

OPUS2

Fishmongers Hall Inquests

Day 12

April 28, 2021

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1 Wednesday, 28 April 2021
 2 (10.05 am)
 3 JUDGE LUCRAFT: Good morning, ladies and gentlemen. Good
 4 morning, Mr Hough. I think we're ready for our first
 5 witness?
 6 MR HOUGH: Yes, the first witness is Brother 2.
 7 Brother 2 (affirmed)
 8 JUDGE LUCRAFT: Brother 2, good morning. If you are happy
 9 to, please do feel free to remove your mask while giving
 10 evidence. If you are happy to stand, that's fine. If
 11 you wish to take a seat, there's a seat just to your
 12 side where you can sit to give evidence, whichever you
 13 prefer.
 14 A. Yes, I would like to sit down. Yes.
 15 JUDGE LUCRAFT: Certainly.
 16 As I say, if you are happy to remove your mask; if
 17 you want to keep it on, that's fine.
 18 A. Yes.
 19 MR HOUGH: Sir, before I ask any questions of Brother 2,
 20 even to ask his name, let me run through orders you have
 21 made in relation to his evidence.
 22 JUDGE LUCRAFT: Thank you.
 23 MR HOUGH: By your directions of 22 October 2020, you
 24 ordered that if any relevant Khan family members, which
 25 includes Brother 2, is called to give evidence, they

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1 shall be screened so that they are seen only by the
 2 jury, coroner, court staff, interested persons and legal
 3 representatives of interested persons. That is being
 4 given effect by the public being in a part of the
 5 overflow courtroom which is screened so that they cannot
 6 see Brother 2.
 7 JUDGE LUCRAFT: Yes.
 8 MR HOUGH: The order was later amended to permit accredited
 9 members of the press to see Brother 2. So there are
 10 accredited members of the press in this room and I think
 11 also the overflow room who will be able to see him.
 12 Your order also provided that Brother 2 could enter
 13 and exit the court by an appropriate non-public route,
 14 which has been facilitated, and that no reference should
 15 be made to any of the children of the siblings of
 16 Usman Khan, except with the permission of the court, so
 17 no questions should be asked tending to go to those
 18 matters.
 19 In addition, you made an order on 1 April 2021 to
 20 the effect that there shall be no publication of the
 21 name or identifying information, including images of the
 22 relevant Khan family members in connection with these
 23 Inquests or their subject matter. That obviously [does]
 24 include Brother 2's name [and] images of him, and that
 25 has effect for the duration of the Inquests and

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1 thereafter, subject to any order of the court.
 2 So, in simple terms, the press should not photograph
 3 Brother 2 in or in the environs of this building or
 4 publish his photograph in connection with these
 5 proceedings. If the court artist is here, or arrives,
 6 she should not make a sketch of him, and nobody should
 7 publish any information describing his facial features.
 8 JUDGE LUCRAFT: Thank you very much. And the jury may think
 9 that I'm surrounded by screens and it looks like mission
 10 control on my desk. It does a bit, but one of the
 11 screens that I have, ladies and gentlemen, in fact shows
 12 me the overflow court, so I can keep one of my eyes on
 13 that some of the time to see actually that the
 14 directions that Mr Hough has outlined that I have given
 15 at previous hearings are actually being complied with.
 16 Thank you.
 17 Questions by MR HOUGH QC
 18 MR HOUGH: With that rather long introduction, Brother 2,
 19 you can keep your mask on or take it off as you wish.
 20 A. Yes.
 21 Q. Would you please give your full name for the court?
 22 A. Brother 2.
 23 Q. Brother 2, you understand I'm asking you questions first
 24 on behalf of the Coroner and you may then have some
 25 questions from other lawyers?

3

1 A. Yes.
 2 Q. You made witness statements on 1 December 2019 and
 3 21 December 2020, and we may refer to those as we go.
 4 A. Okay. First of all, could I make a sincere condolences
 5 to the families of Jack Merritt and Saskia Jones. We
 6 are truly, truly sad of the events that happened, and
 7 whoever has been affected or, you know, physically or
 8 mentally with the incident, we are really sorry as
 9 a family, you know. We are really, really sad. I just
 10 wanted to get that off my chest, and, you know, we are
 11 really sorry.
 12 Q. Thank you very much, Brother 2.
 13 Your relationship to Usman Khan, I think, is that
 14 you are his elder brother?
 15 A. Yes.
 16 Q. And is it right that he was seven years younger than
 17 you?
 18 A. He was, yes.
 19 Q. You were the fourth of seven children?
 20 A. Fourth, yes.
 21 Q. And Usman, I think, the sixth?
 22 A. Yes, sixth.
 23 Q. The jury have heard that by way of family background,
 24 your father came to the United Kingdom in the 1960s --
 25 A. Yes.

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1 Q. -- and lived in Stoke; is that right?
 2 A. Yes, he did, yes. See my grandad, he come to England in
 3 the early sixties and my dad come along in, you know,
 4 the mid--sixties.
 5 Q. Is it right that your father later married your mother
 6 in Pakistan and then she came to the United Kingdom in
 7 the 1980s?
 8 A. 80s, yes.
 9 Q. Is it right that your eldest sister and eldest brother
 10 were born in Pakistan, but the remainder of your
 11 siblings, including Usman, were born in the UK?
 12 A. Yes.
 13 Q. In general terms, how close and supportive a family were
 14 you and are you?
 15 A. What, as general, all of us?
 16 Q. Yes, all of you. Are you one of those families which
 17 are very cohesive or are you one of those families where
 18 various people split apart and do their own thing?
 19 A. No, we tend to, you know, help each other when help is
 20 needed and, you know, whenever any of us needs some help
 21 or need a lift to work, or, you know, general stuff.
 22 You know, if I need a lift to work I would ring my
 23 brother and "Oh, can you give us a lift", he'd say "No
 24 problem", just like that, yes, close together, yes.
 25 Q. What is the family's religion?

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1 A. Muslim.
 2 Q. Are you in general practising Muslims, people who go to
 3 Friday prayers regularly and practise the main feasts,
 4 such as Ramadan?
 5 A. Yes, yes, we do, yes, you know, I wouldn't say regular
 6 Friday prayers, but best we could, you know. If I have
 7 to go to work or something's up, you know, then I'll
 8 have to, but yes. Yes.
 9 Q. May I turn, then, to Usman Khan's early life. The jury
 10 have heard that from the age of 12 he attended Haywood
 11 High School, which is a mixed state comprehensive; is
 12 that right?
 13 A. Yes, he did, yes.
 14 Q. We've heard that he attended that school until the age
 15 of 14 or 15; is that also right?
 16 A. To the best of my knowledge, to be honest, yes, because,
 17 you know, at that age, because I was seven years older
 18 than him, I was busy in my own life because I've left
 19 college and, you know, as 18 and 19, you know, you get
 20 partying and this and that, so, you know, so I wasn't
 21 really, you know, concentrating on my little brothers
 22 because there was a big age gap, so I just carried on
 23 with my friends.
 24 But to the best of my knowledge, yes.
 25 Q. I will ask you a little bit more about that in a moment,

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1 but what's your recollection of Usman Khan as a child
 2 and while he was at school, his character and behaviour?
 3 A. The times I've seen him, you know, when I was at home,
 4 he seemed fine, you know, as a child, he seemed fine,
 5 but it was mainly like, you know, especially at that
 6 age, at that age when he was 12, I was, you know, 17,
 7 18, so I rarely saw him, to be honest, because I used to
 8 be out. I used to be out with my friends, you know,
 9 just enjoying life at that age.
 10 Q. Did you know whether he was particularly religious as
 11 a young teenager, for example?
 12 A. As a 12 -- no.
 13 Q. Now, in May 2014, so when he -- sorry, May 2004, when he
 14 was aged 13, Usman got into a fight with a fellow pupil
 15 at school, and the police became involved; do you
 16 remember being aware of that at the time?
 17 A. No, I'm not. No, I'm not aware of that.
 18 Q. At that time, so around 2004, were you living at home?
 19 A. 2004. Yes. Well, home, like, you know, I used to spend
 20 most of the days, you know, all--nights, and when I was
 21 coming home, you know, but I was, yes, residing at home,
 22 yes, living at home.
 23 Q. But your younger brother got into trouble with the
 24 police --
 25 A. Yes.

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1 Q. -- for getting into a fight and kicking another boy in
 2 the head.
 3 A. Okay.
 4 Q. That doesn't ring a bell, does it?
 5 A. No, because it's so long back, I can't really recall or
 6 remember anything, to be honest.
 7 Q. Do you remember when and how Usman's formal education
 8 came to an end? Do you know when and how Usman stopped
 9 being at school?
 10 A. Stopped going to school?
 11 Q. Stopped going to school.
 12 A. Not really, no.
 13 Q. The jury have heard that around the age of 14 or 15,
 14 Usman, on his own account, on the basis of what he said
 15 later --
 16 A. Yes.
 17 Q. -- was expelled, stopped going to school, and didn't go
 18 to any school after that. So he stopped going to school
 19 a couple of years before he should have stopped going to
 20 school.
 21 A. Yes.
 22 Q. Is that something you were aware of at the time?
 23 A. What age was that again? 15?
 24 Q. When he was about 14 or 15?
 25 A. 14 or 15. Not really, not really. I don't -- to be

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1 honest, I didn't even -- the way of life I was living,
 2 like, you know, going out, I didn't care, to be honest.
 3 At that age, I wasn't bothered --
 4 Q. But --
 5 A. -- about him going to school or not because I was too
 6 busy in my own... you know.
 7 Q. Most people would expect that in a reasonably close and
 8 supportive, cohesive family --
 9 A. Yes.
 10 Q. -- an older brother, late teens, would at least know
 11 that his younger brother had been expelled and stopped
 12 formal education two years earlier; are you saying you
 13 didn't?
 14 A. I can't -- I can't recall him getting expelled.
 15 I can't -- I can't remember him getting expelled.
 16 Q. If somebody had asked you: do you think Usman had
 17 finished his schooling aged 16 or aged 18, what would
 18 you have said?
 19 A. I'd say -- I'd say he finished it, to be honest.
 20 I don't --
 21 Q. So you have a vague thought that he had finished his
 22 education in the usual way --
 23 A. Yes.
 24 Q. -- at 16 or afterwards, but you can't be sure?
 25 A. No.

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1 Q. We've heard that after he stopped going to school at
 2 age 14, at least on his own account, he went to Pakistan
 3 for two months because your mother was ill. Any
 4 recollection of anything like that happening around
 5 2004/2005?
 6 A. I think he did go Pakistan, yes. I think so, but...
 7 Q. Can you remember why he went to Pakistan?
 8 A. It's so back ago, it doesn't -- I can't -- you know,
 9 it's so many years ago I can't recollect why he went or,
 10 you know...
 11 Q. Was it because your mother was ill?
 12 A. She was ill, yes.
 13 Q. Was she in Pakistan because of being ill?
 14 A. She was in Pakistan, yes.
 15 Q. How long was she in Pakistan for being ill, roughly:
 16 months? Years?
 17 A. Probably about -- I'm not sure, I'm not sure the time,
 18 because I can't remember.
 19 Q. I'm not asking you for precise times, but can you say
 20 roughly in terms of whether it was weeks, months or
 21 years?
 22 A. Probably months. Months.
 23 Q. So it's right that around that time your mother was in
 24 Pakistan for a number of months because she was unwell,
 25 and you think that Usman visited her while she was out

10

1 there; is that right?
 2 A. Yes.
 3 Q. But you don't have a recollection of him being expelled
 4 and ceasing his formal schooling early?
 5 A. No, not really.
 6 Q. Between 2005 and 2010, which is the time that he was
 7 arrested and went into prison, how much contact did you
 8 have with Usman?
 9 A. Between 2005 and 2010?
 10 Q. Yes.
 11 A. Not much. Not much. Because, like I said, I used to go
 12 out clubbing and, you know, I used to go out as far as
 13 Newquay, you know, go to gigs with my friends and
 14 all --nighters. Sometimes I didn't even go home, you
 15 know.
 16 You see my mum was worried about me not coming home,
 17 so I used to have that kind of a teenage years that
 18 I was a -- I was just -- I liked partying and I liked
 19 going out. I even went to Tenerife with my friend, just
 20 for partying, you know, Tenerife around that time as
 21 well, 2006, it was, something like that, you know, just
 22 for a party, because I was like that in my young days,
 23 I was just, you know, on the trap, wherever there's
 24 a party, I'm out there, so.
 25 Q. This is the period 2005 to 2010 when I think you were in

11

1 your early 20s?
 2 A. Yes. Yes.
 3 Q. Were you living at home at the time with your parents?
 4 A. Yes. Yes, sort of.
 5 Q. Was Usman living at home with your parents?
 6 A. Yes.
 7 Q. How big was the house? How many bedrooms?
 8 A. It was three, three bedrooms.
 9 Q. So you're living in quite close proximity to him for all
 10 this period of maybe five years?
 11 A. Yes.
 12 Q. What was he doing over that time? Was he going to
 13 school? Was he going to college? Was he doing a job?
 14 What was he doing?
 15 A. At that time, I don't know.
 16 Q. Many people might be surprised that you were living in
 17 close proximity to him --
 18 A. Yes.
 19 Q. -- for five years and you can't tell us anything about
 20 what he was doing over that five-year period at all?
 21 A. I mean, after school -- I don't think he went college,
 22 and... he was just chilling with his friends.
 23 Q. So you think he was chilling with his friends on the
 24 street for at least a few years?
 25 A. Yes.

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1 Q. Now, he told his probation officer that he had become,
2 over these years, involved in criminality and the gang
3 culture in Stoke; do you think that's right?
4 A. I didn't know anything about that. You see, because
5 Usman, he was a — he kept everything to himself, you
6 know. He kept everything to himself, so we didn't hear
7 nothing, you know, like he didn't say that he's got
8 into, you know, certain trouble, like, you know, with
9 gangs or this and that, I mean, if he did get into gangs
10 we would have known about it.
11 Q. In June 2009, he was involved in another violent
12 incident where he was arrested for throwing a brick at
13 the head of another man, and he accepted a caution from
14 the police, so he accepted that he had done it. Did you
15 know about that at the time?
16 A. Yes, I knew about that.
17 Q. How did you know about it? Did Usman tell you?
18 A. No, I found out from my mum that he's done this.
19 Q. What did she tell you about the incident?
20 A. That he's got into trouble with the police, he's done
21 something, he's got into trouble with the police.
22 Q. Did she tell you anything about the circumstances of the
23 trouble, how it had arisen?
24 A. She told me that vaguely that he's had a fight, you know
25 he's had a fight, so I told him off, I told him off and

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1 he got cautioned, so I said: make sure you don't do it
2 again, you know, told him off, basically.
3 Q. Did he tell you how the fight had happened?
4 A. He didn't explain the details or anything, you know,
5 it's just, he said, I was with my friends and, you know,
6 just someone swore at him or something, you know, like
7 kids are. You just need a little excuse for, you
8 know — someone swore at him or something and, you know,
9 they started fighting. But he didn't explain to me, you
10 know, exactly what happened.
11 Q. Well, didn't you ask for the details?
12 A. I did ask further details, but that's what he said: he
13 swore at me, so this happened, or, you know. We asked
14 the police — we got more information than getting out
15 of him we got out of the police, like, you know, he had
16 a fight with somebody and they've cautioned him.
17 Q. Did that make you and other family members ask him what
18 he was doing during his days?
19 A. Yes. Yes.
20 Q. What did he say?
21 A. He said: I just chill with my friends, you know, and
22 watch the movies, you know, how normal teenagers do.
23 Q. Were you concerned that this teenager didn't seem to be
24 doing anything, hadn't gone to college, was around the
25 streets and getting into fights?

