

OPUS2

Inquests into the deaths arising from the Fishmongers' Hall and London Bridge terror attack

Day 1

March 25, 2021

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1 Thursday, 25 March 2021
 2 (10.00 am)
 3 JUDGE LUCRAFT: Good morning, Mr Hough. Mr Hough, I'm just
 4 going to say a couple of things at the beginning, rather
 5 as I did on the last occasion that we had a pre-inquest
 6 review using CVP.
 7 Because I think all of our experience with CPV is
 8 that the sound can occasionally be lost for those who
 9 are on a remote link, can I simply ask everyone who is
 10 not speaking please to make sure they remain on mute
 11 until their time is to speak.
 12 The second thing is that I know that a transcript
 13 will be made of this hearing in due course, and I hope
 14 anyone who loses part of the dialogue will be able to at
 15 least read the transcript in due course.
 16 Again, my experience borne out in another
 17 jurisdiction, but reinforced by the last hearing we held
 18 on this particular -- these particular inquests, is that
 19 in due course a note will be produced of the matters
 20 which have been discussed and of course a ruling in
 21 relation to any matters that I'm asked to rule on will
 22 be given in due course.
 23 I say that by way of simple introduction because I'm
 24 so conscious that we've got quite a number of people who
 25 are participating in this hearing through the CVP link.

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1 The final thing I was going to say at this stage is
 2 simply to make clear to everyone that I received quite
 3 a volume of the closed material last week. I have not,
 4 thankfully, been sitting in court every day all day
 5 since the material arrived, and so I have had a good
 6 period of time to familiarise myself firstly with that
 7 material and also the submissions which have been
 8 received by me, both for the open part of the hearing
 9 this morning and indeed in relation to the closed part
 10 of this hearing to take place this afternoon.
 11 I say that by way of introduction simply so people
 12 are aware that I'm not coming to this entirely cold.
 13 I have had plenty of time to look at the material and
 14 indeed to read and re-read the statement of Witness A
 15 which touches upon many of the points which are made in
 16 the written submissions that I have received for today.
 17 MR HOUGH: Thank you, sir. This is, as you know, sir, the
 18 third pre-inquest review hearing in these inquests
 19 concerning the deaths resulting from the attack at
 20 Fishmongers' Hall on 29 November 2019. As you have
 21 alluded to, the hearing will consist of an open session
 22 this morning followed by a closed session this
 23 afternoon.
 24 All interested persons are participating in this
 25 morning's part of the hearing by remote links and you,

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1 sir, gave directions on 16 March to provide for such
 2 links and an audio broadcast for the press. Some
 3 members of the press sit in court behind me.
 4 I stress that it remains a contempt of court to
 5 photograph or make an audio or video recording of any
 6 part of this hearing.
 7 May I deal with representation and the
 8 representatives' ability to see and hear these
 9 proceedings has been checked.
 10 I appear with Aaron Moss as counsel to the inquest.
 11 For the family of Saskia Jones, Henry Pitchers QC,
 12 Philip Rule and Ramya Nagesh. For the family of
 13 Jack Merritt, Nick Armstrong and Jesse Nicholls.
 14 Mr Nicholls will be making the oral submissions. For
 15 the family of Usman Khan, Jude Bunting. For the
 16 Metropolitan Police Service, Matthew Butt QC and
 17 Genevieve Woods. For the City of London Police,
 18 Fiona Barton QC. For the Staffordshire Police,
 19 Gerard Boyle QC and Louisa Brown. For the West Midlands
 20 Police Jason Beer QC and Georgina Wolfe. For the
 21 Secretary of State for the Home Department and Secretary
 22 of State for Justice, Neil Sheldon QC, Samantha Leek QC
 23 and Francesca Whitelaw. For the London Ambulance
 24 Service, Gemma Brannigan. For Barts Health NHS Trust,
 25 Sebastian Naughton. For Cambridge University

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1 Nicholas Griffin QC. For the Fishmongers' Company Sarah
 2 Le Fevre. For the City of London Corporation,
 3 Stephen Morley. For Staffordshire Police Prevent Team
 4 Officers, Kevin Bamber; and representing the IOPC,
 5 Danny Simpson. I hope I haven't missed anyone out.
 6 The following topics, sir, are to be addressed in
 7 this open part of the hearing.
 8 First of all, the public interest immunity, PII,
 9 claims for the Secretary of State and West Midlands
 10 Police.
 11 Secondly, adequacy of investigation. If the PII
 12 claims are entirely or substantially upheld, should you
 13 proceed with these inquests or call for a public
 14 inquiry.
 15 Thirdly, anonymity and special measures application
 16 of Witness A, the MI5 witness. Should the witness be
 17 granted anonymity, and if so, from whom should they be
 18 screened?
 19 Fourthly, should you call for statements from
 20 Security Service witnesses other than Witness A?
 21 Fifthly, should accredited press see the screened
 22 witnesses other than Witness A?
 23 Sixthly, any remaining case management issues,
 24 including a selected number of issues about witnesses
 25 and disclosure items.

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1 We have provided written submissions addressing
 2 these issues and those IPs with an interest in them have
 3 provided their written responses.
 4 Subject to your preference, sir, I prefer to go
 5 through all items on the agenda, summarising our
 6 submissions for the benefit of all attending and
 7 answering points in the submissions of others. It may
 8 then be sensible to ask each advocate to address all
 9 items. Finally, I would intend to reply briefly.
 10 JUDGE LUCRAFT: I'm just going to remind people please to be
 11 on mute if you're not speaking.
 12 MR HOUGH: Finally, I would intend to reply briefly to any
 13 points requiring a response. Would that approach be
 14 convenient?
 15 JUDGE LUCRAFT: Very much so thank you, Mr Hough.
 16 Submissions by MR HOUGH
 17 MR HOUGH: Turning to item 1, the PII claims, we address
 18 these from page 2 of our document.
 19 Sir, as you know, the Home Secretary and the
 20 Chief Constable of West Midlands Police have made PII
 21 claims objecting to the disclosure of some documents to
 22 interested persons and seeking to justify redactions of
 23 other documents. The principal claim is that of the
 24 Home Secretary and is supported by a ministerial
 25 certificate. Because some of the submissions suggest

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1 that the PII claims are all about withholding documents,
 2 and the consideration has not been given to providing
 3 documents in redacted form, I should stress that
 4 a significant element of the PII claim concerns
 5 justifying redactions. These include redactions to
 6 various police documents such as those of Staffordshire
 7 Police and Prison Service documents such as the Mercury
 8 intelligence record from Khan's time in prison.
 9 Sir, the background to the PII claim is summarised
 10 from paragraph 4 of our submissions. To summarise
 11 briefly, first of all, MI5 was involved in the
 12 investigation which led to Usman Khan being imprisoned
 13 in 2010 and he remained under investigation in his early
 14 years in prison. An investigation was re-opened in
 15 August 2018 in preparation for his release and he then
 16 remained under investigation as a subject of interest
 17 until the time of his death. MI5 worked with West
 18 Midlands Police CTU and Staffordshire Special Branch in
 19 that investigation.
 20 Secondly, from an early stage we recognised that MI5
 21 was likely to hold relevant material about this
 22 investigation and that MI5 information was likely to be
 23 in police material as well. We also recognised that
 24 security sensitivities are likely to exist because
 25 secrecy attaches to subjects such as MI5's operational

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1 capabilities, its investigations into other subjects of
 2 interest and its sources.
 3 Thirdly, we therefore adopted a process which is set
 4 out at paragraph 7 of our document. We reviewed MI5's
 5 post-attack review report and the underlying
 6 investigation documents. In a series of discussions we
 7 identified topics and information relevant to the
 8 inquest adopting a low threshold of relevance. MI5 then
 9 produced a witness statement of a senior officer,
 10 Witness A, providing evidence of its investigations into
 11 Khan and what it knew about him before and after the
 12 attack. The statement contains an extended gist or
 13 summary of the investigation materials prepared, MI5
 14 says, to avoid harming national security interests. The
 15 statement went through drafts as we sought to encourage
 16 the provision of ever more information.
 17 We then identified material which we considered
 18 should be disclosed on relevance grounds alone if
 19 national security concerns were not a factor, again
 20 applying a low threshold of potential relevance. And
 21 that triggered the current PII claims.
 22 We should stress that nothing about this process has
 23 been cursory or deferential. It was and is our aim to
 24 press for as much information to be made available as
 25 possible.

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1 JUDGE LUCRAFT: Just pausing there for a minute, Mr Hough,
 2 it may just help obviously from my review of the
 3 material, I can say that from what I have seen there
 4 appears to be a very lengthy, very detailed process
 5 that's been undertaken in dialogue between the team for
 6 the inquest and those representing the Home Secretary.
 7 MR HOUGH: Sir, we would agree with that characterisation.
 8 In addition, we've been inventive in pursuing our
 9 objective of maximum openness. As I have said, some
 10 documents have been disclosed with redactions and those
 11 redactions have been usually very limited and the
 12 gisting statement of course has been produced. In
 13 addition, we devised the in camera disclosure process, a
 14 new process, which you, sir, approved at the last
 15 hearing to enable disclosure of material which the
 16 government is prepared to have deployed within in camera
 17 hearings.
 18 Turning then to the legal principles, we set those
 19 out from page 4 of our submissions and I can take them
 20 relatively briefly because they are not controversial,
 21 although different interested persons inevitably give
 22 emphasis to different principles.
 23 As we say at paragraphs 10 to 11, a coroner may
 24 refuse disclosure of otherwise relevant documents on the
 25 basis of a valid PII claim and in doing so should apply

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1 the rules of PII as applying to legal proceedings
 2 generally, but with proper account taken of the nature
 3 of inquest proceedings.
 4 At paragraph 13 we refer to the Binyam Mohamed case
 5 where Lord Justice Thomas classically proposed
 6 a four-stage approach for PII. First, is there public
 7 interest in disclosure? Second, would disclosure bring
 8 about a real risk of serious harm to an important public
 9 interest? Third, can the risk be protected against by
 10 other means or more limited disclosure? And fourth, if
 11 there is no adequate alternative, where does the balance
 12 of the public interest lie between allowing or refusing
 13 disclosure? That is the Wiley balance.
 14 As we point out at paragraph 14, there is in general
 15 a public interest in disclosure of relevant material in
 16 inquests to serve the purposes of the inquest process.
 17 Those purposes were described by Lord Bingham in
 18 well-known terms in the Amin case in a passage we quote
 19 at paragraph 14 and which, sir, you may have seen others
 20 quote too. They include ensuring that the full facts
 21 are brought to light, that any culpable conduct is
 22 exposed, and that lessons are learned for the future.
 23 At paragraph 15 we cite extensively from the
 24 Litvinenko case of 2013, where Lord Justice Goldring,
 25 having gone through the previous authorities, identified

1 nine principles of particular relevance to PII claims
 2 based on national security interests in inquest
 3 proceedings.
 4 Let me summarise each of those briefly. First,
 5 public justice is important and it's for the court to
 6 decide whether a PII claim should prevent disclosure of
 7 a document.
 8 Second, the context of the balancing exercise is
 9 critical and PII claims based on national security raise
 10 their own particular considerations.
 11 Third, if a PII claim is based on national security
 12 concerns, there must be proper evidence in support.
 13 Fourth, if disclosure would have a sufficiently
 14 serious effect on national security, there must be no
 15 disclosure. If the claimed damage to national security
 16 is not, however, plain and substantial enough to prevent
 17 the balancing exercise being performed, then it should
 18 be performed.
 19 In that exercise, fifthly, the Secretary of State's
 20 view of the nature and extent of the damage to national
 21 security should be accepted absent cogent reasons to
 22 reject it.
 23 Sixthly, it is usually a given that the Secretary of
 24 State knows more about national security and the coroner
 25 knows more about the proper administration of justice.

1 Seventh, a real and significant risk of damage to
 2 national security will generally, but not invariably,
 3 preclude disclosure.
 4 Eighth, to reject a PII claim backed by
 5 a ministerial certificate, the coroner must find that
 6 the damage to national security as assessed by the
 7 Secretary of State is outweighed by the damage to the
 8 administration of justice.
 9 Ninth, it is incumbent on the coroner to give
 10 reasons, especially if ordering disclosure against a PII
 11 claim.
 12 Sir, as that set of principles recognises,
 13 considerable weight has to be given to the Secretary of
 14 State's assessment of the harm which disclosure of
 15 a document or part of a document would cause to national
 16 security, both because she has access to expert advice
 17 about security matters and also because she is
 18 politically accountable for the protection of the public
 19 while the court is not.
 20 The authorities making those points are cited at
 21 paragraph 16 of our submissions.
 22 The Secretary of State can also properly point to
 23 various passages in the authorities saying that a real
 24 and significant risk of harm to national security will
 25 usually preclude disclosure, and they are set out in

1 paragraph 17 of our submissions.
 2 But there are two important countervailing
 3 considerations, at least, which we make at paragraph 18
 4 and which the families also properly make.
 5 First, upholding a PII claim involves a restriction
 6 on open justice in the coronial process. The open
 7 justice principle is one of constitutional importance.
 8 Second, the entire process depends on the court
 9 exercising rigorous independent judgment and not, in the
 10 evocative words of one judgment, saluting a ministerial
 11 flag. Sir, the submissions of Mr Pitchers QC, Mr Rule
 12 and Ms Nagesh for the Jones family make those points
 13 very compellingly at paragraphs 9 to 16.
 14 In striking the Wiley balance, a variety of factors
 15 may come into play. They include the weight and
 16 significance of the national security interest claimed,
 17 the degree of relevance to the inquiry of the
 18 information being withheld, and the consequence on the
 19 inquiry of upholding the certificate, and the extent to
 20 which evidence on the subject is already provided by way
 21 of gist and/or by disclosed material.
 22 Let me then turn to the application of the
 23 principles in this case. We set out the approach as we
 24 say it should be followed at paragraph 21 of our
 25 submissions.

1 Sir, let me now add three points, having regard to
 2 the submissions of others.
 3 First of all, the investigation in which MI5
 4 participated is a subject within the scope of these
 5 inquests which will be considering the management and
 6 monitoring of Khan and whether his attack could have
 7 been prevented. In theory it could have been prevented
 8 in one of two ways: if Usman Khan's preparations for the
 9 attack had somehow been identified in advance, or if
 10 further information had been gathered or a higher
 11 assessment of risk made which would have caused him to
 12 be prevented from going to the Learning Together event,
 13 or perhaps accompanied to that event.
 14 As we say at paragraph 22 of our submissions, this
 15 topic is a proper subject for inquiry. For instance,
 16 there had been prison intelligence from shortly before
 17 Khan's release in late 2018 that he intended to return
 18 to terrorism. MI5 acknowledged that there was a risk in
 19 this regard.
 20 Then shortly before the attack a joint operational
 21 team or JOT meeting of police and MI5 on 18 November
 22 noted that he had become withdrawn and might re-engage
 23 in extremist activity.
 24 The inquest can and should legitimately consider
 25 what information MI5 had at each stage of the history,

1 what assessments they made, what investigative measures
 2 they took, what were the results of their investigation
 3 and to what extent their information was provided to
 4 other agencies responsible for managing Khan.
 5 Secondly, however, a great deal of information about
 6 intelligence available to all state bodies will be in
 7 evidence in any event and in open. There has been
 8 a vast amount of disclosure of prison intelligence
 9 documents, probation records, West Midlands Police and
 10 Staffordshire Police intelligence reports, minutes of
 11 MAPPA meetings at which the decisions about Khan's
 12 management were made, reports of DDP mentors and so on.
 13 The court has statements from and will hear directly
 14 from officers of Staffordshire Police, both the Prevent
 15 officers managing Khan and the Special Branch officers
 16 dealing with intelligence and communicating with West
 17 Midlands Police CTU and MI5.
 18 The court will very shortly receive statements from
 19 officers of the West Midlands Police Team 7 who were the
 20 partners of MI5 in the joint investigation. Those have
 21 been prepared at our request. And contrary to the
 22 assumption made in one set of submissions, we have made
 23 clear that key officers from Team 7 will be called as
 24 live witnesses.
 25 There will be further disclosure of investigation

1 documents from Staffordshire Police, Special Branch and
 2 West Midlands Police CTU in the coming week or two, with
 3 only quite limited PII redactions at most.
 4 Sir, let me give a few examples to illustrate the
 5 significance of the huge amount of disclosure, and I'm
 6 going to use the first three issues of significance
 7 raised in Mr Armstrong's submissions at paragraph 6 for
 8 the Merritt family.
 9 Paragraph 6(a), Mr Armstrong points to prison
 10 intelligence which MI5 received shortly before Khan's
 11 release indicating that he continued to radicalise
 12 others and that he said he would return to his old ways
 13 believed to relate to terrorism. Mr Armstrong asks
 14 whether this information reached others. In fact, it is
 15 in the Mercury Intelligence review -- report
 16 {DC6503/2242} for your note. And it featured in the
 17 MAPPA minutes from 5 December 2018 {DC6409/6} as well as
 18 in Staffordshire Special Branch's profile of Usman Khan,
 19 {WS5059-2A/13}.
 20 Then at paragraph 6(b) of his submissions
 21 Mr Armstrong refers to the JOT meeting on
 22 18 November 2019, noting that it referred to concerns
 23 about Khan isolating and reacting badly to a visit from
 24 police officers. Sir, those were considerations noted
 25 in the minutes of the MAPPA meeting four days previously

1 which was attended by all the relevant agencies and the
 2 discussion of what concerns they raise is set out in
 3 great detail in those minutes {DC6417/5}. Police visit
 4 and Khan's apparent isolation were also the subject of
 5 detailed consideration in emails between the actual
 6 officers involved in dealing with him and their
 7 Special Branch colleagues which we have disclosed
 8 {WS5063/JS413}.
 9 Then at paragraph 6(c) Mr Armstrong refers to
 10 contact between Khan and other TACT offenders while in
 11 prison and asks whether information on this subject was
 12 communicated to Staffordshire Special Branch or in MAPPA
 13 meetings. In that regard we would point to the MAPPA F
 14 form for 5 August 2018 which refers to Khan being
 15 regarded as one of the main extremists on the wing,
 16 responsible for radicalising others, and having close
 17 associations with other TACT offenders who are named,
 18 including Brusthom Ziamani, who carried out a later
 19 attack in Whitemoor Prison. See for your note
 20 {DC6420/6}. Ms Bolton, the MPS offender supervisor for
 21 Khan, acknowledges this in her statement and deals with
 22 it.
 23 Sir, I should also note in passing that it is wrong
 24 to say, as suggested at one point in Mr Armstrong's
 25 submissions, paragraph 6(b)(vii) and 6(f)(ii), that the

1 subject of Khan's trip to London came to MI5 after the
 2 JOT meeting on 18 November. What Witness A says at
 3 paragraphs 135 to 136 of their statement is that the
 4 proposed trip was discussed in the meeting, that MI5 was
 5 told the exact date of the trip very shortly after, and
 6 that it was notified of the travel arrangements for the
 7 trip on 22 November.

