

# OPUS2

Fishmongers' Hall Inquests

Day 1

February 12, 2021

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1 Friday, 12 February 2021  
 2 (2.00 pm)  
 3 JUDGE LUCRAFT: Good afternoon, Mr Hough. This is a further  
 4 pre-inquest review hearing in relation to the inquests  
 5 into the deaths which arose from the Fishmongers' Hall  
 6 incident and at London Bridge. Can I just say a couple  
 7 of things about the use of CVP.  
 8 I'm simply going to ask that all of those with what  
 9 I will call non-speaking roles, please, if you could  
 10 keep your own system on mute throughout and also, so  
 11 those particularly with non-speaking roles, if they  
 12 could turn their cameras off. That would be of great  
 13 assistance.  
 14 For those with speaking roles, can I ask, please,  
 15 that you remain on mute until I call upon you to speak.  
 16 That will, I think, make life much easier for all of us  
 17 and should cure any issues with feedback.  
 18 Mr Hough, the second thing I'm going to say in  
 19 relation to CVP -- and really this is born out of my  
 20 experience through extensive use of CVP over the last  
 21 eight to nine months -- I intend to adopt the process  
 22 that I've taken at all hearings I've conducted with CVP,  
 23 which is to simply say that I will provide after the  
 24 hearing a note of the decisions that I make and the  
 25 reasons.

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1 It is unlikely that I will announce any decisions  
 2 today. I'm doing that simply so there can be no  
 3 misunderstanding or ambiguity about what it is that I've  
 4 decided and, perhaps more importantly, the reasons for  
 5 those decisions. Experience has shown to me that in all  
 6 sorts of hearings, whether it be bail or whether it be  
 7 other hearings involving Crown Court cases, that doing  
 8 it that way has made life much easier, not only for me  
 9 but for all parties concerned, to have clarity as to  
 10 what has been decided at a hearing and the reasons why.  
 11 Whilst I was saying that, Mr Hough, I was conscious  
 12 a couple of times of some noise coming back, so I'll  
 13 simply repeat my request that people please keep on  
 14 mute. If I want to hear from you, I will ask you to  
 15 speak and then you can come off mute.  
 16 Thank you.  
 17 Submissions by MR HOUGH  
 18 MR HOUGH: Sir, as you've indicated, this is the second  
 19 pre-inquest review hearing for the inquests arising from  
 20 the attack at Fishmongers' Hall, 29 November 2019.  
 21 As with the first PIR hearing, this concerns the  
 22 inquests of Jack Merritt and Saskia Jones, the victims  
 23 of the attack, as well as the inquest of Usman Khan, the  
 24 attacker.  
 25 Sir, as you've indicated, this hearing is taking

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1 place as a partially remote hearing and we are here in  
 2 court number 1 of the Central Criminal Court with  
 3 a capacity for attendance by press and public, and there  
 4 are some members of the press here. Interested persons  
 5 and their legal representatives are attending by CVP.  
 6 The hearing is going to be the subject of audio  
 7 broadcast to the press and a transcript of the hearing  
 8 should also be made available. Sir, you have made an  
 9 order varying the ordinary effects of section 9 of the  
 10 Contempt of Court Act 1981 to allow official audio  
 11 broadcast. That order has been provided to interested  
 12 persons and is available to the press. I should stress,  
 13 sir, that it remains a contempt of court to photograph  
 14 or make an audio or video recording of any part of this  
 15 hearing.  
 16 May I now introduce the advocates. I appear with  
 17 Aaron Moss as counsel to the inquests, instructed by  
 18 Sinéad Lester and Natasha Davis of BDB Pitmans.  
 19 Sir, I have introduced myself and Mr Moss as counsel  
 20 to the inquests. For the family of Saskia Jones,  
 21 Philip Rule and Ramya Nagesh. For the family of  
 22 Jack Merritt, Nick Armstrong and Jesse Nicholls. For  
 23 the family of Usman Khan, Jude Bunting. For the  
 24 Metropolitan Police Service, Matthew Butt QC and  
 25 Genevieve Woods. For the City of London Police,

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1 Fiona Barton QC. For British Transport Police,  
 2 Elliot Gold. For Staffordshire Police, Gerard Boyle QC  
 3 and Louisa Brown. For West Midlands Police, Jason Beer  
 4 QC and Georgina Wolfe. For the Secretary of State for  
 5 the Home Department and Secretary of State for Justice,  
 6 Samantha Leek QC and Francesca Whitelaw. For the London  
 7 Ambulance Service, Gemma Brannigan. For Barts Health  
 8 NHS Trust, Sebastian Naughten. For the University of  
 9 Cambridge, Nicholas Griffin QC. For the Fishmongers'  
 10 Company, Daniel Mansell. For the City of London  
 11 Corporation, Stephen Morley. For Staffordshire Police  
 12 Prevent team officers, Ciju Puthuppally. Representing  
 13 the IOPC, Danny Simpson.  
 14 So I hope I've not omitted or misidentified anybody.  
 15 I mentioned that members of the press are in court and  
 16 it may be that they may address you on special measures  
 17 questions.  
 18 May I point out that any advocate invited to make  
 19 submissions should identify themselves at the outset of  
 20 what they say for the benefit of the transcriber.  
 21 Sir, let me then briefly outline the procedural  
 22 background. In April and May of last year, you received  
 23 initial written submissions. You then produced a first  
 24 ruling in directions on case management on 5 June last  
 25 year. The first PIR hearing then took place on

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1 16 October, after which you gave a second ruling and  
 2 directions on 22 October. Those rulings and directions  
 3 can be found on the inquest website.  
 4 Last week BDB Pitmans issued an agenda for today's  
 5 hearing. On Tuesday afternoon we circulated submissions  
 6 and a disclosure update, and yesterday interested  
 7 persons provided their written submissions in response.  
 8 Ms Lester and Ms Davis will provide our submissions  
 9 to any journalists on request. Subject to your  
 10 permission, sir, I propose to go through the items on  
 11 the agenda one by one, summarising our submissions for  
 12 the benefit of all attending and answering briefly  
 13 points in the submissions of others. It may then be  
 14 sensible to ask each advocate to address all items  
 15 together, and then finally, I may reply briefly to any  
 16 points requiring a response. Would that approach be  
 17 convenient?  
 18 JUDGE LUCRAFT: Thank you. That's very helpful.  
 19 MR HOUGH: Item 1 concerns venue listing and logistics for  
 20 the inquest hearing, and we address that from page 2 of  
 21 our submissions. The court's previous directions have  
 22 been for there to be two hearings, a hearing of the  
 23 inquests of the two victims of the attack followed  
 24 immediately by a separate and shorter hearing of the  
 25 attacker's inquest. At the last hearing the court set

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1 a date of 12 April 2021 as the start date for the first  
 2 hearing.  
 3 The plan had been for each hearing to take place  
 4 here at the Old Bailey with, first of all, a main  
 5 courtroom occupied by coroner, jury, witnesses, some  
 6 principal advocates and some interested persons, and  
 7 a second courtroom with a two-way link to the first and  
 8 containing the remaining legal representatives and  
 9 interested persons.  
 10 Over recent weeks, we have been informed that only  
 11 one courtroom can be made available at the Old Bailey  
 12 because of severe pressures on criminal courts and the  
 13 need to reduce backlogs in trials. We, of course,  
 14 understand those pressures. After very careful work by  
 15 our team, we have come to the conclusion that it's not  
 16 feasible to hold these jury inquests here with just one  
 17 courtroom. In short, there are technical difficulties  
 18 with advocates examining witnesses by CVP links with  
 19 access also to documents, footage and so on, so the  
 20 principal advocates need to be accommodated in court.  
 21 In addition, with a jury, we would expect many  
 22 advocates to want to be physically present. One  
 23 courtroom here could not accommodate coroner, jury and  
 24 all those advocates with social distancing in place.  
 25 Enquiries have therefore been made about availability

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1 and suitability of other occasions and we have to date  
 2 identified one location, which is very promising.  
 3 I can't name it now because to do so would create  
 4 commercial difficulties, but I can say that it would  
 5 provide a single space large enough to take all  
 6 participants with social distancing and that there  
 7 should be videolink capabilities for interested persons  
 8 to participate remotely if that venue is available.  
 9 If and when the availability and suitability of that  
 10 venue can be confirmed, we shall tell interested persons  
 11 and indeed the wider public.  
 12 In response to questions which have been raised by  
 13 some interested persons in their submissions, I can say  
 14 that if the venue is still regarded as appropriate, we  
 15 should be able to identify it to interested persons  
 16 within two weeks of today.  
 17 While we were looking into alternative venues, the  
 18 solicitors for the inquest wrote to all interested  
 19 persons to take their views on whether the inquest  
 20 should proceed in April or be adjourned. The question  
 21 was asked both because of the uncertainty over venue and  
 22 also because of the risks of the inquest being disrupted  
 23 or delayed if participants test positive for COVID-19  
 24 wherever we are sitting. Most interested persons,  
 25 including bereaved families of the victims, favour

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1 retaining the April start date if possible. In our  
 2 submission, sir, if a suitable venue can be confirmed,  
 3 the current listing should be retained for five reasons  
 4 which we set out at paragraph 10 of our submissions.  
 5 First, there is a general obligation to conduct an  
 6 inquest as soon as practicable. That is justified by  
 7 the understandable need to minimise distress to families  
 8 and by the need to prevent witnesses' recollections  
 9 fading.  
 10 Second, all interested persons have been working for  
 11 some time on the basis of the April start date, with  
 12 preparations made and professional diaries committed.  
 13 Third, it's difficult to say now what adjournment  
 14 short of a year or more would ensure an improved public  
 15 health situation. Fourth, most interested persons  
 16 favour retaining the current listing if possible, and we  
 17 give particular weight to the views of the Merritt and  
 18 Jones families, who, understandably, want to complete  
 19 these inquests without delay.  
 20 Fifthly, we have the real prospect of securing  
 21 a venue which is large enough to make social distance  
 22 feasible and so reduce the risk of disruption. We  
 23 therefore submit the court should confirm the April  
 24 listing subject to the very important caveat that the  
 25 issue may have to be revisited if no suitable venue can

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1 be secured for the necessary period.  
 2 We are acutely aware of the worry caused by  
 3 uncertainty and of the distress which many involved in  
 4 the case may feel if the hearing were to be put off by  
 5 months. All I can say now is that, subject to you  
 6 confirming the listing, the team will do everything in  
 7 their power to provide the necessary facilities.  
 8 Turning then to item 2, anonymity of Khan family  
 9 members, which we address from page 5 of the  
 10 submissions. Before the last hearing, applications were  
 11 made for anonymity and special measures in respect of  
 12 all immediate family members of Usman Khan. We put in  
 13 submissions opposing the applications for anonymity but  
 14 supporting those for screening. By the time of the last  
 15 hearing, the applications were varied to seek, first of  
 16 all, an order for screening of any family members called  
 17 as witnesses and, secondly, an order that none of  
 18 Usman Khan's sisters and none of the spouses or children  
 19 of Usman Khan's siblings should be named in the hearing  
 20 except after application on notice. You, sir, made  
 21 orders in favour of the screening application, so that  
 22 doesn't need to be considered today. You deferred the  
 23 application that certain family members should not be  
 24 named except after application on notice.  
 25 The basis of that application, as we understand it,

1 was that their names are irrelevant to the inquest and  
 2 don't need to be mentioned. You deferred the  
 3 application because it wasn't clear from the material  
 4 disclosed by last October whether or not their names  
 5 would prove to be relevant.  
 6 Our submission now, sir, is that the two sisters of  
 7 Usman Khan may realistically feature in the evidence,  
 8 since they were in contact with him while he was in  
 9 prison and afterwards. In footnote 6 of our document we  
 10 have given references to disclosed materials to support  
 11 that proposition. We therefore resist the making of the  
 12 suggested order in relation to them.  
 13 By contrast we don't foresee his siblings, spouses  
 14 or their children featuring in the evidence. So we  
 15 support the making of an order to avoid unnecessary  
 16 reference to these individuals in open court. Of  
 17 course, if it transpires that they do feature, you can  
 18 provide for that by order. We understand from  
 19 Mr Bunting's submissions that his clients don't actively  
 20 resist the approach we suggest.  
 21 Turning then to the other anonymity applications,  
 22 item 3, at page 6 and following of our submissions, the  
 23 court has before it four applications for anonymity and  
 24 special measures, one from Witness Q, Usman Khan's  
 25 partner from before he went into prison until midway

1 through his sentence, one from TM, a theological mentor  
 2 assigned to Usman Khan, under the Home Office desistance  
 3 and disengagement programme, DDP, and one each for M1  
 4 and M2, who were successively assigned as practical  
 5 mentors for Usman Khan under the DDP.  
 6 The governing legal principles are set out at  
 7 paragraph 15 of our submissions from page 7. We don't  
 8 understand they are in dispute. In simplest terms, the  
 9 court is required to undertake a highly fact-sensitive  
 10 balancing exercise, setting the interests in favour of  
 11 the applications, including the witness's Article 8  
 12 rights, against countervailing factors including the  
 13 important open justice principle and the Article 10  
 14 rights of media organisations.  
 15 We address the application of Witness Q at  
 16 paragraph 16 on pages 9 to 10. In short, we submit that  
 17 it should be granted having regard to three particular  
 18 considerations. First, this individual has only  
 19 a marginal role to play in the evidence because she  
 20 separated from Usman Khan several years before his  
 21 attack and because we have seen no evidence that they  
 22 were in contact after his release from prison in late  
 23 2018. In this regard, she is in a very different  
 24 position from close members of his family who, of  
 25 course, remained in contact with him in the period