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1 A. I mean, that was the only time he had a fight actually.
2 After that, once he got cautioned, we made sure, you
3 know, you don't get into trouble.
4 Q. Usman told those from the criminal justice system later
5 dealing with him that he had looked into current affairs
6 around this time and he had conceived a grievance about
7 what was happening in Kashmir, which was an area close
8 to where I think your family had origins. Were you
9 aware of that?
10 A. No.
11 Q. He has also said that he became more interested in the
12 Islamic faith in his later teenage years; were you aware
13 of that?
14 A. No. We knew he was praying, but that was it, really.
15 Q. Now, between 2008 and 2010, there is evidence that Usman
16 was involved in preaching an extreme version of Islam in
17 public, including for an organisation called
18 Al-Muhajiroun. Were you aware, or was any other of your
19 family members aware, to your knowledge, of that sort of
20 behaviour going on?
21 A. No, not at all. I mean, we didn't even — you know, the
22 time we found out about this was when he got arrested.
23 It was such a shock, and we thought: why has he got
24 arrested? Then it came out in the press and that's when
25 we found out about, you know, him associating with this,

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1 that and the other, and we thought — you know, we
2 didn't have a clue.
3 Q. So for a period of nearly two years between 2008 and
4 2010 —
5 A. Yes.
6 Q. — so his later teenage years, Usman was going to stalls
7 in public, handing out literature and preaching
8 an extreme version of Islam and the family had no
9 knowledge of that at all?
10 A. I mean, we — you know, we heard from hearsay, yes, that
11 he's got stalls, his and his mates have got stalls and
12 they hand out leaflets and tell people about Islam, and
13 we confronted him, I confronted him and I asked him:
14 what's going on, you know, how come you're doing this,
15 why don't you go to work, or, you know, do something
16 with your life, what are you doing? He said: I'm just
17 preaching, and he said to us, you know, the police
18 stopped by us, whilst in public, the police stopped by
19 us and I give them — I tell the police, like, check all
20 the leaflets, and there's nothing wrong. So once
21 we tried to ask him, he said: don't get into my life,
22 leave me alone, you know.
23 He moved out as well, I think it was before he got
24 arrested, about six months, a year, he moved out of home
25 as well.

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1 Q. Where was he staying over that period?
 2 A. He was staying in a house in Tunstall, an area a bit --
 3 about three miles away from us, two or three miles away.
 4 Q. With whom?
 5 A. No clue.
 6 Q. Now, we know when a terrorism search warrant was
 7 executed against him in 2008, it was executed at your
 8 sister's address where he was staying at least for some
 9 time over that period. Do you remember him staying at
 10 your sister's house for a bit?
 11 A. Yes, he used to stay there now and then, because
 12 obviously when my sister got married from Pakistan and
 13 her husband was still in Pakistan, so my sister didn't
 14 want to stay on her own there, so she was staying with
 15 my mum and, you know, he was staying there for brief
 16 periods, you know.
 17 Q. Did it concern you and members of the family that Usman
 18 was spending his time out at these stalls in Stoke --
 19 A. Yes.
 20 Q. -- handing out Islamic literature?
 21 A. Actually, it did concern us, and you know the time they
 22 got raided, you know, we got really worried, I got
 23 really worried about him, I thought what was going on.
 24 He was saying: I've done nothing wrong, I've done
 25 nothing wrong, they've raided me for nothing.

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1 So a few months down the line, all the charges got
 2 dropped, and whatever literature they took, they gave it
 3 him back. So then we thought: wow, I mean, if
 4 everything's been dropped, he's probably, you know,
 5 doing nothing.
 6 Q. But yet here you have a late teen who spent years, or
 7 a significant period of time, on the streets doing
 8 nothing, apparently chilling with his friends, getting
 9 into trouble with the police, and then he suddenly
 10 starts spending his time handing out Islamic literature
 11 and he is raided by the police. Doesn't this give the
 12 family some concern that he's on the wrong track and
 13 getting in with the wrong sort of people?
 14 A. I mean... yes. Yes, we did. We were concerned, we were
 15 concerned that, you know, he's been raided and, you
 16 know, then, obviously when the charges were dropped, you
 17 know, we didn't bother. And then he started going in
 18 the newspapers to, you know, to say: I've done nothing
 19 wrong, in the newspapers.
 20 Q. But didn't you confront him about the sorts of
 21 concerns --
 22 A. Yes, of course.
 23 Q. -- that you've said you had?
 24 A. Of course.
 25 Q. What did he say?

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1 A. He said: I'm not doing anything, you know. We were
 2 concerned, like, you know, and we confronted him, but he
 3 said: I'm not doing anything wrong.
 4 Q. Did you ask to see any of the literature he was handing
 5 out at these stalls?
 6 A. We've seen a few, seen a few, just the leaflets, like,
 7 you know like -- what he -- what he handed to the
 8 police.
 9 Q. What did you think about it?
 10 A. What the police -- I mean, he just -- the leaflet I've
 11 seen, it was, you know, just about Jesus, about Jesus,
 12 how he lived, and how we believe that, you know, Jesus
 13 is a messenger of God, and he says: I've give that out.
 14 Q. Now, in 2010, as you know, December 2010, Usman was
 15 arrested and he was later charged with terrorism
 16 offences. You presumably became aware of that?
 17 A. Yes. Yes. Through the news, we were aware of that
 18 through the news about what he's been tried for, because
 19 obviously he wasn't living with mum and dad, he was
 20 living at the different property.
 21 Q. Okay, let's take this in stages. How did you and your
 22 family first become aware that he had been arrested:
 23 from him, from the press, or from some other source?
 24 A. No, he was, obviously he was at his own property so we
 25 didn't know he got raided. It's -- one of his friends,

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1 they live in the local area and their house got raided,
 2 so we -- because it's his friend, the house got raided,
 3 so we inquired about him and we found out that -- my
 4 older brother went to his house, and he wasn't there but
 5 he said that it got raided, so he informed us.
 6 Q. And did he inform you about the arrest --
 7 A. He's been arrested, yes.
 8 Q. Did he tell you what he'd been arrested for?
 9 A. He didn't, he didn't, because he tried to ask, you know,
 10 the officers that did raid, but they didn't tell him
 11 nothing. So we found out from the news, mainly. Mainly
 12 it was from the news.
 13 Q. What did you find out from the news about his arrest and
 14 what he had been charged with?
 15 A. I mean, his arrest, we found out that he's been arrested
 16 for, you know, obviously terrorism.
 17 Q. Did you discover what particular acts were being alleged
 18 against him? What he was said to have done?
 19 A. Only what was on the news.
 20 Q. Well, we know that the case against him was that he had
 21 conspired with others to set up a militant training camp
 22 in Pakistan, which would produce terrorists who might
 23 later attack the UK. Is that information you discovered
 24 at the time?
 25 A. I think that was on the news, later on on the news, but

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1 first on the news they were saying something about the
 2 Stock Exchange or, you know, something like that, but
 3 that become thingy later on, but that was a shock to us,
 4 you know, it's ...
 5 Q. Had you had any suspicions before that that Usman might
 6 be doing something more serious than getting into
 7 trouble locally and preaching on these stalls?
 8 A. Not at all. Not at all. I mean, if we did, we would be
 9 the first ones to inform, you know. Like -- you know,
 10 to stop him in his tracks or whatever.
 11 Q. What was the reaction of the family to the arrest and
 12 the information coming through on the news which you say
 13 was concerned with a potential plot against the
 14 London Stock Exchange?
 15 A. It was a total shock. It was a total shock. I mean, he
 16 was -- he was just -- it was unbelievable, you know,
 17 we're thinking.
 18 Q. Did you, or to your knowledge any other members of your
 19 family, speak to him about the charges and what he was
 20 said to have done?
 21 A. Speak to him whilst he was in --
 22 Q. Well, did you call him or see him and say: what's all
 23 this, what have you done?
 24 A. Yes, we confronted him, you know, when we went to see
 25 him, so, you know: what is this?

1 Q. What was his response?
 2 A. He just wouldn't tell us. He wouldn't tell us.
 3 Q. Didn't you insist?
 4 A. We did insist. He said: stop stressing me out. You
 5 know. So because he was -- because he was so young, he
 6 was 19, and we thought, you know, he was so young and we
 7 thought, you know -- and he's in prison as well, and
 8 he's so young, we didn't want to, in case, in prison,
 9 because, you know, he loses the plot or something, you
 10 know, we don't want to stress him, but we insisted and
 11 he wouldn't tell us.
 12 Q. He didn't tell you anything about the charges that were
 13 being reported as him being involved in a plot for
 14 a serious terrorist attack on the London Stock Exchange?
 15 A. Nothing. He said "I didn't do nothing wrong, I've done
 16 nothing wrong". This was right at the start. I mean,
 17 we visited about a month after.
 18 Q. Let me turn to that now. He was in prison
 19 between December 2020 and 2018.
 20 A. Yes.
 21 Q. It's right, isn't it, that he had regular contact with
 22 members of the family?
 23 A. Yes.
 24 Q. Including almost daily calls?
 25 A. Daily calls, yes.

1 Q. And regular visits?
 2 A. Well, regular visits, it depends where he was. I mean,
 3 if he was further away, the prison was further away, you
 4 know, it would be less. If the prison was closer, like,
 5 if it was in London it would be rare, like now and then.
 6 If he was closer, like Manchester, probably regular.
 7 Q. You visited him a number of times?
 8 A. Yes. Yes.
 9 Q. How did he seem to be in prison?
 10 A. In the start he was like, you know, edgy and, you know,
 11 in the start, but gradually, he was more remorseful for
 12 what he was -- what he was, you know, charged for and
 13 more -- you know, as we've seen, like a different
 14 attitude in him, we started asking, you know... but he
 15 said "I was just a silly kid. I was silly. I was
 16 stupid".
 17 Q. Did he ever talk to you about what he was in prison for,
 18 the charges, what he had been convicted for?
 19 A. No, because obviously we already knew, didn't we, so he
 20 didn't -- in prison -- in prison, when we used to go
 21 visit him, we didn't talk about, you know -- we just --
 22 we just -- we used to talk about, you know, football
 23 and, you know, this, that, just laughing and joking,
 24 because we used to have, you know, a prison officer
 25 right next to us as well, so they used to monitor as

1 well, and he used to -- he used to talk about just
 2 random things.
 3 Q. Did you discover through the trial that he went through
 4 that he had pleaded guilty to acts -- performing acts
 5 preparatory to terrorism on the basis that he had been
 6 involved in trying to set up a terrorist training camp
 7 in Pakistan? Did you discover that?
 8 A. We discovered from the news.
 9 Q. Did you, during any of the later conversations with him,
 10 say something along the lines "We've discovered this
 11 about you and what you've pleaded guilty to, tell us
 12 about it, what have you done?"
 13 A. Yes, we asked him, but he wouldn't -- he wouldn't open
 14 up. He would not open up. He used to keep everything
 15 dead thingy, and he was in prison as well, so we used to
 16 think, he's in prison as well, and we didn't want to,
 17 you know, stress him out or, you know, extra, you know,
 18 put pressure -- because he's in prison and we're there
 19 for an hour, and we're going to go.
 20 JUDGE LUCRAFT: Can I just be clear: you said at the
 21 beginning that he told you that he hadn't done anything
 22 wrong, and yet you had now found out on the news that he
 23 has pleaded guilty, so he has done something wrong.
 24 A. Yes.
 25 JUDGE LUCRAFT: I mean, that must have given you a clear

1 indication of saying: well, what are you playing at?
 2 A. Yes, yes, because in the start he was really stubborn,
 3 he was really stubborn in the start of his sentence,
 4 then gradually, you know, he was -- he calmed down, but
 5 we did confront him, but he wouldn't open up. He used
 6 to threaten us, you know, "I'll stop the visits", you
 7 know.
 8 MR HOUGH: Now, you said he became more remorseful?
 9 A. Pardon?
 10 Q. You said he became more remorseful?
 11 A. Yes, of his actions, like, you know, it's like, he said
 12 "I was a silly kid and I made mistakes and I've changed
 13 now".
 14 Q. Now, normally when people are remorseful and they say
 15 sorry or express that they're sorry about something,
 16 they say something about what they're sorry for, what
 17 they're sorry for doing. Did he ever express remorse
 18 explaining what he'd done and why he was sorry for it?
 19 A. He never explained to us what he's done, it's never
 20 explained to us. We tried to get it out of him, but he
 21 never -- he never told us -- explained to us, you know.
 22 Q. During these discussions while he was in prison, did you
 23 ever become aware or did any of your other family
 24 members, to your knowledge, become aware that Usman had
 25 been involved in a number of violent incidents in

25

1 prison?
 2 A. Not at all. Not at all.
 3 Q. Did you ever become aware that he was high up within the
 4 Muslim community in the various prisons or that he was
 5 understood to be?
 6 A. Not at all, no.
 7 Q. Did you understand that he was suspected of being
 8 involved in radicalising others, preaching extremist
 9 Islam --
 10 A. No.
 11 Q. -- in the prisons?
 12 A. Not at all, because I can recall like when he was in
 13 Milton Keynes, Woodhill, he was in a separate building.
 14 So we had to go in the main building, get his food or
 15 whatever, chocolates or whatever, crisps or whatever,
 16 and we had to walk, and there was a prison officer who
 17 used to escort us to the other building where he was,
 18 like, you know, segregated, and we used to go there, and
 19 at one time I -- we had a laugh and a joke, we were
 20 talking about football, and I found out that, you know,
 21 the prison officer who was there, he was a Leicester
 22 fan, he was a Leicester fan, and I think it was that
 23 year when Leicester were going to win the Premier League
 24 as well, so we were having a laugh and a joke about
 25 Leicester and he was saying: they're not going to win

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1 it, they're going to slip up.
 2 So as the visit was done, I was walking back with
 3 the prisoner officer, and I asked him "How is he? How
 4 is he in prison? How is he?" and he said like; "Yes,
 5 he's a good lad, he's a good lad, keeps his cell nice
 6 and tidy, yeah, he's okay". So we relied on that, we
 7 relied on the prison officers because we couldn't get
 8 nothing out of him, so we asked them, we relied on the
 9 prison officers and the authorities, you know, to keep
 10 an eye on him.
 11 Q. Now, you're right to say, based on our reading of the
 12 monitoring of the prison visits --
 13 A. Yes.
 14 Q. -- that you weren't discussing his offences with him, or
 15 that's what we can tell from the monitoring that
 16 existed?
 17 A. Yes.
 18 Q. What was you say if it was suggested that you and the
 19 other members of the family just tried to turn a blind
 20 eye to what he was doing; just tried to shut it out?
 21 A. No, we didn't turn a blind eye, we tried to do as best
 22 as we could, you know, and in prison we mainly relied on
 23 the prison officers, you know, to keep on an eye on him,
 24 and we thought, you know, he's -- they're the best
 25 people to keep an eye on him and keep him, you know...