8 The third general point we make is that the
 9 statement from Witness A is a very detailed document and
 10 in many respects more detailed than comparable MI5
 11 statements made in other cases. It identifies the key
 12 intelligence received at each stage and also the
 13 judgments made at the most significant meetings,
 14 including quarterly case review meetings. This
 15 information can be directly compared with what others
 16 received and the risk assessments of MI5 can be tested
 17 by reference to all the other information.

18 Sir, let me give a couple of examples, again by
 19 reference to Mr Armstrong's detailed submissions.

20 As he says at paragraph 6(e), MI5 considered that
 21 Khan might be acting in a compliant way in order to
 22 avoid scrutiny from the authorities. The statement of
 23 Witness A says when this judgment was made, see in
 24 particular paragraph 128. That concern, that Khan might
 25 be acting in a compliant way to avoid scrutiny, was,

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1 sir, a constant feature of concern in relation to Khan
 2 recorded in the documents. It had been raised in
 3 a MAPPA intelligence report in mid 2018 and was recorded
 4 in the MAPPA minutes, both of which have been disclosed.
 5 See {DC6406/6}. It was the risk under constant
 6 consideration by the MAPPA bodies thereafter.

7 Secondly, at paragraph 6(f) Mr Armstrong refers to
 8 the JOT meeting again on 18 November. That meeting is
 9 gisted in detail over two paragraphs of Witness A's
 10 statement, paragraphs 135 to 136.

11 Sir, I should also note that DS Stephenson of
 12 Staffordshire Special Branch, who attended the meeting
 13 and provided the intelligence update to MI5, will be
 14 giving evidence and deals with this in his statement
 15 {WS5072/12-13}. He was also present at the MAPPA
 16 meeting of 14 November 2019 and we have disclosed his
 17 emails with the Prevent Team evidencing his knowledge
 18 about the London visit.

19 Sir, we don't make any of those points to suggest
 20 that you should take a superficial approach to the PII
 21 process. Far from it. We urge you, sir, to take
 22 a rigorous approach, subjecting each damage argument to
 23 critical analysis and considering carefully the
 24 relevance of the documents. Without going into the
 25 detail of the closed submissions, you will be aware from

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1 our written closed submissions that we have taken
 2 a questioning and challenging approach to the claims.
 3 You will also be aware, sir, that as a result of the
 4 exchange of closed submissions, multiple documents, the
 5 Secretary of State has already abandoned and adjusted
 6 aspects of the PII claim. And that is how
 7 a constructive PII process ought to work.

8 JUDGE LUCRAFT: Just in relation to that exchange of
 9 submissions, those documents came to me yesterday,
 10 Mr Hough, and I have had a chance to see it. Again,
 11 just to make clear, it is clear to me from having read
 12 that document that clear thought has been given to the
 13 various points that were made in the submissions that
 14 you and Mr Moss made in respect of the first detailed
 15 submissions received on the closed side, and again, it's
 16 obvious to me that a lot of work has gone into a close
 17 consideration of those points that were made.

18 MR HOUGH: Sir, we understand, as professional advocates,
 19 that it must be frustrating for others to be told about
 20 the process but without being party to it. But
 21 unfortunately that is the nature of such things.

22 JUDGE LUCRAFT: Yes.

23 MR HOUGH: For the benefit of all listening to the hearing,
 24 before I move on to the other agenda items --

25 JUDGE LUCRAFT: We will have to keep our voices raised.

19

1 Point taken, thank you very much.

2 MR HOUGH: I should refer before leaving this topic, sir, to
 3 the types of damage that need to be considered in cases
 4 of this kind by reference to paragraph 24 of our open
 5 submissions.

6 First of all, the Security Service uses operational
 7 techniques which have to remain secret in their details,
 8 use, practicalities and limitations. If they became
 9 known, terrorists and criminals would be able to avoid
 10 them and the risk of future atrocities would increase.

11 Secondly, operations and subjects of interest can be
 12 linked. Disclosing information about other operations
 13 and individuals under investigation may make those
 14 investigations less effective. Again, that puts us all
 15 at greater risk.

16 Thirdly, it is well known that law enforcement
 17 agencies receive information from individuals. If
 18 material is disclosed which reveals a human source or
 19 which gives information from which a source can be
 20 suspected or known, that has at least three damaging
 21 effects: the individual may be at risk of harm or death,
 22 the intelligence may dry up, and others may be dissuaded
 23 from helping in future.

24 Fourthly, disclosure of information which reveals
 25 liaison and relationships with foreign sources can be

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1 expected to damage those relationships and so cut off
 2 future intelligence .
 3 I make those as general points without saying that
 4 any of them in particular applies here or to what
 5 extent.
 6 May I then turn to item 2, adequacy of
 7 investigation . That issue follows on from the first .
 8 If you uphold the PII claim to any extent, you will need
 9 to consider whether it is possible for you to conduct
 10 a satisfactory investigation through these inquests. In
 11 particular , you will need to consider whether you can
 12 properly discharge the responsibility to hold
 13 a sufficient inquiry to answer the statutory questions
 14 set out in Section 5 of the Coroners and Justice Act,
 15 including how each of the attack victims came to die.
 16 If not, the appropriate course would be to request
 17 the establishment of a public inquiry since such
 18 an inquiry can hear evidence in closed session and could
 19 therefore receive material which is the subject of the
 20 PII claim.
 21 At paragraph 20 of our submissions on page 9 we
 22 suggest that a request for an inquiry should be made
 23 where the investigation would be seriously incomplete or
 24 potentially misleading without the deployment of
 25 material covered by PII. Mr Armstrong's submissions

1 take issue with our use of the adjective "seriously" or
 2 the adverb "seriously" before "incomplete",
 3 paragraph 27(a). However, the point is that a coroner
 4 does not necessarily call for a public inquiry just
 5 because some relevant documents or some facts may be
 6 excluded. If that were the case, almost any inquest in
 7 which a PII claim was upheld could not proceed as an
 8 inquest.
 9 The starting point is that you have been appointed
 10 as coroner to conduct these inquests and you have
 11 statutory responsibilities to conduct the inquests. It
 12 is only if you conclude that those responsibilities
 13 cannot be satisfactorily discharged that you should ask
 14 for a different form of process to be put in place.
 15 That, sir , was the essential approach taken by both
 16 Sir Robert Owen in the Litvinenko case and Sir John
 17 Saunders in the Manchester Arena case. The
 18 justifications for their decisions can readily be seen.
 19 In the Litvinenko case, as it was put in the divisional
 20 court, without the PII material it was impossible to
 21 investigate whether the death was the result of an
 22 ordinary crime or the result of state sponsored
 23 terrorism.
 24 In the Manchester Arena case, Lord Anderson's public
 25 report stated that MI5 twice received intelligence which

1 could in retrospect be seen to be "highly relevant" to
 2 what was an organised and highly sophisticated attack.
 3 Paragraph 2.37 of his report.
 4 In his letter to the Home Secretary of
 5 27 September 2019, Sir John concluded that the PII
 6 material was centrally important and that the inquiry
 7 could not properly consider whether the attack might
 8 have been prevented without that material. He observed
 9 that no interested person in that case differed from
 10 that view.
 11 There have of course been other cases involving
 12 upheld PII claims which have proceeded as inquests, not
 13 only your own Westminster and London Bridge cases, but
 14 also the London bombings case and the Perepilichnyy
 15 case, not to mention numerous cases involving police and
 16 MOD PII claims.
 17 Plainly the judgment is fact sensitive and requires
 18 the coroner to consider the PII material carefully ,
 19 asking whether its absence prevents a legally sufficient
 20 inquiry.
 21 Sir , we agree with Mr Armstrong's submissions that
 22 in considering that question, you should not be swayed
 23 by the consideration that a family engaged in a public
 24 inquiry will be unlikely to receive MI5 material
 25 attracting PII in that inquiry.

1 We also agree that you should not be swayed by any
 2 perceived advantages of the inquest process or by the
 3 fact that calling a halt now would be disruptive and
 4 potentially distressing to many witnesses. In our case,
 5 however, it is our submission that a legally sufficient
 6 inquiry is possible even if the PII claims were upheld
 7 fully , and that you should proceed to discharge your
 8 statutory duties under the Coroners and Justice Act.
 9 We make five submissions in that regard, developing
 10 the point in paragraph 28 of our document. We shall of
 11 course expand on these in closed oral submissions since
 12 your judgment by definition needs to be made with
 13 reference to the closed materials.
 14 First , the relevance of material for which PII is
 15 claimed needs to be seen in context. Unlike the
 16 Litvinenko case and the Anthony Grainger case, the
 17 material does not relate to how the deaths occurred.
 18 How the attack was prepared for and carried out is
 19 apparent, and Witness A has made clear that MI5 has no
 20 information to add to this subject. Furthermore, the
 21 attack was one with the lowest level of sophistication ,
 22 requiring no network, no communications, and no
 23 logistics . There is no suggestion that the PII material
 24 may contain evidence of attack planning which was there
 25 to be seen.

1 Secondly, we point again to the vast amount of
 2 disclosure provided about the management and monitoring
 3 of Usman Khan, what was known to state agencies about
 4 him and the risk assessments formed. It is telling that
 5 the statement of Witness A reflects MI5 having a picture
 6 of intelligence which was consonant with that in the
 7 MAPPA minutes and in the prison intelligence, the key
 8 items of which fed into the MAPPA process. Of course,
 9 sir, if you were to conclude that the PII material
 10 includes further items of information which should
 11 significantly have influenced the consideration of the
 12 risk Khan posed, then that might alter your view. But,
 13 sir, that is not our assessment of the material.

14 Thirdly, we would make the related point that the
 15 inquest will receive a large amount of witness and
 16 documentary evidence of the decisions taken in the
 17 management of Usman Khan, including that critical
 18 decision permitting him to travel to London. That
 19 decision was primarily a matter for the MAPPA agencies,
 20 notably the probation officers and the Staffordshire
 21 Prevent Team officers, taking account of the
 22 intelligence which sped into the MAPPA process as
 23 recorded in the minutes.

24 Advocates can ask participants in those meetings
 25 what they knew of the visit and why they sanctioned it.

25

1 For instance, Mr Skelton, the probation officer,
 2 discusses how the visit was proposed and considered in
 3 MAPPA meetings and why it was agreed. For your note,
 4 that's {WS5057/27-28}. Sergeant Forsyth of the Prevent
 5 Team discusses why he approved the visit. That's
 6 {WS0256D/24}. DS Stephenson of Staffordshire
 7 Special Branch explains how he came to know of the event
 8 and describes communications with the West Midlands
 9 Police Team 7 officers about the details of the event,
 10 {WS5072/13} and all those three men will be witnesses in
 11 the inquest.

12 Fourthly, as we have already pointed out, the
 13 statement of Witness A provides an account of the key
 14 information received by MI5 and the risk assessments
 15 made. The witnesses may be questioned about the extent
 16 to which this information was shared with others, and
 17 whether any information from other bodies was not
 18 provided to MI5. And those questions may also be asked
 19 of Witness A.

20 Fifthly, consideration should be given to the nature
 21 of the attack here. Even now, after all the extensive
 22 post-attack investigations, there is no evidence that
 23 Khan did anything in a public place or in a place
 24 visible to the public which would have pointed to an
 25 intended attack. And there is no evidence that he

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1 shared his attack aspiration or plan with anyone in the
 2 11 months following his release. This is accordingly
 3 not a case where it can be said that further
 4 surveillance on Khan could realistically have identified
 5 actual attack preparations or even an imminent intention
 6 to commit an attack.

7 Sir, that's what I say about item 2.

8 May I now move to item 3, the anonymity and special
 9 measures application of Witness A, and that is the
 10 application by the Secretary of State on behalf of
 11 Witness A.

12 We summarise it at paragraphs 29 to 30 of our
 13 document and the orders sought you will recognise as
 14 materially the same as those made in the Westminster and
 15 London Bridge cases. They're also substantially the
 16 same as those made in the Manchester Arena Inquiry, with
 17 the important exception, that in that case the screening
 18 order permitted the witness to be seen by the chairman,
 19 counsel to the inquiry, and some advocates for family
 20 core participants.

21 Sir, we have set out the governing principles at
 22 paragraph 31 of our document. To summarise very
 23 briefly, in cases where a refusal of an order would
 24 expose the witness to a real and immediate risk of death
 25 or serious harm, the order should usually be made

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1 without hesitation to protect the Article 2 and
 2 Article 3 rights of the witness. Otherwise, the court
 3 seeks to strike a balance between the interests served
 4 by the application and countervailing interests. Weight
 5 is given to the important principle of open justice with
 6 due regard to the context. Article 8 rights of the
 7 witness are balanced against Article 10 rights of those
 8 reporting on the proceedings. Applying those
 9 principles, you have already granted some applications
 10 in this case and refused others.

11 Sir, no interested person actively resists the
 12 application for anonymity and screening from the general
 13 public, although the Merritt family rightly ask you to
 14 scrutinise it carefully.

15 In our submission, the application plainly justifies
 16 anonymity and screening from the general public on the
 17 basis of the common law balancing exercise. Therefore,
 18 you need not consider whether refusal of the orders
 19 would expose Witness A to a real and immediate risk of
 20 attack which is a judgment that may require
 21 consideration of closed material.

22 We make five short points. First, the witness at
 23 least has reasonable fears of reprisals if required to
 24 give evidence without anonymity and screening from the
 25 public.

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1 Second, refusal of the orders would on the evidence
2 compromise the witness's future career opportunities and
3 may deprive the UK intelligence community of a valuable
4 asset.

5 Third, refusal of the orders would on the evidence
6 seriously impact on the witness's private life by
7 effectively blowing their long-term professional cover.

8 Fourth, the witness's name is not relevant to the
9 evidence to be given.

10 And fifth, granting the orders would help the
11 witness to give best evidence.

12 We should also briefly address the suggestion that
13 the Security Service should have avoided the need for
14 this application by putting in the director general as
15 the witness because his identity is public. Sir, we
16 would not accept that suggestion just as Sir John
17 Saunders did not in the Manchester case.

18 As we submitted at the last hearing, the witness
19 needs to do a huge amount of preparatory work for just
20 this hearing, a matter of weeks, rather than days, and
21 it would not be feasible or good for any of us for
22 Mr McCallum to be taken away from his very busy day job
23 for the necessary period.

24 Sir, so much for the application in general terms.

25 The Merritt family take a more assertive position in

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1 relation to the screening of the witness. They submit
2 that they and their advocates should be permitted to see
3 the witness. They make the very valid points that first
4 of all they have a proper interest in seeing the
5 significant witness rather than merely hearing the
6 witness's disembodied voice, and secondly that
7 questioning by advocates can benefit from the ability of
8 the advocate to pick up non-verbal cues and reactions.
9 We all understand that as professional advocates, and it
10 is a point specifically identified within Rule 18.

11 They also submit that the risk of any of them both
12 seeing the witness outside court and either deliberately
13 or inadvertently revealing the witness's identity to
14 others is a non-existent risk.

15 Sir, those are cogent arguments. We would
16 ultimately on balance favour the application for the
17 following two main reasons.

18 First, unlike in the Manchester Inquiry, this case
19 will be heard by a jury. The jury should not be
20 permitted to see the witness because they cannot
21 realistically be vetted or vouched for. That does not
22 happen with English juries.

23 The risk of a chance encounter outside court with
24 a juror is a real risk. A chance encounter of that
25 kind, not with a juror, happened in the London bombings

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1 cases.

2 If the jury as tribunal of fact cannot see the
3 witness, and it is of course for them to assess
4 witnesses, it is difficult to see any justification for
5 others doing so. Furthermore, it would be exceedingly
6 difficult to find and configure a courtroom in such
7 a way that a witness could be seen only by a few
8 selected advocates and not by the jury.

9 Secondly, quite apart from any logistical
10 challenges, permitting a witness to be seen by the
11 families and their advocates raises some problems of
12 principle. It creates a hierarchy of interested person
13 advocates with some given more direct access to the
14 witness. It would also raise the unwelcome general
15 prospect of the Security Service having to check out
16 family members in cases of this kind.

17 It may also be that Mr Sheldon with instructions
18 from his client will have further points to make on that
19 subject.

20 Sir, let me then turn to item 4, Security Service
21 witnesses.

22 At the last hearing you considered applications by
23 the families that you seek statements from MI5 officers
24 involved in the investigation into Usman Khan. You
25 decided that the question could only properly be

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1 resolved after the PII claim had been considered. The
2 question whether there is a call for these further
3 statements is one of the judgments you as coroner
4 perform in making enquiries and selecting witnesses.
5 See paragraph 35 of our submissions on that sort of
6 judgment.

7 In our submission, if you uphold the PII claim
8 largely or entirely, it would not be appropriate to call
9 further MI5 witnesses. We would give three reasons in
10 these open submissions as set out at paragraph 36 of our
11 document.

12 First of all, Witness A --

13 JUDGE LUCRAFT: Can I just repeat my request. Anyone not
14 speaking is on mute, please.

15 MR HOUGH: First of all, Witness A's statement gives an
16 account of the history of MI5's investigations into
17 Usman Khan and his knowledge of him. It addresses the
18 intelligence received, assessments made and attempts to
19 obtain coverage. In addition, as I've already
20 submitted, the court will have the evidence of the
21 counter-terrorism police officers involved in the
22 investigations, including officers from Staffordshire
23 Special Branch and West Midlands Police.