1 before the attack.  
 2 Secondly, her name has not featured in media reports  
 3 to date and it is an unusual name. Refusing anonymity  
 4 would cause her to be very publicly associated with  
 5 Usman Khan. She is concerned about shame and stigma in  
 6 her community, based on a relationship which we  
 7 understand ended seven years ago. Those concerns cannot  
 8 possibly be dismissed as baseless.  
 9 Thirdly, she has a new family who have no connection  
 10 with Usman Khan but who she reasonably fears would be  
 11 caught up in the negative publicity.  
 12 So for those reasons, we submit that her application  
 13 is justified.  
 14 We address the applications of the three mentors,  
 15 TM, M1 and M2, at paragraph 17. We support those  
 16 applications, but for very different reasons. In short,  
 17 first of all, each of the mentors has reasonable fears  
 18 that, if publicly identified as a mentor for terrorist  
 19 offenders, he would be at risk of abuse, and even  
 20 attack, from either far right groups or, conversely,  
 21 from Islamist extremists. They have provided evidence  
 22 of mentors suffering deeply unpleasant abuse on social  
 23 media. Secondly, the Home Office witness supporting the  
 24 applications, Ms Ellsmore, makes the important point  
 25 that it would be much more difficult to recruit and keep

1 DDP mentors if those involved in any high profile case  
 2 such as this were immediately named.  
 3 Thirdly, allowing their applications wouldn't impair  
 4 anybody's ability to receive and understand the evidence  
 5 of these witnesses or the ability of interested persons  
 6 to test their evidence.  
 7 Before leaving the applications, I should make two  
 8 further points. First, sir, if you grant any screening  
 9 applications, you will need to consider from whom the  
 10 witnesses should be screened. Subject to submissions by  
 11 others, our submission is that they should be seen by  
 12 coroner, court staff, inquest team members, jury,  
 13 interested persons in the inquest for which they give  
 14 evidence, and all legal representatives of those  
 15 interested persons.  
 16 Secondly, if you grant any anonymity applications,  
 17 you will need to consider what information is to be  
 18 withheld. The submissions from Times Newspapers Limited  
 19 make the fair and important point that an order in  
 20 respect of the mentors should not prevent questioning  
 21 about relevant biographical details which may cast light  
 22 on their experience and background as mentors. The  
 23 usual form of order is to preclude publication of  
 24 information which would actually reveal their specific  
 25 identities.

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1 In our submission, that shouldn't present a problem  
 2 with looking into relevant biographical background.  
 3 Turning to items 4 and 5 together, which we address  
 4 from page 12 of the submissions, those are enquiries  
 5 being made by the inquest team and disclosed to  
 6 interested persons.  
 7 Since the last hearing, sir, a vast amount of work  
 8 has been done to enquire after and press for relevant  
 9 material with a view to disclosing it to interested  
 10 persons over the Opus platform. A detailed update note  
 11 has been provided alongside our submissions. To  
 12 summarise very briefly by reference to paragraph 19 of  
 13 our submissions, first of all in recent times many  
 14 further witness statements from the SO15 investigation  
 15 have been produced. Second, at our request, corporate  
 16 and managerial witness statements have been produced and  
 17 disclosed from a range of organisations, including the  
 18 City of London Police, West Midlands Police, HM Prison  
 19 and Probation Service, and Staffordshire Police. More  
 20 such statements are in the course of being produced,  
 21 including from firearms training officers, from senior  
 22 London Ambulance Service staff, and from the City of  
 23 London Corporation.  
 24 Very large volumes of relevant documentary evidence,  
 25 fourthly, have been obtained and disclosed, including

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1 from the prison and probation service,  
 2 Staffordshire Police, the London Ambulance Service, the  
 3 Metropolitan Police, and the City of London Police.  
 4 At this stage, I should acknowledge a point properly  
 5 made in Mr Beer's submissions: some documents which are  
 6 attributed to West Midlands Police on the Opus system  
 7 are in fact Staffordshire Police documents. As  
 8 I understand it, those are documents which West Midlands  
 9 Police provided in response to a disclosure request and  
 10 of which the owner or source wasn't easily identifiable.  
 11 The solicitors for the inquest will be in contact with  
 12 Mr Beer's client to reclassify the material on the  
 13 platform so as to avoid any confusion.  
 14 Fifthly, further documentary material is in the  
 15 course of being disclosed. Many of the remaining  
 16 documents involve security sensitivities, which require  
 17 more intensive work than for other documents, and I'll  
 18 turn to those in a moment.  
 19 Sixthly, an expert report on emergency care given to  
 20 the victims of the attack has been obtained from  
 21 Professor Deakin. Seventh, animations and schematics of  
 22 the scene are being produced by the Metropolitan Police  
 23 computer aided modelling bureau to our specifications  
 24 and are nearly ready to be disclosed.  
 25 Eighth, a series of video compilations is being

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1 produced, again to our specifications, which again are  
 2 to be disclosed very soon.  
 3 Ninth, the SO15 investigation team has been working  
 4 on a set of reports at our request and under our  
 5 direction, including reports on the victims of the  
 6 attack, a general investigation report, a biographical  
 7 report about Usman Khan, and lengthy reports on  
 8 analytical work on digital devices.  
 9 Finally, sir, DV-cleared members of your team have  
 10 been reviewing MI5 investigation materials, and I shall  
 11 come to those again shortly.  
 12 Sir, in their submissions, Mr Pitchers and Mr Rule  
 13 identify various items which are outstanding, most of  
 14 which are covered in the update note. I can say that  
 15 since they prepared their submissions, the inquest team  
 16 has uploaded the items at their paragraphs 6.3, 6.5,  
 17 9.1, 9.2, 9.3, 9.5, 10.1, 10.6, 10.7, 10.12, 10.13 and  
 18 10.21. The items at paragraphs 9.6 and 9.7 had been  
 19 disclosed previously. The item at paragraph 10.16 will  
 20 be covered by the SO15 report on digital devices. The  
 21 CAD dispatch report, referred to at paragraph 12.1, is  
 22 covered in the emergency services general set and the  
 23 items identified at paragraph 12.5 have already been  
 24 addressed save for the two subject profiles, which are  
 25 referred to in their paragraph 10.17.

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1 I appreciate that that was something of a canter  
 2 through, but it should all be picked up on the  
 3 transcript, and that short summary should give an  
 4 indication of how the pace of disclosure is being kept  
 5 up.  
 6 Turning then to item 6, procedures for the  
 7 disclosure and use of sensitive material, which we  
 8 address at paragraph 14 of our submissions and onwards.  
 9 First of all, material and evidence relating to the  
 10 involvement of MI5. Sir, as soon as MI5 had completed  
 11 their post-attack review concerning this case, Mr Moss  
 12 and I visited their offices to read the review report  
 13 and the underlying documents concerning Usman Khan. We  
 14 identified to MI5 topics and documents of potential  
 15 relevance to the inquest, adopting a low threshold of  
 16 relevance.  
 17 A witness statement was then produced by a senior  
 18 MI5 officer, Witness A, giving evidence of the service's  
 19 work and its knowledge of and involvement with the case  
 20 of Usman Khan. That statement was then the subject of  
 21 further meetings, as we sought to encourage the  
 22 provision of as much information as possible.  
 23 A statement has recently been disclosed to interested  
 24 persons. The position of MI5, as we understand it, is  
 25 that this statement contains as much relevant evidence

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1 as can be provided without unacceptable damage to  
 2 national security interests.  
 3 We have identified a volume of original MI5  
 4 investigation documents which would be relevant and fall  
 5 for disclosure absent any consideration of national  
 6 security. MI5 will now be making, through the  
 7 government, a public interest immunity application in  
 8 respect of those documents.  
 9 The intention is for that application to be heard in  
 10 late March, in the conventional way, with an open  
 11 session followed by a closed session. The most likely  
 12 date for a hearing at present, as we understand it, sir,  
 13 is 25 March, although we shall confirm shortly.  
 14 Secondly, we are aware that there are some documents  
 15 which will be the subject of contents claims for public  
 16 interest immunity, generally in respect of very limited  
 17 content. Content for which PII is claimed has been  
 18 redacted in the course of disclosure and we have  
 19 required the relevant public authorities to make PII  
 20 applications, with a view to those two being heard with  
 21 the Government's application in late March.  
 22 Sir, some of the submissions you've received have  
 23 raised the question of when other public authorities,  
 24 other than the Home Secretary, should file any PII  
 25 application. Our answer is simply as soon as possible

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1 but, in any event, in good time before the Government's  
 2 application is to be heard. If more specific guidance  
 3 is wanted, we would suggest the public authorities work  
 4 to a deadline of 11 March, two weeks before the likely  
 5 listing of the Government's application to prepare and  
 6 file any application in both open and closed parts.  
 7 Thirdly under this item, there are further documents  
 8 in which the government objects to some parts being put  
 9 into the public domain but is happy for those parts to  
 10 be seen by interested persons in the inquests of the  
 11 victims. We have identified the categories of materials  
 12 in our submissions, although I should make one  
 13 correction, that MAPPA minutes are not included in this  
 14 set; they are being disclosed without restriction.  
 15 In order to ensure that as much relevant material  
 16 can be disclosed for interested persons as possible, we  
 17 have provisionally agreed with the Government an in  
 18 camera regime subject to your approval, sir. We set out  
 19 that regime at paragraph 24 of our document. In short,  
 20 for a few categories of documents, and only a few, we  
 21 shall be disclosing a public version of each document to  
 22 interested persons, along with a confidential version.  
 23 Some sections of text which appear visible in the  
 24 confidential versions are redacted in the public  
 25 versions. If any advocate wishes to deploy the

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1 confidential material in the inquest hearing. He or she  
 2 will need to give notice so that, for example, the  
 3 Government can consider making an application for the  
 4 hearing to go into camera under rule 11.4 of the  
 5 coroner's inquest rules.  
 6 In answer to questions which have been raised in  
 7 some submissions, the effect of this process is that the  
 8 Government is not claiming public interest immunity in  
 9 respect of the material which appears unredacted in the  
 10 confidential versions but redacted in the public  
 11 versions. If it were claiming PII, there would be no  
 12 disclosure to anyone of the content for which PII is  
 13 claimed.  
 14 The position of the Government in simple terms is  
 15 that there is some material which can be revealed to  
 16 interested persons but which it would or might object to  
 17 being put in the public domain. The rules implicitly  
 18 recognise that some inquest evidence may fall into that  
 19 category because they permit coroners to hold in camera  
 20 sessions on grounds of national security. That is what  
 21 rule 11.4 says but, as we all know, such sessions in  
 22 camera are not closed to interested persons.  
 23 So we respectfully ask that this regime be approved  
 24 since it has enabled fuller disclosure to be given and  
 25 it doesn't prevent the confidential material being

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1 deployed; it merely imposes a restriction to ensure that  
 2 it can be properly considered.  
 3 I should make two further points before leaving the  
 4 topic. First, we agree with the point made by  
 5 Mr Armstrong in his submissions that it should be open  
 6 for interested persons to argue that any specific  
 7 documentary contents should not be subject to the in  
 8 camera process. We also agree that interested persons  
 9 and the media should have the opportunity to object to  
 10 any proposal that the court go into camera and that it  
 11 may be appropriate to provide accredited press with an  
 12 indication of subject matter or some material on a not  
 13 for publication basis so that they can make properly  
 14 informed submissions.  
 15 Secondly, as we understand it, the Government is not  
 16 content for members of Usman Khan's family to see the  
 17 confidential content of these documents. In our  
 18 submission, the appropriate way to respect that concern,  
 19 while enabling the Khan family's legal representatives  
 20 to play a full part, would be to make a confidentiality  
 21 club order permitting Mr Bunting and certain of his  
 22 instructing solicitors to see the confidential documents  
 23 on terms that they are not to provide them to or discuss  
 24 them with their clients without further order. We see  
 25 that Mr Bunting's submissions helpfully and practically

1 make that proposal, and we understand that Ms Leek's  
 2 team is content with it.  
 3 Turning then, sir, to item 7, Security Service  
 4 witnesses, which we address from page 17 of our  
 5 submissions, we understand that an application for  
 6 anonymity and special measures will be made in respect  
 7 of the MI5 witness, known at present as Witness A. The  
 8 intention is that that application should be heard at  
 9 the hearing in late March, open parts of the application  
 10 will be provided to interested persons and the media.  
 11 In our submissions at paragraphs 28 and 29 we raise  
 12 another point about this witness. Our experience from  
 13 similar cases is that MI5 witnesses are much better able  
 14 to give fuller answer to questions if they have prior  
 15 notice of topic areas to be addressed. So we propose  
 16 a direction that first we, and then interested persons,  
 17 give prior notice of topics for questioning of the MI5  
 18 witness. I stress that such a direction wouldn't  
 19 require the list to be exhaustive or to set out the  
 20 particular questions and that it wouldn't prevent  
 21 advocates going into different areas. It would simply  
 22 allow the witness to take a view about how much  
 23 information could be given without having to make snap  
 24 decisions in the witness box and default to a more  
 25 limited answer.