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1 Q. Did you try to do anything to discover whether he had
 2 really changed and whether his ideology had really
 3 changed?
 4 A. What, whilst he was in prison? That's what -- yes,
 5 through the prison officer, and that's what I relied on.
 6 That's why I thought: wow, so he is making -- he is
 7 progressing, you know, he is. You know, he has changed.
 8 Q. May we turn to the period after his release. We know
 9 that he was released at the end of December 2018, and
 10 that he lived in Stafford in a probation hostel
 11 until September 2009 when he moved to his own flat,
 12 I think you're aware of that?
 13 A. Yes.
 14 Q. How regularly did you and other family members see him
 15 during the 11 months or so that he was out of prison?
 16 A. I mean, when he was -- when he got released, when he
 17 went to the hostel, I went to see him on the first day
 18 and went to the fast food place and got him some fast
 19 food.
 20 Then when he was in the hostel, we didn't -- not
 21 regular because, you know... but after a few months he
 22 got a clearance to go to my mum's house, to visit my mum
 23 once a week, so once he got the clearance -- I think it
 24 was after a couple of months -- once he got the
 25 clearance they had to sort out the route, you know, what

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1 road and everything, so it was -- you know, we were
 2 really -- we were really thinking about that, make sure
 3 he gets a route so he doesn't, you know, breach his
 4 conditions. And once he got the route, and I think it
 5 was a month after, a couple of months, once he got the
 6 route, he used to visit on -- every Sunday.
 7 Q. And I think he stayed in the house for, or stayed with
 8 you for most of the day on those Sunday visits?
 9 A. No, you know, when -- because he had a curfew and when
 10 he got released he had to be at the hostel 4 o'clock.
 11 So he come to the -- he got picked up, my brother picked
 12 him up, brought him to the house about 11.00, a couple
 13 of hours at the house, then we made sure that, you know,
 14 just in case of traffic or anything like that, we make
 15 sure that we take him back to the hostel before time.
 16 So we used to get back to the hostel before, half
 17 an hour before. We used to make sure that we, you know,
 18 were well on schedule with, you know, the curfew.
 19 Q. But I think the days extended over time as his curfew
 20 was put later?
 21 A. They did extend it gradually, like months down the line.
 22 Then it went to -- I think then he went to 6 o'clock,
 23 and then it went to 11.00.
 24 Q. So for the later months, is this right, that he was
 25 staying for several hours at home on a Sunday?

1 A. Several, yes, yes, on a Sunday.
 2 Q. During the period after his release, what, as far as you
 3 know, was Usman doing with his time?
 4 A. During, sorry?
 5 Q. What was he doing with his time?
 6 A. What, when he was alone?
 7 Q. After he had been released, when he was in the hostel
 8 and then in his own flat, what did he do during the
 9 days?
 10 A. Don't know.
 11 Q. Did you ever ask him?
 12 A. Yes, I asked him: what do you do, do you play computer
 13 or, you know, go round shops?
 14 Q. Do you know what his attitude was to the future, what
 15 his plans for the future were?
 16 A. His plans for the future were very -- they seemed very
 17 positive, you know. He was thinking about, you know,
 18 getting a job, you know, planning -- getting a job. He
 19 even got -- applied for the -- I think it's the
 20 construction CSCS, he even got one of them cards, and he
 21 was very optimistic about the future, and, you know,
 22 wanted to get married, you know, have a family of his
 23 own.
 24 So we thought: wow, you know, he has -- you know, he
 25 has -- you know, he wants progress.

1 Q. Was he always upbeat or was he sometimes more downbeat
 2 or despondent?
 3 A. The times -- the times we've seen him, he was -- he was
 4 no, fine, like normal, you know.
 5 Q. Did you know anybody else he was seeing at the time, any
 6 other people he was spending time with?
 7 A. No.
 8 Q. Did he mention anything about people from Cambridge
 9 University?
 10 A. He -- he did mention when he went on his first -- you
 11 know, his first -- he went to his first meeting or
 12 whatever, he went to somewhere, and he then mentioned
 13 that he's going with, you know, the course, he's doing
 14 some kind of a course, he's doing some kind of course,
 15 some progress learning course, and he's going with
 16 Cambridge, you know, through the Cambridge, you know,
 17 university.
 18 Q. On all of these Sunday visits, did you and other members
 19 of the family speak to him about his past and his
 20 offending?
 21 A. We tried, we tried, but he used to just brush it off.
 22 He used to brush it off, he'd say: don't worry about the
 23 past, you know, I'm trying to think about the future,
 24 don't worry about the past, don't stress me about the
 25 past.

1 Q. Did you ask him or have any discussions about his
 2 current attitude to religion?
 3 A. His current -- we didn't ask him about his current
 4 attitude to religion, but, you know, he didn't seem
 5 religious or, you know, he didn't seem to, you know,
 6 because he completely -- it's like from what he was
 7 eight years back, eight/nine years back, what he was
 8 then, and what he was, you know, 2008, he was
 9 a completely different person.
 10 Q. So are you saying that in the course of all these Sunday
 11 visits, some of them lasting for several hours --
 12 A. Yes.
 13 Q. -- none of the family ever got a straight answer out of
 14 Usman about his previous offending and what had got him
 15 into prison for eight years?
 16 A. No, no, I mean, we tried, but was saying: I was just
 17 a silly boy, you know, I was young, I was silly, I got
 18 into stupid things, and just leave it to that.
 19 Q. And you accepted that?
 20 A. Yes.
 21 Q. Now, we understand from toxicology evidence that he had
 22 used illegal drugs, notably cocaine, in the months
 23 before his death. Were you aware that he was getting
 24 access to drugs?
 25 A. Not at all. Not at all. I mean, it's a bit

1 unbelievable, that is, because when he was in prison,
 2 I mean I found out that — you see I didn't even know he
 3 smoked before he went to prison, and I only found out he
 4 smoked cigarettes when he suddenly quit. I said:
 5 I didn't know you smoked? He said: yes, I quit, and the
 6 tobacco, one day, I just flushed it down the toilet and
 7 just, you know, I thought I'm going to quit, flush it
 8 down the toilet, then he said: I sat down and regretted,
 9 why did I flush the tobacco? I should have had the last
 10 cigarette. Then he said: oh, I thought I might as well
 11 quit now, got no choice. So that's when I found out
 12 he's quit smoking, so he didn't even smoke. Cocaine is,
 13 no, that's a total, you know, it's a shock, like, you
 14 know.
 15 Q. Now, moving to the period immediately before the attack,
 16 so November 2019, based on the CCTV evidence, we know
 17 that he visited you and your family every Sunday
 18 during November 2019; that's right, isn't it?
 19 A. Yes.
 20 Q. And you would, on some of those occasions, at least,
 21 collect him in the morning, take him back in the
 22 evening?
 23 A. Yes. Well, my elder brother would collect him in the
 24 morning and he'll park up in the car park on the side
 25 and he'll jump in the car, he'll drop him off, then I'll

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1 drop him off in the evening.
 2 Q. And we also know that you visited him on
 3 20 November 2019, and I think that was after you, in
 4 your taxi, had taken a customer —
 5 A. Yes, yes.
 6 Q. — to near the area, and you dropped in to see him?
 7 A. Yes, yes, because I was a —
 8 Q. I don't think we need the details of your precise day.
 9 A. Okay. Okay.
 10 Q. Just to ask these questions: how did Usman come across
 11 in these meetings during the last month of his life?
 12 A. Absolutely normal, like, same, like — like he was the
 13 previous Sunday and the previous Sunday, you know,
 14 exactly the same, it was like a — like a routine,
 15 dropping — I used to take him to the flat and go in
 16 there and we'd order some food, we'd order some food and
 17 wait for the food, play a little console game or watch
 18 a little series, because he was into his series, you
 19 know, TV series, and watch a bit of TV series, and once
 20 the food arrived, have the food, and as soon as we
 21 finished the food: okay, that's it, I'm going to go, see
 22 you next week.
 23 Q. Now, other people who knew him reported that he was
 24 becoming isolated over this period; that whereas he had
 25 gone to the mosque and the gym earlier on after his

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1 release, now he was spending an awful lot of time on his
 2 own, not going to these other places; is that something
 3 you were aware of?
 4 A. Not aware of that, no.
 5 Q. Did you ask him what he was doing with his time and find
 6 out that he was (overspeaking)?
 7 A. He used to tell me that he goes to the gym, goes to the
 8 gym, does a workout, and just, you know, if he gets
 9 bored, he'll just go for a walk, and mainly he used
 10 to — he said: mainly I play on my Xbox, you know, in
 11 the evenings, but in the daytime, he said: when I get
 12 bored I go for a walk, you know.
 13 Q. Were you aware that he was due to go to London to
 14 an event on 29 November 2019?
 15 A. See, I — at that time he said he was going to an event,
 16 at that time, but I didn't take no notice because
 17 I thought that, you know, like he went to the previous
 18 meeting, it's going to be something similar, it's going
 19 to be something similar. And that's it, really.
 20 Q. So you knew he was going to London? Did he say anything
 21 about the event?
 22 A. He didn't explain nothing about the event. He just
 23 said: I'm going — going with the same, you know, the
 24 same course what I went to last time, with the Cambridge
 25 University, so we thought okay, he's going to go and

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1 last time — he's going to be escorted, and he's going
 2 to be escorted with the police, like last time, and
 3 whoever he was escorted with last time, I think it was
 4 the police because he told me he was escorted with the
 5 police, and he will be back.
 6 Q. Now, you had, I think, your last contact with him by
 7 a telephone call on Thursday, 28 November 2019?
 8 A. Yes.
 9 Q. The day before the attack?
 10 A. Yes.
 11 Q. That call must have stuck in your mind because of what
 12 happened later?
 13 A. Yes, because it was a brief call, it was a brief call,
 14 because I — it was about 6.00 or something like that,
 15 and he phoned me, and hello, because the last time I've
 16 seen him on the Sunday, on the Sunday before that call,
 17 the Sunday, he had — when I went to his flat he said:
 18 oh, my sink's blocked, my sink's blocked. So I thought:
 19 oh, I've seen this on the internet, you know, if you put
 20 salt in the sink and put boiling kettle water in there,
 21 boiling hot water, it opens the sink. So we've done it
 22 on the Sunday, we've done it, I said: have you got
 23 enough salt? He said: I've got enough salt, don't
 24 worry, so we'd put, we'd done it. So on the Sunday
 25 I asked him: how's your sink, is it unblocked? He said:

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1 yes, it's unblocked, yeah, you know, flaming heck, it
2 worked. He was laughing and joking and he said: if only
3 I knew this thing in prison, because a lot of people
4 have their sinks blocked because the hair going in the
5 sink, and I said: ah, if you knew that in prison you
6 would have been the plumber of the prison, just having
7 a laugh like that.

8 And my **child** was crying at the same time as well,
9 so when your kids cry when you're on the phone you want
10 to put the phone down and, you know, grab your kid, so
11 I was trying to get rid of him because my **child's**
12 crying, and I said to him: what you doing now? He said:
13 I'm going to get some food. So I thought -- I said: you
14 go and get some food and we'll talk later, I'm going to
15 calm my kid down, little kid, and that's it.

16 Q. And there was no later call?

17 A. No later call.

18 Q. Based on what you have told us, there was nothing
19 unusual or concerning about his manner?

20 A. Nothing. Nothing at all.

21 Q. We also know he spoke to other family members that day.
22 Do you have any knowledge of how those calls went?

23 A. No, not really. Well, my mum told me that he did -- he
24 rang and he explained -- well, he explained to my mum,
25 you know, that he's going to, you know, London, and

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1 that's it, really. That's it.

2 Q. How did you become aware of the attack on
3 29 November 2019 and Usman's part in it?

4 A. Actually, because, you know, on Fridays I pick up my
5 children from school and I go to sleep for an hour,
6 about 5.00 until 6.00 I go to sleep, because I want to
7 do an evening shift, because Friday is a busy night, and
8 I went to sleep, got up at -- got up at 6 o'clock, and
9 I went to -- I went on the -- you know, I went -- I went
10 on the app, Sky News app, and I've seen an incident but
11 I didn't take no notice, like, you know, because I -- to
12 be honest, I completely -- I completely forgot that --
13 that day I completely forgot that he's gone to London.
14 It completely -- I completely forgot, because that call
15 I had, a brief call, he didn't get to explain much
16 because my kid was crying, so I completely forgot. So,
17 you know, I went to work and my mum phoned and my mum
18 said that, you know, Usman's gone to London and he's not
19 picking his phone up, he's not picking his phone up, and
20 an incident's happened as well, and so I thought -- then
21 it hit me, I thought: oh, no way. But this was -- this
22 wasn't even in our wildest dreams that -- you know
23 I thought -- I didn't think nothing, I thought, he's
24 been escorted by officers, so I thought he'll be fine,
25 you know.

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1 So I said to my mum, it's probably a delay because
2 of the incident, but he'll be back, don't worry, mum.
3 So I carried on working for a few -- half an hour or so,
4 or I think I did one job or so, and then I thought: oh,
5 I might as well go to my mum, comfort her a bit, you
6 know that he'll be back.

7 So I went home, I went home to my mum and my mum was
8 worried, my mum was worried: oh, he's not picking his
9 phone up. I said: don't worry, mum, you know, he must
10 have gone with, you know, the officers, obviously he's
11 not -- he couldn't have gone on his own, so there must
12 be someone with him, so don't worry.

13 Q. Just pausing there. Was the concern that he had been --
14 might have been harmed in the attack, or that he might
15 have been the guilty party, the perpetrator?

16 A. See, 'cause the thing was, we didn't know which place he
17 was going.

18 Q. Just listen to the question.

19 A. Okay.

20 Q. Your mother was concerned about Usman having been in
21 London because of the news about a terrorist attack --

22 A. Okay.

23 Q. -- at Fishmongers' Hall. Was her concern that he might
24 have been hurt in the attack, or that he might have been
25 responsible for the attack?

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1 A. Her -- her thingy was that he might be hurt, he might be
2 hurt, he's not picking up the phone, he might be hurt.