24 If you uphold the PII claim, by definition you will
25 have decided that it is not possible for MI5 to give

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1 further substantial information about its investigation
 2 than is in the Witness A statement without harming
 3 weighty national security interests .
 4 Secondly, if the PII claim is upheld on that basis,
 5 there would be serious problems both of principle and of
 6 practicality in individual officers being asked to give
 7 evidence about the investigation. Questions about the
 8 individual judgments and decisions of officers would
 9 inevitably call for them to go into facts or operational
 10 techniques that could not be disclosed.
 11 Suppose, for example, that an officer is asked the
 12 set of questions which the Merritt family pose at
 13 paragraph 6(h) of their detailed submissions: were the
 14 surveillance capabilities that were used the best ones
 15 and was any of them used — not used to its full effect?
 16 Those are questions, sir , guaranteed to get into
 17 a discussion of secret techniques. How could an officer
 18 answer without referring to the full menu of other
 19 options?
 20 Thirdly, there are good reasons why the
 21 Security Service has put forward the statement of
 22 a senior officer in this and similar cases. If an MI5
 23 witness is to give meaningful evidence about
 24 an investigation without revealing any sensitive
 25 information or techniques, or any fact which might allow

1 a hostile actor to divine sensitive information or
 2 techniques, the witness needs to engage in prolonged and
 3 extensive preparation. They need to be intimately
 4 familiar with every detail of the investigation and any
 5 related investigations and subjects, a process which
 6 takes even an experienced officer out of their regular
 7 job for weeks on end.
 8 Sir, in the closed session you will be able to form
 9 your own view of how feasible it would be for a number
 10 of individual officers to engage in this task as well as
 11 Witness A. Sir, you may also hear about what has
 12 actually happened in the Manchester case if — in case
 13 there are any submissions made in open or closed to the
 14 effect that that represents a model, given that some
 15 individual officers will be giving evidence or have
 16 given evidence there.
 17 Sir, let me then turn to item 5, screened witnesses
 18 and the press, which we deal with from page 20 of our
 19 submissions. I can take this item quite quickly because
 20 it has become uncontroversial.
 21 In your directions of last June, last October and
 22 this February, you've made various sets of orders for
 23 witnesses to be granted anonymity and screened from the
 24 general public if they are called to give evidence.
 25 On the last occasion a media representative raised

1 the suggestion that accredited journalists might be
 2 permitted to see these witnesses. In our submissions we
 3 argued that this suggestion was in keeping with open
 4 justice and that there was a lot to be said for it. We
 5 cited a recent decision of the Court of Appeal.
 6 The representatives of the police officers granted
 7 anonymity have considered the matter and they are
 8 content for the officers to be seen by accredited
 9 journalists , provided that your orders under Section 11
 10 of the Contempt of Court Act, which prohibit information
 11 liable to identify them, extend to names, physical
 12 descriptions and images.
 13 Sir, we agree that the Section 11 orders do have
 14 that effect and that any order permitting journalists to
 15 see the witnesses can make that point explicit. We are
 16 sure that the experienced journalists reporting on this
 17 case will understand them and abide by them.
 18 In our submission, there is no basis for any other
 19 screened witness to be treated differently , save for
 20 Witness A.
 21 As regards members of Usman Khan's family, sir, we
 22 are not persuaded that permitting them to be seen in the
 23 witness box by accredited journalists would cause them
 24 legitimate concern. Concerns have been raised to avoid
 25 them being approached by journalists but we say, sir ,

1 that those concerns could be met by providing them with
 2 secure and escorted means of entry and exit to and from
 3 the court.
 4 Sir, finally , item 6, remaining case management
 5 issues . Let me deal with the remaining case management
 6 issues by answering the submissions of each interested
 7 person who has raised some.
 8 First of all , the submission of — the submissions
 9 of the team of Mr Pitchers QC for the Jones family.
 10 Having considered the submissions about the value of
 11 calling PC Parke in relation to the care provided to
 12 Saskia, we are prepared to add that officer to the
 13 witness timetable.
 14 As regards witnesses from the Fishmongers' Company,
 15 we are not at present persuaded that it is necessary to
 16 call Ms Spolton, the grants officer , who had the
 17 discussions with Learning Together about arranging the
 18 alumni event on 29 November. What the Fishmongers'
 19 Company was or was not told about the event is
 20 documented in an extensive set of emails and the person
 21 best placed to address what the company would have done
 22 with further information is Commodore Williamson.
 23 As regards Philip Bromley, who was Khan's offender
 24 manager up to 2017, and Mr Skelton's manager at a later
 25 stage, we're not persuaded by the arguments for calling

1 him because he was not directly involved with Khan over
 2 the most relevant period and there are many more
 3 directly involved witnesses who attended the MAPPAs
 4 meetings which are of course minuted.
 5 As regards further witnesses from the University of
 6 Cambridge, we've requested statements from both the
 7 individuals who Mr Pitchers identifies and we have
 8 chased twice in the last week.
 9 As to the Operation Aragon report of the IOPC, we
 10 have been chasing for that. We have been told that it's
 11 recently been completed and will be provided to us very
 12 shortly for onward disclosure.
 13 As regards the Staffordshire Special Branch
 14 officers, some statements have already been disclosed.
 15 Others are going through the review pipeline and are to
 16 be disclosed in the very near future.
 17 As regards West Midlands Police subject profiles,
 18 one has been disclosed and another is going through the
 19 review process to be disclosed very shortly.
 20 As regards MAPPAs agendas, they are with us for
 21 review and again will be disclosed very shortly.
 22 As regards drug testing, we can confirm that we have
 23 no further material as far as we are aware.
 24 As for the exhibits to Mr Woods' statement, we
 25 understand that they are not on the system because they

1 are physical exhibits, for example the constituents of
 2 the hoax IED.
 3 As regards paragraph 36, the reference to a report
 4 from Annie, we can resolve the mystery by explaining
 5 that Annie is a nickname for Ian Oakley, if anyone
 6 remembers the 19th century gunslinger Annie Oakley.
 7 Annie get your report. And the report which has been
 8 mentioned is at {DC5256}.
 9 As to paragraph 37, we'll make enquiries of the
 10 Fishmongers' Company about the report described as the
 11 Wallace Report. We think it might be the document at
 12 {DC5064}.
 13 We then turn to the submissions of Mr Armstrong's
 14 team for the Merritt family.
 15 As to paragraph 40(a) concerning West Midlands
 16 Police Team 7 officers, we agree. Some weeks ago we
 17 asked for statements from the key Team 7 officers,
 18 including DS Jerromes, and those officers are to be
 19 called. We understand that the statements are in
 20 production and will be with our team shortly.
 21 As to paragraph 48(b), we are not at present
 22 persuaded that Dr Bennett should be called. There will
 23 be a number of witnesses already dealing with the
 24 development of the Learning Together programme,
 25 including its founders, and also the Prison Service's

1 dealings with this programme.
 2 As to paragraph 48(c), the case management system
 3 log, I understand that solicitors to the inquest have
 4 dealt with that request directly and that it is
 5 a problem of nomenclature.
 6 As to paragraph 48(d), the JOT minutes, those have
 7 been gisted in Witness A's statement and they are within
 8 the PII claim.
 9 As to paragraph 48(e), Mr Armstrong and his team
 10 make a good point about the process for passing Khan to
 11 participate in the Learning Together programme in 2017.
 12 We have made a series of requests over several weeks for
 13 further information from the Prison Service about what
 14 process was followed for clearing offenders for further
 15 education courses and how that process was followed in
 16 the case of Khan. We understand that a further
 17 statement is being taken from Gina Butler on that
 18 subject.
 19 As to paragraph 48(f), Khan's illegal drugs, so far
 20 as we're aware there are no records dealing with how
 21 Usman Khan obtained drugs which he had apparently taken.
 22 As to paragraph 48(g), we do not propose, subject to
 23 submissions from anyone else, that the families of the
 24 victims of the attack be interested persons in the
 25 inquest of the attacker.

1 Thirdly, and finally, the submissions of Mrs Begum,
 2 mother of Usman Khan. As to paragraph 8(a), we note
 3 that Mrs Begum is currently in Pakistan and might not be
 4 able to give evidence because of her location. We shall
 5 of course keep the question of calling her under review
 6 and stay in touch with her representatives.
 7 As to paragraphs 9(f) — 9 and following, we
 8 understand that Mr Bunting makes a good point that it
 9 would be better if the police training officers confined
 10 their evidence to the training given to officers as to
 11 how they should respond to particular situations, and
 12 that they should not deal directly with whether the
 13 officers involved in the confrontation acted in
 14 accordance with their training. We consider that is
 15 a matter more properly for the jury.
 16 However, we stress that there is nothing wrong in
 17 our view with the training officers being asked how
 18 firearms officers are trained to respond to particular
 19 sets of circumstances, for example the presence of an
 20 apparent suicide vest on a suspect in a city centre.
 21 Sir, I appreciate I have taken some time, but I have
 22 covered, I hope, all the agenda items.
 23 JUDGE LUCRAFT: It's very helpful also, Mr Hough, I suspect,
 24 for others that you've responded to what is set out in
 25 some of the written submissions. So you've dealt with

1 particular issues in relation to case management, for
2 example, and the issues over witnesses which I suspect
3 is very helpful indeed.

4 The one other matter which is resolved since the
5 last hearing was obviously the location of the inquest.

6 MR HOUGH: Yes.

7 JUDGE LUCRAFT: I should simply put on record my formal
8 thanks for the Guildhall being made available for us to
9 be able to conduct these inquests if I accede or don't
10 accede to the various matters which are set out in the
11 submissions. But obviously that gives us a location
12 which is close to the Old Bailey and it gives us
13 a location of good size for us to be able to accommodate
14 these hearings.

15 MR HOUGH: Thank you very much, sir. I'll now yield the
16 floor to others.

17 JUDGE LUCRAFT: What I'm going to do, Mr Hough, is I'm going
18 to go through the list of people who I think want to be
19 heard in relation to oral submissions. I'm going to
20 start first of all with Mr Pitchers.

21 MR PITCHERS: Sir, yes. Can I first check you can hear me
22 adequately at this point?

23 JUDGE LUCRAFT: I can hear you loud and clear, Mr Pitchers.

24 Submissions by MR PITCHERS

25 MR PITCHERS: Thank you, sir. As you would expect, we adopt

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1 our written submissions of 22 March 2021. The bulk of
2 my oral submissions will address the claims for public
3 interest immunity and the requests that remain for
4 operational witnesses from MI5.

5 It's fair to say, at least in our submission at
6 least, there's a significant overlap between those
7 matters and I propose to deal with them both first
8 before picking up the sequence of the other agenda
9 items.

10 So, sir, I'll start with Security Services and MI5.
11 I should say at the outset that we're pleased to hear
12 that there is a prospect of further operational
13 statements being provided from the West Midlands Police.
14 Obviously you have claims to PII from both them and the
15 Secretary of State, and much of my submissions certainly
16 as to principle apply equally to those two interested
17 parties.

18 I say the starting point is this, and has been
19 fairly acknowledged by Mr Hough this morning, that as
20 already determined, the scope of these inquests is to
21 include but not be limited to three areas of particular
22 pertinence for today.

23 Firstly, the management of Khan after his release
24 from prison by probation officers and others. Secondly,
25 any monitoring of him by the police and/or the

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1 Security Services. And thirdly, arrangements for him to
2 attend the event. And in relation to all three of
3 those, of course, you've determined that the scope
4 should include relevant systems and procedures.

5 So as we understand it, all of the material that you
6 will be asked to consider in relation to PII, the
7 witnesses that we suggest in relation to operational
8 matters, all of that comes squarely within the scope of
9 the inquests. We say not just within the scope, but
10 central to it.

11 The importance of the Security Services' involvement
12 in the scope of the inquest can be stated in quite
13 simple terms. Of course Usman Khan was not an unknown
14 entity before these events. He was a convicted
15 terrorist, released under stringent conditions less than
16 a year before the attack, and at the time of the attack
17 he was subject to 16 licence conditions and remained at
18 the highest level of MAPPA arrangements.

19 As a result of these, he was of course required to
20 be subjected to close supervision by a number of state
21 agencies with input from the police, Security Services
22 and probation. It should also be borne in mind that his
23 attendance at the Learning Together event wasn't
24 unexpected. He had been invited to attend, he required
25 permission to attend, and such permission was granted.

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1 On the basis of what we have seen thus far, having
2 given permission for him to attend, there seems to have
3 been no real arrangements for him to be accompanied on
4 the day of the event, nor were there any particular
5 notifications given to others who might have had a real
6 interest in his attendance such as the Fishmongers'
7 Company, the Metropolitan Police or the City of London
8 Police.

9 So we have an authorised attendance and we would say
10 at least, on the face of the evidence that has been
11 provided, a lack of any precautionary measures
12 surrounding his attendance. We say those matters are
13 very much at the heart of the inquests.

14 Ultimately, whoever had the particular
15 decision-making responsibilities, the power of veto, if
16 you like, in that regard, it must be, we say, unarguable
17 that were there to have been input from
18 Security Services, from MI5, expressing concerns about
19 what was proposed, that would or certainly should have
20 been given serious weight by the decision-makers.

21 Of course, we are all too aware of what happened
22 after Khan was permitted to attend without those
23 precautions having been taken. He was able to prepare
24 for this attack, assembling the fake suicide vest at
25 home, travelling to London wearing a large coat,

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1 carrying a bag, and taking those items along with two
2 large knives into Fishmongers' Hall, unchallenged. And
3 he arrived there several hours before the attack.

4 We say that if one looks at that in the round, there
5 are highly important questions to be asked of the state
6 agencies involved in his supervision and management,
7 which includes MI5, and these questions can be probably
8 fairly distilled into the following.

9 The first question, and it's simple to express but
10 it's clearly going to take up a lot of time at the
11 inquest, is: why was he permitted to attend at all? And
12 the second question is: if he was permitted to attend,
13 why were there no protective measures taken? Whether
14 that might include visits in the days leading up to the
15 event, escorting him on the day, ensuring that he was
16 subject to some sort of check, his person and his
17 belongings before entering the hall, or as I have said,
18 notifying others who may well have had a legitimate
19 interest to know that he was coming.

20 As has been outlined to you by Mr Hough, we know and
21 we do give credit to what the witness statement from
22 Witness A does tell us. It has given us some useful
23 background information to help us understand their
24 knowledge of Khan prior to the attack, and as you've
25 heard, information had been obtained prior to his

1 release from prison that he may have had an intention to
2 carry out an attack after his release. We know that he
3 was subject to heightened surveillance, a formal risk
4 assessment, quarterly reviews, and we know, as you've
5 heard, that in October 2019 — we don't have a precise
6 date, I don't think — that MI5 became aware of the plan
7 for Khan to attend the Learning Together event.

8 Of course we had the joint operational team meeting,
9 the JOT meeting, just 11 days before the attack.

10 We would say we don't have a complete understanding
11 as to all of the rationale for the decision-making
12 around him attending, but what we do know is that at
13 that meeting, shortly before his attendance, it was
14 noted that he'd been attending the gym less frequently,
15 he'd stopped attending the mosque, he was noted to have
16 significantly withdrawn since moving into his new flat,
17 and at that meeting risks were identified that he might
18 engage in further Islamist extremist activity and might
19 attempt to travel to Pakistan.

20 It would seem that there were some discussions about
21 enhancing the level of coverage, including for the
22 proposed trip to London, but for reasons which certainly
23 aren't yet clear to us on reading the documents that
24 have been provided, such enhanced coverage wasn't
25 possible.

1 Then a week before the attack the Security Services
2 became aware of his travel arrangements, and again, on
3 the evidence available, nothing to indicate that that
4 prompted any further considerations as to whether any
5 further steps should have been taken.

6 Sir, the family of Saskia Jones don't accept that
7 Witness A's statement, whilst acknowledging its use, is
8 sufficient, and we don't accept that the — particularly
9 looking at paragraphs 133 to 137 give a sufficient gist
10 on some important questions.

11 It doesn't enable us to consider whether and to what
12 extent the risks associated with him attending were
13 considered. It doesn't enable us to make proper
14 conclusions about the decision-making process or
15 inter-agency communication. And from our perspective,
16 as we consider this from a PII angle, these aren't
17 questions about the methods of gaining intelligence. We
18 are not looking to have detail about surveillance
19 techniques.

20 The thrust of our submissions, and we've tried to be
21 realistic and pragmatic within the limitations of a PII
22 claim, is to be focused and specific, and the things
23 that we are most concerned with, we say, should not
24 trespass upon national security interests if national
25 security interests are properly defined.

1 I have indicated that we say there's an
2 interrelationship between the PII claims and decisions
3 about further operational witnesses from MI5. At the
4 last hearing you heard submissions about that and you
5 heard the family's submission that it would be
6 preferable to obtain those witness statements before you
7 determined PII to give you the context to look at the
8 documents that you've been provided.

9 That's part of the argument here. The other part is
10 this. We resist a submission that the resolution of the
11 PII claims will be dispositive of the question of
12 whether or not further operational witnesses should
13 provide statements. We say it doesn't follow, and it's
14 quite possible that you may accede to some of the PII
15 claims yet further require there to be operational
16 witnesses from MI5.

17 Just turning to some specific submissions on the
18 claims to PII, I'm not going to go into the weeds of the
19 legal principles here to any significant extent. Just
20 to flag up and emphasise the following.

21 Obviously, the material that you've been provided
22 has already been assessed as relevant. So the material
23 that you're invited to withhold from public scrutiny is
24 evidence which is relevant to the inquest and within the
25 scope.

1 Whilst we acknowledge that you must give due weight
2 to the views of the Secretary of State, as has been said
3 and recited by you in relation to the London Bridge
4 inquests and already referenced earlier, you must
5 exercise independent judgment and not simply salute
6 a ministerial flag.

7 We say that the presumption must be for onward
8 disclosure, unless you're satisfied that that is not
9 possible without a significant risk to national
10 security, and of course it would seem that
11 considerations as to redactions are already in hand.

12 So, as I say, in relation to the claims to PII,
13 I hope you will consider that our position is not to try
14 and trespass on to issues of national security, but
15 rather to focus upon what was done with the information
16 that was available. What was the decision—making
17 process? Why were steps not taken? Why were
18 communications not better between the agencies?

19 We say that there's no public interest in concealing
20 failings on the part of the Security Services. Quite
21 the contrary. Shining a light on those matters actually
22 should increase the chances of avoiding future mistakes.

23 Sir, moving on to the question of operational
24 witnesses, so these are witnesses from MI5 beyond the
25 statement we have from Witness A, as we've acknowledged,

1 there is a value to a corporate witness statement, but
2 we say it is not nearly sufficient for the purposes of
3 these inquests.

4 To state perhaps the obvious, Witness A was not
5 present at the time or involved in any of the key events
6 about which the interested parties will want to ask
7 questions.