1 JUDGE LUCRAFT: The other benefit, Mr Hough, of that is that  
 2 also it means that if, for example, topics are common to  
 3 a number of people, one doesn't need to have repeated  
 4 questions on the same issue, if people know that it's  
 5 going to be covered by somebody.  
 6 MR HOUGH: That may be hoped, sir.  
 7 JUDGE LUCRAFT: And also, I think, to some extent, having  
 8 what is sometimes called a route map or a road map  
 9 through a witness's testimony can be invaluable to many  
 10 people.  
 11 MR HOUGH: Yes.  
 12 Let me then turn to an issue which has been raised  
 13 particularly in the submissions of the Jones and Merritt  
 14 families of calling other witnesses from MI5 other than  
 15 Witness A, and I will refer to these other witnesses who  
 16 are being called for as operational officers. I should  
 17 say immediately that the families have raised this point  
 18 both promptly and properly. I should also say that  
 19 although we have been involved in the production of the  
 20 MI5 corporate statement to the extent that I've  
 21 indicated already, that does not in any way suggest  
 22 a pre-formed view of yours. Neither are you bound by  
 23 the approach taken in any previous inquest. Every case  
 24 has to be considered on its own facts. Our current and  
 25 provisional position is that the only witness to be

1 called from MI5 should be Witness A. Our reasons, in  
 2 brief, to the extent that they can be given in open, are  
 3 as follows.  
 4 First, this witness's evidence covers the full  
 5 history of MI5's investigations into and knowledge of  
 6 Usman Khan over a period of years. The witness  
 7 addresses what information was received by MI5 at each  
 8 stage, what assessments it made and what coverage it  
 9 sought to put in place. This evidence will allow the  
 10 inquest to explore what information MI5 received and  
 11 what it passed on to the police and probation officers  
 12 who were actually making the decisions about managing  
 13 Khan. For example, the decision to permit him to attend  
 14 the event at Fishmongers' Hall. Of course, those police  
 15 and probation officers who made the decisions will be  
 16 giving evidence.  
 17 We understand that detail is limited in places  
 18 within Witness A's statement, such as precisely what  
 19 monitoring methods were used and what was the full  
 20 detail of discussions at joint operational team  
 21 meetings, but that's not because a corporate witness is  
 22 giving the evidence, it's because a PII claim is to be  
 23 made in respect of subject matter such as some  
 24 capabilities and sources.  
 25 Secondly, if you do uphold the PII claim to any

1 extent at all regarding capabilities and sources, there  
 2 would be real practical difficulties about the  
 3 operational officers giving evidence. For example, any  
 4 attempt to examine those officers about views they  
 5 individually formed based on all the information in  
 6 their possession would almost inevitably go into  
 7 information or sources of information which  
 8 they couldn't reveal. Any attempt to examine them about  
 9 decisions they individually made about what monitoring  
 10 capabilities should be directed against Khan would  
 11 almost inevitably require them to speak about the full  
 12 range of their capabilities, the full menu of options,  
 13 some of which they could not reveal.

14 Thirdly, sir, the value of having a single,  
 15 relatively high-ranking witness give evidence is that  
 16 that person can do the necessary preparatory work in  
 17 order to give as much information as possible consistent  
 18 with national security and whatever PII ruling you make.

19 That is a task, the preparatory work, which takes  
 20 weeks, not days. The witness has to know the  
 21 investigation and underlying documents, forwards,  
 22 backwards and sideways. He or she also has to know all  
 23 about the personalities involved and any investigations  
 24 linked to any of them, even peripherally. He or she  
 25 needs to have a deep understanding of the policies of

25

1 the service and what can and can't be disclosed. The  
 2 witness need to work with colleagues to ensure that he  
 3 or she knows what answers might reveal information  
 4 which, in combination with other public information,  
 5 could damage the work of the service. Asking each  
 6 operational officer to meet these standards is likely to  
 7 be unrealistic. Quite apart from the fact that it would  
 8 remove a number of valuable staff from their work for  
 9 weeks.

10 Having made all those points in the interests of  
 11 complete openness, our submission is not that you should  
 12 now rule out asking for statements of and calling MI5  
 13 operational officers. Instead, we submit that this  
 14 issue be resolved at the PII hearing in late March.  
 15 It's only when you've considered the underlying  
 16 investigation documents and decided whether any of them  
 17 should be disclosed that you will be able to reach  
 18 a properly informed view as to whether operational  
 19 officers would add materially to the evidential picture,  
 20 having regard to any limitations on disclosure which you  
 21 have accepted.

22 We appreciate that resolving the issue finally in  
 23 late March would mean that if any statements were  
 24 produced, they would be served around the start of the  
 25 inquests, but that would still be several weeks before

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1 any of the relevant witnesses actually gave evidence,  
 2 and so there would be time for those statements to be  
 3 digested before witnesses gave evidence to whom their  
 4 contents could be put.

5 May I now turn to item 8, witness selection and  
 6 timetabling. We address that at page 18 of our  
 7 submissions. As usual in large inquests, the selection  
 8 of witnesses is mainly addressed by draft lists being  
 9 circulated and interested persons making representations  
 10 in writing. We circulated our second draft list on  
 11 26 October, which took account of many of the points  
 12 made by interested persons up to that point in time.  
 13 Several interested persons made what were relatively  
 14 limited submissions on that second draft list.

15 We appreciate that given the disclosure that's taken  
 16 place over recent weeks, some interested persons may  
 17 have more submissions. What we propose is that those  
 18 submissions, if there are any, be filed within 14 days  
 19 of today. Those representing the interests of potential  
 20 witnesses may at this stage also make any submissions,  
 21 for example that witnesses should not give evidence or  
 22 should give evidence by videolink, whether for reasons  
 23 of COVID risk or for reasons of psychological  
 24 vulnerability, or indeed that witnesses should give  
 25 evidence subject to ground rules.

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1 We shall then produce a draft timetable and any  
 2 final submissions on witnesses can be made either at the  
 3 hearing in late March or, as appropriate, during the  
 4 inquests themselves.

5 Ultimately, sir, the choice of witnesses will be  
 6 a matter for your judgment. It involves making  
 7 a reasonable and proportionate selection in order to  
 8 cover the evidential ground.

9 Finally, sir, item 9, any other business. As I've  
 10 already mentioned, it will be necessary to have  
 11 a hearing in late March to consider the anticipated PII  
 12 application or applications and the special measures  
 13 application for Witness A, as well as a range of other  
 14 issues which I've identified. We understand that  
 15 25 March has been identified as likely to be the most  
 16 convenient date and we are hoping that that hearing can  
 17 take place in the Royal Courts of Justice in a courtroom  
 18 with the special facilities to host a closed session.  
 19 The open session of that hearing, as I've said, can be  
 20 used to address remaining case management issues.

21 Finally, under the topic of any other business, sir,  
 22 both the Jones and Merritt families raise the  
 23 understandable and important point of the need for  
 24 sensitivity concerning footage and imagery showing Jack  
 25 and Saskia in an injured state. Sir, I can say that

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1 every care is being taken to limit the disclosure and  
2 control the disclosure of the most graphic material, as  
3 interested persons will be aware from updates from the  
4 inquest team.

5 We cannot guarantee that no footage or imagery will  
6 be shown in court which includes any imagery of Jack and  
7 Saskia in an injured state because of the need to deploy  
8 evidence about the attack.

9 But, sir, we shall minimise graphic imagery being  
10 shown in court and we shall give appropriate warnings,  
11 as we have done in similar cases.

12 Sir, I think I've covered all the ground in those  
13 submissions but, as I say, I would welcome the  
14 opportunity to come back in reply if others raise new  
15 points.

16 JUDGE LUCRAFT: Thank you very much indeed, Mr Hough. That  
17 has been extremely helpful. I have had the opportunity  
18 of looking through the written submissions that have  
19 been made on behalf of many interested persons. I know  
20 a number of people take no real issue with what you've  
21 outlined, but I'm going to start in a moment with  
22 Mr Rule and just simply go through the agenda items, to  
23 give him a chance to address me on anything he wishes to  
24 in relation to what you have said effectively  
25 foreshadowing some of the points that were made in the

1 written submissions, and I'll just follow through, as  
2 best I can, what I think is a fairly logical order  
3 through the various IPs. If I miss anyone, do remind me  
4 when we go through them, but I start first of all with  
5 Mr Rule.

6 Submissions by MR RULE

7 MR RULE: Sir, I hope I may appear by speaking.

8 JUDGE LUCRAFT: Yes, I can hear you and I can now see you.

9 MR RULE: I'm grateful. Sir, you have the written  
10 submission, and I only intend to address you orally to  
11 assist you on those which appear to be in some dispute  
12 or not that have been addressed already. If you have  
13 those available to you, sir, the first agenda item, the  
14 venue and listing --

15 JUDGE LUCRAFT: I have certainly got the document in front  
16 of me, which is very helpful. And again, I'm just going  
17 to repeat, Mr Rule, if you are getting a bit of  
18 feedback, please, for those who are not speaking, please  
19 just to make sure that their microphones are on mute.

20 MR RULE: I'm grateful. For the transcript I'm Philip Rule,  
21 I represent the Jones family, as you know.

22 Sir, the first item -- all I would add is that  
23 I would invite you to consider whether a particular date  
24 or timescale is given for confirmation of the potential  
25 venue, having been assessed to be both suitable and

1 available. The submissions in writing, certainly, left  
2 open. That was still being investigated and if it  
3 proves impossible to secure that venue, the sooner we  
4 recognise that and can find alternatives, the better  
5 prospects of retaining the current listing.  
6 JUDGE LUCRAFT: Thank you. I think what Mr Hough suggested  
7 is within 14 days of today, which I think would be  
8 26 February, and certainly I think as soon as that  
9 confirmation is clear one way or the other, you will all  
10 be notified. We certainly won't wait until 26 February  
11 because I think we all appreciate the amount of work  
12 that's going to need to be done for that to actually  
13 happen.

14 MR RULE: I'm grateful. Sir, if I go straight forward then  
15 through the list of documents, some of which the list  
16 was answered in oral submissions a moment ago and I have  
17 a partial record of the answers. I can go to item 6 on  
18 the agenda.

19 JUDGE LUCRAFT: Yes.

20 MR RULE: In the paragraph 13 references, we have invited  
21 that we are given as much information of course as  
22 possible about the items that may be subject to PII  
23 application, documentation that has been referred to  
24 and, obviously, I invite attention to be given to that  
25 by the counsel to the inquest team.

1 Paragraph 14 has been partially answered in the oral  
2 submissions today, and I'm grateful for the explanation.  
3 It seems that the confidential records, for which we  
4 will have access on an undertaking basis, have been  
5 redacted but not to include all matters for which the  
6 Secretary of State may claim a national security  
7 interest in order to have an in camera element to the  
8 inquest hearing. So I understand that proposition. We  
9 make a point in paragraph 15 as to the form of the  
10 undertaking at present, preventing any copying or  
11 printing of the documentation if we were to prepare it  
12 to bring to the hearing, which might be practically  
13 something that causes some difficulty, but that's  
14 a minor point for consideration as to the detail of the  
15 undertaking.

16 If I can turn to agenda item 7, sir, and the  
17 Security Service witness point, I would like to amplify  
18 the submissions, if I may, that you've received in  
19 writing. I understand entirely the proposition put to  
20 you a moment ago by my learned friend, that it's  
21 a matter that should be looked at in the round of PII on  
22 the next occasion but, in my submission, there is,  
23 respectfully, a need to have the witness evidence  
24 available for that consideration. So I perceive  
25 a difference of principle between myself and Mr Hough

1 about when it's appropriate for these witness statements  
2 to be available, if at all, in order to consider whether  
3 or not the witnesses are necessary and relevant to be  
4 called and/or whether their accounts include material to  
5 which PII would properly attach on national security or  
6 other bases.

7 You will recall, sir, that we were not able in  
8 writing previously to address this point, and your  
9 ruling on 5 June was made on that basis, on the papers,  
10 as you will appreciate, because of the pandemic, we were  
11 unable to have an oral hearing and, of course, we now  
12 have the material in much larger form, not only this  
13 Witness A statement but more generally.

14 But I note from your ruling on 5 June, sir, that it  
15 is, of course, accepted that certain documents may yet  
16 fall to be disclosed in addition to Witness A's  
17 evidence, on the basis that that summary, that gist,  
18 will be insufficient to pass on the relevant information  
19 and any claimed PII for the documentation may not be  
20 accepted when you come to rule on the matter.

21 We, in the correspondence, have seen the 3 November  
22 letter from counsel to the inquest's solicitor,  
23 confirming no pre-determination as to whether underlying  
24 documents will be disclosed, and I've looked, sir, at  
25 your ruling in the London Bridge matter, where you

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1 recognised expressly that there will be fact-specific  
2 questions for the documents, as to whether the gist  
3 conveyed is sufficient or not to ensure that justice is  
4 going to be done and a full investigation is going to be  
5 done.

6 So I rely on the fact that the documentation is  
7 accepted to being matters which, where relevant, ought  
8 to be considered for PII in the usual way, for any claim  
9 of national security or other PII, but it is looked at  
10 in a fact-specific way to determine whether or not that  
11 public interest immunity does apply and whether it can  
12 be upheld.

13 We submit on principle there is no distinction to be  
14 drawn between what happens to be written on the  
15 documentation presently and what is an account that  
16 could be given, and we submit should be given, by those  
17 officers who have had firsthand dealings with making  
18 decisions or assessing information or passing on  
19 information or receiving information of relevance.

20 Sir, we submit that the observations cannot be  
21 summarised by a third party, Witness A, of the  
22 recollections, the thoughts, the knowledge, the  
23 decision-making of the individuals who have made those  
24 decisions.

25 So I make, if I may, sir, seven points of principle

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1 that support the need to investigate the witnesses'  
2 evidence that could be given. The first is the starting  
3 point to the inquest, seeking to place into public  
4 knowledge the full facts brought to light. That is, of  
5 course, for the public interest but also for the  
6 relatives of those who lost their lives. Of course,  
7 that will be tempered by any public interest immunity  
8 which does not enable the full facts to be adduced, but  
9 the starting point is to look for that full, complete  
10 evidence and best evidence.

11 The second point of principle is to consider the  
12 nature of PII, of public interest immunity. It  
13 obviously applies to the information itself, rather than  
14 any particular branch of Government or organisation that  
15 happens to possess it. One accepts that the  
16 fact-specific issues will arise more frequently in some  
17 organisations than in others by their nature, but that  
18 does not convert the fact-specific nature of  
19 establishing cogent reasons for the national security  
20 why these matters would not be disclosable without  
21 harming the public interest.