3 Q. Were you at that stage, or any member of your family,
4 saying: maybe Usman's actually responsible for this?

5 A. No. No. Not at all.

6 Q. Did, shortly afterwards, the police arrive at your
7 mother's house?

8 A. Yes, because I went home and I was comforting my mum.
9 I said: don't worry, mum, it will be all right, you know
10 how you comfort your mum, I tried to calm her down,
11 because she was stressing out then.

12 But a few minutes later, four or five minutes later,
13 the police knocked on the house, on the front door of my
14 mum's, and I opened the door, I went to open the door,
15 and it was a -- the police, PC Ian Brown, I later on
16 knew his name. But he knocked on the door, he showed me
17 the badge, and he said "Can we step inside?" So they
18 stepped inside, and there was about a gang of them.

19 Q. I don't think we need step by step.

20 A. Okay.

21 Q. But is it right that the police told you that Usman
22 either had committed this attack or was suspected of
23 committing it?

24 A. See, the police constable come inside, he come inside
25 the living room and he said the person who was shot and

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1 killed was Usman Khan.
 2 Q. How did you and your family react to that news?
 3 A. We were shocked. We were -- I was shocked, my mum can't
 4 understand him, you know, because she's not, you know,
 5 too good at English, so she was there -- I was just
 6 looking at his face and I thought: no, it can't be. So
 7 he said it is. So my mum's asking me what's happened,
 8 and I don't want to tell my mum in case -- [REDACTED]
 9 [REDACTED], and I don't want to tell my mum in case
 10 she has a heart attack, because I was feeling dead hot.
 11 I had a coat on, and, you know, I was distressed, I was
 12 shocked, like what are you on about? It wasn't
 13 registering. It wasn't registering at all. It was not
 14 registering.
 15 So my mum was asking, I didn't want to tell my mum,
 16 so I phoned my older brother and I told him to get here
 17 now. I didn't even tell him in case on his way he has
 18 an accident. So I said: get here now.
 19 Q. Okay. So it was a shock to all members of the family?
 20 A. Yes.
 21 Q. If it were suggested to you that, looking back, the
 22 family had really not pressed Usman enough for what he
 23 was -- what he had done and what he was doing after
 24 release, that you hadn't really pushed him to find out
 25 more about his life, what would you say to that?

1 A. I mean, we tried our best. We tried our best. Because,
 2 see, we mainly relied on the people who were monitoring
 3 him, because he had a tag on, a MAPPA tag, and he
 4 explained to us that it's a MAPPA tag and it's a GPS,
 5 I thought it looks a bit different, so GPS, so we were
 6 like kind of relying on that, we thought: wow, at least
 7 someone's monitoring him so they know his whereabouts,
 8 you know, where he goes, and we were solely relying on
 9 that, and his, you know, parole officers, because he
 10 used to see us just once a week, and we were mainly
 11 relying on that, that there is someone watching him.
 12 Q. Didn't you and your family consider that it was any part
 13 of your responsibility to find out about what he had
 14 done in the first place to get him into prison, his
 15 attitudes and whether and how he had really changed?
 16 A. We -- like I say, we tried our best. As a family, we
 17 tried our best to, you know, before he got arrested, we
 18 tried our best to keep him out of, you know, give him
 19 advice and this and that, and when he got released we
 20 tried our best to, you know, keep him out of trouble,
 21 you know, follow his conditions, and that's what we
 22 could do. That's all that we could do.
 23 I mean, if we noticed anything, anything different
 24 or anything suspicious, we would have been the first
 25 ones to alert. We would have been the first ones. We

1 would have been the first ones, because we'd rather have
 2 him in prison than all this.
 3 MR HOUGH: Thank you very much, Brother 2. Those are my
 4 questions. There will be some more.
 5 Questions by MR PITCHERS QC
 6 MR PITCHERS: Brother 2, Henry Pitchers, asking questions on
 7 behalf of the family of Saskia Jones.
 8 Can I just ask you about the period 2008 to 2010, so
 9 that's the two years before your brother was arrested.
 10 A. Yes.
 11 Q. As I understood your evidence earlier in relation to
 12 that period, you said that he kept everything to
 13 himself.
 14 A. Yes.
 15 Q. Is that your evidence in relation to that period of
 16 time, 2008--2010?
 17 A. Yes. He was like a... he didn't let anything out. He
 18 didn't let anything out. Even if you tried to, you
 19 know, ask him, he just kept everything to himself. And,
 20 as you know, as teenagers, he used to just brush us off,
 21 he didn't care. At that time he didn't really care
 22 about his family.
 23 Q. But the stalls that he manned, as I understand it, were
 24 in Stoke-on-Trent; is that right?
 25 A. Yes.

1 Q. So that was your hometown at the time?
 2 A. Stoke-on-Trent is my hometown, yes.
 3 Q. So presumably you would see him as you went around the
 4 town manning those stalls?
 5 A. To be honest, because, you see my lifestyle was a bit --
 6 it was a bit weird. They used to call me -- sometimes
 7 they used to take the mick and call me the vampire,
 8 because I used to sleep during the day and go out at
 9 night, you know.
 10 Q. But not every night of the week?
 11 A. Well, not every night, but, you know, most nights I used
 12 to, you know, just hang about with my friends, we used
 13 to have late nights.
 14 Q. Were you working at the time?
 15 A. Working brief periods. Brief periods when I could get
 16 a job, yes.
 17 Q. 2008--2010, were you in employment?
 18 A. 2008... I was working in a warehouse.
 19 Q. In a warehouse?
 20 A. Yes. Yes.
 21 Q. And what shifts were you doing?
 22 A. 8.00 until 8.00.
 23 Q. Okay. Five days a week?
 24 A. Yes, three, four, it depended, yes.
 25 Q. Could we have up, please, {DC6502/4}. Can we just zoom

1 in on those photographs, please. So you see, when you
 2 say that he kept everything to himself, you see these
 3 images, don't you?
 4 A. Yes.
 5 Q. One of your brother waving that flag, that black flag.
 6 These seem to come from the Stoke Sentinel; is that
 7 a local ...?
 8 A. That's a local, yes ...
 9 Q. And we see him holding some of those leaflets?
 10 A. Yes.
 11 Q. And if we can turn down to {DC6502/5}, if we can just
 12 zoom in on the top image, please. So as we look at that
 13 photograph, it's your brother, Usman, on the right—hand
 14 side, isn't it?
 15 A. Yes.
 16 Q. Who is it on the left?
 17 A. The one in the middle?
 18 Q. No, the left?
 19 A. Which, the far left?
 20 Q. Yes.
 21 A. Don't know.
 22 Q. You don't know Anjem Choudary?
 23 A. Well, I've heard of him on the news.
 24 Q. Yes.
 25 A. But then...

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1 Q. You didn't know him personally but you knew who he was,
 2 presumably?
 3 A. Not then. Not then, no.
 4 Q. You didn't?
 5 A. We only found out about these guys after he got
 6 arrested.
 7 Q. You didn't know of Al—Muhajiroun?
 8 A. No.
 9 Q. That Anjem Choudary led, no? Because this is a press
 10 conference, isn't it? You weren't aware that your
 11 brother was doing a press conference —
 12 A. No, no. Not at all.
 13 Q. — with Anjem Choudary?
 14 A. No.
 15 Q. Because I just want to suggest to you that this isn't
 16 really keeping everything to himself, is it?
 17 MR HOUGH: In fairness to the witness, I don't think
 18 Anjem Choudary is pictured in this picture, I think it's
 19 in the later picture —
 20 MR PITCHERS: Right, the later picture.
 21 MR HOUGH: — that he is pictured, the picture further down
 22 on page 5.
 23 MR PITCHERS: But I think it's right he was at the press
 24 conference with Usman Khan.
 25 MR HOUGH: I don't think DCI Brown has given that evidence

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1 but we may be able to find out if he was.
 2 MR PITCHERS: Thank you. But did you see the press
 3 conference that was given the day after the raid of your
 4 sister's home?
 5 A. No.
 6 JUDGE LUCRAFT: I think there are two conferences. One is
 7 a conference on Shari'a law and the other is a press
 8 interview, I think that's what DCI Brown told us, and
 9 I think it may be, Mr Pitchers, that those have been
 10 aligned together.
 11 MR PITCHERS: They may have been conflated.
 12 JUDGE LUCRAFT: Yes.
 13 MR PITCHERS: Thank you. Those are all the questions
 14 I have.
 15 Questions by MR ARMSTRONG
 16 MR ARMSTRONG: Thank you, Brother 2, my name is
 17 Nick Armstrong and I ask questions on behalf of
 18 Jack Merritt's family.
 19 A. Yes.
 20 Q. Can I just have one of those images back up on the
 21 screen again, please, {DC6502/4}. We can have
 22 a conversation about the nature of the conferences and
 23 the number of times and how public they were when he met
 24 Anjem Choudary, but at a time when you say that he was
 25 chilling with his friends in the street, that he was

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1 chilling with his friends and keeping himself to
 2 himself, he was literally standing in the street with
 3 a flag, Brother 2.
 4 A. That doesn't look like our local street.
 5 Q. Your evidence is —
 6 A. That's not a local street, because our — where our
 7 street is, where we live, you know, that looks like in
 8 that picture, it looks a mile and a half, a couple of
 9 miles away, you know.
 10 Q. I don't want to get into a debate with you about which
 11 street this is —
 12 A. Okay.
 13 Q. — this is not a man who is keeping his beliefs to
 14 himself: he is trying to get attention for the cause
 15 that he espouses, Brother 2.
 16 A. Yes.
 17 Q. By standing in the street, waving a jihadi flag.
 18 All right. Now, just to go back in time, you do say
 19 that you don't know very much of his early years because
 20 you were seven years older than him?
 21 A. Yes.
 22 Q. You don't remember the police involvement when there is
 23 an attack that he carries out at age 13.
 24 A. 13, I don't know. I don't know about 13.
 25 Q. Yes.

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1 A. The one at that school?
 2 Q. The one after that you do know about a little bit?
 3 A. Pardon?
 4 Q. The later one you know a little more about?
 5 A. Yes, I found out from my parents.
 6 Q. You found out from your parents. And you think that he
 7 is wrong. You don't remember him being expelled from
 8 school?
 9 A. No. No. No.
 10 Q. Well, you are consistent with others on that. Can
 11 I just have witness statement {WS0120C/1}, thank you,
 12 and then {WS0120C/2} of that at the top. Can we just
 13 have that expanded. Yes. Third line.
 14 "The police have asked me about Usman being expelled
 15 at the age of 14 or 15, but I don't know anything about
 16 this. I don't remember any time when he didn't go to
 17 school..."
 18 And that's Brother 3, your brother Brother 3?
 19 A. Yes.
 20 Q. Can we also have the teacher's witness statement up,
 21 {WS0744/1}, expand on that, and then go to the next half
 22 of that, I think. At the bottom there:
 23 "I have been asked if remember any significant or
 24 memorable incidents involving Usman Khan and
 25 specifically if he was excluded from school. I can't

1 remember him not finishing school..."
 2 And the records have been deleted.
 3 Now the reason why I ask about this is your memory
 4 is consistent with the teacher and with your brother
 5 that he was not excluded from school. Now, the reason
 6 why that's significant is, he says he was, and that
 7 looks like somebody who is making up a bad boy image in
 8 order to further some narrative about being a bad boy;
 9 do you see?
 10 A. Uh.
 11 Q. Do you recognise that as part of your brother's
 12 personality?
 13 A. No.
 14 Q. You don't. All right.
 15 Now, we however then see that when he gets to stall
 16 and we've seen some of the images and we've seen there
 17 are a couple of different conferences, that he was
 18 hanging out with people like Anjem Choudary; all right?
 19 So he's status-seeking; do you see?
 20 A. Mm.
 21 Q. He wants some kind of association with people who are
 22 bigger and badder than he is --
 23 A. Yes.
 24 Q. -- do you see?
 25 A. Is that because of his age, or --

1 Q. I'm putting it to you, I'm asking you, what do you think
 2 is going on with him? You don't know.
 3 When he goes to prison, as Mr Hough extracted from
 4 DCI Brown yesterday, he sought to be on the wing with
 5 another hate preacher, he sought out Abu Hamza; remember
 6 him?
 7 A. Yes, I remember him from the news, yes.
 8 Q. When Abu Hamza was extradited to New York, where he was
 9 convicted of terrorist offences in 2012, your brother
 10 wrote to him. Can we have {DC5595/2} up, please. This
 11 is a Central Case Management Group entry. This is
 12 because your brother is now in specialist units managing
 13 challenging behaviour, and if you see there, there is
 14 reference there to Mostafa:
 15 "... expressing his sorrow at Mostafa's [and that is
 16 Abu Hamza] move and now (imminent extradition to the
 17 USA)..."
 18 2012. Your brother has sought a cash disbursement
 19 for the cost of a first class letter of 60p to do that
 20 and he has written the letter to Mostafa, Kamel Mostafa,
 21 Metropolitan Correctional Centre, in Park Row, New York.
 22 This is your brother again seeking status of the
 23 worst kind, sidling up to big, senior, evil men; do you
 24 see? You're not aware of any of that? You don't see
 25 any of that behaviour?

