purposes of
 3 rule 18. Secondly, the weight on the other side of the
 4 balance must be drawn from the evidence produced by each
 5 of the applicants seeking protection. The media
 6 organisations (inaudible) the submissions from July that
 7 the evidence in support of the applications produced is
 8 speculative and unsupported, and it remains as yet
 9 unclear which siblings will be seeking protection as
 10 they did in July. It may indeed be premature to seek
 11 a determination on special measures.
 12 But of course, the court must take into account the
 13 subjective fears expressed by any witness, but they may
 14 bear very little weight in the absence of objective
 15 verification and the court is referred to the case
 16 (inaudible) in support of my written submissions.
 17 And finally, any special measures exercised by the
 18 coroner must be no more than is necessary and to the
 19 extent necessary. That is well supported of course in
 20 the case law (inaudible) submissions in the case of
 21 (inaudible), in the cases subject to appeal. But the
 22 media organisations would say of course that that
 23 (inaudible) will establish the principle that any
 24 departure from the principle of open justice must be
 25 justified by cogent justification. That is from the

1 well-known case of T v West Yorkshire, cited in my
 2 written submissions. And, of course, the very
 3 well-known (inaudible) any departure must be justified
 4 to the extent and to no more than the extent that the
 5 court reasonably believes to be necessary in order to
 6 serve the interests of justice. Well-known (inaudible)
 7 Attorney General v (Inaudible) Magazine.
 8 I can't assist the coroner any further on the issue
 9 of screening, other than to say that I think that there
 10 is an agreement on the principles which should be
 11 applied, and the media organisations invite the coroner
 12 to subject that application to close scrutiny.
 13 Moving to the logistics, we very much welcome the
 14 coroner's recognition that all efforts will be taken to
 15 procure effective press participation, and of course, as
 16 we know, special measures that are being put in place
 17 can sometimes go wrong, as we saw this morning.
 18 HHJ LUCRAFT QC: Yes.
 19 MS PATRICK: But the press simply want to reiterate, given
 20 the significance of these inquests and the significant
 21 public interest that they raise, that the starting point
 22 must be open justice, not only (inaudible) rule 11 and
 23 note 25 of the media, but of course the recognition in
 24 note 38, as you said, that even in a (inaudible) hearing
 25 the starting point needs to be open justice. The media

1 has been (inaudible) the eyes and ears of the general
 2 public. That's not any less so in the current
 3 environment.
 4 HHJ LUCRAFT QC: Well, arguably it's more so.
 5 MS PATRICK: Indeed. If it's impractical in ordinary times
 6 for even the most interested of individuals to make it
 7 to court and to the public gallery, it's even more
 8 difficult and impractical now.
 9 On that basis we say it's incredibly significant
 10 that the press are present both in the hearing room and
 11 able to attend remotely if required, and we ask that if
 12 a plan is prepared for the logistical arrangements for
 13 the inquest, the press, including the media
 14 organisations that I represent through the Press
 15 Association, are consulted at an early stage in the
 16 planning for those arrangements and given an opportunity
 17 to make early submissions if required.
 18 I think that's all I have to say, unless I can help
 19 you further.
 20 HHJ LUCRAFT QC: No, Ms Patrick.
 21 You will know, simply because of other cases which
 22 are currently taking place in this building, which again
 23 have a high public interest, where again the courts
 24 currently sitting in this building are very anxious to
 25 make sure there is proper public access, both in the

1 sense of members of the public who may wish to be
 2 present but also press. I can give you the reassurance
 3 that I gave right at the beginning that we will look at
 4 this very carefully, and guidance note number 38 that
 5 I issued earlier this year is one of those documents
 6 which will be under review during this ongoing pandemic.
 7 The restrictions to some extent will ebb and flow,
 8 as I'm sure they will during the coming months, but we
 9 will have those very much under review as we prepare for
 10 the hearing next year.
 11 MS PATRICK: Sir, I'm sure that those I am instructed by
 12 would be very grateful for the opportunity to assist you
 13 in that process.
 14 HHJ LUCRAFT QC: Thank you.
 15 Mr Hough, I think then I've given everyone who is
 16 present and represented an opportunity to address any of
 17 the points on the agenda that have arisen so far, and it
 18 may be in reply that you really just need to address the
 19 ones where there has been any real challenge to the
 20 observations and submissions that you made in opening.
 21 Reply submissions by MR HOUGH
 22 MR HOUGH: Yes, sir.
 23 I can probably limit what I say in reply to some of
 24 the submissions made on the subject of Interested Person
 25 status for the Khan family.