22 There will, of course, need to be evidence to  
23 support any assertion of public interest immunity. And  
24 again, sir, looking at your ruling from the  
25 London Bridge inquest, at paragraph 28, that you refer

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1 to Lord Justice Goldring's judgment in the judicial  
2 review arising from the Litvinenko affair, and we submit  
3 only by knowing what a particular witness would say and  
4 can say are you in a position, sir, where you are able  
5 to consider upholding or otherwise the claim of PII,  
6 that there would be substantial or significant harm to  
7 the public interest to reveal what that officer knows.

8 As authority on that proposition, sir, of course,  
9 again cited in your open ruling in the London Bridge  
10 case at paragraph 22 is the case of *ex parte Wiley*  
11 [1995] 1 AC 274.

12 Ultimately, sir, we recognise there can be cases  
13 where the public interest immunity is such that a public  
14 inquiry is required rather than an inquest. I'm not  
15 suggesting that that is a position that is preferable or  
16 one that would be reached here, but it is a reason why  
17 the full picture has to be assessed by the court  
18 receiving the application for public interest immunity,  
19 not on a generalised basis but specific to the matters  
20 that that assertion of the public interest immunity  
21 relates to, fact-specific to the material that is  
22 relevant to this inquest.

23 The third point is that national security, of  
24 course, like any other public interest immunity  
25 assertion, must not cover withholding of mistakes or

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1 failures or embarrassments on the part of an  
 2 organisation.  
 3 The public interest is plainly served by the  
 4 investigation into the death exposing any such failings,  
 5 even if uncomfortable for an organisation.  
 6 The fourth point of general principle, sir, I invite  
 7 you to consider is that these are relevant witnesses  
 8 that we are discussing. Their existence is confirmed by  
 9 the details revealed by Witness A. So their existence  
 10 is not a matter which causes in itself any public  
 11 interest concern. They are the actors or  
 12 decision-makers referred to within evidence now given in  
 13 Witness A's statement.  
 14 The question before you at present, sir, is not one  
 15 of anonymity or screening but simply to have the  
 16 relevant witness's evidence available so that it can be  
 17 considered as to whether those individuals ought also to  
 18 be witnesses called orally to be questioned or whether  
 19 their witness statements suffice, subject to any PII  
 20 that's claimed about the content or part of the content.  
 21 But in order to determine the relevance of the  
 22 first-hand witness rather than an individual at third  
 23 hand, looking at documentary record to try and give an  
 24 overview gist of events, you would need to know what the  
 25 recollection is of the individual. So, having seen the

1 response by my learned friend Ms Leek QC for the  
 2 Secretary of State in writing this morning, to answer  
 3 whether it's necessary for a witness to give evidence  
 4 cannot be performed now in the vacuum of not being  
 5 informed of what that witness's account would deal with.  
 6 It is to put the question in the wrong order, we submit  
 7 respectfully. And whether or not there is a coherent  
 8 narrative provided in Witness A's statement is to be  
 9 decided essentially by the narrative an inquest provides  
 10 having considered the evidence. That witness's evidence  
 11 must, by necessity, be incomplete as he was not present  
 12 to have a recollection of events or to describe the  
 13 decision-making that was in someone's else mind.  
 14 So the sole question at present is relevant to the  
 15 enquiry of that witness who, for example, attended, in  
 16 November 2019, a meeting that discussed Mr Khan's trip  
 17 to Learning Together in advance of it taking place.  
 18 There are plainly individuals involved in decisions  
 19 and in discussions of relevance to this enquiry, and it  
 20 cannot be said in the vacuum that the Secretary of State  
 21 would invite that none of the officers could or should  
 22 give relevant evidence about the full facts of this  
 23 case.  
 24 The fifth point that I make is in relation to  
 25 questioning of a witness. They are matters which can be

1 and will be appropriately controlled, and although my  
 2 learned friend has provided today some reasons in  
 3 outline, as can be said in open court, that might  
 4 support a claim to PII or some difficulties,  
 5 practicalities that would need to be met in terms of  
 6 operational officers giving evidence, in my submission  
 7 that cannot be considered at the point of discounting  
 8 obtaining that material because it fails to be able to  
 9 balance the relevance and the content of the witness's  
 10 recollection and account and it's without evidence as to  
 11 the specific substantial harm that would be caused by  
 12 a witness explaining that material. It relies on  
 13 speculation that any answer would be unable to be given  
 14 in any meaningful way for fear of revealing matters that  
 15 are harmful to national security, but that, in abstract,  
 16 simply cannot be sustained without clarity about the  
 17 position as to what those questions would be, what the  
 18 answers would be, what the information is that the  
 19 individual would refer to. So, again, one has to put  
 20 the questions in the right order by firstly obtaining  
 21 information from the witness directly.  
 22 The process, of course, of voluntary indication of  
 23 topics, I don't understand any person has objected to.  
 24 The category of or the individual questions may be those  
 25 which are permitted or not permitted, depending on the

1 specifics and the individual consideration at that time,  
 2 and nothing prevents the witness who is unable to answer  
 3 from saying that, "I would need to seek advice on  
 4 whether I can answer that or as to the terms on which  
 5 I can answer it."  
 6 We are also, sticking with the point of witnesses,  
 7 considering trained Security Service personnel. Given  
 8 that these individuals are trusted to be employed in the  
 9 intelligence service, it's reasonable to anticipate that  
 10 they are acutely conscious of the need for secrecy  
 11 generally or of the sensitivity of their work or methods  
 12 of work. As to matters on which they would require  
 13 guidance, that, of course, could be appropriately  
 14 provided and the interests of the service would be  
 15 represented in the inquest process.  
 16 The sixth point, is, of course, some may work in  
 17 covert surveillance, others may not. Others may simply  
 18 be office-based, and in either case, in our respectful  
 19 submission, anonymity or screens is an answer,  
 20 potentially, to any public interest or concern about  
 21 that. Absenting them from the process and what they  
 22 would have to contribute is not the answer.  
 23 The final general point I make is that the  
 24 comparison can be drawn between this form of witness  
 25 under discussion now and similar witnesses, where there

1 are elements of sensitivity to what they do and the  
 2 operational framework in which they conduct themselves.  
 3 An example might be tactical firearms officers, where  
 4 certain questions might be inappropriately revealing of  
 5 operational sensitive matters or processes. What they  
 6 say, however, about decisions they took or information  
 7 received, one would not countenance that we would have  
 8 an inquest that did not ask the questions of those  
 9 individuals but merely a commander gave an overview from  
 10 reviewing documentation or communications or other  
 11 matters.

12 Again, the answer in those cases is the public  
 13 interest is served by an anonymity and screens, as we  
 14 have in your ruling already in relation to tactical fire  
 15 arms officers. One of the things that your ruling of  
 16 5 June, paragraph 52, speaks of is the need for those  
 17 officers to potentially be involved in covert operations  
 18 and, again, that is a reason for anonymity, but it has  
 19 not absented them from the inquest process.

20 And one might also seek to draw similarities with  
 21 the use of covert human intelligence sources as  
 22 witnesses, or even the mentors in this case, where  
 23 certain things might be difficult to ask or to be  
 24 answered without infringing PII but, again, that is  
 25 a specific issue to be dealt with, with each specific

1 individual, on the basis of the issues and the relevance  
 2 of the material at that point.

3 So, those submissions, sir, all go to the principle  
 4 of seeking the witness's account first before making  
 5 premature rulings or decisions on whether or not that  
 6 evidence is either attracting PII or the reasons that it  
 7 might, in part or in whole, and to balance what that  
 8 content is and its relevance, therefore, to uncovering  
 9 the full facts as to what has taken place in the  
 10 management and supervision and knowledge, on the state  
 11 authority's part, of Usman Khan's actions and movements.

12 It may not assist you to go into great detail, sir,  
 13 beyond that, but I would point you to paragraph 17 of  
 14 our submissions, respectfully, where we have identified  
 15 that in the period of time after August 2018, when the  
 16 service re-opened an investigation into Usman Khan,  
 17 shortly before he was released from custody, we have  
 18 identified at paragraph 17 a number of areas where the  
 19 individual witnesses, for example speaking to police  
 20 teams and having the direct communication or involved in  
 21 any surveillance that may have involved some visual  
 22 surveillance, formal risk assessment would have involved  
 23 him seeking to avoid scrutiny as a concern on the part  
 24 of those assessors and how they formed that view and who  
 25 they informed of that view, sharing of their scepticism,

1 and the meeting, as I've mentioned earlier, in November,  
 2 at the JOT meeting, at which there was representation to  
 3 discuss his trip to Fishmongers' Hall.

4 We point out in the following two paragraphs other  
 5 examples of those points which could be clearer if some  
 6 of the witnesses themselves were able to speak of  
 7 matters. One doesn't know, for example, if they have  
 8 concerns that they were placed in a position where they  
 9 got it wrong for a particular reason that is a systemic  
 10 error, that they would wish to comment on. We have seen  
 11 that potentially with prevent officers already in these  
 12 proceedings. It wouldn't be right to ignore what those  
 13 four frontline officers say but to simply look at the  
 14 overview or gist from their commander or director.

15 I won't, unless you invite me to, sir, take the  
 16 specifics of individual cases further because it seems  
 17 to me the argument today is one of principle about  
 18 whether we need to know what these individuals would  
 19 contribute, and that, in my submission, has only one  
 20 clear answer, that we must have that information for the  
 21 inquest to be fully effective and able to then make  
 22 informed decisions about PII applications, if they are  
 23 made in this case.

24 We support the further details given in Mr Merritt's  
 25 family's — submissions from my learned friend for the

1 Merritt family of further witnesses at their  
 2 paragraph 25 in particular.

3 Sir, unless I can address you further on that  
 4 particular topic, I move back to the agenda items.

5 JUDGE LUCRAFT: Thank you. Yes.

6 MR RULE: Sir, the date of the next hearing I've noted. You  
 7 will note at our paragraph 21 we raise that we are not  
 8 aware of any update, and it may be that we are simply  
 9 not in the loop, but as to the criminal investigation  
 10 and the stage reached by the City of London Police, and  
 11 I've noted there is nothing in the written submissions  
 12 for today that answered that. So if Ms Barton QC is  
 13 able to assist, we would be grateful.

14 Our paragraph 22 refers to witness summonses only  
 15 because there has been a certain amount of slippage,  
 16 despite the huge efforts of the counsel for the inquest  
 17 team and others in the authorities, as to the amount of  
 18 volume of material. If there are those who appear from  
 19 the submissions we have received to be not turning up  
 20 when required, or perhaps providing documents in  
 21 a timely fashion, so that we can be effective for  
 22 preparation for April, we would invite the counsel for  
 23 the inquest team to consider whether anyone requires  
 24 a witness summons in order to produce relevant documents  
 25 or a statement where that has been requested.

1 You've seen, sir, at our paragraph 23 how we leave  
2 Article 2. We don't invite you to deal with that again  
3 today, of course, but we do put down the marker that  
4 that is a matter which we shall give notice about in due  
5 course.

6 I add two matters which are not on the written  
7 document, if I may. The first relates to the graphic  
8 material that may be shown, and I hear again, with  
9 gratitude, the intention to avoid, so far as humanly  
10 possible, that there is any such material to be dealt  
11 with in public in the inquest. May I invite also  
12 consideration is given, if it appears that anything is  
13 going to feature in the compilations that I understand  
14 are to come of visual footage, that there could be  
15 consideration of pixellation or partial editing of  
16 a screen if those elements of the screen would otherwise  
17 cause distress but are unnecessary. So I just raise  
18 that invitation for consideration by the counsel to the  
19 inquest team.

20 My final point, subject to anything you wish to ask  
21 me, is that, sadly, today was Saskia's birthday, and  
22 I appreciate entirely that that is not something which  
23 would have been consciously aware of on the part of  
24 those responsible for listing the matter. It,  
25 understandably, has caused some emotional distress to

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1 Saskia's mother in particular, so I raise it not  
2 because, of course — I fully understand no one would  
3 have intentionally fixed the date in that way, but just  
4 so that it raises, so that that matter could be  
5 considered in other future instances, so that there is  
6 no repetition for others and just be put on record that  
7 that was unfortunate, from Saskia's mother's point of  
8 view, that we had that unfortunate coincidence of date.

9 JUDGE LUCRAFT: Mr Rule, I'm very sorry that that has  
10 occurred. Obviously, fixing a date is very difficult  
11 and partly it is entirely my fault because I have  
12 limited availability to do things in the light of other  
13 cases that I have to deal with. So I'm very sorry,  
14 particularly to the family, for any distress caused.  
15 That was not my intention whatsoever, but I hope they  
16 can understand that undertaking what I have to  
17 undertake, fortunately now only doing one job rather  
18 than two, does make my life extremely busy at the moment  
19 and I'm very sorry that it has meant that the case has  
20 been listed today when it clashes with what would have  
21 been her birthday. So my sincere apologies to them.

22 MR RULE: I'm very grateful, sir, and we, of course, don't  
23 mean any discourtesy raising it, I understand entirely  
24 the position, but it's very kind of you to offer those  
25 thoughts. Thank you.

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1 JUDGE LUCRAFT: Thank you very much indeed, Mr Rule.

2 Can I then turn to Mr Armstrong. Mr Armstrong,  
3 again I make it very clear, I've read the detailed  
4 submissions that have been put in on behalf of the  
5 family of Jack Merritt. A number of the points that  
6 Mr Rule has covered in some detail are points that are  
7 made in your written submissions, so I won't ask you to  
8 do any more than just to amplify, where you wish to,  
9 anything which is set out in the written documentation  
10 that I have.