8 Now, of course, he or she may be able to refer to
9 documents, but the documents are unlikely to provide
10 complete answers to proper questions. Now, we haven't
11 seen all of the documents of course, but unless there's
12 a transcript of a meeting, it won't be a complete
13 account. The subjectivity of minutes of meetings is
14 perhaps obvious to anyone who has attended a meeting.

15 What Witness A cannot do, we say, is to answer
16 properly the whys. For example, why were there not
17 concerns expressed about Khan attending at all? Why was
18 it not suggested that permission be refused to him to
19 attend? Why were no other notifications given?

20 These are the questions that Witness A cannot
21 adequately answer, and we fear that the jury, as well as
22 the interested parties, will be bemused that the central
23 questions are not being answered by operational officers
24 and decision-makers, perhaps particularly when other
25 state agencies are not afforded the same luxury of

1 simply providing a corporate witness.

2 And as we know, there was quite a long list of
3 police officers and probation officers who will be
4 attending in person and will have difficult questions to
5 answer about their direct experiences and their own
6 actions and inactions and we say that there's no reason,
7 once you've dealt with PII, to afford any special
8 measures to MI5 operational witnesses save for the
9 following, which is of course we know, as it's already
10 in play in this case, that there are special measures
11 that can be deployed so as to protect those officers,
12 and those may relate to anonymity, special measures when
13 giving evidence, advanced notification of topics for
14 questioning.

15 So these are measures that we've deliberately tried
16 to take a neutral, as far as possible, stand on those
17 points, because we're more concerned with hearing from
18 the proper range of witnesses than trespassing upon
19 issues of confidentiality. We would rather provide
20 those protections but be able to ask the right
21 witnesses.

22 We say that the officers involved, we suspect, are
23 not naive, unsophisticated witnesses, and that they
24 ought to be well able to acknowledge the proper
25 boundaries of their evidence and not inadvertently

1 reveal or stray into areas of national security.

2 Of course, the Secretary of State will be
3 represented no doubt by leading counsel who will, I'm
4 sure, object to questions which are inappropriate or
5 realistically risk inappropriate answers being provided.

6 So we say there's lots of protections in place that
7 should be reassuring to those officers of MI5.

8 Moving on to the question of a public inquiry, the
9 family of Saskia at this point do not argue for a public
10 inquiry. Our position is not to support that
11 suggestion, but nor actively to oppose it.

12 I acknowledge that the test does not give you a broad
13 discretion. This issue would only arise if you were
14 satisfied based upon what you have seen, but we have
15 not, that you were unable to carry out a legally
16 sufficient inquiry.

17 From our perspective, until we know the results of
18 your decisions as to PII and to further witnesses, the
19 family cannot take an informed view as to whether or not
20 we would suggest a public inquiry is required, but we
21 are not advancing that suggestion at this point.

22 In relation to anonymity and special measures for
23 Witness A, as I say, we have taken a relatively neutral
24 position. Others have set out the applicable legal test
25 and the need for rigour in relation to policing these

1 measures.
 2 We do share the concerns expressed by the Merritt
 3 family about Witness A not being visible to Saskia's
 4 family or her legal teams. As you heard, any advocate
 5 will be conscious of the impairment that can arise by
 6 not having that visual ability to take visible cues or
 7 visible responses from a witness, as well as of course
 8 the family not being able to see the person giving
 9 evidence. So we would invite you, sir, to look with
 10 scrutiny about the suggestion of screening and to
 11 consider, if possible, allowing Saskia's family and her
 12 legal teams to have sight of any witnesses such as
 13 Witness A from the Security Services.

14 But as I say, our primary concern is to hear from
 15 more witnesses of MI5, not fewer.

16 We raise a very practical point about the
 17 restriction on the use of electronic devices. Just to
 18 set out our understanding, which is that's a restriction
 19 that's aimed at preventing audio or video recording
 20 which of course we wouldn't oppose. My instructing
 21 solicitors were just conscious that they wouldn't be
 22 prevented from tapping a note on to their laptops during
 23 the course of the evidence.

24 Moving on to other case management matters, and
 25 firstly witnesses. We're pleased to hear that PC Parke

1 will now be added. We continue our position in relation
 2 to Fishmongers' Company. We say that there's a very
 3 real concern for the family and we think also for the
 4 jury as to what were the arrangements made by Learning
 5 Together, Fishmongers' Company, in the run-up to this
 6 event. What information was exchanged? What
 7 information was sought? If information wasn't sought,
 8 why wasn't it? What sort of planning went in
 9 specifically to the security surrounding this event?
 10 Even if that is to say there wasn't any planning, that
 11 is evidence that should come from the person who was
 12 involved in those arrangements.

13 We can see that Commodore Williamson in a sense
 14 provides again a corporate position, but he can't answer
 15 directly because he wasn't directly involved in those
 16 matters. We say it's entirely proportionate for there
 17 to be at least one witness from Fishmongers' Company who
 18 can speak to those matters, even if there is evidence of
 19 it already set out in emails.

20 We maintain our request for Philip Bromley to
 21 provide evidence at the inquests. It's right that he
 22 ceased to be Khan's offender manager in 2017, but he
 23 continued to be involved as the line manager of
 24 Kenneth Skelton. So he was a senior probation officer,
 25 Kenneth Skelton's line manager.

1 So he was clearly directly in that sense involved in
 2 the Probation Service management of Khan during 2019.
 3 From reviewing his statement, it's clear that he was
 4 involved in the downgrading of the assessment of Khan's
 5 risk of harm on 14 May 2019. He seems to have attended
 6 the MAPPAs meetings, he was aware of Khan's planned
 7 attendance at the Learning Together event, and clearly,
 8 as the line manager, he had the opportunity to express
 9 concerns or to intervene if there were difficulty
 10 identified in the way that Khan was being managed.

11 Again, and I don't want to pre-empt the questions,
 12 but clearly there's a possibility that deficiencies in
 13 Mr Skelton's experience or training may arise or
 14 deficiencies in relation to the way that he was managed
 15 and supervised. And a more senior probation officer,
 16 the line manager of Kenneth Skelton, can properly
 17 address those issues.

18 So there's one other matter on witnesses I think
 19 that's outstanding. It's not actually something that we
 20 raise. We picked up a suggestion that Vincent Cirimele
 21 should have his evidence read. He's a toxicologist.
 22 I think it's the Metropolitan Police Service have
 23 suggested that his evidence should be read.

24 We have a reservation about that which is we would
 25 like to have the opportunity ask live questions of him

1 in relation to the extent to which he can assist with
 2 when Khan last consumed illegal drugs prior to the key
 3 events, and perhaps also as to the potential impact upon
 4 him of that ingestion. So we would resist
 5 Vincent Cirimele becoming a witness whose statement was
 6 simply read.

7 In relation to documents, we're grateful for the
 8 resolution of the Annie mystery. The only other point
 9 I would make, having heard from Mr Hough, is I'm not
 10 sure -- I may have missed it -- if he dealt with
 11 paragraph 33(d) of our written submissions which related
 12 to the Prison and Probation Service offender supervisor
 13 contact logs. So our request in that respect remains.

14 Sir, unless I can assist you any further, those are
 15 my oral submissions to amplify what we've set out in
 16 writing.

17 JUDGE LUCRAFT: Mr Pitchers, thank you very much.

18 Can I just make one thing clear, I hope to Saskia's
 19 family through you, and obviously what I say applies
 20 equally to Jack's family.

21 Although you will not be present for the closed
 22 hearing, can I simply give you this assurance. The
 23 points made very clearly in the written submissions that
 24 I've got and amplified today in your oral submissions
 25 will be very much at the forefront of my mind in the

1 course of the closed hearing, and I will take those
 2 matters into account in my determinations of the issues
 3 that surrounding the public interest immunity concerns
 4 that are present.
 5 MR PITCHERS: Thank you, sir.
 6 JUDGE LUCRAFT: Just on that final point, Mr Pitchers, in
 7 relation to paragraph 33(d), I'm sure that it -- I'm
 8 just going to suggest that rather than take the normal
 9 course, I was just going to ask Mr Hough to deal with
 10 that simply because it may make more sense if it's dealt
 11 with now rather than at the end.
 12 MR HOUGH: Yes, sir. We received an update from the
 13 government legal department on 22 March telling us that
 14 Suzanne Nidai, Kay Linsley and Christine Andrew do not
 15 have additional records and that they are waiting to
 16 hear from the other offender supervisors to see if they
 17 have further logs.
 18 JUDGE LUCRAFT: Thank you very much.
 19 Can I next turn I think it's to Mr Nicholls, rather
 20 than Mr Armstrong, who is going to make any oral
 21 submissions on behalf of Jack Merritt's family.
 22 Mr Nicholls, can I again just say what I have just
 23 said to Mr Pitchers applies equally to Jack's family.
 24 Can I also make clear that the very detailed written
 25 submissions that I've got dated 22 March which run to

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1 some 35 pages, I've got that material very clearly in my
 2 mind.
 3 Mr Nicholls, what I would suggest you do is to
 4 simply amplify any particular points that you feel need
 5 amplification but don't feel, please, that you need to
 6 go through that material. I have certainly got it very
 7 much in my mind having had the opportunity to read those
 8 detailed submissions.
 9 MR NICHOLLS: Thank you. Can I check first that you can see
 10 and hear me?
 11 JUDGE LUCRAFT: I can certainly hear you. I can't see you
 12 at the moment. But I can now.
 13 Submissions by MR NICHOLLS
 14 MR NICHOLLS: I'm very grateful. Can I start by thanking
 15 you, sir, in relation to both the indication you've
 16 given in relation to the closed process and also in
 17 relation to the written submissions. I was intending to
 18 make those points at the start and I'm very grateful for
 19 the indications you have given.
 20 I'm intending to take our oral submissions in the
 21 order that CTI have taken matters. It was my intention,
 22 sir, not to repeat the written submissions but rather to
 23 seek to distill those submissions as you have suggested,
 24 particularly in light of Mr Hough's submissions, and in
 25 doing that I will also seek to reply to points raised by

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1 Mr Hough orally.
 2 JUDGE LUCRAFT: Thank you.
 3 MR NICHOLLS: The first topic is the PII applications. And
 4 in headline terms, the family's position on those
 5 applications is that the evidence over which PII is
 6 claimed appears to be to them of central relevance to
 7 one of if not the central issues in these inquests. And
 8 that is a matter of the greatest importance to them and
 9 we submit the wider public.
 10 The second point on the family's position on PII is
 11 that because of the relevance and importance of the
 12 evidence over which PII is claimed, and I'll expand on
 13 this a little in these oral submissions, Jack's family
 14 respectfully invite you, sir, to adopt the most careful
 15 and exacting approach to the substance of the PII
 16 applications and as I say, they are grateful for the
 17 indication you have given in that regard.
 18 If I can briefly develop those two headline points
 19 in turn. First, the centrality of the evidence over
 20 which PII is claimed. I do not intend, sir, to go
 21 through the detail of paragraphs 5 and 6 of the written
 22 submissions which I know you have before you. The
 23 thrust of the family's submission is that the open
 24 evidence that they have considered gives rise to
 25 a concern, indeed a significant concern, that

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1 opportunities were missed to prevent the attack. In
 2 short that is because the open evidence reveals the
 3 following points.
 4 First, that there were serious concerns about Khan's
 5 risk prior to his release given his previous
 6 convictions, the long held concerns that MI5 held about
 7 him, and the fact that he had been assessed at or near
 8 the very highest level of risk right up to his release
 9 from prison.
 10 Second, MI5 and CTP continued to have concerns about
 11 him following his release. He was subject to active
 12 monitoring and MI5 were concerned that his apparent
 13 compliance may have been an attempt to evade scrutiny
 14 from the authorities. Similar concerns were expressed
 15 about him by the Prison Service.
 16 Third, concerns developed about Khan's risk very
 17 shortly prior to the attack. There were growing
 18 concerns that he was isolating, a key risk factor in his
 19 case, on or around 6 November. A MAPPA visit took place
 20 on 14 November, Khan reacted very badly to that, and on
 21 18 November the JOT meeting identified Khan as being
 22 increasingly withdrawn and at risk of re-engaging in
 23 extremist activity.
 24 Those were concerns that fell squarely within the
 25 warning signs identified by the latest risk assessment

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1 conducted on him.
 2 In addition, MI5 and CTP were aware that he was
 3 intending to travel to Learning Together, a sizeable
 4 event at a central London landmark attended by high
 5 profile guests. No steps appear to have been taken to
 6 review or prevent that attendance or to raise concerns
 7 with those responsible for the event.
 8 In our submission that position revealed by the open
 9 evidence begs a number of key questions which are
 10 central to these inquests, and those are set out at
 11 paragraph 6 of the written submissions. As I say,
 12 I will not repeat them.
 13 Mr Hough has very helpfully drawn your attention to
 14 some of the specific points made in our paragraph 6.
 15 Can I respond on a number of specific points but without
 16 going into great detail in a way that I hope will
 17 indicate the family's overarching position in light of
 18 what Mr Hough has said.
 19 First, Mr Hough referred to paragraph 6(b) and the
 20 stated concerns over Khan's isolation. Mr Hough draw
 21 attention to the fact that those concerns were raised in
 22 the 14 November MAPPA minutes and were also covered in
 23 emails of officers that dealt with Khan at the time.
 24 In our submission, sir, that is not the issue that
 25 we raise. The issue we raise is what was discussed

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1 about this concern and its risk at the JOT meeting on
 2 18 November, how that concern informed an assessment by
 3 MI5 and CTP of Khan's risk and what options were
 4 considered as a result.
 5 The fact that a MAPPA review before the JOT
 6 considered the same risk factor does not in our
 7 submission answer the point, and neither does
 8 Witness A's statement. That is clear from
 9 paragraphs 133 to 135 where a bare and short description
 10 of the JOT meeting is set out. The reason for that, the
 11 clear inference arises, is because of the PII claim.
 12 Second, Mr Hough referred to our paragraph 6(e). He
 13 points to the fact that Witness A's statement says when
 14 MI5 judged that Khan may have been manipulating, and
 15 that that was a concern that others also held, including
 16 those involved in the MAPPA process.
 17 Again, in our submission that does not answer the
 18 point we make at paragraph 6(e). The point we make is
 19 not whether others considered the issue. The question
 20 is what MI5 knew, what they shared, the basis for their
 21 concern and why they had the concerns that they did
 22 about manipulation and indeed how strong those concerns
 23 were. Witness A's statement does not answer those
 24 questions. Again, the clear inference is that that is
 25 because of the PII claim.

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1 In our submission, it is telling that in referring
 2 to paragraph 6(e) of our submissions Mr Hough drew
 3 attention to the fact that Witness A says when MI5 made
 4 their judgment on this point, but nothing more.
 5 Third, Mr Hough referred to our paragraph 6(f)
 6 concerning the meeting of the JOT on 18 November 2019.
 7 In our submission this was clearly a key moment given
 8 the issues discussed and the proximity to the attack.
 9 Mr Hough understandably emphasises what is available
 10 about the JOT meeting on 18 November. But as we can see
 11 from Witness A's statement, that reveals the limits of
 12 that submission. The summary is three short paragraphs.
 13 The JOT minutes have been withheld on PII grounds. The
 14 content of the discussion is highly limited, for example
 15 we do not know what was said about logistics and
 16 accompaniment issues, and so is the detail on what was
 17 decided.
 18 Again, the reason for those limits clearly appears
 19 to be PII, as Witness A says at paragraph 133 in
 20 referring to national security concerns.
 21 In light of those submissions, and others that
 22 I won't develop in detail, it remains the family's
 23 position that the questions identified at paragraph 6 of
 24 their written submissions are the questions that must be
 25 asked, investigated and answered in order to address the

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1 concerns that arise from the open evidence. But they
 2 are not addressed and answered by the open evidence, and
 3 that is because of the PII claim.
 4 It follows that if the PII claims are upheld in full
 5 or in large part, and these submissions proceed on that
 6 basis, as do Mr Hough's, the inquests will not ask and
 7 answer those central questions raised by the open
 8 evidence. That, sir, is the context which Jack's family
 9 invite you to have firmly in mind when considering the
 10 PII claims and the consequences of how they are
 11 determined.
 12 That brings me on to the second of the two headline
 13 points on PII, namely the approach to the PII balancing
 14 exercise, and I will be shorter on this point than the
 15 first.
 16 The family's submissions on approach are set out in
 17 detail at paragraphs 8 to 22 of the written submissions.
 18 Those submissions can be summarised in a single central
 19 proposition that is this. There is a compelling public
 20 interest in full disclosure of the relevant evidence
 21 over which PII is being claimed. CTI make the same
 22 point. In our submission the basis and strength of that
 23 public interest is perhaps broader than the way in which
 24 CTI have put it. In the family's submissions, it is
 25 underpinned by the following factors.