1 A. It's the first time I've --
 2 Q. But you've never seen that aspect of your brother's
 3 personality?
 4 A. No, not at all.
 5 Q. I see. Now, this is status that he seeks out, he
 6 doesn't want to work for it. He does his GCSEs in
 7 prison, doesn't he? That's where he got his GCSE's.
 8 Are you aware of that?
 9 A. No, not really.
 10 Q. He didn't do much work, did he, before he went to
 11 prison?
 12 A. No, he didn't.
 13 Q. You don't remember any of that. So he wants unearned
 14 status of the worst kind; do you see? Most of us seek
 15 to get status by doing good things in the world, and
 16 working and getting jobs --
 17 A. Yes, yes, sure.
 18 Q. -- and raising families; he doesn't do any of that, does
 19 he?
 20 A. No, he don't.
 21 Q. He's not a very nice man even at this stage, even pre
 22 the offence, is he?
 23 A. Well, no, that don't seem like it.
 24 Q. Later on, we see the same behaviour. We had
 25 Lisa Ghiggini in the position that you're now occupying

1 on Friday to whom he was showing off about
 2 Charles Bronson, it made the press over the weekend.
 3 Again, he sidles up to these guys, he seeks some kind of
 4 derived status, do you see? And the point I'm putting
 5 to you is, he's always been this man, Brother 2.
 6 There's never been any fundamental change. Do you see?
 7 You don't see any of that? Never?
 8 A. Never, never. Never.
 9 Q. But that's because you don't want to challenge him. You
 10 tell Mr Hough, you sit with him in the prison visits
 11 room at whichever category A prison he is in, and you
 12 don't want to stress him out; is that right? Better not
 13 to stress him out?
 14 A. I mean, we — when we went and visited him we've seen
 15 the progress in him. All we could see is his face. We
 16 didn't know what was inside him.
 17 Q. And he's telling you he's progressing?
 18 A. He's — yes. He's telling us he's progressing, the
 19 prison officer, I asked the prison officer how is he
 20 doing, he said: he's a good lad.
 21 Q. A prison officer told you he was a good lad?
 22 A. Yes.
 23 Q. Really?
 24 A. He keeps his cell tidy and he's a good lad.
 25 Q. Is that all you have to do, do you think, to put this

1 kind of behaviour or to fundamentally rewire your
 2 personality, is keep your cell tidy?
 3 A. I — well, I don't know what — how they do it in, you
 4 know...
 5 Q. Look, I can't —
 6 A. That's all —
 7 Q. I'm putting to you that these features of his
 8 personality have been clear throughout his life.
 9 A. Yes.
 10 Q. All right. And he tells you that he's progressing, that
 11 he's doing well, right? I'm saying to you that that's
 12 another feature of his personality, his self-regard; do
 13 you ever see that from him? He thought rather well of
 14 himself?
 15 A. I mean, he was, he used to talk about his progressions.
 16 Q. Right. You see, we've seen an application form for
 17 Learning Together, for example, where he scores himself
 18 9 out of 10 for pretty much all of it, he thought quite
 19 well of himself. Did you see that? Do you see that
 20 aspect of his personality?
 21 A. Yes, he used to go on to us, like, you know, he is doing
 22 well.
 23 Q. I'm going to give you another example just in order to
 24 give you a sense of this. One of the ways in which he
 25 sought to show that he was progressing is by doing

1 something called a Healthy Identity programme. I'm not
 2 suggesting you will have seen this before, but I want to
 3 show it to you as an illustration of who your brother
 4 was.
 5 A. Yes.
 6 Q. {DC5327/1}, please, paragraph 4.1, this is a programme
 7 that he completed, as you can see, in November 2015, and
 8 was the reason why {DC5327/3} he was taken off the MCBS
 9 later, but paragraph 4.1 is interesting:
 10 "Brother 2 attended 30 Healthy Identity Foundation
 11 and Plus sessions ... Brother 2 stated his reasons for
 12 participating on the course was to 'tell his side of the
 13 story' ..."
 14 So he wants to use it as an outlet.
 15 "... as he openly disagreed with some of the content
 16 within the ERG risk assessment reports, and also to
 17 'better himself', however he did not provide any detail
 18 of any specific areas that needed improving. Brother 2
 19 was also keen to report that due to the independent part
 20 of his sentence being quashed, he felt there was less of
 21 a need to complete the intervention for the process of
 22 progression and release, however he stated he still
 23 remained committed to complete the intervention... [he
 24 wanted to] further reflect on his life and apply the
 25 session content with more of a future focus. However,

1 there were some occasions when he reported he felt
 2 unable to complete work as he felt it was not relevant
 3 to him, an example of this was during the self-image
 4 sessions when he found it difficult to complete the
 5 building a positive self-image out of session work, as
 6 he reported he already has a positive self-image and
 7 'just wants to improve' on this."
 8 So he doesn't need to do self-image work because he
 9 has already got one, he doesn't need to better himself,
 10 he can't think of any specific areas that need
 11 improving. That's who your brother was. He doesn't
 12 need this work; he hasn't done anything wrong. That's
 13 his view; do you see? Recognise that?
 14 A. No. I — I don't recognise that person.
 15 Q. When he comes out, you're spending some time with him.
 16 You still don't see anything other than this positive
 17 self-image that he projects?
 18 A. Yes.
 19 Q. You don't see him taking cocaine?
 20 A. No.
 21 Q. You never hear of that, that's a shock?
 22 A. No.
 23 Q. That's not the kind of thing a brother would know. You
 24 say you're a party guy: you didn't notice him going out
 25 and taking cocaine?

1 A. I mean he was living in Stafford, that's about 10 or
 2 15 miles away from us.
 3 Q. Yes.
 4 A. So we didn't interact, only once a week, so the one day
 5 he come, he didn't look high.
 6 Q. He was using sex lines as well, he was getting sex texts
 7 according to the police who examined his phone. Did you
 8 ever know anything about that: he couldn't get
 9 a relationship but he was using sex lines; he didn't
 10 talk to you about that either?
 11 A. Nothing, no.
 12 Q. Can I ask you about this: you saw him on 20 November,
 13 we'll call up the documents if we need, didn't you? You
 14 went to see him on 20 November, so about nine days
 15 before this event. It was an irregular one and you went
 16 there --
 17 A. In the mid-week.
 18 Q. -- because you had a taxi ride nearby?
 19 A. Yes, yes.
 20 Q. Now, you saw him at 15.34 to 16.04, so you were there
 21 for 30 minutes according to the CCTV report?
 22 A. Yes.
 23 Q. And we know that an hour after that at 17.05, Brother 2
 24 left his flat, DC Brown believes deliberately, to go and
 25 buy the tape at Tesco that he used for strapping the two

1 knives to his hands at Fishmongers' Hall. So within
 2 an hour of seeing you, he goes and performs that. Do
 3 you see anything in his demeanour that suggests all
 4 might not be well?
 5 A. Nothing. Nothing.
 6 Q. You miss it all again?
 7 A. Nothing. I mean, if I've seen anything, I would have
 8 alerted. If I'd seen any little thing out of the
 9 ordinary --
 10 Q. Any little thing, you would alert?
 11 A. I would alert. Any little thing. I mean, I went there,
 12 he made a cup of tea, had a cup of tea, and we were
 13 laughing and joking about the fare, that, you know, he
 14 went to the wrong hospital and he's supposed to be at
 15 the Stafford Hospital, laughing and joking, I said to
 16 him, oh, I'm going to get the fare back so I might as
 17 well wait and have a cup of tea, and I got the fare and
 18 I left.
 19 Q. He is, it seems very likely, actively planning this
 20 attack and has on his to-do list for that day to go and
 21 buy some of the implements he uses for that attack. You
 22 see nothing in his demeanour of any kind that suggests
 23 he might not be other than happy, progressing perfectly
 24 fine?
 25 A. Nothing at all.

1 Q. Would you say you were an attentive man, Brother 2?
 2 A. Pardon?
 3 Q. Would you say you are an attentive or curious man?
 4 A. Yes. Yes.
 5 Q. You would?
 6 A. Yes. I would be curious, yes, of course.
 7 Q. All right. I want to put something else to you just to
 8 finish.
 9 A. Okay.
 10 Q. Because I want to say to you, see if I can get your
 11 attention on this, that there was something, and it may
 12 be obvious to everybody in the room, but I'm suggesting
 13 that it was obvious at earlier stages in his life, that
 14 there was something deeply, deeply wrong with your
 15 brother, and I'm going to show it in one very clear way.
 16 Can I have {DC6690/1} up. This is an interview with
 17 your brother. This is the research interview that
 18 Usman Khan had with Learning Together in March 2019.
 19 Can we go to {DC6690/16}, and can we just expand the top
 20 half of that, please. This is a research interview.
 21 This is where Usman Khan talks about, in response to
 22 questions from Learning Together, how brilliant
 23 Learning Together is and largely how brilliant he is on
 24 Learning Together. But, look, three lines in, he talks
 25 about how he speaks to Amy, he talks about how he speaks

1 to Lisa, and he talks about how he speaks to Jack:
 2 "I had a good conversation with Jack, half an hour
 3 conversation."
 4 Okay. {DC6690/18} at the bottom, please. You will
 5 see, about six lines up:
 6 "... I think to myself, come on, man. You
 7 remember... one thing you never do -- and I was speaking
 8 to Jack about this -- don't forget your experiences.
 9 A lot of people say 'I want to forget a traumatic
 10 experience or this experience'."
 11 He is talking to Jack, and he is engaging with Jack,
 12 warmly. Jack is somebody who is trying to help him, all
 13 right.
 14 {DC6690/21}, please. Top half. About 10 lines down
 15 from the top half. So here he is talking about what
 16 an awful time he had in prison, and he's talking about
 17 somebody who was on dirty protest with him, it's the
 18 usual kind of narrative that he exhibits, and he talks
 19 there about 10 lines down:
 20 "He has looked at me shocked ... [this] is the
 21 reality ... then I feel grateful. I said to Jack, you
 22 know, the day was sunny, I was walking and I said for me
 23 what happens is after a time something wears out and you
 24 are like ..."
 25 He goes on. He is speaking warmly and casually and

1 referencing Jack as somebody who was helping him, as
 2 somebody he is engaged with, as a friend; that is what
 3 your brother is doing, right.
 4 A. Yes.
 5 Q. This is in March. In November we have the attack.
 6 Brother 2, he is able to talk that way about somebody
 7 and then he is able to attack Jack in the way that we
 8 have seen described. I'm not going to go through this
 9 and I certainly am not going to put it on the screen
 10 because my clients are watching this online. The
 11 pathology evidence, put it alongside those remarks: that
 12 was your brother. He was deeply, deeply disturbed. He
 13 was a nasty, violent, self-regarding piece of work, and
 14 all the signs of that were there from childhood. You
 15 looked away, didn't you? You saw none of that.
 16 A. (Indistinct).
 17 MR ARMSTRONG: Thank you, Brother 2, no further questions.
 18 JUDGE LUCRAFT: I don't know if there are any other
 19 questions from anyone else?
 20 MR BUNTING: Sir, if I may ask one or two questions.
 21 JUDGE LUCRAFT: Certainly, and Mr Bunting, if you would,
 22 again, as with others, just introduce yourself. We are
 23 going to have a break but if it is just one or two
 24 questions it might be sensible to --
 25 MR BUNTING: It will be about five minutes if --

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1 JUDGE LUCRAFT: We'll take those questions, Mr Bunting, and
 2 then we'll reward ourselves with a break at the end of
 3 them.
 4 Questions by MR BUNTING
 5 MR BUNTING: Just for the jury, my name is Jude Bunting,
 6 I appear on behalf of the family of Usman Khan.
 7 You've given the jury some helpful evidence about
 8 your reaction to this incident when you found out about
 9 it, and the pain and difficulty you were faced with on
 10 that evening. Very soon after the incident, the family
 11 also released a statement through the police; is that
 12 correct?
 13 A. Yes.
 14 Q. And was that statement along the following lines:
 15 "We are saddened and shocked by what Usman has done.
 16 We totally condemn his actions..."
 17 A. Yes.
 18 Q. "... and we wish to express our condolences to the
 19 families of the victims that have died and wish a speedy
 20 recovery to all of the injured."
 21 Is that what your family said at the time.
 22 A. Yes, yes.
 23 Q. And is that what your family continues to believe today?
 24 A. We totally condemn his actions, totally condemn.
 25 I mean...

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1 Q. Just to go back through one or two of the points that
 2 you have gone through today already. You've explained
 3 that your family was -- the faith of your family was
 4 Islam.
 5 A. Yes.
 6 Q. Were you an expert in Islam yourself?
 7 A. No.
 8 Q. We've heard about the types of things that you were into
 9 in 2008--2010. You were working in a warehouse, you
 10 liked to party, you liked to go to gigs?
 11 A. Yes.
 12 Q. Have you got any specific theological experience? Do
 13 you understand what that means?
 14 A. No.
 15 Q. Do you know anything about the learning in respect of
 16 interpretation of literature related to Islam?
 17 A. Not at all. Not at all.
 18 Q. When your brother was preaching in public, as we've
 19 heard, how did that make you feel?
 20 A. We felt upset, you know, it was -- you know, but
 21 I didn't understand.
 22 Q. Mr Armstrong showed you a picture of your brother with
 23 a flag; did you know what that flag was?
 24 A. I've -- I've never seen him like that, whilst he was --
 25 before he got arrested.

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1 Q. Mr Armstrong asserted that that flag was a jihadi flag.
 2 We haven't heard any evidence along those lines in these
 3 proceedings; did you recognise it as a jihadi flag?
 4 A. That one?
 5 Q. Yes.
 6 A. By the news and everything, it's --
 7 Q. Yes.
 8 A. You know, yes, jihadi flag.
 9 Q. Mr Hough asked you if you had asked to see the
 10 literature that your brother was handing out at the
 11 stalls and you said that you had?
 12 A. Yes.
 13 Q. Were you able to interpret that literature and give any
 14 view as to what it included?
 15 A. No, not really, no.
 16 Q. The jury have heard yesterday that that literature was,
 17 however, interpreted by an expert who was able to give
 18 certain views about that evidence. If we could quickly
 19 turn that expert's evidence up, if I could just have one
 20 minute to get the -- it's at page {DC6502/7}, please, at
 21 the bottom of the page.
 22 So we can see that an expert interpreted the
 23 literature, and he says:
 24 "On two occasions there are references in material
 25 ... to jihad and ... to martyr. In none of these

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1 references are listeners directly encouraged to engage
 2 in jihad or to become martyrs".
 3 So that's the expert's view, that this wasn't
 4 material that encouraged people to jihad or martyrdom.
 5 Then over the page, please {DC6502/8} at the top of the
 6 page:
 7 "Overall, in my opinion the evidence as presented
 8 here is fairly mild."
 9 Is that consistent with your interpretation of the
 10 literature, that it was mild in tone? Or did you have
 11 the expertise to judge that?
 12 A. I didn't.
 13 Q. I just want to ask a few final questions, if I can,
 14 about after the events, when he came out of prison.
 15 A. Okay.
 16 Q. And your evidence, as I understand it, to the jury is
 17 that you had understood Usman to have matured and to
 18 have progressed?
 19 A. Yes. Yes.
 20 Q. Now, the jury have also heard evidence in respect of
 21 other people's views about Usman Khan during that
 22 period.
 23 A. Yes.
 24 Q. We've heard in particular from Learning Together
 25 witnesses, one of whom gave the assertion that your

1 brother had de-radicalised, and that this was based on
 2 a solicitor who had apparently worked with Usman.
 3 A. Okay.
 4 Q. Is that consistent or inconsistent with your family's
 5 views as to what Usman Khan — how he was presenting?
 6 A. By the look of it, it's consistent, because we could see
 7 him, like, completely changed, mature, you know.
 8 Completely, as he was as a teenager, he was just
 9 completely different. Completely different.
 10 Q. Now, we've heard assertions from Mr Armstrong about how
 11 he interprets Usman Khan's personality. Did those
 12 interpretations reflect your interpretation of his
 13 personality?
 14 A. No.
 15 Q. And —
 16 A. That's completely different.
 17 Q. — of course, if any of those things had become clear to
 18 you as a family, what would you have done?
 19 A. Tell the authorities.
 20 Q. Thank you very much.
 21 A. We would have phoned the authorities straightaway.
 22 Q. Thank you very much, Brother 2.
 23 A. Straightaway.
 24 MR BUNTING: I have no further questions.
 25 MR HOUGH: Thank you very much, Brother 2, those are all the

1 questions we have for you.
 2 Sir, if we now have our break, we will be moving to
 3 a witness who isn't screened, so arrangements will be
 4 made for everyone to see the next witness.
 5 JUDGE LUCRAFT: Thank you very much. We've sat slightly
 6 longer, members of the jury, but I hope you understand
 7 I wanted to do that so we can then revert back to the
 8 normal layout that we've been using, so we'll pause
 9 there and have our mid-morning break. Thank you.
 10 (In the absence of the jury)
 11 I'll rise.
 12 (11.42 am)
 13 (A short break)
 14 (12.02 pm)
 15 MR HOUGH: Sir, the next witness is Professor Charles David
 16 Deakin.
 17 JUDGE LUCRAFT: Thank you.
 18 PROFESSOR CHARLES DEAKIN (sworn)
 19 JUDGE LUCRAFT: Good morning, Professor Deakin.
 20 A. Good morning, sir.
 21 JUDGE LUCRAFT: If you are happy to, please do feel free to
 22 remove your mask whilst giving evidence.
 23 A. Thank you.
 24 JUDGE LUCRAFT: It's a matter for you whether you wish to
 25 sit or stand, I'm happy either way, whilst giving

1 evidence.
 2 A. Thank you. I might stand, if I may.
 3 JUDGE LUCRAFT: Thank you.
 4 Questions by MR HOUGH QC
 5 MR HOUGH: Before I ask any questions, even to ask your
 6 name, let me say this: some of Professor Deakin's
 7 evidence will focus upon the injuries sustained by
 8 Saskia Jones and Jack Merritt. As such, it has the
 9 capacity to distress. I'm just saying that in case
 10 anyone watching either in court or online would rather
 11 not watch. We will be using stylised images from the
 12 Professor's report, but not any post mortem photography,
 13 in this evidence.
 14 JUDGE LUCRAFT: Thank you very much.
 15 MR HOUGH: Could you give your full name and your title to
 16 the court, please?
 17 A. Yes, my full name is Charles David Deakin.
 18 I'm a consultant in anaesthetics and intensive care and
 19 also professor of resuscitation and pre-hospital
 20 emergency medicine at Southampton University.
 21 Q. Have you had, in summary, a 30-year period of both
 22 practice and academic expertise of clinical care in the
 23 pre-hospital setting, so that includes ambulance and air
 24 ambulance work?
 25 A. Yes, I have extensive experience over the 30 years.