11 Submissions by ARMSTRONG

12 MR ARMSTRONG: Yes, sir. Can I, first of all, just check  
13 you can hear me okay.

14 JUDGE LUCRAFT: I can hear you absolutely fine, thank you.

15 Again, I just repeat, anyone who is not speaking, please  
16 to be on mute, but I can hear you loud and clear.

17 MR ARMSTRONG: Sir, can I just indicate, first of all,  
18 I will adopt the written document completely, and I'm  
19 only planning to address you on item 4, which is  
20 disclosure, and the Security Service witnesses issue.

21 Otherwise, I will rely entirely on the written document.

22 JUDGE LUCRAFT: Thank you.

23 MR ARMSTRONG: The point on disclosure is very brief.

24 I just want to correct one point in particular on our  
25 document. You will have seen, sir, from that — I'm

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1 sorry, I'm getting a lot of echo there. We are very  
2 interested in the sift process that took place, whereby  
3 Usman Khan was put on the Learning Together programme in  
4 the first place, and the robustness or otherwise of that  
5 procedure. We have just had in the Georgina Butler  
6 statement. Can I just flag, while I have the  
7 opportunity to do so, that is describing quite a limited  
8 process from a security point of view and it doesn't  
9 provide any detail about the decisions that were in fact  
10 taken in this case. So we are asking that those who  
11 were looking at the statements look again at the  
12 Georgina Butler statement and what it doesn't tell us  
13 about who designed the process, what process was being  
14 applied here and what was the result of it. There is  
15 a reference to a Steve Machin, who was part of security  
16 at the prison at the time, who may be able to give  
17 further evidence about that. We have also made  
18 reference to a Thomas Hamilton, who makes a Nomis  
19 entry — the Thomas Hamilton entry in Nomis — and that  
20 may also help us.

21 MR HOUGH: If it assists a moment — I'm sorry to interrupt,  
22 but this may just help — I entirely agree with what my  
23 learned friend says about the Georgina Butler statement.  
24 We have raised this, both at a solicitor level to the  
25 Government Legal Department and also at a counsel level

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1 to Ms Leek's team.  
 2 MR ARMSTRONG: Sir, I'm very grateful for that indication.  
 3 It's a statement that only came in in the earlier part  
 4 of this week and I hadn't seen it until after we had  
 5 completed that document. So I just wanted to deal with  
 6 that. But you will see the importance of that issue,  
 7 certainly to Jack's family.  
 8 Can I also just say, also on disclosure, it seems  
 9 increasingly important to have the Staffordshire Police  
 10 material. I note what is said by my learned friend at  
 11 paragraph 2.9 of the update about the continuing absence  
 12 of that material. We are equally anxious to see that.  
 13 Sir, that's all I want to say about disclosure.  
 14 I'll therefore move on to the Security Service witness  
 15 and try very hard not to repeat anything in the written  
 16 document or Mr Rule's submissions, with which I agree.  
 17 Can I just align myself in particular with what  
 18 Mr Rule said about getting on with potential MI5 witness  
 19 statements now because we are very concerned -- if we  
 20 are going to keep open the possibility of doing that, as  
 21 it is said that whatever preliminary view has been  
 22 taken, we want to keep that opportunity open. Given  
 23 what my learned friend has also said about the weeks  
 24 involved in carrying out this analysis and having a to  
 25 and fro about witness statements and preparing for

1 giving evidence at an inquest of this kind, we are very  
 2 concerned that if we leave it until the PII process  
 3 without having started and then start it then, we may  
 4 well be overtaken by events. I've had an exchange with  
 5 my learned friend about this already today and he  
 6 understands the point, but it's an important one.  
 7 What I want to do, sir, if this helps, is I want to  
 8 deal, firstly, with what is said in the Home Office's  
 9 document, Ms Leek's document, and can I just say this.  
 10 The starting point is a strong one. Every inquest  
 11 absent security services will hear from decision-makers,  
 12 not people above them who describe what they did.  
 13 We say that putting that -- there are obvious best  
 14 evidence reasons why that is done, and it requires  
 15 something very substantial indeed to put that to one  
 16 side. What the Secretary of State does is talk about  
 17 it's the most appropriate route for giving a narrative  
 18 about an investigation over many years concerning  
 19 collective assessment, not individual decision-making.  
 20 Can I just deal with that very briefly. This is not  
 21 about getting a narrative. We want to guard against  
 22 that. We don't want an overarching narrative. We want  
 23 the facts and the detailed facts that underpin the  
 24 narrative so that we can examine them.  
 25 This is also not actually about a long investigation

1 over many years. This inquest is concerned about 2018  
 2 to 2019, for the most part, and in particular 2019. As  
 3 a third response, we say there is nothing in the point  
 4 that MI5 is any more collective in its decision-making  
 5 than any other body. We can see, when we look at the  
 6 probation material here, the number of people involved  
 7 in probation decision-making. There are at least four  
 8 probation officers involved at any one time. Those  
 9 decisions are taken by individuals, and even when they  
 10 are taken together, we need the evidence from people who  
 11 contributed to the decision, not people who didn't  
 12 contribute, but describe the process afterwards.  
 13 I would also note, while I'm here, that Witness A,  
 14 at paragraph 51(b) of his statement, describes there  
 15 being an assigned lead investigator for Khan. So there  
 16 is a high level of, we say, on the face of it,  
 17 individual decision-maker. So with respect to what the  
 18 Home Office says about this, we say that those are not,  
 19 on the face of it, good reasons for putting the usual  
 20 process to one side.  
 21 It's then said we have not explained how or why an  
 22 individual officer would contribute anything else. I've  
 23 touched upon that already, and Mr Rule has also touched  
 24 upon it. But I do need to answer that, and I need to  
 25 answer it with a degree of factual context.

1 Sir, this is about the level of risk that Mr Khan  
 2 represented, the level of unknowns about the level of  
 3 those risks at the time with which we are concerned, and  
 4 the decisions that were taken, despite those unknowns,  
 5 to let him go to Fishmongers' Hall and take place(?) and  
 6 other activities, in any event.  
 7 You've got my document on this, and I don't want to  
 8 go through the detail again, but the fact that he was  
 9 a high risk category A shortly before release is very  
 10 significant, not even just category A, high risk  
 11 category A, who had spent much of his detention in  
 12 special units, going straight out into the community  
 13 without Parole Board scrutiny. That is a very  
 14 significant matter, which requires close consideration  
 15 by those who are risk assessing him.  
 16 We then have the prison records that we have, and  
 17 you've seen them, but the radicalising prisoners, the  
 18 taking a senior role with other Muslim prisoners,  
 19 encouraging violence in prisons. All of those matters  
 20 are very serious. He is then put on the Learning  
 21 Together programme and, as I've already indicated with  
 22 my disclosure request, there are a number of very  
 23 serious concerns about the robustness or otherwise of  
 24 that process, but once he goes on that programme, it  
 25 gives rise to a momentum, and we have noted with

1 interest another witness statement that came in this  
 2 week from Lois Gell, from the probation service, who  
 3 talks about the fact that one of the things in her  
 4 reasoning was a desire not to frustrate him by  
 5 frustrating the progression which had already started.  
 6 The answer to that, of course, is that that's only  
 7 arisen because he was put there in the first place. But  
 8 those are the circumstances in which he is then  
 9 released.  
 10 I've also emphasised in the written document  
 11 the April 2018 extremism risk guidance document, and I'm  
 12 not going to go through that in detail either, but you  
 13 will see the seriousness of the views that were taken at  
 14 that stage about him continuing to hold extremist  
 15 beliefs in 2016/17, about association issues in 2017,  
 16 where prison security thought he was still actively  
 17 involved in extremist groups, that he was a recruiter to  
 18 those groups in prison, that they couldn't see  
 19 a reduction in his risk, and then they identified  
 20 a number of warning signs, which included lack of  
 21 purpose, feeling of injustice, unemployment, boredom,  
 22 feeling lost, et cetera. All of which are matters,  
 23 which we are going to explore but one may think were  
 24 present in November 2019.  
 25 The question then is -- back to that risk

1 assessment -- which is what was different in 2019 to  
 2 allow all of that to be put to one side, and the answer  
 3 is essentially nothing serious had emerged, nothing  
 4 serious significant had emerged, it was essentially just  
 5 silence. He had been progressing along and nothing  
 6 seemed to be going wrong, but the problem with that is,  
 7 of course, that he may just have been sitting on it. It  
 8 may have been false compliance. He may have been  
 9 deceptive, and those are concerns which I'll come to in  
 10 a moment because that may not be enough to stop him  
 11 going to -- the assessment is that nothing has emerged,  
 12 and so they took the decision to allow him to go to  
 13 Fishmongers' Hall in a less regulated way than he had  
 14 gone to anything previously, which was, of course,  
 15 a high-profile London landmark, from a man who was  
 16 status seeking within the Islamist community on previous  
 17 occasions, and the chimes with his index offence are  
 18 there and real.  
 19 Sir, the point of all this introduction is that it  
 20 will be said in response to all of this, no doubt, that  
 21 serious people were looking at this seriously and they  
 22 saw nothing. Lois Gell again talks about how heavily  
 23 sceptical they were about what he was saying to them.  
 24 That is the process that requires careful scrutiny, and  
 25 in particular because Ms Gell goes on to say, in several

1 places in her witness statement, that even a hint that  
 2 he posed any risk might have made a difference. If  
 3 there had been the slightest doubt in her mind about his  
 4 motivations, he would not have gone. That is why we  
 5 make the submission that we do, which is that it would  
 6 not have taken much in the way of information sharing or  
 7 additional concern to change the outcome of this, and  
 8 you will understand the significance of that, from all  
 9 sorts of points of view.  
 10 So that brings me to why it is important to  
 11 interrogate very closely that which MI5 had but  
 12 potentially did not share, because they won't have had  
 13 to share or talk about very much more than they did for  
 14 that to have made a difference, and that's the anxious  
 15 context in which we are operating. Let me just focus  
 16 on, I think, three things that we say that we would need  
 17 to be dealt with by these individual statements.  
 18 First, MI5 thought, on a number of occasions,  
 19 according to Witness A's statement, that Khan might be  
 20 manipulating, that it might be false compliance. That's  
 21 important because it goes into a concern that Ms Gell  
 22 and probation had, so the fact that MI5 thought that as  
 23 well might have given sustenance and support for that  
 24 view and they may have investigated that further. That  
 25 is obviously important.

1 So the question then is: was it shared? It's not  
 2 clear from paragraph 124 of Witness A's statement that  
 3 it was. So we need to investigate was that material  
 4 shared with probation and, if not, why not, and there is  
 5 not, on the face of it, any explanation. Witness A  
 6 talks about that information. There is no obvious  
 7 reason why that couldn't be shared, why anything  
 8 particularly confidential applies to it. It's not an  
 9 operational issue. It's: you thought this, did you tell  
 10 anybody else you thought this?  
 11 Can I just flag on that note that at paragraph 146  
 12 of Witness A's evidence it is said as a learning point  
 13 after the post-attack review that MI5 need to understand  
 14 more "Understanding of the processes governing prisoner  
 15 release and the bodies involved in these processes."  
 16 That appears to be MI5 saying they didn't know enough  
 17 about what probation did, because that's the body,  
 18 obviously, involved in prison release.  
 19 If that's true, it's a matter of significant concern  
 20 and one that we need to explore, which is what was the  
 21 underdevelopment, to use the language of the witness  
 22 statement, of that understanding and how far did it go  
 23 and what sort of factor it was in this case because in  
 24 order to -- what we are fundamentally about is we want  
 25 MI5 to know what probation do so that MI5 know what

1 probation need from them in order to take complex  
 2 sensitive decisions or risk assessment. If they could  
 3 have shared this information with them and backed up  
 4 what probation were already thinking themselves, but  
 5 didn't because they didn't understand probation needed  
 6 it, then that's a proper issue for this inquest and that  
 7 should be explored. But there is no point in exploring  
 8 that with Witness A because he is not the  
 9 decision-maker. That's the first point.

10 Can I also just say about that that there is no  
 11 suggestion in any of that that that's about -- my  
 12 learned friend talked a lot about operational witnesses  
 13 and operational matters. These decisions appear to be  
 14 taken in an office, they are not field officers, as far  
 15 as we can see, so again the reason why that can't be  
 16 disclosed and deployed is less clear.

17 The second thing where we can see an obvious need to  
 18 explore, including with individual witnesses, is the  
 19 fact that MI5 had intelligence shortly before his  
 20 release, that he was planning a post-release attack.  
 21 That is a matter of, obviously, very great significance.  
 22 It led to an upgrading from P4 to P3, and so it was  
 23 clearly taken seriously. I assume, but don't know, that  
 24 the basis for that decision, intelligence itself, is  
 25 going to be the subject of a PII application but that

1 does need to be checked, but I'm assuming it probably  
 2 will be. But again, we come back to sharing on that  
 3 because when you read carefully the witness statement of  
 4 Witness A, he talks about sharing with the police. He  
 5 talks about sharing with the counter-terrorist police  
 6 and he talks about sharing with special branch police.  
 7 He does not talk about sharing with probation, and when  
 8 you compare what Witness A says about this and with  
 9 what, for example, Nigel Byford at MAPPAs talks about,  
 10 there seems to be a sharing with the police and not with  
 11 probation.

12 Mr Byford talks about, at some length, he himself,  
 13 though he is senior, not having the highest level of  
 14 security clearance. There was a provision for having  
 15 people step out of the MAPPAs room to deal with security  
 16 issues, but he doesn't remember those occurring in this  
 17 case. And so it seems, sir, that that process didn't  
 18 happen, that for whatever reason, security services may  
 19 have been sharing with police but not with probation and  
 20 not potentially with MAPPAs.