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1 First, the evidence is central to the family's
 2 understanding of how Jack died.
 3 Second, such an understanding is necessary to allow
 4 the family to gain any form of meaningful catharsis from
 5 the inquest process.
 6 Third, full disclosure is necessary to ensure
 7 accountability, the allaying of concern and lesson
 8 learning. Those functions are vital to Jack's family
 9 and the wider public.
 10 Fourth, because the public interest in disclosure,
 11 full investigation and public recording of the facts
 12 concerning specifically MI5 and CTP is very
 13 considerable, that is for the reasons at paragraphs 16
 14 and 17 of the written submissions which I don't repeat.
 15 Fifth, because without full disclosure the inquests
 16 cannot ask and determine the central questions that the
 17 open evidence, as they see it, raises.
 18 The effect of that compelling public interest in
 19 full disclosure is, we submit, twofold when it comes to
 20 considering the substance of the PII claims.
 21 First, it is relevant to the first and fourth
 22 questions identified in Mohamed. The family submit that
 23 for the reasons I have summarised, sir, there is a very
 24 considerable public interest in disclosure. Where the
 25 public interest balance lies is of course a matter for

1 you, sir, and not one that the family can address in any
 2 detail.
 3 Second, as a result, the public interest in full
 4 disclosure supports the approach to PII which the family
 5 have invited you to adopt.
 6 And having made those submissions on PII, and the
 7 approach to the process, can I turn to the second topic,
 8 which is adequacy, dealt with by Mr Hough in his oral
 9 submissions as well as in writing.
 10 The family's submissions are at 23 to 28. They
 11 proceed on the same basis as CTI's, that the PII claims
 12 are upheld in whole or largely, and that contrary to the
 13 family's position, no evidence is sought from any MI5 or
 14 CTP witness of fact, and I will proceed on that basis.
 15 In those circumstances, the family's position is
 16 that they are unable to see how the inquest can comply
 17 with the statutory duty of inquiry, and I wish to make
 18 clear, sir, on their behalf that they do not say that
 19 lightly. They understand the implications of that
 20 submission which will of course impact them as well as
 21 others, but having considered the matter carefully,
 22 including the position adopted by CTI, they remain
 23 unable to see how the duty of inquiry can be met, and
 24 that is for the following reasons.
 25 First, preventability is one of if not the central

1 issue in these inquests. A full investigation of it is
 2 required to answer the "how" question in Section 5.1(b).
 3 Second, when determining whether the inquests will
 4 be adequate, the family invite you, sir, to adopt the
 5 approach they have set out at paragraph 27 of their
 6 written submissions.
 7 In summary, the question is whether the inquests
 8 will be insufficient, incomplete or inadequate with no
 9 gloss applied. The question should not be considered on
 10 the basis that it is preferable or strongly preferable
 11 that the investigation remains within the coronial
 12 jurisdiction. Where relevant material is withheld from
 13 an inquest on PII grounds, there may be a number of
 14 reasons why the investigations, findings and public
 15 utility of a public inquiry into that death may be
 16 fuller and greater than if the matter were to remain as
 17 an inquest.
 18 Adequacy should be assessed without reference to
 19 practicalities, and Mr Hough has made that point.
 20 CTI have suggested a number of reasons why in their
 21 submission these inquests will comply with the statutory
 22 duty of inquiry where the relevant material is withheld
 23 on PII grounds. And we have of course considered those
 24 submissions in writing and orally made by Mr Hough with
 25 great care. Having done so, the family's submission is

1 that those reasons do not demonstrate that the inquests
 2 will meet the duty of inquiry.
 3 They say that for the following reasons, sir.
 4 First, Mr Hough made the point that a coroner does
 5 not call for a public inquiry in any case where some PII
 6 material is withheld because were that the case, in any
 7 inquest involving PII material, there would be a public
 8 inquiry. We agree. That is not our submission.
 9 Our submission is not that in any inquest where
 10 material is withheld on PII grounds there must be
 11 a public inquiry. Our submission is that in this case,
 12 from the open evidence and what it omits, a public
 13 inquiry is required.
 14 Second, CTI suggests that the material for which —
 15 I'm quoting from paragraph 28(a) of the written
 16 submissions, which I understand to have been adopted
 17 orally — CTI say that the material for which PII is
 18 claimed does not relate to the questions of how the
 19 attack was perpetrated or how the deceased came by their
 20 death.
 21 That is not accepted by the family. First,
 22 an investigation of how you an attack was perpetrated
 23 requires careful examination of whether it could and
 24 should have been prevented.
 25 Second, failing to prevent an attack that causes

1 death does in the family's submission "relate to the
 2 question of how the deceased came by their death". It
 3 is central to that question.
 4 Third, in response to the CTI's submissions on
 5 adequacy, CTI's submissions, we suggest, are in essence
 6 premised on the suggestion that the investigation of the
 7 immediate means of death is more important in
 8 discharging Section 5.1 than the investigation of
 9 preventability. The family do not agree. There is no
 10 hierarchy of importance or relevance within Section 5.1.
 11 The question is whether it will be discharged.
 12 Fourth, CTI submits that there has been a vast
 13 amount of disclosure concerning Khan's background and
 14 what was known to a range of public bodies. That is
 15 necessary for Section 5.1 to be fulfilled, but not
 16 sufficient because that evidence does not illuminate the
 17 key issue of MI5 and CTP's role in preventability for
 18 the reasons we have already addressed. Indeed, it may
 19 distract from it because the greater intensity of review
 20 applied in open to the actions of, for example, the
 21 Probation Service, may suggest greater culpability when
 22 that is not in fact the case.
 23 Fifth, CTI submit that the inquests will receive
 24 considerable witness and documentary evidence of the
 25 decisions taken in the management of Khan. Again, we

1 submit that that is necessary but not sufficient.
 2 Again, it will not illuminate the issue of MI5 and CTP's
 3 role. To the extent that it does, it will only do so to
 4 the extent of the limits of what is held on PII grounds.
 5 Sixth, CTI submit that the key decision-makers will
 6 be giving evidence and can be questioned, but in our
 7 submission that is not the case. Some key
 8 decision-makers will be giving evidence, other key
 9 decision-makers with relevant evidence to give will not
 10 because of the position adopted on PII and in relation
 11 to witnesses of fact.
 12 Seventh, CTI submit that the inquests will be
 13 adequate because they will receive evidence from MI5 and
 14 CTP about their knowledge of Khan. In our submission
 15 that reasoning is circular. The inquests will receive
 16 some evidence about that but indeed that is the very
 17 evidence that raises significant concerns that are
 18 central to the preventability issue, and that evidence
 19 does not answer those concerns.
 20 Eighth, CTI suggests that when assessing the
 21 sufficiency question, you should bear in mind that it is
 22 understood that Khan acted alone, did not share his
 23 plans with anyone, and the evidence of his movements
 24 gives no suggestion he did anything in public suggestive
 25 of attack preparation.

1 In our submission, sir, that suggestion should be
 2 approached with significant caution when determining the
 3 question of adequacy.
 4 First, because it relies on other reviews which have
 5 variously not involved the gathering of full evidence,
 6 have involved no questioning of witness, certainly not
 7 in public, and have involved no participation by the
 8 family.
 9 Second, relying on previous reviews prior to the
 10 inquests to determine the inquests' adequacy would risk
 11 usurping the very investigative function that Section 5
 12 requires. Put simply, the question of preventability is
 13 the very issue that the rule requires investigation.
 14 Third, it would in the family's submission be
 15 concerning if the inquests were deemed adequate without
 16 investigating the withheld material because of reliance
 17 on reviews and untested evidence from the very
 18 organisations under investigation and who are asserting
 19 PII.
 20 Fourth, in our submission, CTI's approach appears to
 21 adopt an overly narrow approach to preventability
 22 because it suggests that Khan's attack could only have
 23 been prevented had others known that the attack was to
 24 take place or seen attack preparation. In our
 25 submission, preventability should not be approached in

1 that way. For example, Khan's attack may have been
 2 prevented had he been subjected to a more exacting risk
 3 assessment informed by relevant information shared
 4 between agencies. Had that taken place, he may have
 5 been prevented from attending the event altogether.
 6 Sir, finally, before concluding on the issue of
 7 adequacy, the family suggest that the submissions I have
 8 made on that point lend powerful support for three
 9 consequences.
 10 First, a change in position to provide meaningful
 11 further disclosure on the role of MI5 and CTP.
 12 Second, adoption of the family's position on
 13 Security Service witnesses of fact.
 14 Third, if it is determined that due to PII no
 15 further disclosure can be made and no evidence from MI5
 16 witnesses of fact will be sought, the family, sir,
 17 invite you to request the establishment of an inquiry
 18 under the Act. I make clear, sir, on their behalf that
 19 they do so solely to ensure that the investigation of
 20 Jack's death is complete, meets the concerns that they
 21 consider the open evidence reveals, and allows the
 22 fullest findings and learning to take place.
 23 They do not seek to cause difficulties, but they
 24 consider that that is what is required. They do it with
 25 their eyes open to the practical consequences, but it is

1 critical in their view, and they have no doubt that it
2 is what Jack would have wanted. For them this needs to
3 be got right and that requires this submission.

4 Having made those submissions, sir, on PII and
5 adequacy, can I now turn to deal with the application in
6 relation to Witness A.

7 On anonymity, I don't intend to add anything on the
8 written submissions we have made, paragraphs 30 to 32.

9 I would like to address you if I may, including in
10 light of Mr Hough's submissions orally today, on the
11 issue of screening.

12 The strong view of Jack's family is that Witness A
13 should be seen by them and their legal team and
14 certainly that he should be seen — that she should be
15 seen by the family's advocate when giving evidence, and
16 that is for the reasons set out in detail at 35 to 42 of
17 the written submissions.

18 Distilling those points, first, screening is not
19 required to give effect to anonymity. It may be
20 justified but that will require cogent evidence because
21 screening separate from anonymity interferes with the
22 default presumption in favour of open justice.

23 Second, the default position is that which Mr Hough
24 has identified, that witnesses should give evidence in
25 public, including visible to the bereaved family. The

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1 open justice principle, as the Supreme Court recognised
2 recently in *Kuja*, has only increased in an age which
3 attaches growing importance to the public accountability
4 of public officers and institutions. That is the case
5 here.

6 Third, the circumstances of these deaths are of
7 considerable public interest and concern. The case of
8 *Dyer* that Mr Hough has referred to and which we have
9 drawn your attention to in our written submissions
10 identifies that as relevant when determining a screening
11 application.

12 In this case the central aspect of the concern
13 raised by the deaths is whether MI5 failed to prevent
14 the attack. MI5 are therefore one of the main bodies
15 subject to investigation. It is proposed by MI5 that
16 Witness A will give the entirety of the MI5 evidence.
17 That is the position that CTI also adopt. If the
18 Secretary of State's PII claim is upheld, Witness A's
19 evidence will not contain relevant content on grounds of
20 national security, and Witness A is likely to be giving
21 evidence anonymously.

22 No other witnesses in the inquests will be screened
23 from the family and their lawyers. In those
24 circumstances, screening Witness A, a central witness,
25 giving the only evidence from one of the state

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1 organisations that is key to these inquests, from the
2 family and their lawyers, will, we submit, lend
3 a further air of secrecy and special treatment to their
4 evidence. That may not be the intention. The concern
5 is that will be the perception and that that will reduce
6 the ability of the inquests to allay the concerns of
7 both the family and the public.

8 The fourth reason why the family consider that they
9 should be entitled to see Witness A when she gives
10 evidence. It is important to Jack's family that they do
11 so for a number of reasons. Her evidence is of
12 considerable importance to them. It will be more
13 detached and less intelligible if given as a disembodied
14 voice. That was a matter relied on by Lady Justice
15 Hallett in the 7/7 ruling. Of course such rulings, as
16 Mr Hough has indicated, have gone in different
17 directions and carry only a degree of weight. We accept
18 that.

19 Witness A's evidence is central to an understanding
20 of how Jack died. It is contentious and we anticipate
21 will be subject to some challenge. In those
22 circumstances it is important to the family to see
23 Witness A when she answers so they can assess her
24 response, including hesitation or equivocation.

25 In *Dyer*, it was indicated that allowing a family to

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1 see a witness will enhance the accountability function
2 of the inquests. We rely on that proposition.

3 In *Dyer*, it was also indicated that seeing a witness
4 can assist the family in seeking catharsis and
5 resolution from the process. Again, we consider that
6 that will be undermined if Witness A's evidence is
7 merely a disembodied voice.

8 Fifth, the risk of Witness A being identified
9 publicly and becoming known to a hostile actor as an
10 officer of MI5 is, we say, remote and does not justify
11 screening from the family. It also does not justify
12 screening from counsel for the family. We say the risk
13 is remote for the following reasons.

14 Jack's family do not object to Witness A being
15 screened from the public or other IPs who have no need
16 to see Witness A. That will significantly limit the
17 number of people who do see Witness A. The family are
18 subject to strict undertakings. If necessary, further
19 undertakings could be put in place.

20 In our submission the same could be applied to
21 jurors.

22 Importantly, the risk that is relied on by CTI is
23 premised on a scenario that in our submission is highly
24 unlikely to materialise. What is described in CTI's
25 submission as a chance encounter involves the following

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1 taking place. If the families, their lawyers and/or the
 2 jurors are allowed to see Witness A, it is suggested
 3 that the following may occur. They may by chance
 4 encounter Witness A in public at some future point.
 5 Despite knowing the importance of not doing so,
 6 including because of undertakings that they will not do
 7 so, they may then say publicly something to the effect
 8 of "You work for MI5". That may occur in the presence
 9 of a hostile actor. Such a hostile actor may then
 10 successfully capture an image of Witness A. That image
 11 is then uploaded to the internet and/or circulated to
 12 others, and as a result, Witness A is identified to
 13 hostile actors as an officer of MI5 and put at risk.

14 That is a risk that was dismissed as a justification
 15 for screening by Hallett, Lady Justice Hallett in the
 16 7/7 inquests, it was rejected as a basis for screening
 17 of anonymous police witnesses in the Grainger Inquiry by
 18 the current Chief Coroner, and it was rejected as
 19 a basis for screening from counsel for the families in
 20 the Manchester Inquiry.

21 It of course was accepted, as Mr Hough indicates, as
 22 a basis for screening in Manchester from the families
 23 but that was because two particular factors applied: the
 24 engagement of Article 2 and the large number of family
 25 core participants who would need to see the MI5

1 witnesses.

2 Those issues do not arise here. And, sir, just to
 3 be clear. When I say the engagement of Article 2, I'm
 4 referring to the Article 2 engagement of the corporate
 5 witness's rights in the ruling given by Sir John
 6 Saunders.

7 It was suggested finally on this point of risk by
 8 Mr Hough that the risk he relies on in fact materialised
 9 following Lady Justice Hallett's ruling in the 7/7
 10 inquests in relation to MI5's corporate witness. In our
 11 submission that proposition should be treated with some
 12 caution.

13 Having considered your earlier ruling, sir, in the
 14 2017 attack inquests, including the Westminster Bridge
 15 Inquest ruling, it appears where you quoted, sir, from
 16 the open assessment given by MI5 about what had happened
 17 in the 7/7 case that what in fact had happened was that
 18 Witness G, the corporate witness, was subsequently
 19 recognised by an IP whilst travelling on public
 20 transport, but was not identified publicly, and
 21 certainly not with the effect that a hostile actor was
 22 and did identify Witness G's image and the fact that he
 23 was an MI5 officer.

24 In our submission, that demonstrates the minimal
 25 prospect of the risk materialising here, particularly

1 where the number of people involved are significantly
 2 lower than in 7/7 and where the very experience of 7/7
 3 provides a cautionary tale.

4 Sixth, as to why the family suggest they should be
 5 entitled to see Witness A, and certainly that their
 6 advocate should do so, there is meaningful value to the
 7 inquest process and to the family in allowing that to
 8 occur. First, because it brings forensic benefits.
 9 These are set out in some detail at paragraphs 50 to 52
 10 and in particular paragraph 52 of Sir John Saunders'
 11 ruling in the Manchester case, where that was the issue
 12 that he ruled in favour of.

13 Second, Sir John Saunders in that ruling identified
 14 that allowing counsel for the family to see such
 15 a witness will provide some reassurance to the family.
 16 And in the same ruling, Sir John Saunders identified
 17 that allowing counsel for the family, in that case four
 18 leading counsel, gave rise to what he described as
 19 a non-existent risk of identification of the relevant
 20 witness, in that case Witness J.

21 All of the reasons given by Sir John Saunders in
 22 that ruling, we submit, apply here. In addition, there
 23 are only two briefed families in this case, so only two
 24 advocates who could see Witness A. The risk therefore
 25 is even lower than in the Manchester Inquiry.

1 A number of points, sir, have been made by the
 2 Secretary of State and CTI as to why it is said that
 3 screening Witness A from the family and their lawyers is
 4 justified. Can I respond to those briefly in turn.

5 First, it is said that Witness A should be screened
 6 because her credibility is not in issue. In our
 7 submission, that misunderstands the nature of
 8 Witness A's evidence which is central and contentious,
 9 its importance to the family, the perception of evasion
 10 that is created by seeking screening from a family who
 11 present no threat to the witness but merely wish to ask
 12 questions and understand the answers, and because of the
 13 various reasons which I have sought to summarise earlier
 14 in these submissions that are unconnected with
 15 credibility as to why a bereaved family may wish to see
 16 a witness giving evidence.

17 Second, in their written submissions CTI identify at
 18 paragraphs 32(a) to (c) a number of reasons why in their
 19 submission adverse consequences would result from
 20 Witness A being identified. Sir, we accept that you may
 21 consider that those matters justify an order for
 22 anonymity, but in our submission none of those factors
 23 justifies an order for screening from the family and
 24 their lawyers. That is because for those factors to
 25 justify a screening order, it would need to be shown

1 that without being screened Witness A would be
 2 identified .
 3 The evidence provided by the Secretary of State in
 4 our submission from what we have seen of the open
 5 evidence does not support that conclusion and nor does
 6 the possibility of a chance encounter for the reasons
 7 I have set out.
 8 Third, CTI suggests that screening Witness A would
 9 help Witness A to give best evidence because she would
 10 not be concerned about the consequences that would
 11 attend "giving evidence in her own name". Jack's family
 12 can well understand that submission in respect to
 13 screening from the public, but if it is said to apply to
 14 screening from the family, then they disagree. First,
 15 that written submission from CTI appears to contain an
 16 oversight. It appears to suggest that screening would
 17 remove Witness A's fear of giving evidence in her own
 18 name, but of course screening has nothing to do with
 19 whether Witness A gives evidence in her own name. That
 20 is a matter for anonymity and the two applications are
 21 different .
 22 In addition, to the extent that it is suggested that
 23 Witness A would be assisted to give best evidence
 24 screened from the family, in our submission there is no
 25 open evidence from Witness A or in the open threat

1 assessment that demonstrates either a subjective fear to
 2 that extent or an objective basis for such a fear. And
 3 we say that is unsurprising because there is no
 4 suggestion that Jack's family present any risk to
 5 Witness A and the possibility of a chance encounter is
 6 remote.
 7 The fourth point. CTI — and these points were
 8 amplified by Mr Hough in his oral submissions — suggest
 9 that screening from the family is justified because
 10 Witness A will be giving evidence before a jury.
 11 In our submission that does not justify screening
 12 from the family. First, because Witness A could be seen
 13 by the jury. There is no reason why jurors would have
 14 to be security cleared to see an anonymous witness and
 15 if it were required, in our submission that could be
 16 done.
 17 The jurors could of course be reminded of the need
 18 to avoid any contact with Witness A and what they should
 19 do if they happen to see her in public. Sir, I know you
 20 will be well familiar with the law in the criminal
 21 context that proceeds on the basis that jurors will
 22 follow assiduously the directions they are given which
 23 has been stated repeatedly in the case law, a recent
 24 example being the case of Sarker [2018] 1 WLR 6023,
 25 paragraph 32.