- 1 Q. Could you give, very briefly, the relevant
2 qualifications you have for the evidence you're about to
3 give?
- 4 A. Yes. So I'm a Fellow of the Royal College of
5 Physicians, Fellow of the Royal College of
6 Anaesthetists, Fellow of the Faculty of Intensive Care
7 Medicine and Fellow of the European Resuscitation
8 Council, and that's in addition to my basic medical
9 qualifications.
- 10 Q. You understand you were instructed by the Coroner to
11 consider the injuries suffered by each of Jack Merritt
12 and Saskia Jones, and to answer a series of questions
13 about whether either one could have survived with
14 different treatment at the scene?
- 15 A. That's correct.
- 16 Q. For that purpose, were you provided with the following
17 documents, as set out on page 6 of your report:
18 pathology reports, CT imaging reports, numerous witness
19 statements, London Ambulance Service patient report
20 forms, transcripts of body-worn video, post mortem
21 photography, defibrillator files, and a medical
22 timeline?
- 23 A. I was, and in fact, I have actually seen the body-worn
24 video in its entirety, not just the transcripts.
- 25 Q. Thank you very much.

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- 1 I'm going, then, to take you first of all to your
2 evidence in relation to Saskia Jones, which is from
3 page 44 of your report. First of all, may I ask you
4 about the injury that was suffered, and for this purpose
5 may we have on screen {DC6184/45}.
- 6 As we have heard from the pathologist,
7 Dr Fegan—Earl, did Saskia suffer a knife wound to the
8 base of her neck?
- 9 A. Yes, she did.
- 10 Q. What were the immediate effects of that injury?
- 11 A. So this picture is taken from my report, which I hope
12 would make it clearer anatomically what was — the
13 injuries sustained.
- 14 So the knife entered at the base of the neck on the
15 right-hand side, as shown on this diagram, and just
16 relatively close to the surface of the base of the neck
17 under the skin are two major blood vessels that are
18 called the subclavian artery and subclavian vein, and
19 those are blood vessels that supply blood to the right
20 arm, so the artery taking blood to the arm and the vein
21 taking blood back from the arm. They are quite large
22 blood vessels, obviously the artery is under quite high
23 pressure, and both those blood vessels were essentially
24 completely transected, completely divided.
- 25 Immediately under those blood vessels — and I don't

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- 1 know whether it's possible to show the next picture that
2 I have in my report.
- 3 JUDGE LUCRAFT: It's the lower part of the same page,
4 I think.
- 5 A. That's correct, sir. That's it, thank you {DC6184/45}.
- 6 So immediately under those blood vessels sits the lung
7 in the right chest, and the knife having penetrated the
8 subclavian artery and vein then carried on into the lung
9 itself and damaged the top part of the lung.
- 10 So obviously there are a number of consequences of
11 those injuries, both in terms of the blood vessels
12 themselves being transected, and also damage to the
13 lung.
- 14 So if I may start with the first of those, in terms
15 of the blood vessels being transected. The immediate
16 result of that would be very rapid and profuse bleeding.
17 Some of that was apparent externally, it had come out
18 through the wound, but a very significant proportion of
19 the blood actually trickled down over the surface of the
20 lung and pooled around the lung itself.
- 21 So although there was externally visible blood loss,
22 by far the greater proportion of blood loss was actually
23 internal and to some extent hidden from sight.
- 24 So that blood would have been brisk and profuse.
- 25 The body can cope with losing a little bit of blood, but

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- 1 obviously not a great deal, and as the blood loss
2 continued quite briskly, then the blood pressure would
3 drop, and as the blood pressure drops, both the brain
4 and the heart in particular have less blood flow and
5 less oxygen, and once the blood pressure gets to
6 a critical level, then the brain in particular isn't
7 supplied with sufficient blood to function normally, and
8 the level of consciousness would decrease, progressing
9 to complete unconsciousness.
- 10 Eventually the blood pressure becomes so low that
11 the heart itself isn't being supplied with adequate
12 oxygen and the heart will then go on to stop beating,
13 essentially, and that's a term we call cardiac arrest.
- 14 Q. So that's the point in the process when cardiac arrest
15 occurs, and we'll look at the timing of that shortly.
- 16 A. Indeed.
- 17 Q. If we can put on screen the next page, page 46 —
- 18 A. Sorry, could I just finish. I have talked about the
19 vascular injuries, if I may, talk about the lung very
20 quickly.
- 21 Q. I think it might help in explaining that to have the
22 image on the next page.
- 23 A. Thank you. {DC6184/46}.
- 24 So we've talked about blood loss. This is just
25 a diagrammatic representation of what was going on, just

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1 to try and make it a little bit clearer. The blood
2 I talked about that is collecting internally pools
3 around the base of the lung and forms what medically is
4 called an haemothorax, and the label there is "blood in
5 the pleural space", so you can see that there is quite a
6 lot of blood that tends to collect within the chest
7 cavity itself.

8 The other very important effect, though, of injury
9 to the lung, is — the knife, as we discussed,
10 penetrated the surface of the lung. Normally the
11 surface of the lung is completely sealed with
12 a membrane, but when the surface of the lung is
13 penetrated by the knife, then air can get out of that
14 hole in the surface of the lung and again, tends to
15 collect in the cavity around the lung.

16 For various reasons, that air tends to accumulate
17 quite significantly and builds up under pressure, and
18 that pressure building up tends to squash the lung even
19 further, and that pressure we call a tension
20 pneumothorax. So the lung itself collapsing is termed
21 a pneumothorax, when all the pressure around it builds
22 up that's called a tension pneumothorax, because there's
23 a lot of pressure squashing the lung flat.

24 So that can obviously cause difficulties breathing
25 if your lung is squashed flat. It can also impede blood

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1 flowing around the body as well and it can contribute
2 quite significantly to a low blood pressure that's
3 already occurred because of the loss of blood.

4 So both these changes, both the blood loss and the
5 collapsed lung tend to interact to make the situation
6 a lot more serious, having suffered those injuries,
7 people tend to deteriorate very rapidly as the blood
8 flow reduces to the brain and the heart as well.

9 Q. Thank you very much. We can take that image off screen
10 now.

11 May I now ask you about the medical care and
12 prospects for survival for Saskia Jones. I'm going to
13 run through a number of points in timing in the medical
14 care that we have from the other evidence, so that you
15 can then address your evidence to them.

16 A. Thank you.

17 Q. But for your ease of reference, you give something of
18 a chronology from page 46 of your report?

19 A. I do.

20 Q. I don't ask that to go on the screen.

21 The injury was sustained at, as we understand it,
22 between 13.56 and 13.57. Attendees at the event came
23 quickly to Saskia's help and applied pressure to the
24 wound, which was bleeding very heavily, pumping blood,
25 as it was described.

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1 A. Mm—hm.

2 Q. The call to the ambulance was at 14.00, to the
3 London Ambulance Service. At 14.05, while pressure was
4 being applied to the wound, Saskia Jones was noted to be
5 no longer breathing, with her pupils fixed.

6 At that stage, or very shortly afterwards, around
7 14.05 or 14.06, CPR began and the police were very
8 shortly involved in CPR after some initial compressions.

9 At 14.08 a defibrillator was applied, with CPR
10 ongoing.

11 At 14.12, officers identified what they thought was
12 a weak pulse, but they gave evidence to the jury that
13 they are uncertain now whether that was a genuine
14 finding or whether they were mistaken about that.

15 A. Yes.

16 Q. At 14.16 and 14.18, the defibrillator advised no shock,
17 so that the heart was not in a shockable rhythm, in
18 ventricular fibrillation.

19 Just before 14.21, London Ambulance Service
20 paramedics entered Fishmongers' Hall, having been held
21 at a rendezvous point from, in some cases, around 14.10,
22 and having been allowed to go forward shortly after
23 14.17.

24 At 14.21, Mr Eve of London Ambulance Service was
25 informed that CPR had been ongoing for at least 5—10

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1 minutes, and at 14.23, HEMS doctors and Mr Eve of
2 London Ambulance Service together assessed Saskia Jones
3 and concluded that CPR should cease.

4 Does that summary accord with your understanding of
5 the material you reviewed?

6 A. Yes, it does.

7 Q. I'm now going to ask you about the prospects of survival
8 against that background, and you addressed this from
9 page 52 of your report. The question you were asked,
10 which you had addressed from paragraph 8.5, is this: is
11 it realistically possible that Saskia could have
12 survived with any earlier or different treatment that
13 could practically have been provided at the scene?

14 What was your answer to that?

15 A. So essentially my answer was that she couldn't have
16 survived, sadly. She had such catastrophic injuries
17 that caused her heart to stop so quickly that it was
18 really not probable that she stood any realistic chance
19 of surviving those injuries.

20 Although the collapsed lung can be treated on scene
21 with a small needle that's inserted into the chest, the
22 real issue was the blood loss, and the blood loss was
23 very brisk and catastrophic, as I mentioned, and even
24 with an immediate ambulance response, it would be very
25 difficult to actually stem the bleeding. Anatomically

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1 it's actually a very difficult area to get to and
 2 I don't think there's any realistic prospect, with
 3 Saskia having suffered her cardiac arrest so rapidly,
 4 that any treatment, even if she had been in hospital
 5 straightaway, would have actually resulted in her
 6 surviving, unfortunately.

7 Q. Did you make an assessment of her injury using a scoring
 8 system called the Trauma Injury Severity Score?

9 A. Yes, I did. So there are a number of scoring systems
 10 that can be applied to trauma patients, just to give
 11 an estimate of their chances of survival. Those are
 12 based on thousands of patients and looking at their
 13 injuries, from which quite complicated equations have
 14 been drawn, but they are useful in terms of assessing
 15 someone's injuries to give an approximate estimate of
 16 the chances of survival.

17 That calculator is based both on the anatomical
 18 injuries, so the transection of the blood vessels and
 19 the collapsed lung, but also the blood pressure and
 20 pulse and so on at the time that medical help arrives.

21 So putting all the variables into the calculator,
 22 the score for Saskia's chances of surviving came up as
 23 2.72%, so just under 3%, so really a very remote chance
 24 of surviving those injuries, sadly.

25 Q. Even if the London Ambulance Service had attended her in

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1 the first few minutes after the attack, do you consider
 2 that it is likely they could have saved her life?

3 A. I don't, no. So I used the same calculation but applied
 4 it slightly earlier on in events, but even at best that
 5 still only gave a very small chance of survival, so
 6 I don't think there's any realistic chance that Saskia
 7 could have survived.

8 Q. If we could put on screen {DC6194/1}. This is
 9 a download from the defibrillator which you considered,
 10 and if we put the entire document on, the entire page on
 11 screen, and then if we can have the second page up
 12 immediately afterwards {DC6194/2}. Were you able to
 13 draw any conclusions from the early minutes when the
 14 defibrillator was applied, so 14.08–14.10, relevant to
 15 your opinion?

16 A. Yes, if you could just go back to the first of those
 17 two; is that possible?

18 Q. {DC6194/1}, please?

19 A. That's it. Thank you.

20 This is a trace from the defibrillator when it was
 21 initially connected. There are some lines in green and
 22 there are some lines in black, and obviously following
 23 a timeline.

24 The lines in black are the electrical recording of
 25 the heart, what we call the ECG, so that's the

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1 electrical activity within the heart. The green line
 2 above that on each of the three sections is what we call
 3 impedance, that's the electrical resistance across the
 4 chest. It's a measurement that the defibrillator makes,
 5 and it's quite sensitive to movement, and so all the
 6 green line shows is — the up and down lines on the
 7 green line are essentially consistent with chest
 8 compressions during resuscitation attempts, and then
 9 when it becomes flat on the second section there and the
 10 third, then there's no chest compressions being given.
 11 So it's a fairly crude way of seeing if chest
 12 compressions are being given at any time.

13 I think the key thing from the defibrillator is that
 14 at no stage was there any rhythm that suggested
 15 a defibrillator shock was the appropriate therapy. It's
 16 a very specific therapy for a specific type of rhythm,
 17 and at no stage did Saskia have any rhythm that was
 18 amenable to the defibrillators delivering a shock.

19 Q. In your report, and this is paragraph 8.5.3, do you
 20 describe the development of the defibrillator download
 21 information as showing first of all an agonal rhythm of
 22 the heart which slows and widens?

23 A. Yes. So an agonal rhythm is one where the heart is
 24 suffering from lack of oxygen, and is not effectively
 25 beating, and then as the trace progresses, I don't know

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1 whether we could just see the second section again.

2 Q. So it's page 2, please.

3 A. It's a little bit difficult to see because there is some
 4 motion artefact, but essentially the heart slows to
 5 a rhythm where it's not beating at all.

6 Q. Thank you. We can take that off screen.

7 Paragraph 8.7.1, you address what would have been
 8 needed for Saskia to have any chance of survival at all,
 9 given the nature of the injury. What was your
 10 conclusion?