21 If you look at the detail of the MAPPAs minutes, and  
 22 if you look at the probation documents and you look at  
 23 Kenneth Skelton's evidence and various other documents,  
 24 there is no reference to this intelligence in any of  
 25 them, and so one of the organisations which was

1 absolutely primarily involved in managing his risk  
 2 didn't know that absolutely key issue, and that is  
 3 something that we need to explore. (a) is that  
 4 factually the case and (b) if it is, why is it. That  
 5 needs the individuals who decided not to share it  
 6 because their understanding of probation was limited or  
 7 whatever else it was.

8 Third point about sharing, the MI5 statement tells  
 9 us that he was looking at and considering relocating to  
 10 Pakistan and giving up his British nationality, and that  
 11 was something that they investigated and found was  
 12 a current issue in 2019 -- paragraph 125 of Witness A's  
 13 evidence -- and that is a key matter. The reason why  
 14 it's key is not because necessarily we're worried about  
 15 him absconding particularly, it's more nuanced than  
 16 that. It's about the fact that if he is thinking about  
 17 doing that, how do you reconcile that with the rather  
 18 rosy view of the world he has given to probation about  
 19 wanting to settle here, wanting to move on beyond the  
 20 life he previously had and wanting to do the work and  
 21 the Learning Together-type activities that were being  
 22 set up for him.

23 It's a contradistinction between the picture that  
 24 MI5 had and the picture that probation had, and it  
 25 needed to be explored, and it needed to be explored by

1 probation, and none of it features anywhere in any of  
 2 the probation materials. So again, what was the basis  
 3 for that, if we can know it, but certainly, what was the  
 4 basis for the decision to not share that. That is  
 5 a matter of very real concern, particularly in the  
 6 context if MI5 don't fully understand what it is that  
 7 probation need to know, and as I've made -- a couple of  
 8 times I've made this point in the written document is  
 9 they don't provide the information to probation, so  
 10 probation don't know, and then it becomes circular  
 11 because MI5 then rely on the information coming back to  
 12 them from Staffordshire police and probation.

13 So it becomes circular, where both sides assume the  
 14 other one knows and both sides are reliant on the other  
 15 and there is no communication going on. That is  
 16 a classic information sharing problem of the kind that  
 17 is featured in inquests all the time in the UK and would  
 18 ordinarily be resolved by hearing from the  
 19 decision-makers and hearing from what they understood.  
 20 You are not going to get to the bottom of what officers  
 21 understand or don't understand by asking the manager  
 22 what they understand.

23 So I make all of those points in response to  
 24 Ms Leek's document, and I hope that helps in  
 25 illustrating why we say the individual witnesses are

1 important and why we need points of detail not  
 2 headlines.  
 3 Can I just finish by making two other points. One  
 4 is to repeat that there are obvious reasons why that  
 5 might have made a difference because you wouldn't have  
 6 needed much to stop this going ahead, according to  
 7 Ms Gell's evidence, but it may also have meant that they  
 8 did individual things like the police visit that took  
 9 place on 14 November 2019, so only 15 days before the  
 10 attack, and which seems to upset Khan enormously, if we  
 11 look at the Kenneth Skelton evidence in particular. If  
 12 that had happened earlier because information was shared  
 13 earlier, that may well have produced more information.  
 14 That is the level of detail that we are going to be  
 15 getting into.  
 16 My second and final point is this: I do see the  
 17 force and the reasons for my learned friend's suggestion  
 18 that we defer this decision until after the PII. But  
 19 the concern is that we then get locked into  
 20 an inevitability, it's a real one. If we have the PII  
 21 applications, some of those are upheld but then you  
 22 accede to a submission that, in order to be effective  
 23 following that and to keep it out of being a public  
 24 inquiry, we need to look at this material, if we start  
 25 from then and it is weeks, even allowing for the fact

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1 that this is going to be an inquest, to have the to and  
 2 fro with the Security Service and counsel to the inquest  
 3 discussing what needs to be in, and then we have the  
 4 process where there are submissions on it and then you  
 5 have to rule on it, potentially with the inquest going  
 6 on, then that makes it very difficult to deal with it,  
 7 and given the importance of these issues, we are very  
 8 anxious that this doesn't get knocked out simply for  
 9 those practical reasons.  
 10 So we are concerned -- and this is why I finish  
 11 where I came in -- with supporting Mr Rule's suggestion  
 12 that work is started, at least, on identifying these  
 13 individual witnesses now, getting statements from them  
 14 as to what they can say, just tracking the same things  
 15 that Witness A says but providing the actual evidence of  
 16 it rather than his headline explanation, because  
 17 otherwise we may end up in a situation where we can't do  
 18 it at all for reasons that are not good reasons.  
 19 Unless I can assist you further, sir, those are my  
 20 submissions.  
 21 JUDGE LUCRAFT: No. Thank you very much indeed,  
 22 Mr Armstrong. Next I'm going to go to Ms Leek.  
 23 Submissions by MS LEEK  
 24 MS LEEK: Good afternoon, sir.  
 25 JUDGE LUCRAFT: Again, Ms Leek, for the benefit of all, I've

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1 got the document -- I say "the documents" because there  
 2 were two documents that had come through to me from you,  
 3 and indeed Mr Sheldon, which I've got in front of me.  
 4 MS LEEK: Thank you, sir. For those who were not aware, as  
 5 you have said, my clients have submitted two notes for  
 6 the purposes of this PIR. The first in response to the  
 7 submissions and update note of counsel to the inquest  
 8 and the second to address a number of matters set out by  
 9 interested persons.  
 10 Sir, in the later note served this morning, we deal  
 11 with four discrete issues. The first relates to  
 12 The Times newspaper's submissions in relation to the  
 13 application for anonymity and special measures made by  
 14 TM, M1 and M2. The second concerns the request by the  
 15 families of Saskia Jones and Jack Merritt that further  
 16 MI5 witnesses give evidence. The third concerns  
 17 Usman Khan's mother's submissions in relation to the in  
 18 camera handling arrangement, and the fourth deals with  
 19 requests for further disclosure.  
 20 Sir, I shall deal with each of these briefly  
 21 because, as you've said, our submissions have been set  
 22 out in those notes.  
 23 Sir, you will see from our submissions that in  
 24 relation to anonymity and special measures, that the  
 25 secretaries of state endorsed The Times newspaper's

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1 submission regarding the fundamental importance of the  
 2 principle of open justice, transparency of process and  
 3 assuaging of public concerns.  
 4 Sir, we have read what has been written by counsel  
 5 to the inquest and heard what Mr Hough has said in  
 6 support of these applications today, which we support  
 7 entirely, and, sir, we accept the legal principles as  
 8 set out by him.  
 9 Sir, the only thing I would like to reinforce is  
 10 this: any biographical or historical information which  
 11 would not disclose the identity of TM and M1 and M2 may  
 12 be provided. At no point has it been suggested or  
 13 requested, sir, that this may not be given. Sir, the  
 14 application has been made deliberately on as narrow  
 15 a basis as possible, recognising the importance of open  
 16 justice.  
 17 Sir, I don't propose to repeat what is set out in  
 18 our submissions, unless there is anything further I can  
 19 assist you with on that point.  
 20 JUDGE LUCRAFT: No, thank you.  
 21 MS LEEK: Thank you, sir. Sir, turning to the  
 22 Security Service witnesses, as you have just heard, the  
 23 families of Saskia Jones and Jack Merritt have suggested  
 24 in submissions, and amplified on those today, that in  
 25 addition to the evidence of a senior member of the

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1 security services, further factual witness evidence is  
 2 required from individual officers of the  
 3 Security Service who had direct involvement with  
 4 Usman Khan's management and oversight prior to the  
 5 attack.  
 6 Sir, the Home Secretary's position with regard to  
 7 this request is set out in the submissions that have  
 8 been circulated this morning. Sir, we have also heard  
 9 what Mr Hough has said in his submissions and  
 10 respectfully agree that this is a sensible way forward.  
 11 The position cannot be considered proportionately in  
 12 isolation from the disclosure of Security Service  
 13 material and the related PII application.  
 14 Sir, the point is that those acting on behalf of the  
 15 families want witnesses to testify to each of the  
 16 decisions that were or were not made. But what  
 17 witnesses can or cannot say will depend entirely upon  
 18 the outcome of the PII application. It would be wholly  
 19 disproportionate to spend weeks and weeks taking  
 20 statements and identifying what can and cannot be put in  
 21 the public domain if indeed it is ruled at the PII  
 22 application that none of the underlying material or  
 23 rationale can be put in the public domain.  
 24 Sir, for that reason, it is understood that — it is  
 25 for that reason that Mr Hough made the suggestion that

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1 he did, with which we respectfully agree.  
 2 In summary, the issue will essentially be whether  
 3 there is anything that any individual witness can  
 4 usefully add in open to what the corporate witness has  
 5 already said. Sir, there is nothing further that I can  
 6 say at this stage, but if there are any specific points  
 7 that you wish my clients to deal with, then those  
 8 matters can be put in writing.  
 9 JUDGE LUCRAFT: Thank you.  
 10 MS LEEK: Sir, I'm going to move on now to disclosure to  
 11 Usman Khan's mother. The third issue relates to the  
 12 mother of Usman Khan requesting that she be included in  
 13 handling arrangements to deal with the in camera  
 14 material. Sir, I've spoken with Mr Hough this morning  
 15 and been in contact with Mr Bunting by email. Those  
 16 instructing me have agreed that Mr Bunting and named  
 17 solicitors will be permitted to see the material and  
 18 have agreed to set out in correspondence why  
 19 Mr Bunting's client herself will not have access to it.  
 20 So Mr Bunting and I have agreed that we will work on  
 21 a legal representatives only basis for now.  
 22 Sir, I don't propose to say anything further on that  
 23 matter.  
 24 JUDGE LUCRAFT: Yes. Thank you.  
 25 MS LEEK: Sir, finally, may I address briefly the issue of

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1 further requests for disclosure. You will be aware that  
 2 the Home Office and the Ministry of Justice have already  
 3 provided a considerable quantity of material and that  
 4 more is to come. A number of witness statements, both  
 5 factual and overarching, are being prepared in addition  
 6 to the ones that have already been submitted. Sir,  
 7 yesterday afternoon and evening we received submissions  
 8 from IPs, in some of which further extensive requests  
 9 for disclosure are made.  
 10 Sir, I'm grateful to CTI for noting that our clients  
 11 have already provided or are providing all documentation  
 12 and statements requested by the inquest legal team. As  
 13 to further requests, those will, of course, be addressed  
 14 by my clients if the inquests team consider them to be  
 15 both relevant and proportionate.  
 16 Sir, unless I can assist you further, those are my  
 17 brief submissions in relation to the four headline  
 18 points that needed to be dealt with.  
 19 JUDGE LUCRAFT: Thank you very much, Ms Leek. Next I'm  
 20 going to move to Mr Butt on behalf of the  
 21 Metropolitan Police.  
 22 MR BUTT: Nothing to add to our written submissions, sir,  
 23 unless there is anything you require my assistance on.  
 24 JUDGE LUCRAFT: No, that's very helpful, thank you very  
 25 much.

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1 Can I then turn to Ms Fiona Barton, representing the  
 2 City of London Police. Again, Ms Barton, I've got your  
 3 written document. I think the only issue which I've  
 4 gleaned from what has been said so far which isn't  
 5 covered in there was the point made by Mr Rule, the  
 6 question asked by Mr Rule in their written document, and  
 7 I don't know if you are able to help him with that.  
 8 Submissions by MS BARTON  
 9 MS BARTON: Sir, can I deal with — I think it's the same  
 10 point as was asked by Mr Armstrong with regard to the  
 11 Crown Prosecution Service position.  
 12 JUDGE LUCRAFT: Yes. In the submission, written  
 13 submissions, from Mr Rule, it's specifically set out at  
 14 the end that they just wanted to know what the current  
 15 position is in respect of the City of London potential  
 16 position, and I think you are right, I'm just  
 17 double-checking what is said in Mr Armstrong's written  
 18 document, but, as I say, it was particularly clear from  
 19 what Mr Rule said both in his written document and in  
 20 his oral submissions.  
 21 MS BARTON: Sir, can I confirm that the Crown Prosecution  
 22 Service has determined that there was insufficient  
 23 evidence to charge any person or organisation with any  
 24 offence arising from the deaths of Saskia or Jack, so no  
 25 offence which falls within schedule 1, paragraph 1 of

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1 the Act, and therefore there is no reason why the  
2 inquest cannot proceed as planned.  
3 I had understood that the criminal investigating  
4 team from the City of London Police had had meetings  
5 with the family to confirm this and had communicated by  
6 letter with your team, but I am confirming now that that  
7 is the position.  
8 JUDGE LUCRAFT: Thank you.  
9 Submissions by MS LEEK  
10 MS LEEK: Sir, can I deal with just one other issue in  
11 addition to those set out in our written submissions,  
12 and that relates to anonymity and the suggestion in  
13 paragraph 33 of the submissions filed on behalf of the  
14 media that the identities of anonymised witnesses should  
15 be set out on the face of any directions that you give  
16 or provided to the media in a confidential annex.  
17 Sir, whilst these particular media submissions are  
18 not directed to the issue of the anonymised police  
19 officers, we would be very concerned if it were to be  
20 suggested that the principle which underpins that media  
21 submission applies equally to anonymised witnesses,  
22 including police officers. And it's for that reason  
23 that I need to make our position crystal clear.  
24 We support the submissions that were made in writing  
25 on behalf of the Secretary of State to the effect that

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1 regulation 27(2) of the Coroner's (Investigations)  
2 Regulations of 2013 provides no support for that  
3 submission, and disclosing the identities of anonymised  
4 witnesses in the way suggested undermines the object of  
5 anonymity and increases the risk of disclosure, whether  
6 deliberate or inadvertent, and it is for that reason  
7 that the suggestion should be rejected by the court.  
8 Sir, unless I can assist on any other matters of  
9 principle, those are the submissions on behalf of  
10 City of London Police.  
11 JUDGE LUCRAFT: Thank you. Can I then turn next to  
12 Mr Boyle, Staffordshire Police. Again, if there is  
13 anything in further application or any other matters,  
14 Mr Boyle, you want to make. I've obviously got your  
15 very short written submissions in front of me.  
16 Submissions by MR BOYLE  
17 MR BOYLE: Thank you very much, sir. One minor matter  
18 I have been asked to bring to your attention by Mr  
19 Simpson something and I'm very happy to do so. When  
20 I launched my written submissions yesterday lunchtime,  
21 I had understood that SO15 had very recently provided  
22 the Staffordshire Special Branch statements through the  
23 IOPC for their consideration.  
24 I was contacted by Mr Simpson yesterday afternoon to  
25 inform me that in fact that had not as yet occurred.