1 Sir, contrary to that, if you were to consider that
 2 the jury should not see Witness A, CTI's submission is
 3 that in those circumstances it is difficult to see
 4 a justification for advocates seeing Witness A. We
 5 disagree. There are strong reasons why those seeking to
 6 question the witness and gain a combination of
 7 understanding and catharsis from the process should see
 8 such a witness.
 9 Finally, CTI suggests that the layout of the
 10 courtroom and the presence of jurors, advocates and
 11 witnesses gives rise to practical concerns that it would
 12 be very difficult for Witness A to be screened from
 13 everyone in court but not from a few selected lawyers.
 14 In our submission that does not justify screening from
 15 the family and their lawyers. It is of course a matter
 16 that would have to be dealt with, but in our submission
 17 it is a matter of practicality for which a practical
 18 solution should be found.
 19 We note in this respect that in the decision of the
 20 divisional court in a screening case involving an
 21 inquest, Hicks v Inner North London Senior Coroner
 22 [2016] EWHC 1726 (Admin), both Mr Justice Irwin as he
 23 then was and Lord Justice Gross emphasised the
 24 importance of finding practical solutions using the
 25 court estate to allow tailored screening arrangements to

1 be put in place, and I refer there, sir, to
 2 paragraphs 41 to 42 and 46.
 3 Two final points arising from Mr Hough's oral
 4 submissions. In oral submissions Mr Hough suggested
 5 that if the family and their teams see Witness A and
 6 other IPs do not, that would create a hierarchy and that
 7 that justifies screening from the family. In our
 8 submission we do not consider that if a hierarchy were
 9 required, that it would be so objectionable as to
 10 justify screening.
 11 If it is necessary to limit the IPs who see
 12 Witness A, that simply reflects the difference of
 13 interests that different IPs have. Indeed, that is
 14 implicit from the ruling of Sir John Saunders in the
 15 Manchester Inquiry, and it was not seen as objectionable
 16 or a course that meant that approach should not be
 17 taken.
 18 Sixth and finally, Mr Hough in oral submissions
 19 suggested that allowing the families to see Witness A
 20 would require vetting and checks and might result in
 21 undesirable consequences. In our submission, if that
 22 needed to be done, that could of course be considered.
 23 One must treat that submission in our view with care and
 24 caution given that if it is adopted, it will result in
 25 the other objectionable course which is that a matter of

1 great importance to them, seeing the witness giving
 2 evidence, will not occur.
 3 Sir, can I turn briefly to the fourth topic, the
 4 need for Security Service witnesses of fact. The
 5 written submissions are detailed at paragraphs 44 to 45.
 6 In summary, they can be distilled to five propositions
 7 and they are short.
 8 First, preventability is a central issue in these
 9 inquests. There is a compelling public interest in this
 10 full investigation.
 11 Second, the relevant questions that need to be asked
 12 in order for that issue to be investigated concern
 13 individual officers' understanding at particular moments
 14 in time and how that impacted on the decisions that they
 15 made. That cannot be done in our submission through
 16 questions about — to Witness A because they do not
 17 concern her individual understanding and decisions
 18 because she was not involved, and they cannot be done by
 19 considering what MI5's corporate understanding was
 20 because MI5 as an entity did not have a particular
 21 understanding and then make particular decisions. Its
 22 officers did, individually or with a few other officers,
 23 as part of a team.
 24 Third proposition. The relevant questions need to
 25 be asked of those who are best placed to answer them in

1 order to secure best evidence. Those are the people who
 2 were present and/or responsible for particular decisions
 3 or actions. That is not Witness A.
 4 Fourth, for that reason Witness A is not the witness
 5 able to provide best evidence. If she is asked why was
 6 that decision taken or what were you thinking when you
 7 did that, what was your understanding of X or if you had
 8 known Y would you have done something differently,
 9 Witness A's answers will necessarily involve speculation
 10 and assumption, potentially quite considerable
 11 speculation and assumption.
 12 Fifth proposition. If all MI5's evidence is given
 13 by a corporate witness, that is likely to give rise to
 14 difficulties during the inquests. They are summarised
 15 at paragraphs 44(f) of the written submission
 16 and I won't repeat them.
 17 In summary, we suggest that that approach will
 18 undermine the effectiveness of both the evidence and the
 19 conclusions that the inquests can reach, and that that
 20 should be avoided.
 21 In our submission, what should follow from those
 22 propositions is the normal course that is routinely
 23 followed in inquests, namely evidence should be sought
 24 from the relevant witnesses of fact. It can be
 25 assessed, and a determination can then be reached on

1 which witnesses to call.
 2 The Secretary of State and MI5 invite you, sir, to
 3 adopt a different approach and to divert from the normal
 4 course. In our submission there are not proper reasons
 5 to do that. That is for the following reasons in
 6 summary.
 7 First, MI5 witnesses of fact have no special status
 8 which means they should not give evidence. Publicly on
 9 their own website, MI5 make clear that "MI5 officers
 10 have been witnesses for the prosecution in a number of
 11 high profile criminal trials" and they also indicate
 12 that MI5 officers have given evidence in many SIAC and
 13 TPIM cases. Of course those are not enquiries. But the
 14 point is this. CTI state in their written submissions
 15 that there would be "serious objections of principle and
 16 practice to calling individual officers", yet in certain
 17 contexts MI5 officers do give such evidence. Indeed,
 18 the same section of MI5's public facing website says the
 19 evidence given by MI5 witnesses remains subject to
 20 cross-examination by the defence in the normal way even
 21 where the judge makes an order for the witness's
 22 screening and anonymity.
 23 Of course, the context is different, but in our
 24 submission the approach that arises is the same. In
 25 those circumstances, in our submission, it's not clear

1 why there is said to be such a serious objection of
 2 principle to MI5 witnesses of fact giving evidence and
 3 being questioned.
 4 Secondly, as Mr Pitchers has said, the involvement
 5 of MI5 witnesses may give rise to particular issues to
 6 ensure that the evidence can be given, for example
 7 anonymity and screening, but those measures can be put
 8 in place if justified. They are not a reason for not
 9 obtaining the evidence in the first place.
 10 Third, both the Secretary of State and CTI submit
 11 that MI5 witnesses of fact may be unable to walk the
 12 line between open and closed evidence and that that
 13 means they cannot be called and therefore no useful
 14 purpose will be served in obtaining evidence from them.
 15 Jack's family do not accept that submission for the
 16 reasons set out in detail in the written submissions.
 17 I won't go through those in any detail.
 18 Fourth, proportionality concerns are raised. It is
 19 suggested that to give evidence without harming national
 20 security interests each MI5 witness of fact would need
 21 to develop a comprehensive understanding of the totality
 22 of the evidence about MI5's involvement with Khan.
 23 In our submission, that overstates the position, is
 24 inconsistent with the approach taken to all other
 25 witnesses from organisational IPs, and does not justify

1 declining to seek the evidence.
 2 The witnesses will be asked to focus on matters with
 3 which they have direct involvement, questions outside
 4 that could be prevented, they could decline to answer
 5 questions and seek clarification, and the other measures
 6 Mr Pitchers identified would also remain in place.
 7 Fifth, the Secretary of State submits that
 8 a corporate witness will in fact give better evidence
 9 than MI5 witnesses of fact. The family do not agree
 10 with that submission.
 11 First, the Secretary of State suggests that because
 12 a number of MI5 officers considered Khan in a number of
 13 contexts, such matters are better covered by a corporate
 14 witness. In our submission that does not follow. Just
 15 because a number of individuals have relevant evidence
 16 to give is not a reason to call none of them. It may be
 17 a reason to call some but not all of them.
 18 Second, the Secretary of State suggests that
 19 evidence solely from Witness A is appropriate because
 20 MI5's assessments were based on intelligence built up
 21 over time which involved large numbers of people. In
 22 our submission that is no different to a range of other
 23 organisational IPs who are providing individual
 24 witnesses of fact.
 25 Third, the Secretary of State suggests that evidence

1 from Witness A is appropriate because relevant decisions
 2 were not made by individual MI5 officers in each case.
 3 But if one looks at the open statement from Witness A,
 4 it appears clear that those decisions did involve
 5 individual officers and even the number of officers.
 6 Sixth and finally, sir, the Secretary of State
 7 submits that there would in fact be no point in seeking
 8 further evidence from witnesses of fact because if PII
 9 is upheld, they could not add further relevant evidence.
 10 In our submission, that reasoning is flawed. If PII
 11 is upheld, MI5 witnesses of fact can give evidence
 12 within the limits of the PII ruling. That is what
 13 Witness A has done but she cannot give the relevant
 14 evidence because she had no involvement. Witnesses of
 15 fact should be asked to do that. If the evidence they
 16 then provide is relevant, but is covered by PII,
 17 following the ruling, open aspects can be disclosed and
 18 if that evidence is relevant but cannot be disclosed on
 19 PII grounds, that, we submit, is of direct relevance to
 20 the adequacy question.
 21 Indeed, we note in that respect, sir, that in London
 22 Bridge in your PII ruling in the final paragraph you
 23 indicated that you would of course keep the issue of
 24 adequacy under review. And that point that I have just
 25 made goes to that issue.

1 Ultimately, sir, it seems that the underpinning
 2 objection to obtaining evidence from MI5 witnesses of
 3 fact is that there is no point in doing so because of
 4 the limits imposed by PII. But in our submission that
 5 takes things back to front. If in the normal way, for
 6 the reasons we have submitted, factual evidence should
 7 be sought, and we submit it should, the question is then
 8 how that can be achieved given the effect of the PII
 9 ruling. The answer is to look to the mechanisms within
 10 an inquest, gisting, summaries, anonymity, screening.
 11 If those mechanisms are not sufficient for the relevant
 12 evidence to be admitted, then the inquiry route is the
 13 alternative route that provides a solution.
 14 The answer is not simply to decline to seek the
 15 evidence altogether in order to remain an inquest, in
 16 our submission.
 17 So I'm coming on to my final topic. We have nothing
 18 to say on topic 5, screening of witnesses and accredited
 19 press, and only one short matter to raise with you in
 20 relation to the remaining case management matter, and
 21 that concerns the evidence of Dr Jamie Bennett. Sir,
 22 I appreciate you may not be fully familiar with the
 23 details of his evidence, but can I raise some brief
 24 points about that in light of what Mr Hough has said in
 25 his oral submissions.

1 He said today that the inquest team are not yet
 2 persuaded that Dr Bennett should be included. We would
 3 seek to persuade you, sir, that he is more important and
 4 more distinct from, for example, Governor Styles than
 5 may first appear. He is a very senior witness, now the
 6 head of operational security at the MOJ, previously
 7 deputy director for security at the Prison and Probation
 8 Service. He had or should have the clearest
 9 understandings of the dangers that someone like Khan
 10 represented. He was also a prison governor, including
 11 of a category A prison.
 12 He knew and, as we understand it, championed the
 13 Learning Together programme as governor of Grendon
 14 Prison where it started and as a friend of Learning
 15 Together. In our submission, he appears to be in a very
 16 good position to add — he appears to have been in
 17 a very good position to add the discipline to Learning
 18 Together and the safeguards that appear not to have been
 19 in place. Questions arise for him: why was Learning
 20 Together rolled out so far with so few safeguards in
 21 place? Why was it being approved and championed at
 22 Dr Bennett's level?
 23 The answer to those questions in his statement is
 24 that an informal review took place and nothing more was
 25 said. We suggest, sir, that that is not enough and we

1 would wish to probe what that means and why it was not
 2 more.
 3 Sir, that is the family's position. I appreciate
 4 that is not a matter that you're likely to rule on now.
 5 If you would like us to provide further submissions in
 6 correspondence, we will of course do that, but it is a
 7 matter of importance for the family that I wish to
 8 raise.
 9 Sir, unless I can assist you further, those are our
 10 submissions on the topics for the agenda today.
 11 JUDGE LUCRAFT: Thank you very much indeed, Mr Nicholls.
 12 That's very thorough. Thank you.
 13 I'm going to turn -- Mr Hough, I'm conscious that --
 14 keeping an eye on the clock, but also conscious of who
 15 I've got written submissions from. What I'm going to do
 16 is to go through the others who have made written
 17 submissions, just to see if there's anything they wish
 18 to add.
 19 MR HOUGH: Sir, I suspect that the two other advocates who
 20 will have significant submissions to make are Mr Sheldon
 21 QC and Mr Beer QC.
 22 JUDGE LUCRAFT: Yes, I was going to come to them last of all
 23 and really go to the others first of all.
 24 If I can then start, Ms Barton of City of London
 25 Police, is there anything you wish to say in addition to

1 the short document I have from you for today's hearing?
 2 Submissions by MS BARTON
 3 MS BARTON: Sir, there is, yes, please.
 4 Sir, I should address an issue -- are you able to
 5 hear?
 6 JUDGE LUCRAFT: I can hear you, yes.
 7 MS BARTON: I'm grateful.
 8 Sir, I should address an issue which has arisen from
 9 paragraphs 9 to 14 of the submissions made by Mr Bunting
 10 on behalf of the mother of Mr Khan. That submission
 11 concerns whether the firearms trainers should be invited
 12 or permitted to give their assessment of the actions of
 13 the firearms officers, and in particular whether their
 14 actions were in accordance with their training.
 15 That has not been dealt with in my written
 16 submissions because it only came to light as a result of
 17 the submissions that were served by Mr Bunting.
 18 Sir, Mr Hough appeared to agree that Mr Bunting's
 19 submissions had merit. I have to say that it comes as
 20 something of a surprise because the content of the
 21 statement of Acting Inspector Flack on behalf of the
 22 City of London Police is based upon a list of issues,
 23 including that issue, which was provided by your team on
 24 your behalf. That list of issues mirrors those which
 25 were covered in both statements and oral evidence of

1 similar witnesses in the course of the London Bridge
 2 inquests.
 3 Sir, that said, if you were to conclude on
 4 reflection that you will not follow the course adopted
 5 in the London Bridge inquests, and witnesses should not
 6 give evidence on the issue of whether the force used was
 7 compliant with training, then in my submission that can
 8 be very easily dealt with as Mr Bunting suggests by
 9 limiting the evidence to the training provided and if
 10 the evidence heard ultimately justifies it, then one
 11 could leave the issue of whether officers complied with
 12 their training to the jury.
 13 Sir, I say that in the context of this case it's not
 14 inappropriate for them to give that evidence, but if you
 15 were against me on that, then the issue is to consider
 16 the evidential position at the end of all the evidence
 17 and if the issue in fact is one for the jury and arises
 18 on the facts, leave it to the jury.
 19 Sir, that's all I seek to add to my written
 20 submissions unless I can assist further.
 21 JUDGE LUCRAFT: No, thank you very much. That's understood,
 22 thank you.
 23 Mr Butt on behalf of the Metropolitan Police,
 24 anything in addition to the short document I've got from
 25 you?

1 Submissions by MR BUTT
 2 MR BUTT: Sir, only the same point raised by my learned
 3 friend Ms Barton. Can I just ask in deference to what
 4 Mr Hough has said that you and your team just revisit
 5 the evidence that was given on Day 8 of the Butt, Zaghba
 6 and Redouane inquests at page 67 to 75. That's the
 7 evidence of Chief Inspector Sheridan from the
 8 Metropolitan Police Service and former Superintendent
 9 Brown from the City of London Police who gave precisely
 10 the evidence that it was asked that Mr Sheridan and
 11 Mr Flack give in these proceedings, and also that you
 12 review Day 19 of the Khalid Masood inquest,
 13 8 October 2018, at pages 45 to 48.
 14 In our submission, what Mr Hough did on those
 15 occasions was to carefully call evidence from Chief
 16 Inspector Sheridan and former Superintendent Brown that
 17 appropriately assisted the jury with matters that are
 18 properly expert evidence but did not in any way risk
 19 usurping the jury's function.
 20 Just very briefly addressing the points raised by
 21 Mr Bunting, it is suggested that Chief Inspector Taylor,
 22 if not independent in the manner in which one expects an
 23 expert evidence to be, sir, as you will be aware there
 24 is of course no rule that an expert witness cannot be
 25 either employed by or an officer of either a past

1 litigation or, far less in this case, an interested
 2 party in an inquest.
 3 In fact, the law is to opposite effect. See, for
 4 example, Factortame Number 8 at paragraph 70.
 5 To the extent that Mr Bunting, treading lightly,
 6 suggests that to express an opinion as to whether the
 7 officers acted consistently with their training might
 8 usurp the jury's role, he relies on obiter from the case
 9 of Re LM with the citation of his footnote 5. We would
 10 simply observe that the evidence as was called in London
 11 Bridge and Westminster goes nowhere near what happened
 12 in LM, where the guardian solicitor in fact in effect
 13 asked an expert to make recommendations as to the order
 14 of the court, and the ultimate issue rule for at least
 15 two reasons would have no application in relation to
 16 this matter.
 17 So, sir, we would simply ask that your team maintain
 18 the approach taken in London Bridge and Westminster and
 19 go no further than that. Chief Inspector Taylor and
 20 also Superintendent Flack are independent of the events
 21 of 29 November and are able to give expert evidence, and
 22 in our submission there would be nothing wrong with the
 23 approach you have taken before being adopted, and there
 24 is of course no requirement in an inquest that
 25 independent, in the sense that Mr Bunting means it,

1 evidence is required for an Article 2 inquiry.
 2 Mr Bunting makes reference to the cases of Wright
 3 and Stanley. As you will know, both of those cases were
 4 considered in Goodson v Coroner for Bedfordshire and
 5 Luton [2004] EWHC 2931, where at paragraph 71
 6 Mr Justice Richards as he then was held that neither
 7 Wright nor Stanley established a principle that
 8 independent expert evidence was required by Article 2
 9 and that in fact there was no such principle.
 10 But, sir, as I say, we hear the submissions of
 11 Mr Hough. That is all we would seek to add to that
 12 point. Unless I can assist further, those are my
 13 submission.
 14 JUDGE LUCRAFT: Thank you very much indeed, Mr Butt.
 15 Mr Boyle I think is on the line. Mr Boyle, I don't
 16 have a written document from you, but is there anything
 17 you wish to say in relation to the points on the agenda?
 18 MR BOYLE: No, thank you, sir. It's kind of you to extend
 19 the invitation, but I've got nothing to say on the
 20 agenda items, thank you.
 21 JUDGE LUCRAFT: Thank you.
 22 Mr Beer, if I come to you next then, please.
 23 Mr Beer, I've got from you, on behalf of West
 24 Midlands Police, a document setting out your written
 25 submissions, but it's really just if there are any other

1 points you wish to address.
 2 Submissions by MR BEER
 3 MR BEER: Sir, I intend to be brief and genuinely brief,
 4 given the need for Mr Sheldon, I think, to have
 5 a sufficient period of time with which to speak, and
 6 therefore I won't be making any submissions on the
 7 consequences of your PII decision, anonymity or special
 8 measures for Witness A, further MI5 witnesses, screening
 9 from the press or further case management. Instead I'll
 10 speak only to our open PII submissions without
 11 repetition of them.
 12 You will see that we have sought, sir, to be as
 13 open and helpful to the inquest as possible through the
 14 disclosure already made and the open witness statement
 15 of Assistant Chief Constable Ward. We have, as you will
 16 know, sir, responded and continue to respond positively
 17 to all further requests for (inaudible) and in that way
 18 have sought to make as much as possible open through
 19 careful and very limited redactions.
 20 That's because the Chief Constable understands that
 21 it is very important, especially for the families, that
 22 as much of the process as is possible is transparent,
 23 and that all relevant evidence is disclosed to all
 24 interested persons.
 25 But of course sometimes that is not possible, and in

1 that regard it must be remembered and not forgotten that
 2 PII is a privilege. It cannot generally be waived.
 3 There is a duty to assert it. We have consequently
 4 sought to apply for PII over the absolute minimum of
 5 material necessary to prevent a real risk of serious
 6 harm to important public interests.
 7 That assessment has been carried out with input from
 8 DV members of your team who have comprehensively
 9 reviewed the material. The application is, as is
 10 required, supported by evidence.
 11 Now, Jack's family's legal representatives have made
 12 very extensive written submissions and oral submissions
 13 this morning culminating in the following suggestion.
 14 Firstly, that the most careful and exacting scrutiny
 15 should be brought to the substance of the applications.
 16 Second, that where any part of the PII claims is to
 17 be upheld, every effort should be made to disclose to
 18 IPs as much relevant information as is possible,
 19 including through gisting, summaries and redacted
 20 disclosures. For our part that is exactly what we
 21 envisage would occur in any event because that is the
 22 very process envisaged by your counsel, by the Secretary
 23 of State and by West Midlands Police which the court is
 24 being invited to undertake. It is incidentally, of
 25 course, what always happens.