11 A. So my conclusion was that for her to stand any chance at
 12 all of her surviving her injury, she would really have
 13 needed to have been in hospital prior to her cardiac
 14 arrest. So the cardiac arrest occurred very quickly,
 15 from the evidence that we've heard, and it just — even
 16 in a normal situation outside the incident that we're
 17 looking at today, it would be difficult to physically
 18 get someone to hospital so rapidly, and actually even if
 19 Saskia had got to hospital within five minutes or so, as
 20 I say, the collapsed lung could be treated relatively
 21 quickly, but the catastrophic haemorrhage would be
 22 difficult to treat, realistically, and I still don't
 23 think she would have stood any realistic chance of
 24 surviving, unfortunately.

25 Q. May we now turn to Jack Merritt, and deal first of all

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1 with the injuries that he suffered and their effects ,
 2 and for this purpose may we have on screen {DC6184/56},
 3 your image of the principal injury and its effects .
 4 What were the injuries relevant to your assessment
 5 of prospects of survival and what were their effects?
 6 A. So this is another diagram taken from my report, which
 7 I thought would be quite useful to demonstrate the
 8 injuries that Jack sustained. They are a little bit
 9 schematic, but I hope they convey what actually happened
 10 from the main wound, which was a knife wound to the
 11 right—hand side of the front of Jack’s chest, and the
 12 knife entered the chest just below the fourth rib,
 13 penetrated the lung, and then went quite deep through
 14 the diagram, which is essentially a muscle at the base
 15 of the lungs, through the diaphragm and then into the
 16 abdomen, and the tip of the knife then injured the
 17 liver .
 18 So that was the most significant of Jack’s injuries .
 19 He had a number of other wounds which essentially were
 20 wounds to muscles in his arms in particular and his
 21 back, which would have bled profusely and would have
 22 contributed to his rapid demise as well through the
 23 blood loss .
 24 In terms of the actual injury itself , most of the
 25 blood loss I think would have come from external wounds,

1 although there was still a significant amount of blood
 2 that was lost internally , both from the damage to the
 3 lung and also the liver itself , obviously the liver is
 4 a very vascular structure with a lot of blood vessels in
 5 it , and bleeds quite freely , so there is quite a lot
 6 of significant internal haemorrhage but also a
 7 significant amount of external haemorrhage from the very
 8 significant wounds to his back and his arms.
 9 I have also put in my report talking about Jack
 10 a similar picture that I used for Saskia in terms of the
 11 collapsed lung. I don't know whether we can see that.
 12 Q. {DC6184/57}, please.
 13 A. Thank you. This is a similar, this is the same picture,
 14 essentially , that I have previously shown and in some
 15 ways these injuries were very similar in terms of the
 16 blood around the lung, and also I'm fairly sure that the
 17 lung would have been collapsed as well, although because
 18 of the further treatment that Jack received, it was
 19 difficult to be certain about the collapsed lung. But
 20 knowing that the lung had been penetrated by a knife, it
 21 would be unusual for it not to collapse .
 22 So, again, quite rapid bleeding, both externally and
 23 internally . The collapsed lung, I think, was very
 24 likely , and that would all come together to result in
 25 rapidly falling blood pressure and then loss of

1 consciousness.
 2 Q. We can take that image off screen. I'm now going to set
 3 out, as I did in the case of Saskia, the principal
 4 points in time the jury have heard in evidence
 5 concerning medical care.
 6 The evidence is that Jack sustained his injuries ,
 7 again, between 13.56 and 13.57; that from 13.58 he was
 8 brought into a reception office at Fishmongers' Hall,
 9 and began to receive first aid in the form of pressure
 10 to wounds and so on, quickly.
 11 The evidence is that at 14.08, the first police
 12 officers began providing first aid, visualising the
 13 wounds, and beginning to apply pressure and dressings.
 14 14.09, it was confirmed that Jack Merritt was
 15 breathing, and during that time he was being checked for
 16 wounds.
 17 Between 14.11 and 14.12, a tourniquet was applied to
 18 his arm, and dressings were applied to his shoulder and
 19 chest wound.
 20 14.16, the officers identified that Jack was not
 21 breathing. This is towards the bottom of your page 58.
 22 A. Yes.
 23 Q. Between 14.16 and 14.17, a defibrillator was applied and
 24 advised no shock. CPR was commenced at 14.17. While
 25 CPR was going on, at 14.21 to 14.22, LAS paramedics

1 arrived in the room and directed that Jack was removed.
 2 At 14.23, he was removed on a drag sled from
 3 Fishmongers' Hall, and for a period of about two
 4 minutes, CPR was discontinued while he was removed to
 5 the casualty clearing point.
 6 At 14.25, at the casualty clearing point, CPR was
 7 resumed and London Ambulance Service paramedics
 8 assisted, first applying their more sophisticated
 9 defibrillator and also maintaining the airway and giving
 10 air, while CPR was being provided by the police
 11 officers .
 12 At 14.27, a shock was delivered by the
 13 defibrillator , but those providing CPR were still
 14 concerned that this was not, in fact, a shockable
 15 rhythm.
 16 At 14.28, clinicians from the HEMS service were with
 17 Jack Merritt. They assessed him and promptly performed
 18 a thoracotomy, open—chest surgery, and they found that
 19 the heart was empty.
 20 At 14.33, they pronounced Jack deceased.
 21 So that's a summary of the evidence the jury have
 22 heard in terms of the timeline; is that consistent with
 23 your understanding —
 24 A. It is.
 25 Q. — from the documents?

1 A. Yes.
 2 Q. Based on that timeline, I think you were asked the
 3 question at paragraph 9.5 on your page 63, is it
 4 realistically possible that Jack Merritt could have
 5 survived with any earlier or different treatment that
 6 could practically have been provided at the scene of
 7 this incident? What was your answer to that question?
 8 A. Well, I concluded that it was very unlikely that any
 9 treatment on scene would have actually altered the final
 10 outcome and it was very unlikely that Jack would have
 11 been able to survive his injuries .
 12 Q. In summary, why was that?
 13 A. Because he had such significant injuries , they are
 14 really difficult to treat on scene. Again, the
 15 collapsed lung can be treated, but the blood loss was
 16 very significant , both internally and externally. It
 17 was occurring very rapidly. It was very difficult to
 18 control the blood loss on scene, particularly with the
 19 internal injuries , and it's likely that he would have
 20 bled so extensively and so rapidly that no treatment
 21 would have been effective.
 22 Q. Did you assess Jack Merritt's chances of survival based
 23 on his injury using the same Trauma Injury Severity
 24 Score?
 25 A. Yes, I did. So as I've previously discussed, I used

1 Jack's physical injuries and his estimated blood
 2 pressure and heart rate and so on to work out
 3 an approximate chance of survival for him, using
 4 a similar method, and that was calculated as a 1.19%
 5 chance of survival. So very slim indeed.
 6 Q. Paragraph 9.5.2, you address this question: if the
 7 London Ambulance Service paramedics had somehow got to
 8 Jack at the same time as the police officers did, is it
 9 likely that they could have done anything to save his
 10 life ?
 11 A. I think -- they obviously have more advanced techniques
 12 in terms of being paramedics, but essentially the
 13 underlying problem that led to Jack's death was blood
 14 loss, and that would have been very difficult to control
 15 on the scene, it really needed surgical intervention in
 16 an operating theatre to stand any chance of controlling
 17 that blood loss, which was obviously not possible to do
 18 very quickly.
 19 Q. Is there any significance in this regard that
 20 a defibrillator was applied at the time of cardiac
 21 arrest and never subsequently advised a shock?
 22 A. It's what I would expect. Normally people who collapse
 23 through blood loss don't go into a rhythm where
 24 a shockable rhythm is required, so it's entirely
 25 appropriate to put a defibrillator on, but I am not

1 surprised to see that the defibrillator didn't advise
 2 a shock, that's entirely what I would expect.
 3 Q. At paragraph 9.7.1, you address the question with
 4 Jack Merritt, as with Saskia Jones, as to what would
 5 have been needed for him to stand any chance of survival
 6 at all. What's your answer to that question?
 7 A. Again, I concluded that if Jack was to have stood any
 8 realistic chance of survival, he would have needed to
 9 have been in hospital before he suffered his cardiac
 10 arrest, but, again, he had very significant and very
 11 severe injuries that even in hospital would have been
 12 a challenge to treat, and I didn't think that even if he
 13 had got to hospital before his cardiac arrest, he would
 14 have stood any realistic chance of surviving.
 15 Q. You considered the level of care provided at the scene,
 16 particularly in those early critical minutes?
 17 A. Indeed.
 18 Q. What was your view of the care which you saw on the
 19 body—worn video and read about in various documents?
 20 A. Thank you. Well, the care on scene was initially
 21 provided by, what we term bystanders, or members of the
 22 public on the scene to start with, and subsequently
 23 followed by the police.
 24 I would just like to take this opportunity to say
 25 that having watched the medical care from both the

1 bystanders, so those people at the conference, and also
 2 the police who responded, it was absolutely outstanding.
 3 I was very impressed by the standard of care that was
 4 given in terms of the first aid. It's difficult to do
 5 it anyway, but in those difficult and harrowing
 6 circumstances, it's even more of a challenge, and
 7 I thought without exception, every single individual who
 8 delivered first aid care did an absolutely superb job
 9 and everything they possibly could have done under the
 10 circumstances.
 11 MR HOUGH: Thank you very much.
 12 A. Thank you.
 13 MR HOUGH: Those are all the questions I have. I'll just
 14 look to see if any others have any questions.
 15 I see not.
 16 Thank you very much, Professor Deakin, for the
 17 assistance you have given us.
 18 A. Thank you.
 19 JUDGE LUCRAFT: Professor Deakin, can I thank you for coming
 20 along. I'm sure that your comments will be much
 21 welcomed by those who -- we all know people are trained
 22 in first aid, but as I've been at pains to point out to
 23 people on these occasions, there can be really quite
 24 a big difference between the training and the reality .
 25 A. Absolutely.

1 JUDGE LUCRAFT: And some of the bystanders, who may have had
 2 fairly rudimentary first aid, I'm sure will be pleased
 3 to hear that although their efforts were not ones which
 4 were successful, nonetheless they did everything that
 5 could have been expected of them --
 6 A. And more.
 7 JUDGE LUCRAFT: -- in very difficult circumstances.
 8 A. Yes, indeed. Thank you.
 9 JUDGE LUCRAFT: Thank you very much.
 10 MR HOUGH: Sir, the next witness is Stephen Machin.
 11 JUDGE LUCRAFT: Thank you.
 12 MR HOUGH: Just for the jury's information, we're now moving
 13 to the first of a series of witnesses from the Prison
 14 Service, dealing with Usman Khan's time in prison.
 15 JUDGE LUCRAFT: Yes.
 16 Just whilst we are waiting for Mr Machin to come
 17 forward, in a sense, Mr Hough, just really finishing off
 18 with the last witness, part of the reason for the jury
 19 hearing that evidence is obviously to be reassured as to
 20 the level of care that was provided at the scene. Part
 21 of any Inquest process, the jury will probably know, is
 22 to look at lessons that can be learned, and that applies
 23 to each stage of the process.
 24 MR HOUGH: Yes, the fact that more questions were not asked
 25 about medical care both of those who were at the scene

1 and also the pathologist and Professor Deakin is in part
 2 a result of the extremely detailed and thorough report
 3 which Professor Deakin provided to everyone.
 4 MR STEPHEN MACHIN (affirmed)
 5 JUDGE LUCRAFT: Good afternoon, Mr Machin.
 6 A. Good afternoon.
 7 JUDGE LUCRAFT: If you are happy to, please do feel free to
 8 remove your mask while you are giving evidence.
 9 A. Thank you.
 10 JUDGE LUCRAFT: A matter for personal preference whether you
 11 are happy to stand or whether you would prefer to sit,
 12 you can do either.
 13 A. I'll begin standing, I think.
 14 JUDGE LUCRAFT: Certainly. If there comes a time when you
 15 want to take a seat, Mr Machin, please do so.
 16 A. Thank you.
 17 JUDGE LUCRAFT: It's possible some documents will appear
 18 either on the screen to the side or it may be easier to
 19 look at the larger screen to my left, whichever you feel
 20 most comfortable doing.
 21 A. Okay.
 22 Questions by MR HOUGH QC
 23 MR HOUGH: Would you please give your full name for the
 24 court.
 25 A. Stephen Machin.

1 Q. Mr Machin, you understand I'm asking you questions on
 2 behalf of the Coroner, and then there will be questions
 3 from others?
 4 A. I do, yes.
 5 Q. You made two main witness statements, one to the police
 6 on 2 December 2019, mainly about the attack; one through
 7 the Prison Service lawyers on 15 February this year?
 8 A. Yes.
 9 Q. We may refer to those from time to time.
 10 What is your current job title?
 11 A. I'm currently the head of counter-corruption and
 12 counter-terrorism at HMP Whitemoor.
 13 Q. By way of career, did you join Her Majesty's Prison and
 14 Probation Service in January 1998?
 15 A. Yes, that's correct.
 16 Q. Have you spent your entire career at HMP Whitemoor
 17 working, I think, in various prison departments there?
 18 A. That's correct, yes.
 19 Q. For the last five years, have you worked in the
 20 counter-terrorism department?
 21 A. That's correct. As a custodial manager and now as head
 22 of the department.
 23 Q. Is it right that you were promoted to your current role
 24 in July 2018 on an acting basis and made permanent later
 25 in 2018?