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1 I can, however, happily report that Mr Simpson further  
2 contacted me this morning to let me know that the  
3 statements have now been forwarded --  
4 (Intervention by transcriber re feedback and audibility  
5 problems)  
6 JUDGE LUCRAFT: Again I'll repeat my request for anyone who  
7 is not speaking to make sure that their microphone is  
8 muted and also if they are not speaking, they can turn  
9 their video contact off as well. That should help with  
10 the feedback, although I can't cure it entirely, I'm  
11 afraid. But we will do our best for the transcription.  
12 Mr Boyle, can I hand back to you.  
13 MR BOYLE: Sir, in light of your observations, I can simply  
14 add that Mr Simpson confirmed this morning that the  
15 statements have now been forwarded by SO15 to the IOPC  
16 and I'm happy to (inaudible) application.  
17 JUDGE LUCRAFT: Thank you very much. Can I turn next then  
18 to Mr Beer on behalf of West Midlands Police. Again,  
19 Mr Beer, I've got your documentation in front of me and  
20 it's really if there is anything you wish to amplify or  
21 address that's arisen which you feel you should raise.  
22 Mr Beer, I don't know if your lips are moving,  
23 I can't see you on my screen, but if you did have  
24 anything to say, you are on mute as far as this end is  
25 concerned, but it may be that you have nothing to say.

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1 There may be a technical glitch there. So perhaps we  
2 will come back to Mr Beer if there is anything that he  
3 wishes to add.  
4 Mr Hough, I'm conscious that Mr Baumber, I think,  
5 had sent an email indicating there was nothing to say,  
6 and I know that you did tell me he was representing the  
7 four officers from Staffordshire Police, but I'm afraid  
8 my note eluded me as to who --  
9 MR HOUGH: It is Ciju Puthuppally, sir.  
10 JUDGE LUCRAFT: Thank you. I don't know if there is  
11 anything that needs to be added to what was a very  
12 helpful but short email.  
13 MR PUTHUPPALLY: (Speaker?) I have nothing to add, thank  
14 you.  
15 JUDGE LUCRAFT: Can I turn next to Mr Griffin on behalf of  
16 the University of Cambridge. Again, Mr Griffin, I've  
17 got the written documents that have been provided. It's  
18 really just if there is anything you wish to either  
19 amplify, add or deal with, which has arisen so far.  
20 MR GRIFFIN: No, nothing on behalf of Cambridge University.  
21 JUDGE LUCRAFT: Mr Simpson next for the Independent Office  
22 of Police Conduct. Mr Simpson, we heard -- or at least  
23 I could hear Mr Boyle indicating that one query you had  
24 raised with him now appears to have been addressed. Are  
25 there any other matters that you wish to raise? Again,

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1 we have got silence at this end at the moment. So I'm  
 2 going to assume the answer is no.  
 3 Can I next then turn to Gemma Brannigan, who I think  
 4 represents the London Ambulance Service. Ms Brannigan,  
 5 anything that you wish to say?  
 6 MS BRANNIGAN: Thank you, sir, we have no submissions.  
 7 JUDGE LUCRAFT: Thank you. Mr Mansell, who I think  
 8 represents the Fishmongers' Company, anything?  
 9 MR MANSELL: No, thank you, sir.  
 10 JUDGE LUCRAFT: Mr Morley, representing the City of London  
 11 Corporation?  
 12 MR MORLEY: No, thank you, sir.  
 13 JUDGE LUCRAFT: Thank you. Mr Gold, Elliot Gold,  
 14 representing British Transport Police, anything?  
 15 MR GOLD: No, thank you, sir.  
 16 JUDGE LUCRAFT: Sebastian Naghton on behalf of Barts NHS  
 17 Trust?  
 18 MR NAGHTEN: Sir, nothing to add, save to draw to your  
 19 attention that in the chatroom Mr Beer says as follows:  
 20 "If you cannot hear me next time I try to speak, can  
 21 you, please, say that I had and have no submissions to  
 22 make."  
 23 So I hope that assists you, sir.  
 24 JUDGE LUCRAFT: That's very helpful indeed, and we will go  
 25 back to Mr Beer in a minute. I'm just trying, where

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1 I can, to identify who I've not yet spoken to. I know  
 2 that I've still got to come to Mr Bunting. Perhaps I'll  
 3 go to Mr Bunting next.  
 4 Submissions by MR BUNTING  
 5 MR BUNTING: Thank you, sir, Mrs Begum is very keen to  
 6 assist the court in any way that she can. She is very  
 7 grateful for the work that has been done to date on  
 8 venue fixing (inaudible). She will assist the court on  
 9 points of detail in respect of witnesses by 26 February,  
 10 and she is grateful to Mrs Leek QC for confirming the  
 11 position in respect of her representatives entering into  
 12 the in camera arrangements.  
 13 Can I reserve her position in respect of whether or  
 14 not she also should be permitted entry into the  
 15 confidentiality circle. That's (inaudible) and, if  
 16 necessary, can assist you on that afterwards. I have no  
 17 further submissions, thank you, sir.  
 18 JUDGE LUCRAFT: Thank you very much. We will just try once  
 19 again Mr Beer, just in case we can make contact with  
 20 him.  
 21 MS WOLFE: Sir, given the pause and the silence, I'm  
 22 Georgina Wolfe, I'm Mr Beer's junior, and I can confirm  
 23 we have no submissions to make in addition to our  
 24 written note.  
 25 JUDGE LUCRAFT: Thank you for that. Mr Hough, I believe

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1 that I've gone through everyone of the IPs who are on  
 2 the CVP link.  
 3 MR HOUGH: Sir, you have. The only remaining matter, before  
 4 I briefly reply, is whether the representatives of the  
 5 press wish to say anything directly to you in relation  
 6 to the —  
 7 JUDGE LUCRAFT: I was going to come to them next. I just  
 8 wanted to check with you that I haven't missed anyone  
 9 out on the link because it's easier to do people who are  
 10 physically present in front of me once we have gone  
 11 through the links.  
 12 MR HOUGH: I have ticked off everybody as well as Mr Beer's  
 13 voices on earth.  
 14 JUDGE LUCRAFT: I'm just going to suggest that actually, if  
 15 you don't mind, if you came into the witness box, not  
 16 that I'm expecting to call you to give evidence or even  
 17 to cross-examine you. It's just really for the benefit  
 18 of the shorthand writer that it should make you more  
 19 audible. If I could just ask you to re-identify  
 20 yourself.  
 21 Submissions by MR GARNER(?)  
 22 MR GARNER: Duncan Garner(?), I'm a court reporter covering  
 23 the proceedings. In court we also have Mr Brown(?) from  
 24 The Times and Ms Pennink from the Press Association, and  
 25 on the link, I believe, we have representatives from the

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1 BBC and from The Independent, and probably a few other  
 2 organisations as well.  
 3 JUDGE LUCRAFT: Thank you.  
 4 MR GARNER: The first point was really to check whether  
 5 there is a proposed new procedure in which evidence will  
 6 be heard in camera, because it sounded as though that  
 7 might be a procedure that you were expecting to adopt  
 8 here for some of the evidence and, if that is the case,  
 9 we would want to reserve our position and make further  
 10 submissions on whether we would consider that  
 11 appropriate in the circumstances. Was that my correct  
 12 understanding?  
 13 JUDGE LUCRAFT: What I might suggest is that Mr Hough just  
 14 clarifies what the position is.  
 15 MR HOUGH: To answer the question, rule 11.4 of the  
 16 Coroner's Inquest Rules permits a coroner to hold part  
 17 of an inquest in camera on the grounds of national  
 18 security. It was decided in a judicial review in  
 19 relation to the London bombings inquest that that power  
 20 didn't allow the Coroner to exclude interested persons  
 21 or their representatives. It did allow exclusion of the  
 22 wider public.  
 23 What is proposed at the moment is that there is some  
 24 very limited content of some documents which is being  
 25 disclosed to interested persons on the basis that before

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1 they deploy it in a hearing, they give notice to allow  
 2 the Secretary of State to make a submission, if he  
 3 wishes, that the hearing in which it's deployed should  
 4 go into camera under the rule 11(4) procedure. So it's  
 5 not a new procedure, it's a well established one. If  
 6 the Secretary of State did make such an application, of  
 7 course, interested persons would have the right to  
 8 object, as would representatives of the media at that  
 9 time. It's a pragmatic procedure to allow some material  
 10 to go to interested persons which wouldn't otherwise go  
 11 to them.

12 MR GARNER: Understood. I understand that did not happen at  
 13 London Bridge or Westminster. Is that correct? We  
 14 didn't face any such hearings.

15 MR HOUGH: There was no request by the Secretary of State to  
 16 go into camera in those proceedings, and in those  
 17 proceedings we weren't dealing with categories of  
 18 material for which this process was suggested.

19 MR GARNER: I'm grateful. And we will, given that notice,  
 20 have lawyers on notice --

21 JUDGE LUCRAFT: I think it gives you the comfort you wanted,  
 22 it I might use that expression, that actually there will  
 23 be an opportunity, should it arise, for representations  
 24 to be made, and I think the clarification that Mr Hough  
 25 has helpfully given sets the landscape in which it would

1 be considered clear.

2 MR GARNER: Absolutely, and I'm very grateful for both  
 3 parties.

4 So then it just falls really to me to cover a couple  
 5 of points that Mr Hough raised. In particular around  
 6 screening, I think there was a proposal that the  
 7 screening of the witnesses, should they be given  
 8 anonymity, should not be made from court staff to jury  
 9 IPs and legal representatives. We would say, although  
 10 Ms Barton's comments were heard and understood, that, in  
 11 the case of those witnesses, the press should also be  
 12 allowed to see the witness, although clearly the  
 13 anonymity would apply to their name, their identity, to  
 14 their photograph and any other identifying features.  
 15 However, we would submit that we should be able to see  
 16 them giving evidence in court, as we would do in  
 17 a criminal trial.

18 But for Ms Barton's comfort, I make clear that we  
 19 would not want to see the identity of police officers or  
 20 other security officials if they were to be included on  
 21 any anonymity list unless they were senior commanding  
 22 officers, in which case we would want to know why they  
 23 were applying for that anonymity.

24 I think, going back and covering a couple of issues  
 25 that we weren't quite clear on around witness -- I think

1 Witness Q, who is the former partner, if I'm getting my  
 2 letters of the alphabet right.

3 JUDGE LUCRAFT: That's right.

4 MR GARNER: We were somewhat less clear of when the  
 5 relationship around Witness Q with Usman Khan took  
 6 place. We are now a little bit clearer, that it  
 7 continued up until his incarceration and indeed through  
 8 the beginning of that incarceration, and that to us  
 9 would suggest that she is a relevant and important  
 10 witness, and indeed she wouldn't be called if she was  
 11 not.

12 So we suggest that the idea that she is a relatively  
 13 minor character in this is not correct. It is important  
 14 that we hear her evidence and, if possible, we also  
 15 submit it's important that we are able to give as much  
 16 detail as we can around her, and we have made the point  
 17 in writing, we make it again now, that there is no  
 18 reason to believe that she will be under any kind of  
 19 threat. There has been a certain amount of caricaturing  
 20 going on in both the applications from the  
 21 Home Secretary and from -- on behalf of Witness Q. In  
 22 one case, in Witness Q's case, suggesting that there may  
 23 be all kinds of attacks from the media, which sort of  
 24 suggests that, dare I say it, that the dramas have  
 25 started to take effect in which the press are shown in

1 huge hordes outside people's houses with cameras and  
 2 knocking on people's doors and doing all sorts of things  
 3 that in reality does not occur -- maybe once it did,  
 4 maybe 20 years ago that sort of thing did happen, but it  
 5 certainly doesn't happen now, and witnesses should be  
 6 reassured that speaking in public does not mean that  
 7 they will be harassed in any way by the media, and  
 8 indeed not by the public either. I think there is also  
 9 a danger here that witnesses sort of see themselves  
 10 being stopped in the street or graffiti being scrawled  
 11 on the walls or windows being put in and, of course,  
 12 these things do happen in dramas, on a regular basis,  
 13 but they don't happen in real life, and I think my Lord  
 14 will be aware, as all the people in this court will be  
 15 aware, that when judges sentence individuals to long  
 16 prison sentences, their families don't turn up at their  
 17 doorstep and they don't scrawl graffiti on them, and  
 18 neither do neighbours or anybody else. I think there is  
 19 a degree of fear here that has been unnecessarily  
 20 raised, by whatever sources that these people are  
 21 getting them from. I'm not saying they are unfounded  
 22 fears, they are fears generated from somewhere, but we  
 23 know that these things simply don't happen. And while  
 24 we have a lot of sympathy for Witness Q and her personal  
 25 situation, we do feel that anonymising her takes quite