1 Sir, like others in court, we are concerned that the
 2 arrangements of these inquests should be sensitive to
 3 the bereaved families and, in particular, to the
 4 families of the two victims, Jack Merritt and
 5 Saskia Jones.
 6 Nevertheless, consideration does have to be given to
 7 ensuring fairness for members of the Khan family. This
 8 brings into sharp relief the question of what degree of
 9 participation, if any, they should be permitted in the
 10 inquests of the two victims.
 11 Sir, we maintain our submission that not only should
 12 the inquests be the subject of separate hearings, but
 13 that the Khan family should not have Interested Person
 14 status in the inquests of the victims. If you granted
 15 them Interested Person status, they would be permitted,
 16 as of right, to examine any witness in those inquests,
 17 and they would be permitted, as of right, to disclosure
 18 of all matters in those inquests. In our submission,
 19 the families of the victims can legitimately have
 20 concerns about that.
 21 As to whether the test for Interested Person status
 22 is satisfied, we submit that it is not, because the
 23 family of Usman Khan do not have the kind of substantial
 24 general interest in the proceedings which is reflected
 25 by the other categories of Interested Persons in

1 section 47(2) of the Coroners and Justice Act or in the
 2 case law. They are not analogous to the claimants in
 3 the Driscoll and Platts cases, but, moreover, their
 4 interest is comparable to the interest that many
 5 witnesses have who play a significant part in many
 6 inquests. They have an interest in certain aspects of
 7 the evidence and in bringing out certain aspects of the
 8 evidence.

9 That leads on to the question of whether they should
 10 be permitted to ask questions of any witnesses.

11 Sir, the starting point in this regard is that there
 12 is no rule in the Coroners Rules and no statutory
 13 provision which limits those who may ask questions.
 14 Rule 19 gives an entitlement to Interested Persons to
 15 ask questions, but it does not prevent the coroner, as
 16 a matter of his general case management powers, from
 17 permitting others to ask questions, and, indeed, when
 18 appointing Counsel to the Inquests and having Counsel to
 19 the Inquests ask questions, the coroner is exercising
 20 that power.

21 Similarly, there have been many other examples of
 22 cases where coroners permit representatives of witnesses
 23 or others who aren't Interested Persons to ask questions
 24 of individual witnesses because they have a proper
 25 interest as a matter of fairness in examining those

1 witnesses, but don't have the substantial general
 2 interest required for Interested Person status under
 3 section 47(2)(m). In our submission, that's the
 4 situation here.

5 The Khan family could be legitimately aggrieved if
 6 it turned out at the inquest, as is entirely possible,
 7 that witnesses are questioned about whether Usman Khan's
 8 ordinary demeanour and behaviour should have led those
 9 who saw him regularly to perceive warning signs. It is
 10 far from speculative that that will be the kind of
 11 questioning to which the Prevent officers and probation
 12 staff are subject. We saw an indication of that when we
 13 heard submissions about the visit to Usman Khan's flat
 14 shortly before the attack. It is perfectly proper for
 15 them to be questioned in that way, but the family can be
 16 legitimately concerned if evidence is introduced
 17 suggesting that Usman Khan's behaviour, the behaviour of
 18 somebody they saw from time to time, indicated that he
 19 was about to commit a terrible attack.

20 You, sir, had cause to make critical comments about
 21 the family of one of the terrorist perpetrators in the
 22 London Bridge attacks. If there were evidence of that
 23 kind in these inquests and you were to make critical
 24 comments, while having precluded the Khan family from
 25 asking questions of those witnesses, there would be

1 a real problem of fairness. It is for that reason, as
 2 an example, as probably the most salient example, that
 3 we support their right to ask questions where
 4 appropriate and subject to your controlling discretion.

5 I've gone into that in a little more detail than
 6 perhaps I might in order to reassure the families of the
 7 two victims that we do not make this submission lightly,
 8 and we recognise and understand their anxiety about the
 9 family of Usman Khan playing any part in the inquest of
 10 their loved ones' deaths.

11 Sir, may I assist you further?

12 HHJ LUCRAFT QC: No, that's very helpful. Thank you very
 13 much, Mr Hough.

14 Mr Hough, as I stated at the beginning of this
 15 hearing, what I intend to do — and, to some extent, the
 16 interruptions we've had this afternoon have rather
 17 reinforced my reasons for doing this — is to produce
 18 a document which will have a ruling on each of the
 19 points that are set out on the agenda, and with my
 20 reasons as to the decision that I've made in respect of
 21 each of them.