1 Jack's family's representatives prejudge, and this
 2 is paragraph 9 of their submissions, that they will be
 3 provided with no meaningful explanation for the outcome
 4 that is reached. But, sir, we have no doubt that you
 5 will say as much as can safely be said in an open
 6 judgment on public interest immunity. That is important
 7 and we encourage it because it comes from you, an
 8 independent judicial officer, sir, not us, somebody
 9 whose conduct is questioned in the course of these
 10 inquests.

11 So with that in mind, there's one point that I wish
 12 to make on the public interest immunity approach.

13 Sir, you will know that there's obviously a clear
 14 process to be followed. It's set out in a guidance note
 15 number 30 that you yourself issued, including a process
 16 where a nominated judge and vetted members of the team
 17 can review the material.

18 In this case both CTI and you have considered or
 19 will consider the material. But it's important to
 20 emphasise that it's the court and not CTI that will
 21 undertake thereafter the balancing exercise.

22 Jack's family, like all other interested persons in
 23 situations where a PII claim is made, find themselves in
 24 the difficult position of having to make submissions
 25 without having the ability to see the underlying

1 material, and they rightly concede in paragraph 3 of
 2 their submissions they cannot make any informed
 3 submissions, and that's certainly the case.

4 But it's vitally important not to mis-state those
 5 matters which have been said in open. There are, I'm
 6 afraid to say, some examples of that in the submissions
 7 that you have received. So it's wrong for Jack's
 8 representatives to say in paragraph 3 that there has
 9 been no gist or summary disclosure. You have
 10 Witness A's statement, as do they. You have, as do
 11 they, the witness statements of ACC Ward, there was
 12 another to follow, and a statement from DS Jerromes
 13 which has been mentioned already.

14 It's also wrong to suggest that no redacted versions
 15 over the material over which PII is claimed has been
 16 disclosed. As Mr Hough has said, exactly that material
 17 has been disclosed on Opus already, and there may be
 18 more documents following your decision after the closed
 19 hearing.

20 It's said in paragraphs 5(e) and (f) of the
 21 submissions -- and I'll invite you in due course, sir,
 22 to have regard to these -- and (h) in particular, that
 23 MI5 and CTP identified Khan as being:

24 "... increasingly withdrawn and at risk of
 25 re-engaging in Islamist extremist activity only 11 days

1 after the attack."

2 That's in (f). And then that is linked to what is
 3 said in paragraph 5(h) of the submissions:

4 "It was considered necessary to gain enhanced
 5 coverage of Khan's trip to London to identify any
 6 intelligence of concern, particularly in relation to his
 7 mindset."

8 Those two paragraphs, 5(f) and (h), are a reference
 9 to what has been disclosed by way of summary and gist
 10 about the JOT meeting of 18 November in paragraphs 133
 11 to 135 of Witness A's statement, and, sir, you said that
 12 you've read that already. I'll invite you in your own
 13 time to go back and read it very carefully, because what
 14 those paragraphs reveal is additionally the following
 15 sentences:

16 "No intelligence of concern had been seen since
 17 Khan's release from prison."

18 And:

19 "Discussion took place within the JOT as to how the
 20 level of coverage of Khan could be enhanced, including
 21 of his proposed trip to London. It was considered that
 22 any further coverage would assist MI5 to identify any
 23 intelligence of concern, in particular in relation to
 24 Khan's mindset."

25 And then this:

1 "Given that no intelligence of concern had been seen
 2 since Khan's release from prison, it was agreed that
 3 this further coverage could be reviewed and the
 4 investigation should be considered for closure if MI5
 5 was unable to identify any intelligence of concern."

6 This context and those sentences is critical and is
 7 omitted from the submissions. It's just ignored. It
 8 was also omitted from the oral submissions that you
 9 heard this morning.

10 Of course, where someone appears to have disengaged
 11 from Islamist extremist activity, there's of course
 12 a risk of re-engagement. But that's not the same thing
 13 as saying that there was some sort of new and concerning
 14 risk identified 11 days before the attack, as is implied
 15 in the submissions and was suggested this morning.

16 The entire context was not one of warning signs that
 17 were missed but of a careful and diligent process of
 18 checking and double-checking to give the necessary
 19 assurance before the ongoing investigation was closed.

20 So, sir, in short, in assessing relevance, you
 21 should not accept the characterisation that is given in
 22 these two paragraphs which entirely mis-states the open
 23 material that the family have received and then use it
 24 as a platform to make an argument as to heightened
 25 relevance which is made on an incorrect and false basis.

1 So that's the only point that I seek to make in
 2 open.
 3 JUDGE LUCRAFT: Thank you very much indeed, Mr Beer.
 4 Mr Sheldon.
 5 MR SHELDON: Sir, thank you very much. I hope you can hear
 6 me and possibly see me.
 7 JUDGE LUCRAFT: Yes. I can indeed. Can I just again,
 8 Mr Sheldon, make clear for your assistance, but also the
 9 assistance of others, that I've got and I have read the
 10 open submissions that are -- that everyone has been
 11 provided with and of course I have seen -- again
 12 I repeat -- the underlying materials which we will look
 13 at in the closed session.
 14 Submissions by MR SHELDON
 15 MR SHELDON: Sir, thank you very much for that. I'm very
 16 conscious of the need to be brief, I know you will need
 17 to hear from Mr Hough again, so I won't repeat matters
 18 that you have already considered.
 19 Can I deal very briefly first with PII and I can
 20 deal with this briefly for two reasons. Firstly, we
 21 have put in detailed written submissions which I adopt
 22 and don't repeat; and secondly, I respectfully agree
 23 with the submissions of your counsel, including what
 24 they identify as the countervailing considerations at
 25 paragraph 18 of their submissions, and indeed with

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1 Mr Hough's reference today to the similar points made by
 2 Mr Pitchers in his submissions.
 3 It doesn't seem to us as though there is any
 4 significant dispute as to the legal principles that
 5 should be applied to a PII claim of the type you have
 6 before you, but for the avoidance of doubt, and in light
 7 of some of the submissions you've heard today, can
 8 I just accept the following important propositions.
 9 The first is that the ultimate decision on each
 10 element of the PII claim is yours and yours alone. It's
 11 not the Secretary of State's and it's not your
 12 counsel's.
 13 Secondly, each element of the claim should be
 14 considered individually.
 15 And thirdly, each element of the claim, each
 16 document, each piece of information, each redaction,
 17 should be subject to careful scrutiny or, as it's been
 18 put, rigorous and exacting analysis.
 19 Can I also accept two further points which are
 20 perhaps obvious, but in light of the submissions you
 21 have just heard from Mr Nicholls in particular perhaps
 22 require express acknowledgment.
 23 Mr Nicholls and to some extent Mr Pitchers reminded
 24 you about certain aspects of the factual background to
 25 this case, for the purpose I think of demonstrating that

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1 the evidence relating to MI5's involvement, particularly
 2 post release, is important.
 3 Now, leaving aside the accuracy and/or balance of
 4 that summary of the evidence, and I certainly adopt the
 5 points just made by Mr Beer in that regard, it is
 6 accepted that this is relevant evidence. If it wasn't
 7 relevant, we would not be here having this argument
 8 because your counsel would not have identified the
 9 material as requiring disclosure.
 10 There is, I accept, a powerful public interest in
 11 not excluding relevant evidence from an investigation of
 12 this sort.
 13 Secondly, and linked to that, I accept that the
 14 effect of upholding the PII claim will be to create some
 15 gaps in the evidential picture. How extensive those
 16 gaps may be will be a matter perhaps for debate, but
 17 there will be gaps nonetheless.
 18 What flows from that, sir, and this is really the
 19 only substantive point I want to make, what flows from
 20 that is that PII claims will not be made in this
 21 situation by the Secretary of State lightly, nor will
 22 they be upheld by you lightly.
 23 In that regard it must be emphasised in light of the
 24 submissions that you've heard, and again, lest there be
 25 any doubt about it, that the sole basis upon which the

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1 Secretary of State has claimed PII in this case is
 2 national security. PII may be, as you know, and indeed
 3 has been claimed on a variety of different bases and to
 4 protect a variety of different interests. The only
 5 basis upon which it is being claimed in respect of
 6 material of relevance to this investigation is on
 7 national security grounds, and where in the considered
 8 judgment of the Secretary of State, having taken expert
 9 advice, disclosure of the information in question would
 10 harm national security by making terrorist attacks
 11 either more likely by providing assistance to those who
 12 would wish to carry them out, or by making it less
 13 likely that the Security Service and CT police would be
 14 able to disrupt and detect their plans to do so and to
 15 bring them to justice.
 16 Now, sir, I won't repeat the submissions I have made
 17 as to the legal significance of the fact that this is
 18 a claim being brought on national security grounds.
 19 Those I anticipate are well understood. I simply make
 20 the point that the purpose of this claim is to prevent
 21 as far as possible future terrorist outrages of this
 22 sort from being perpetrated, and that in making the
 23 claim she has made, the Secretary of State is
 24 discharging a duty and not exercising a discretion,
 25 still less indulging in a luxury or claiming some sort

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1 of special treatment.

2 It is perhaps important in light of the submissions
3 you've heard this morning that that is made clear.

4 Sir, as to the process that has been followed for
5 the purposes of the PII exercise, I have nothing to add
6 to the summary that you have been given by your counsel
7 and indeed that you have provided to the interested
8 persons this morning. So I can perhaps move directly on
9 to the issue of adequacy of investigation.

10 Sir, again, I say only very little about this
11 because the Secretary of State respectfully agrees with
12 the analysis with which you have been provided by
13 counsel to the inquests. Ultimately, of course, this
14 will be a matter for your judgment once the PII exercise
15 has been undertaken.

16 Ultimately the question will be whether what has
17 been excluded prevents you from undertaking an adequate
18 investigation. And that is inevitably an intensely
19 fact-specific inquiry which is determined by careful
20 analysis of the excluded material once the PII claim has
21 been determined.

22 Therefore, whilst it is entirely right that the
23 issue has been raised, as it has been, for example, at
24 paragraphs 23 to 29 of the submissions of Jack Merritt's
25 family, the outcome of your analysis cannot be prejudged

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1 in the way that has been suggested. There are examples
2 quite correctly flagged up of cases in which the nature
3 and extent of the excluded evidence on a claim for PII
4 has been such as to compel the coroner to conclude that
5 an adequate investigation cannot be conducted within the
6 framework of an inquest, and you're well familiar with
7 the Litvinenko and Manchester Arena examples.

8 But there have been many cases, including cases
9 involving extensive evidence from the Security Services,
10 in which a different conclusion has been reached.
11 Again, you will be aware of many examples. You have
12 dealt with a number of them.

13 Now, you will have seen the submissions of your
14 counsel on this issue and we agree with them. We submit
15 that there is absolutely no doubt whatsoever on which
16 side of the line this case falls.

17 We are here dealing with PII and in that context the
18 focus inevitably falls on what is being excluded, and it
19 is easy in my submission to lose sight of what has been
20 included. Through the diligence of your team there is
21 frankly a vast quantity of evidence concerning Khan,
22 both in prison and after his release, which has been
23 disclosed to the interested persons and can be
24 considered in detail in the inquest.

25 Even as matters stand, and before any witnesses have

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1 been heard, the inquests have assembled what I would
2 respectfully suggest is an unprecedented body of
3 evidence concerning the management of a dangerous
4 terrorist offender through their time in custody and
5 following their release on licence which has enabled
6 an extraordinarily detailed chronology to be put
7 together.

8 That evidence will be supplemented in due course by
9 a great deal of oral evidence with the full involvement
10 of the interested persons, and any material that you
11 ultimately decide to exclude by virtue of PII has to be
12 seen in this context. And in assessing whether you can
13 conduct an investigation that is adequate to discharge
14 your statutory obligations, it is necessary to assess
15 the complete evidential picture and take into account
16 the entirety of the iceberg, not just the tip on which
17 the PII material rests.

18 Once that is done, and done thoroughly, sir, in my
19 respectful submission, the conclusion is clear and an
20 adequate investigation can be undertaken within the
21 framework of the inquest.

22 Can I turn then to the issue of MI5 witnesses of
23 fact.

24 Now, once again, sir, a large volume of written
25 submissions have been filed on this issue across

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1 a number of hearings and I anticipate that there is
2 a limited amount that I can usefully add to the
3 submissions that have already been made.

4 Ultimately we agree with counsel to the inquest that
5 seeking evidence from individual MI5 witnesses of fact
6 in addition to the evidence of a corporate witness would
7 not materially advance your investigation for reasons
8 we've set out in our open submissions and for additional
9 reasons which can only be advanced in closed.

10 I would like to take a moment though, sir, if I may,
11 to summarise the essential rationale for that
12 proposition by reference to one of the specific aspects
13 of the evidence raised by the submissions of the
14 bereaved families. But before I do that, can I just
15 attempt briefly to set the context which I would
16 respectfully observe is at risk of being lost in the
17 detail.

18 I do so in particular to address the submission made
19 by Mr Pitchers that the PII exercise may not be
20 dispositive of the issue and that it is possible, even
21 if the exercise has been undertaken thoroughly, to
22 identify aspects of the evidence upon which witnesses of
23 fact might be able to provide additional assistance.

24 Sir, taking us back very briefly to first
25 principles, in a case such as this in which the relevant

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1 evidence includes the product of an MI5 investigation,
 2 it is inevitable that much, if not all, of the
 3 intelligence collected in the course of that
 4 investigation will be highly sensitive such that
 5 disclosure would cause harm to national security.
 6 Now, in those circumstances a claim for PII can be
 7 made in respect of the material. Given the national
 8 security context, that claim is likely to succeed and
 9 the result will be the exclusion of the intelligence
 10 from the proceedings.
 11 Now, until relatively recently that would have been
 12 the end of the matter in a set of proceedings such as
 13 these. However, the practice has developed in recent
 14 years, borne out of a proper acknowledgment of the
 15 importance of a full and fearless investigation open to
 16 public scrutiny in cases such as this one, of finding
 17 a way to place as much as possible of the sensitive
 18 intelligence into the public domain so that it can be
 19 scrutinised and questions may be asked about it — how
 20 the intelligence was evaluated, what actions were taken
 21 in response, could or should more have been done — for
 22 all the reasons that you're familiar with, identified in
 23 Amin and elsewhere.
 24 Now, the mechanism that has been used to achieve
 25 that objective in the 7/7 inquests and in many cases

1 since has been the careful gisting of intelligence into
 2 an open witness statement by a corporate witness. As
 3 this case demonstrates, if that is done with sufficient
 4 care and rigour, a large amount of disclosure can be
 5 given, if not of the intelligence itself, then of the
 6 essence of that intelligence.
 7 Now, sir, I make it clear that I neither confirm nor
 8 deny what sources of intelligence may be relevant to
 9 this particular case, but in general terms experience
 10 has demonstrated that if you exercise enough time and
 11 care, it is possible to find ways of revealing the
 12 reporting of a human source without revealing the source
 13 themselves or exposing them to identification; that it's
 14 possible to reveal the product of intercepted
 15 communications without revealing that interception has
 16 occurred; that it is possible to reveal intelligence
 17 obtained from covert techniques without revealing the
 18 nature of those techniques in a way which would assist
 19 people in evading them.
 20 Now, that can be done if each word or phrase is
 21 carefully evaluated and a careful eye is kept on the
 22 evidential picture as a whole to ensure that individual
 23 bits of the evidence cannot be pieced together in a way
 24 that would amount to damaging disclosure, the well-known
 25 jigsaw or mosaic effect. Once that has been done in the

1 statement of a corporate witness, then there is
 2 an opportunity for CTI and the interested persons to
 3 identify lines of questioning and very considerable
 4 resources can be devoted over the course of some weeks
 5 to see whether any further disclosure can be given if
 6 carefully phrased and when analysed next to the rest of
 7 the evidential picture.
 8 Sir, in short, it is by this means that the maximum
 9 possible disclosure is given, and it is, I would
 10 respectfully suggest, an extremely successful process.
 11 I submitted to you, sir, in the London Bridge Inquest
 12 that the level of disclosure given in that case of
 13 a live MI5 investigation was unprecedented, and indeed
 14 it was. I can say with no hesitation at all that the
 15 level of disclosure of an MI5 investigation into a TACT
 16 offender given in this case is also unprecedented. In
 17 both cases that has been achieved by the process that
 18 I have described and which has been further elaborated
 19 by your counsel today.
 20 So, sir, my fundamental submission is that
 21 Witness A's statement, the process of its production as
 22 overseen by your team, and the calling of Witness A to
 23 give evidence, is a means of achieving disclosure, not
 24 preventing it. It has not been done to obfuscate or
 25 evade public scrutiny. It has been done to enable