1 a lot away from the personal story of Usman Khan.  
 2 We have even greater concerns about the  
 3 deradicalisers, the imam and the two individuals on the  
 4 Unity project, for the very reason that they are  
 5 officials and that they should be publicly identified,  
 6 and that's not to say they are being publicly named and  
 7 shamed in any way, or indeed anybody else in this  
 8 enquiry, but we are concerned about the message that it  
 9 sends out to the general public who are watching the  
 10 proceedings if individuals are anonymised because it is  
 11 saying to the public, these people are afraid, they are  
 12 frightened, and specifically in these cases it's saying  
 13 that they are frightened of extremists, and whether  
 14 those are right wing extremists or Islamist extremists,  
 15 that they are afraid that these people are going to turn  
 16 up at their houses, they are going to intimidate them,  
 17 they are going to do all sorts of things, and that the  
 18 state can do nothing to stop this happening. We think  
 19 this is extremely concerning that the enquiry might be  
 20 saying, well, yes, that is the case and, therefore, you  
 21 must be granted anonymity.  
 22 And I hear the point that Mr Hough makes about  
 23 echoing the Home Secretary's submissions that it might  
 24 make recruitment more difficult, but these individuals  
 25 are being recruited on the basis that they are working

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1 for the Government in highly respected positions, doing  
 2 the right thing for their communities and for the wider  
 3 community in trying to steer individuals away from  
 4 radicalisation, and it seems extraordinary that we would  
 5 be in a position where somebody doing such good work  
 6 should, therefore, feel the need to be anonymised.  
 7 These are not secret agents, they are not undercover  
 8 officers, they are not acting in secret, they are acting  
 9 perfectly openly, as they say in their statements. They  
 10 have been attacked and abused, sadly, on social media,  
 11 and that is because their roles are not secret. And  
 12 indeed, I think one refers to a member of the press  
 13 turning up. So clearly, the communities are aware of  
 14 what they do, and rightly so, and they should be  
 15 afforded every protection that the law can give them but  
 16 that shouldn't include anonymity in an important public  
 17 inquiry.  
 18 I think that is the point that we rest with really,  
 19 that it's important that we don't end up in a situation  
 20 where people doing non-secret work are given anonymity  
 21 because of largely unfounded fears, and I have to make  
 22 the last point around social media, which seems to be  
 23 cropping up again and again, which is that most social  
 24 media circles are closed so people can't abuse  
 25 individuals that they don't know. There are platforms

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1 that are open — Twitter is one of — them but most  
 2 social media that people use, Facebook and WhatsApp and  
 3 Instagram, can be closed to individuals people don't  
 4 know and therefore they shouldn't be concerned that they  
 5 are going to be widely abused, and indeed all of those  
 6 organisations have measures that can be taken on  
 7 a corporate level and indeed on a criminal level, should  
 8 that actually happen.

9 Thank you for listening.

10 JUDGE LUCRAFT: They are points very well made. Thank you  
 11 very much indeed and I repeat what I've said on a number  
 12 of occasions before, that the reporting on the inquest  
 13 which I've covered so far has been first class, and I'm  
 14 obviously very keen, particularly more so perhaps in the  
 15 current circumstances, that there is good coverage of  
 16 inquests, particularly when members of the public who  
 17 might otherwise travel to watch important inquests being  
 18 heard in public have a press which is able to provide  
 19 them with that which they wouldn't otherwise be able to  
 20 come and witness themselves.

21 I have the points you've made on behalf of yourself  
 22 and, I know, your colleagues very much in mind. Thank  
 23 you.

24 MR GARNER: I'm very grateful. If my Lord could just check  
 25 anyone on line wants to add anything or anyone —

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1 JUDGE LUCRAFT: Certainly, I will just see if there is any  
 2 other representative of the press who wishes to add  
 3 anything to what has been said so far and would either  
 4 of your colleagues in court?  
 5 UNKNOWN SPEAKER: The Press Association agrees with Mr  
 6 Gardham.  
 7 JUDGE LUCRAFT: Thank you very much indeed. Mr Hough, if  
 8 I can then come back to you.  
 9 MR HOUGH: Yes, sir.  
 10 Submissions by MR HOUGH  
 11 JUDGE LUCRAFT: Really just if there are points which have  
 12 been made — I appreciate some of the detail in relation  
 13 to disclosure and other points which have been raised is  
 14 probably not what we need to go into now, it's really  
 15 just the issues of principle.  
 16 MR HOUGH: Yes, sir. May I begin by responding to the  
 17 eloquent points which Mr Garner has just made.  
 18 As you have said, the reporting on this and previous  
 19 cases in which Mr Garner has been involved as a reporter  
 20 has been of a high standard, and we know him to be  
 21 a responsible journalist who makes his submissions in  
 22 a measured way.  
 23 As to his first point, he raises the question of  
 24 whether media representatives should be permitted to see  
 25 witnesses who are the subject of special measures

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1 orders. In our submission he raises a good point there.  
 2 There may be some witnesses for whom you are making  
 3 special measures orders or have made special measures  
 4 orders in the past who would not have a reasonable and  
 5 sustainable objection to them being seen by accredited  
 6 members of the press while they are giving evidence. Of  
 7 course those members of the press would be obliged by  
 8 the orders not to disclose identifying features of the  
 9 individuals. But in our submission that is a point well  
 10 taken and we will invite representatives of those who  
 11 have been granted special measures, or will in the  
 12 future be granted special measures, to indicate whether  
 13 they object to accredited members of the press seeing  
 14 them give evidence and on what basis.

15 In that regard we note that in the decision of the  
 16 Court of Appeal last year in the Chief Constable of  
 17 West Yorkshire v Dyer all members of the court indicated  
 18 that where special measures were granted, it would be  
 19 sensible for the court to consider whether accredited  
 20 members of the press could be permitted to see  
 21 witnesses. Obviously, there will be some witnesses for  
 22 whom that will not be possible. You made orders in  
 23 relation to the security service witness in the  
 24 Westminster and London Bridge cases that even you could  
 25 not see the witness. But in our submission that is the

1 appropriate way to deal with Mr Garner's well made  
 2 point.

3 As regards Witness Q, sir, you have our submissions,  
 4 I'm not going to repeat them. I should, however, make  
 5 clear that Witness Q is not a central figure in these  
 6 inquests. As Mr Armstrong said, events of 2014 and  
 7 earlier are well away from our focus and Witness Q is  
 8 a witness who was not in contact with Usman Khan over  
 9 the period we will be focusing upon.

10 At the moment I can say that from our perspective it  
 11 is unlikely that she will be called as a witness. She  
 12 may be referred to because of her connection with him  
 13 and her contact with him in his early years in prison  
 14 but in our submission it's likely to be passing  
 15 references.

16 As regards the mentors, sir, you will set  
 17 Mr Garner's points, which are well taken points, against  
 18 the mentors' concerns and the evidence they have put in  
 19 of the risks of abuse which they do face and you will  
 20 have to form a judgment as to where the balance is to be  
 21 struck. The points which have been made are fair ones  
 22 but they weigh in the balance against other  
 23 considerations, including serious evidence from the Home  
 24 Office about the difficulty and importance of recruiting  
 25 and retaining mentors for this programme.

1 Sir, that's what I propose to say in relation to the  
 2 media submissions. I'll address briefly the question of  
 3 additional MI5 witnesses, which was the topic of  
 4 submissions in helpful detail by Mr Rule and  
 5 Mr Armstrong.

6 Sir, as to when this decision should be made, we  
 7 repeat our submission that it is an issue that should be  
 8 resolved at the same time as you are addressing public  
 9 interest immunity. The decision as to whether  
 10 individual officers can usefully add anything to the  
 11 evidence of Witness A and how much they can usefully add  
 12 will be profoundly affected by the question of how much,  
 13 if any, of the underlying documents you order to be  
 14 released. If you uphold aspects of the PII claim which  
 15 cover wide ranges of sources and capabilities, and you  
 16 view the underlying materials and conclude that the  
 17 witnesses — that the operational officers could in open  
 18 add little, if anything, then that will steer you  
 19 towards not requiring those witnesses to give evidence,  
 20 and Ms Leek makes a powerful point that requiring these  
 21 witnesses to produce very extensive statements and doing  
 22 vast amounts of work with them would not make sense if  
 23 those documents and that work would be dramatically cut  
 24 down if the Secretary of State's own application is  
 25 successful to any extent.

1 I don't propose to repeat what I said about our  
 2 provisional position and its reasons concerning these  
 3 witnesses. The question will be for you whether, as  
 4 a matter of judgment, it is appropriate to require  
 5 additional witness statements to be taken and to call  
 6 additional witnesses in the inquest.

7 It is, we submit, important to bear in mind the role  
 8 MI5 played in this case. Those who were primarily  
 9 responsible for making assessments about Usman Khan and  
 10 decisions about what he should be permitted to do,  
 11 including attending the Fishmongers' Hall event, were  
 12 police officers, probation officers and probation staff,  
 13 working both within the prison and then outside.

14 Those witnesses will be called to give evidence and  
 15 they will be examined by reference to the vast amounts  
 16 of contemporaneous documents that existed governing  
 17 their thought process and decision-making. MI5 was  
 18 inevitably at one remove. Its officers were conducting  
 19 investigations and feeding information in to the MAPPA  
 20 process, for example.

21 What MI5 knew can be addressed, to the extent that  
 22 is possible in open, through Witness A. If there was  
 23 material known to MI5 that was not disclosed and not  
 24 provided to the decision-makers, then Witness A can be  
 25 tested upon that and the decision-makers can be asked

1 what they would have done if the additional information  
 2 was brought to their attention.  
 3 Let me illustrate this by references to  
 4 Mr Armstrong's three examples. First of all, he pointed  
 5 out that MI5 identified, according to Witness A, that  
 6 Usman Khan may be compliant with his restrictions and  
 7 conditions in order to gain the system, in order to put  
 8 off those who might otherwise control him more strictly.  
 9 Sir, from a review of the probation service  
 10 documents and the MAPPA documents, that was a view  
 11 shared by many others. It was a risk which was  
 12 recognised, and recognised and expanded on very clearly,  
 13 in the psychologist's ERG report which Mr Armstrong  
 14 cites in his submissions.  
 15 It is, therefore, a risk which had to be taken into  
 16 account by the decision-makers. If MI5 knew something  
 17 particular to that risk, which was not passed on, that  
 18 is a legitimate focus for enquiry, but that is something  
 19 which you will be able to explore in the context of the  
 20 PII application and which interested persons will be  
 21 able to ask Witness A about. In any event, as I say, it  
 22 was a risk recognised by others, who can be asked about  
 23 it and who made the decisions.  
 24 Secondly, the point is made that MI5 had  
 25 intelligence shortly before Usman Khan's release that he

1 might return to his old ways in the understood sense of  
 2 terrorist offending. That was not intelligence that was  
 3 peculiar to MI5, that was intelligence that also  
 4 appeared in the records of others, as interested persons  
 5 will appreciate from their review of materials being  
 6 disclosed to them. It was intelligence and information  
 7 which others can be asked about because it could have  
 8 been fed through to them by a range of sources. The  
 9 quality of that intelligence and the extent to which the  
 10 source can be revealed will, of course, be a matter for  
 11 you to consider if there is objection to that  
 12 information being provided by way of a PII application.  
 13 Thirdly, the point is made that the Security Service  
 14 had intelligence that Usman Khan was considering  
 15 returning to Pakistan, including in 2019. Well,  
 16 Usman Khan's interest in returning to Pakistan was  
 17 a theme throughout his time in prison. The fact that he  
 18 continued in that view or the possibility that he  
 19 continued in that view can be a subject explored with  
 20 a range of witnesses, including Witness A. If the  
 21 Security Service had intelligence which was specific to  
 22 the 2019 period which was not shared, then Witness A can  
 23 be asked about that and the decision-makers can be asked  
 24 what they would have done differently if told the  
 25 additional information.

1 So, sir, I make those points not in order to suggest  
 2 that you should not consider the question of whether to  
 3 ask for these additional statements at the next hearing.  
 4 You should and Ms Leek accepts that you should. I make  
 5 those points in order to show that whatever decision you  
 6 make on that subject, these questions and the role of  
 7 MI5 will be the subject of careful scrutiny in these  
 8 inquests.  
 9 JUDGE LUCRAFT: Thank you very much indeed, Mr Hough.  
 10 That's very helpful. I'll repeat what I said at the  
 11 beginning, which is that I will provide a document  
 12 setting out those decisions which I come to as  
 13 a consequence of the various very helpful written  
 14 documents which have been provided in advance of this  
 15 hearing and have been amplified during the course of  
 16 this afternoon.  
 17 I think, so far as everyone is concerned, obviously,  
 18 the key point that people wish clarity about is location  
 19 and confirmation that we will start in April, and that  
 20 will be dealt with, as we have indicated, within the  
 21 next two-week period, and also confirmation of the date  
 22 of the likely PII hearing, which again, I know, will be  
 23 made -- once that's confirmed, that date will be made  
 24 known to all IPs. But you've indicated what it's likely  
 25 to be, but we will deal with that.

1 For this afternoon, Mr Hough, I'm not sure there is  
 2 anything further we need to address in terms of the  
 3 items on the agenda or other matters. I hope the CVP  
 4 link has worked well enough. I hope that it has not  
 5 been too difficult for the transcribers to follow  
 6 proceedings but, as I mentioned, there has been  
 7 a separate recording made on the normal court recording  
 8 system so that we do at least have that fallback should  
 9 there have been either a time when the sound dropped out  
 10 from the shorthand writers or there is any need to  
 11 clarify what in fact was said in the course of the  
 12 submissions this afternoon.  
 13 MR HOUGH: Thank you, sir.  
 14 JUDGE LUCRAFT: But I thank everybody and the court staff  
 15 for their forbearance with all the tech that we have  
 16 used but I hope it has worked.  
 17 Thank you very much indeed.  
 18 (4.22 pm)

(The court adjourned)

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