22 I think, because of the method in which some people
 23 are present physically, some people are present on
 24 a link — and I'm afraid I don't know, without going
 25 round and asking again, how good the quality of the link

1 is — that is the easiest, the safest and the best way
 2 in which to deal with these matters.

3 The two things that I think I can state clearly now
 4 are the date that the hearings will commence will be
 5 12 April of next year, and my apologies in advance if
 6 that makes it very difficult to your junior,
 7 Mr Pitchers, but I think, as he probably heard me say
 8 before lunch, that's just one of those features of it.

9 The second thing, Mr Hough, is this: it seems to me,
 10 from the helpful analysis you gave this morning of the
 11 work which is ongoing, we will need a further
 12 pre-inquest review, probably in January. My question of
 13 you is whether we should fix a date for that now or
 14 whether we should leave that for consideration. It may
 15 well be sensible to look to a Friday in January as being
 16 a good day to do that.

17 MR HOUGH: Sir, the only reason why I would suggest not
 18 fixing that now is that, if there is to be a PII
 19 application, it may be possible to combine that with the
 20 next pre-inquest review hearing —

21 HHJ LUCRAFT QC: Yes.

22 MR HOUGH: — which would obviously save time and money of
 23 quite a lot of people. We would like to give that some
 24 consideration. We will give plenty of notice to
 25 Interested Persons of the date of any pre-inquest review

1 hearing.
 2 HHJ LUCRAFT QC: Thank you.
 3 MR HOUGH: We hear what you say about a Friday in January,
 4 and we can see that that may be a good period.
 5 HHJ LUCRAFT QC: The reason I was really highlighting
 6 a potential Friday in January is that that will give the
 7 whole of February and March following that hearing
 8 before the hearings themselves start on Monday,
 9 12 April. But certainly a date can be fixed after this
 10 hearing.
 11 MR HOUGH: Yes, sir.
 12 HHJ LUCRAFT QC: Mr Hough, finally, can I just simply put on
 13 record my grateful thanks to everyone who has sent in
 14 written submissions and the oral submissions which have
 15 been given in the course of this hearing. As I say, we
 16 are all having to deal with hearings in a very different
 17 way because of the nature of the coronavirus, but my
 18 grateful thanks to everyone who has helped set up this
 19 hearing, and my apologies to anyone who has felt that
 20 they haven't been able to hear everything that has been
 21 said or see all of what's being going on.
 22 As I say, it is a genuine thanks on behalf of myself
 23 to the court staff here, as well as to the team that
 24 help me, led by you and Mr Moss, and thank you to
 25 everyone for doing that. As I say, it's not ideal, but

1 we'll have to do the best we can.
 2 Like I say, I give my reassurance that, going
 3 forward, we will make sure that we liaise with everyone
 4 about the arrangements to the hearing in April. None of
 5 us quite know what the restrictions and limitations
 6 might be then, but if I can give the reassurance to
 7 everyone that I certainly am of the view that these
 8 hearings are extremely important, and it's important
 9 that they take place in circumstances where the families
 10 are able to fully participate in those inquest hearings,
 11 but also the press have the ability to faithfully report
 12 these proceedings.
 13 I put on record at the end of both the previous
 14 inquests I dealt with, Westminster Bridge and
 15 London Bridge/Borough Market, the high quality of the
 16 press reporting that took place for each of those
 17 hearings. There is huge significant public interest in
 18 the events that took place in November 2019, and
 19 I repeat, I have no doubt that the quality of the
 20 reporting of this inquest will match that of others, but
 21 particularly in COVID-19 times, when the ability for
 22 ordinary members of the public to attend an inquest
 23 hearing, which they did in large numbers previously, is
 24 not going to be as easy.
 25 So to that extent, really to repeat what I said when

1 counsel for the press organisations was addressing me,
 2 I do take on board the need to make sure that we do
 3 accommodate those interests, because it may be more
 4 important that that is done at this time than at normal
 5 times.
 6 I'm grateful to everyone who has attended today, and
 7 we will meet again, I have no doubt, in January at some
 8 stage next year.
 9 MR HOUGH: Thank you, sir.
 10 HHJ LUCRAFT QC: I'll rise.
 11 (2.40 pm)

(The hearing concluded)

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