1 public scrutiny to be applied to that which would
 2 otherwise have to remain secret.
 3 As to what flows from that as far as individual
 4 witnesses of fact are concerned, two things.
 5 Firstly, if the job has been done thoroughly and
 6 well, and I submit it has been here, then the evidence
 7 of Witness A in the statement, and supplemented to the
 8 extent possible orally, will be the limit of what can be
 9 disclosed consistent with the preservation of national
 10 security. If that is right, then it is axiomatic that
 11 calling additional witnesses will not contribute
 12 anything of value in terms of additional evidence as to
 13 the nature and extent of the MI5 investigation.
 14 Secondly, when you consider the nature of the
 15 exercise I have described, it is clear that calling
 16 individual officers will not achieve the objective that
 17 has been identified.
 18 Now, sir, at this point I was going to take you on
 19 an excursion through the JOT minutes of November 2019,
 20 compare them to the paragraphs 133 to 135 of Witness A's
 21 witness statement, and pick up a number of the specific
 22 additional lines of inquiry that have been identified in
 23 writing and orally in submissions today.
 24 But, sir, I don't propose to do that, firstly
 25 because it would take a bit of time that I don't think

1 we probably have, and secondly, I anticipate that it is
 2 an exercise that you are well capable of doing yourself.
 3 But I would commend it as an illustrative way of
 4 demonstrating how, when you actually test the
 5 propositions with which you are being presented, and the
 6 lines of additional inquiry that are being suggested to
 7 you, against what has been disclosed, and the basis upon
 8 which the PII claim has been advanced in respect of that
 9 material, you reach the clear conclusion that nothing
 10 further of significant value to your investigation would
 11 or could be achieved by calling individual witnesses.
 12 So, sir, I submit simply that whilst we understand
 13 entirely the desire for best evidence and maximum public
 14 scrutiny, and whilst we agree that that should be
 15 achieved to the greatest extent possible, it is actually
 16 through the process of Witness A's witness statement and
 17 further evidence as I have described that that is
 18 achieved in a case of this nature.
 19 Sir, can I deal finally then, and very shortly, with
 20 Witness A and the issue of screening which seems to be
 21 the only significant outstanding issue of contention.
 22 Of course, these submissions are directed primarily to
 23 those advanced by Mr Nicholls in that regard.
 24 Now, it must be said that the submissions advanced
 25 on behalf of Jack Merritt's family on this issue have

1 presented something of a moving target. As I understood
 2 him at one point to acknowledge, Mr Nicholls appeared to
 3 submit that it would make no sense in effect or would be
 4 wrong in principle for the legal representatives of
 5 Mr Merritt's family and Mr Merritt's family members
 6 themselves to see the witness, but not the jury, and
 7 thus what was really being sought was an order providing
 8 for screening for everybody other than the jury,
 9 Mr Merritt's family and Mr Merritt's lawyers.
 10 However, at a later stage in his submissions he
 11 sought to suggest that the level of restriction that was
 12 being advanced in this case on his submissions was less
 13 than that in the Manchester Arena Inquiry because in
 14 that case four lawyers can see the witness, whereas in
 15 this case it would only be two. But of course, as
 16 you've heard, in the Manchester Arena Inquiry the
 17 witness will not be seen by the families and there is no
 18 jury.
 19 It's not entirely clear what is being suggested, but
 20 I'm assuming for present purposes that the submission
 21 that's been advanced to you is that Witness A should be
 22 seen by Mr Merritt's family — I'm not entirely sure
 23 it's been made clear which ones — the legal team of
 24 Mr Merritt's family and the jury, and on that basis
 25 I make these brief limited observations.

1 Firstly, I agree with and gratefully adopt the
 2 submissions made by counsel to the inquiry as to why the
 3 balance should come down against that proposal in the
 4 particular circumstances of this case.
 5 Secondly, I would observe in light of the first
 6 three points made on behalf of Mr Merritt's family that
 7 that arrangement would do nothing to improve the
 8 impression of public scrutiny nor public accountability.
 9 Thirdly, I would invite you to consider the
 10 particular circumstances in which the Manchester Arena
 11 Inquiry's chairman made the decision he made which were
 12 very different.
 13 In the Manchester Arena Inquiry the witness
 14 concerned from MI5 will be travelling to Manchester in
 15 order to give evidence over the course of a day or
 16 possibly longer. There was a very careful consideration
 17 given as to the risks that would arise to the witness if
 18 that situation arose and he was seen by individuals in
 19 the hearing room.
 20 MI5's firm view was that if he were seen by anybody,
 21 including the four advocates for the families, that
 22 would serve to expose him to undue risk. The chairman
 23 took a different view and it will clearly be necessary
 24 in light of that to manage that risk. But the
 25 circumstances in which it will be managed will be

1 circumstances in which the witness is in a city in which
 2 he is not normally based for a very short period of
 3 time, and arrangements will be made to minimise the risk
 4 of inadvertent recognition.
 5 So the factual circumstances relating to Witness A,
 6 as you've seen from open and indeed from the closed
 7 evidence, are very different, and the risk that would
 8 arise from the arrangements that have been proposed to
 9 you by Mr Merritt's family create an entirely different
 10 order of risk.
 11 Those risks are not fanciful or remote. In the one
 12 most comparable situation in which something to similar
 13 effect has occurred, the risk eventuated in
 14 circumstances with which you will be familiar, and I'm
 15 afraid it is simply no answer to that problem for
 16 Mr Nicholls to submit, as he did, well, in the event no
 17 harm was done.
 18 Allowing Witness A to be seen by the individuals
 19 that have been identified by Mr Merritt's family's
 20 submissions, in respect of whom, quite frankly, there is
 21 no realistic prospect of detailed security vetting being
 22 undertaken, would expose that witness to serious and
 23 unacceptable risk, and in my respectful submission the
 24 course proposed by your counsel that Witness A should be
 25 screened from everyone in the courtroom is the

1 appropriate one to take in the particular circumstances
 2 of this case.
 3 Sir, just one minor point of detail on the Witness A
 4 application in light of what Mr Pitchers has submitted.
 5 I should make clear for the avoidance of doubt that, as
 6 far as notes made in the hearing room are concerned, the
 7 application that we make is made on the same basis as it
 8 was made in Westminster and London Bridge, namely that
 9 electronic notes should not be taken during the course
 10 of Witness A's evidence but handwritten notes may be.
 11 The reason for that, sir, as you will have heard
 12 explained in previous cases, is that the risk that is
 13 being guarded against is inadvertent disclosure.
 14 Electronic notes made on computers, linked in some
 15 instances to solicitors' firms' cloud platforms or
 16 otherwise backed up by other means, can be impossible or
 17 at least very difficult to retrieve if inadvertent
 18 disclosure is made and then recorded on an electronic
 19 device.
 20 There will be a transcript. I accept that we are
 21 all of us less used to making handwritten notes than we
 22 used to be, but for the reasons that I have submitted to
 23 you on previous occasions, and have been adopted on
 24 previous occasions, notes should be restricted to
 25 handwritten notes only in the hearing room during

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1 Witness A's evidence, or at least that is our
 2 application.
 3 Sir, I have nothing to add on the case management
 4 issues beyond that which has already been set out by
 5 counsel to the inquiry other than to — to the inquest,
 6 forgive me, other than to confirm that we respectfully
 7 agree with the views expressed about additional
 8 witnesses, and where Mr Hough has indicated that further
 9 information is forthcoming from my clients, that is all
 10 well in hand and will be with you shortly.
 11 Sir, unless I can be of any further assistance,
 12 those are my submissions.
 13 JUDGE LUCRAFT: Thank you very much indeed, Mr Sheldon.
 14 I think in fact, just on that last point you make
 15 about handwritten notes, on the previous occasions when
 16 those restrictions have been in place I myself also made
 17 only handwritten notes. Those who saw me acting in
 18 those previous inquests would have seen that otherwise
 19 I kept a note on a computer, but I applied the same
 20 rules to others as to myself.
 21 Thank you very much, Mr Sheldon.
 22 MR SHELDON: Thank you.
 23 JUDGE LUCRAFT: Mr Hough, I'm going to come to you in just
 24 a moment. I just think I ought to give Mr Bunting
 25 a chance if there's anything he wishes to add to his

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1 written submissions that I've got.
 2 Mr Bunting?
 3 Submissions by MR BUNTING
 4 MR BUNTING: Thank you, sir. Mrs Begum respectfully agrees
 5 with the thorough and detailed submissions of
 6 Mr Nicholls on PII, whether an inquiry is needed and
 7 whether witnesses other than Witness A should be called
 8 to give evidence on behalf of the Security Service.
 9 I'm not going to repeat any of those points, rather
 10 just make three very short points.
 11 The first, as flagged up in the skeleton argument at
 12 paragraph 8(a), is that there is now some doubt about
 13 Mrs Begum's ability to give evidence, not just to
 14 travel, as Mr Hough suggested, but also her medical
 15 fitness to give evidence. We will keep that under
 16 review and we will ensure that Mr Hough and his team are
 17 rapidly updated.
 18 The second relates to the issue of screening for
 19 members of Usman Khan's family. The starting point
 20 here, in my respectful submission, sir, is the witness
 21 statement that was served on behalf of one of the
 22 brothers of Usman Khan on 15 June last year when special
 23 measures were first sought. You, sir, will remember
 24 that in that statement the brothers of Usman Khan
 25 expressed revulsion at what Usman had done, but also

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1 explained how vulnerable, exposed, threatened and
 2 devastated the family felt at the prospect of further
 3 identification in connection with his case.
 4 In particular, they had great fears about being
 5 subjected to reprisal attacks and they felt individually
 6 and collectively under a huge amount of pressure, too
 7 afraid to attend school, to leave homes, to go to work,
 8 in the initial months thereafter.
 9 Sir, those concerns remain vital for the family and
 10 they explain why they invite you, sir, to maintain the
 11 position that you originally ordered, that they be
 12 screened both from the general public and from members
 13 of the press.
 14 The short point is that unless they are protected
 15 from the possibility of their images being disseminated
 16 through these proceedings, then they will not be able to
 17 give their best evidence in these proceedings. And if
 18 they are not screened from accredited members of the
 19 press, there is the prospect of their images being drawn
 20 by court drawers or indeed from accredited journalists
 21 identifying them outside court to photographers who
 22 could then take their photos. Those, whilst there is no
 23 anonymity order in place, would cause the family members
 24 not to be able to give their best evidence.
 25 There is no, of course, real issue with open justice

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1 here because if the family are screened in the way that
 2 you initially ordered, it will still be possible to
 3 report all of their evidence, it will still be possible
 4 to report their names, but what it will do is it will
 5 address that real risk the family members feel about
 6 their images being further disseminated.

7 Sir, the final point which I'll address very briefly
 8 is the point about police training evidence. I'm
 9 grateful to Mr Hough for his very helpful submissions on
 10 this point this morning with which I agree. Mrs Begum's
 11 submissions are in her skeleton argument at paragraphs 9
 12 to 14.

13 There's been two submissions this morning on this
 14 point, one from Ms Barton and one from Mr Butt.

15 Ms Barton's fallback position, as I understood it,
 16 was that officers be permitted to answer questions about
 17 the scope of training provided, but then not to give an
 18 assessment of whether the officers on the ground
 19 complied with that training. Sir, I respectfully
 20 endorse that fallback position.

21 As regards Mr Butt, his submission appeared to be
 22 that it is proper to invite officers of the Metropolitan
 23 Police to opine on the jury issue of whether officers
 24 off the Metropolitan Police on the ground complied with
 25 their training. I disagree with that submission for the

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1 reasons set out in writing.

2 Insofar as that was done in previous inquests, it's
 3 unclear from the transcripts if the court in those
 4 inquests was specifically addressed on the propriety of
 5 that approach. They do not stand as authority, still
 6 less binding authority, for the correctness of that
 7 approach.

8 Mr Butt finally relied on opening remarks of
 9 Mr Justice Richards as he then was in Goodson's case.
 10 Of course, the point made by Mr Justice Richards at
 11 paragraph 71 was that independent expert evidence is not
 12 always required in order to render an inquest an
 13 effective investigation. As Mr Justice Richards said,
 14 all will depend on the facts, and the facts here are in
 15 my respectful submission clear. A high degree of
 16 independence is required of this specific issue in
 17 Usman Khan's inquest, the legality of the use of force,
 18 and for those reasons, the approach which I understand
 19 Mr Hough to take is, in my respectful submission,
 20 correct.

21 Unless I can assist you any further, sir, those are
 22 the submissions of Mrs Begum.

23 JUDGE LUCRAFT: Thank you very much indeed, Mr Bunting.

24 Mr Hough, I think I have now gone round everyone who
 25 I was anticipating wanting to be heard.

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1 MR HOUGH: Sir, it may be an idea to ask whether anyone else
 2 on the CVP link wishes to address you.

3 JUDGE LUCRAFT: I'll simply say: is there anyone who has not
 4 yet spoken who would wish to? I'll take silence as
 5 being a no.

6 Mr Hough.
 7 Submissions in reply by MR HOUGH

8 MR HOUGH: Sir, I can be very brief in response because
 9 I sought to anticipate most arguments and have already
 10 addressed you at length.

11 A few very brief points.
 12 First of all, in relation to submissions made on
 13 behalf of the two bereaved families, it was said at some
 14 points that if the PII claims are upheld, there will be
 15 no evidence of MI5 or CTP documents or witnesses other
 16 than the statement of Witness A.

17 Sir, that is wrong in point of fact. CTP witnesses,
 18 including some of the most important on the ground
 19 operational CTP witnesses, will be called, notably those
 20 from Staffordshire Special Branch and West Midlands
 21 Police CTU Team 7. You have heard two of the key
 22 individuals identified during the course of submissions,
 23 namely DS Jerromes of West Midlands and DS Stephenson of
 24 Staffordshire Special Branch, and those include
 25 individuals who were involved in some of the key

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1 meetings, including the JOT meeting of November 2019.

2 In addition, CTP records, records from these bodies,
 3 have been disclosed and more are due to come shortly,
 4 partly as a result of the PII process and with very
 5 limited redactions.

6 Sir, we would also make the point in relation to
 7 some of the submissions that you have heard that
 8 Witness A can be questioned in relation to the contents
 9 of that witness's evidence and the process for
 10 notification of questions in advance should allow that
 11 witness to be able to provide as much responsive detail
 12 as possible about the decision-making process at each
 13 stage as is consistent with the demands of national
 14 security.

15 You, sir, will remember how that happened in the
 16 Westminster and London Bridge cases and how
 17 an experienced corporate witness who had done the
 18 phenomenal amount of work which Witness L had done in
 19 those cases was able to answer questions of detail,
 20 including about interaction with CTP, represented there
 21 in the person of Witness M.

22 By extension from what I have said about
 23 counter-terrorist police evidence, one of the
 24 suggestions made was that there will be no meaningful
 25 further disclosure from the PII process. We

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1 respectfully disagree. There will be meaningful further
 2 disclosure at the end of the PII process with, as I say,
 3 very limited redactions in most cases.
 4 I should address briefly the point about electronic
 5 note-taking during the evidence of Witness A. The
 6 reasons for that unusual restriction have been given.
 7 It is important to the Security Service to ensure that
 8 if Witness A says something that that witness should not
 9 have said, it can be kept out of the public domain.
 10 Electronic notes, as Mr Sheldon has indicated, have
 11 a habit of being irretrievable .
 12 If I can give this assurance, though: on previous
 13 occasions we have been able to produce the daily
 14 transcript on a half daily basis so that those who would
 15 otherwise take electronic notes can get a complete
 16 transcript very quickly.
 17 In relation to Mr Bunting's submissions concerning
 18 press screening and the concern that those he represents
 19 might be identified outside court, photographed and
 20 those photographs put into the public domain, sir, in
 21 our submission you would be entitled to make an order
 22 under Section 11 of the Contempt of Court Act 1981
 23 prohibiting publication of any images of those witnesses
 24 or any details liable to identify them physically, those
 25 being matters you will have kept from the general public

1 by your screening order. In our submission such
 2 a Section 11 order could be made to bolt on to your
 3 order of 22 October 2020 and would address Mr Bunting's
 4 proper concern.
 5 Finally, as regards the debate about the constraints
 6 on police training officer witnesses, we do accept that
 7 a slightly narrower approach is being proposed than in
 8 the Westminster and London Bridge Inquests, although
 9 Mr Butt and Ms Barton are correct to say that careful
 10 limitations were applied in those cases too. We make
 11 our submissions in deference to the points which
 12 Mr Bunting has made and we suggest that the modest
 13 additional limitations would not create any difficulty
 14 or limit your inquiry in any material respect.
 15 Sir, unless I can be further assistance, those are
 16 my submissions in open.
 17 JUDGE LUCRAFT: Thank you very much indeed, Mr Hough.
 18 Can I just simply repeat my grateful thanks to all
 19 of those who put in very detailed written submissions
 20 and supplemented those by oral submissions this morning.
 21 We've overrun time slightly, Mr Hough, but only
 22 slightly . It's 1.15. What I'm going to suggest we do
 23 is that that will bring the open hearing to an end. We
 24 will reconvene for the closed hearing and those who are
 25 going to be present. I'm going to suggest we start that

1 at 2.10, just to give us all a time for a proper break,
 2 and we will resume those at 2.10.
 3 For the benefit of both Jack and Saskia's family,
 4 I repeat what I said in the course of the submissions
 5 made by Mr Nicholls about how I regard my role in
 6 relation to the closed hearings, conscious as I am that
 7 they will not be present nor represented at those
 8 hearings. But I think the other feature that is perhaps
 9 important for both the families to understand is, again,
 10 the thorough process which has been undertaken by you
 11 leading the team on behalf of counsel to the inquest and
 12 solicitors to the inquest and the interaction that has
 13 taken place before the hearing we're about to embark
 14 upon between you and those who represent the Secretary
 15 of State.
 16 There's been a very thorough analysis of the
 17 material. There's been a degree of questioning of why
 18 it is that material has fallen one side of the line
 19 rather than the other, and I think it's hugely important
 20 for those who are not going to be present for the
 21 hearing to understand that thorough detailed process
 22 which has taken place over many, many hours of work
 23 before we embark on a closed hearing.
 24 I'll rise .
 25 (1.16 pm)

(The open hearing concluded)

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