1 A. That's correct.
 2 Q. Now, in a sentence or two, what is the responsibility of
 3 the counter-terrorism department at Whitemoor Prison?
 4 A. To assess all security information relating to the
 5 people we case-manage, try and suggest interventions
 6 that may be suitable for them. We also have to keep
 7 a careful eye on the good order of the prison, so if
 8 people's behaviour is creating difficulties in areas of
 9 the prison, we may seek to move them because the prison
 10 regime is very important for everyone to have that
 11 routine, so if there's any behaviours that are sort of
 12 preventing that happening around the prison, we also
 13 manage that. We assess the risks within the prison, but
 14 then also it's part of our duty to then share that
 15 information with partners and other agencies.
 16 Q. Do you, therefore, manage those who have committed
 17 terrorism-related offences, but also those who are at
 18 risk of being drawn into terrorism?
 19 A. That's correct, yes.
 20 Q. At any one time, how many inmates fall under the purview
 21 of your department?
 22 A. It tends to average around 30. I think the most actual
 23 TACT convicted prisoners I've had on my case load was
 24 about 22 at one time.
 25 Q. I think physically your department is located next to

1 the security department in the prison?
 2 A. Within the same building, yes.
 3 Q. What's the responsibility of the security department,
 4 very briefly?
 5 A. So the roles that my CT analysts hold to the security
 6 analysts are very similar in terms of how they receive
 7 and process information. The CT department focus solely
 8 on those with a counter-terrorism risk, the general
 9 security department focus on everybody else, is the
 10 easiest way to describe it.
 11 Q. You refer to your CT analysts. In 2017-2018, what was
 12 the structure of the counter-terrorism department in
 13 terms of personnel, the numbers and their roles?
 14 A. So two security analysts, who are civilian grade band 4,
 15 a custodial manager, who is an operational prison
 16 officer at band 5, and then a head of department, which
 17 is what we call a governor grade, at band 7.
 18 Q. And that's your?
 19 A. And that's currently me, yes.
 20 Q. Just so we are clear, there is no mystery for terrorism
 21 offenders themselves that the counter-terrorism
 22 department exists. They know it exists, they know who
 23 you are and what you do?
 24 A. Most definitely do, and we make -- we're quite overt in
 25 that, that we will introduce ourselves to people quite

1 early in them arriving into Whitemoor.
 2 Q. And do you, in fact, have a regime for an annual
 3 meeting, or a meeting at least annually, between a
 4 member of your team and each of the inmates you cover?
 5 A. At the very minimum. It tends to be much more often
 6 than that.
 7 Q. Is this right: that in 2017 to 2018 you worked in
 8 accordance with guidance from the Prison Service,
 9 PSI 13/2016, "Extremism Management Function", you had
 10 specific guidance?
 11 A. That's correct.
 12 Q. And I think that guidance has since been replaced with
 13 an updated form of guidance?
 14 A. It's now a policy framework instead of a PSI.
 15 Q. Now, you told us that part of your department's function
 16 is to consider intelligence and other information about
 17 these prisoners to help manage them. Let me now ask you
 18 about intelligence reporting. Prior to 2013, how was
 19 intelligence gathered in prison documented?
 20 A. Prior to that date it was a paper-based system. Blank
 21 forms would be available in every area of the prison,
 22 easily accessible to staff, and they would write down
 23 their concerns onto the IR. That would then be placed
 24 in the nearest security collection box, and at least
 25 twice a day, security staff would then go and empty

1 those boxes, take the documents back to the security
 2 department, and then begin their work on them.
 3 Q. Then in 2013, was the system upgraded to a nationally
 4 linked database?
 5 A. Yes, we now have an electronic system for all of that.
 6 Q. What's that called?
 7 A. It's called Mercury, that's the common name we use for
 8 it.
 9 Q. And does that produce for each prisoner whom it covers,
 10 something called the Mercury Intelligence record, with
 11 each entry running to a few pages, giving details of the
 12 intelligence or incident?
 13 A. Yes, so reports arrive into an inbox where analysts then
 14 work on them. Once they've finished doing that work,
 15 they will pass through other managers' hands and actions
 16 can be assigned, but it's at that point the analysts
 17 then attach that information to a prisoner's profile.
 18 So if you just, from that point on, search from that
 19 prisoner's name, you will then find all relevant IRs
 20 that have been linked to them.
 21 Q. The intelligence that goes into the Mercury system and
 22 the record of a kind we saw yesterday, that's
 23 intelligence that could come in from any member of
 24 prison staff, is it?
 25 A. From prison staff, from public, it could be anonymous,

1 yes. Intelligence can come from anywhere.
 2 Q. But it is analysed before being put onto the system by
 3 your analysts?
 4 A. That's correct.
 5 Q. And it also goes through the hands of somebody more
 6 senior before it goes onto the system or when it goes
 7 onto the system?
 8 A. Yes.
 9 Q. In the course of that person, the more senior person,
 10 analysing it, is consideration given to whether
 11 particular action is required as a result of the
 12 intelligence?
 13 A. Consideration is given on every individual IR and,
 14 wherever possible, you try and assign an action to it,
 15 whether it's because you've received information that
 16 directly motivates you to take action, or it may be that
 17 the actions that you generate at the end are to seek
 18 more information, to either corroborate the first piece
 19 of information you've received.
 20 Q. Now, when you have a new prisoner within your remit
 21 arriving at Whitemoor from another prison, they may have
 22 an existing set of information reports, or intelligence
 23 reports, on the Mercury system. Will you or your staff
 24 review those previous records when the new prisoner
 25 arrives?

1 A. Yes, it first actually happens before they arrive. In
 2 the process of transfers being arranged, there will be
 3 a pre-transfer document, which tends to be just
 4 a one-page summary of current information, but at the
 5 same time, the prison that currently holds the prisoner
 6 can give Mercury access to my prison for 48 hours so we
 7 can access their current intelligence before they
 8 arrive, and then the day they arrive that intelligence
 9 then becomes ours once they're booked into the prison,
 10 so we can access it all again then.

11 Q. Is it also right that in addition to this formal process
 12 of intelligence reporting, your analysts get out and
 13 about around the prison, speaking to wing staff,
 14 receiving information directly from them?

15 A. Yes. We wouldn't be able to do our job well if all we
 16 worked with was just the intelligence, so we also have
 17 to refer to what we call the C-NOMIS, which is a record,
 18 an open record system where a lot of contacts and
 19 information is recorded, so that's a main point of
 20 information.

21 But the way prisons culturally operate, more
 22 conversations occur than things are recorded, so it is
 23 very important also for my analysts to get out to the
 24 residential wings and speak directly with staff to get
 25 feedback on people's behaviours.

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1 Q. And you actually preempted my next question. Each
 2 prisoner also has a NOMIS record. Is that a personal
 3 record of the prisoner updated from time to time with
 4 matters going outside the field of intelligence, just
 5 general information about them?

6 A. Yes, so it captures the bulk of the information in
 7 a prisoner's sentence in terms of them attending work,
 8 education places, interactions with staff on the wing,
 9 it's the main source of information for most prisoners,
 10 and everyone who is a member of staff in the prison can
 11 access that to either refer to or make entries
 12 themselves.

13 Q. I would now like to ask you about a system of
 14 counter-terrorism case management in a prison context
 15 called Pathfinder. What, in a sentence or two, is that
 16 system?

17 A. It's the process of where we meet each month and we
 18 individually look at all the information for the people
 19 who are on my case load, on my Pathfinder case load. So
 20 it's tended by lots of different departments within the
 21 prison, and also counter-terrorism police, residential
 22 staff are invited to attend, chaplaincy staff, and then
 23 we will go through the written information from the
 24 security files and from their NOMIS files for that
 25 month, and then anyone who has had any direct contact

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1 will also give feedback at that meeting also. It's then
 2 minuted, recorded, and then their case file updated each
 3 month, and all that information is held on one case file
 4 record that builds over their sentence.

5 Q. In the course of those meetings, can decisions be taken
 6 about steps to manage particular prisoners?

7 A. Yes, they can.

8 Q. What sort of management options exist? What can be done
 9 to address concerns about particular prisoners?

10 A. So it's all dependent on the risks you see from the
 11 behaviour, so as I mentioned before, as well as their
 12 counter-terrorism risk we also have to be very conscious
 13 of the good order of the prison, so some of their
 14 behaviour issues are not always directly linked to their
 15 offending, it could be just anger of early in sentence
 16 and behaviours like that, so the options we can take are
 17 very varied, so whether it's a more strategic approach
 18 about trying to motivate them and encourage them to
 19 undertake a certain intervention within the prison, or
 20 it could just be that we've assessed the people they're
 21 living around, there may be a toxic mix, people
 22 negatively influencing each other, so a disruption move,
 23 as we call it, to a different part of the prison, could
 24 be agreed at that meeting. There are a whole host of
 25 actions that can be generated from that meeting, and

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1 I guess the most serious in modern times would be to
 2 even refer someone to a separation centre because we
 3 don't feel it's safe for them to be in mainstream
 4 population.

5 Q. Or, indeed, another form of extreme measure, informing
 6 the police of behaviour which might require police
 7 action?

8 A. Yes, as well.

9 Q. You are the first witness from the Prison Service so
 10 I'm just going to ask you some questions about matters
 11 which will be of relevance to us.

12 First of all, telephone contact and monitoring. Is
 13 it right that offenders at Whitemoor have the use of PIN
 14 telephones?

15 A. Yes, each man is given a unique PIN number that allows
 16 them to access different PIN accounts. All telephone
 17 calls from PIN phones are recorded and stored for,
 18 I think, 90 days. Their accounts can be for legal and
 19 confidential numbers, so the system doesn't record those
 20 or allow those to be listened to, but all of the
 21 domestic calls can be recorded and monitored.

22 In Usman's case, as a high risk category A prisoner,
 23 100% of his calls were listened to.

24 Q. Is it right that offenders have a limited number of
 25 approved personal contacts and a limited number of legal

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1 and confidential contacts?
 2 A. Yes. There is a limit, I believe it's about 20 numbers
 3 on their domestic account.
 4 Q. Is it also right that for someone in Usman Khan's
 5 position as a category A high risk offender, special
 6 rules apply to calls being made in foreign languages
 7 because of the need to monitor?
 8 A. That's correct. So all category A and high risk
 9 prisoners, if they wish to speak a foreign language,
 10 submit an application beforehand, so we have prior
 11 knowledge of this and can arrange for translations as
 12 soon as the call is taking place.
 13 Q. Is it right that on a couple of occasions during his
 14 time in prison, Usman Khan was found to have broken the
 15 rules concerning telephone calls?
 16 A. There are two I know of. What I was unable to
 17 ascertain, though, was whether, because he regularly
 18 submitted his applications, we had a similar occurrence
 19 on a different wing, I couldn't rule out that they just
 20 hadn't been forwarded onto us, but I am aware of twice,
 21 so he was spoken to about that.
 22 Q. Is it also the case that for a prisoner in his position
 23 as a terrorist offender, and as a category A high risk
 24 offender, that his mail would be read when it came in?
 25 A. That's correct. 100% of his mail, with the exception of

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1 those that qualify as legally privileged and
 2 confidential.
 3 Q. And is it part of the job of a CT analyst to review the
 4 records of both the call monitoring and correspondence
 5 monitoring?
 6 A. Yes. Their role is to interrogate all information that
 7 they can access regards — regarding an individual, and
 8 that would include communication files.
 9 Q. Now, we have heard, turning to category and escape risk,
 10 that throughout his sentence, Usman Khan was
 11 a category A offender, one whose escape would be highly
 12 dangerous to the public, and a high risk offender, one
 13 who presented a high risk of escape?
 14 A. Yes, that's correct.
 15 Q. For a category A offender, is it right that there is
 16 an annual review and report about behaviour and
 17 intelligence to decide whether the offender will remain
 18 in that category?
 19 A. That's correct. Different departments within the prison
 20 each year will submit their own reports regarding
 21 an individual that will then go to a review board and
 22 a decision made there.
 23 Q. Now, in Usman Khan's case, I think he was repeatedly
 24 reviewed and his category A status was repeatedly
 25 confirmed?

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1 A. Yes. I know he was — he remained a high risk
 2 category A prisoner up to his release date.
 3 Q. Now, the jury have seen yesterday that on
 4 22 November 2018, a local advisory panel, which is the
 5 body that gives advice on category decisions,
 6 recommended that he be downgraded to category B. Were
 7 you aware of that?
 8 A. Yes, and I think part of that was in recognition of his
 9 imminent release and to do so, I think the suggestion
 10 was to allow resettlement work that didn't take place in
 11 our prison, it would have allowed him to access that, so
 12 I think the recommendation was made with that in mind.
 13 Q. Now, the jury have also heard that the decision to
 14 classify Usman Khan as high risk was taken in 2012,
 15 after he was found to have protested on the netting and
 16 to have obtained a governor's personal details; were you
 17 aware of that?
 18 A. Yes, I was aware of that.
 19 Q. What is the effect of a high risk classification in
 20 terms of a prisoner's accommodation, their movements
 21 around the prison?
 22 A. So, as a high risk category A prisoner, they will be
 23 searched twice every month by a dedicated search team,
 24 we refer to them as DST, who are members of the security
 25 department, who are a specialist search-trained group,

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1 they will move cells every month to a different cell,
 2 there's restrictions around their communication, and by
 3 being high risk we had to monitor 100% of his calls, and
 4 within a certain timescale of those happening, which was
 5 48 hours.
 6 There's — in terms of the security instructions to
 7 staff managing day-to-day activities, there's a whole
 8 host of extra specific instructions for the management
 9 of high risk category A prisoners, and also they have
 10 a book that follows them everywhere throughout the
 11 prison, that records within the hour their location, and
 12 just what they're up to. It's not a behaviour report,
 13 it's a security logging report, but that's unique to
 14 that grade of prisoner also.
 15 Q. One final question on this topic before we break for
 16 lunch: for Usman Khan to go from his cell to, for
 17 example, a classroom where a Learning Together course
 18 was being taught, what security steps would he pass?
 19 A. For the actual journey or for the application before he
 20 had even been...?
 21 Q. We'll deal with the application later, but for the
 22 physical journey from his cell to a Learning Together
 23 classroom where he was booked on a course?
 24 A. So he would be called from his spur to the centre of the
 25 wing, where he would then be searched, so he would walk

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1 through a portal, similar to an airport-style portal.
 2 He — dependent on the indications on the portal, we
 3 also have a handheld metal detector, and dependent on
 4 indications from that, there's also — then staff
 5 conduct a rub-down search also. They will also check
 6 all the possessions that he's carrying.
 7 MR HOUGH: Thank you very much.
 8 Sir, would that be a convenient time for the lunch
 9 break?
 10 JUDGE LUCRAFT: It will, indeed. Mr Machin, we're going to
 11 take our lunch break there, we'll sit again at
 12 2 o'clock.
 13 A. Okay.
 14 JUDGE LUCRAFT: Thank you, members of the jury.
 15 (In the absence of the jury)
 16 I'll rise.
 17 (1.03 pm)
 18 (The short adjournment)
 19 (2.02 pm)
 20 MR HOUGH: Sir, just before the jury comes in, I should
 21 mention something about today's first witness, Brother
 22 2.
 23 JUDGE LUCRAFT: Yes.
 24 MR HOUGH: His name is not to be published, although he has
 25 not been anonymised within the discussions in court.

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1 JUDGE LUCRAFT: Yes.
 2 MR HOUGH: So his name will appear as, I think, "Brother 2"
 3 in the transcript, and I am just highlighting the fact
 4 that his name is not to be published in any reports of
 5 the proceedings.
 6 I say that because it's possible that something
 7 I said at the start of today may have led to some
 8 confusion.
 9 JUDGE LUCRAFT: Thank you.
 10 (In the presence of the jury)
 11 Mr Hough, I think this is the first time we have had
 12 to do it, but some lights have come on to make it a bit
 13 lighter in the hall, some spotlights on to the walls.
 14 Normally, Mr Machin, at this time of the day where you
 15 stand or where Mr Hough stands is normally in the
 16 sunlight so you feel as if you are in the spotlight, so
 17 it has just come on just to give us a bit more ambient
 18 light in the room.
 19 MR HOUGH: Mr Machin, we were going through various topics
 20 by way of background concerning prison life and prison
 21 conditions for offenders such as Usman Khan. I'm now
 22 going to ask you about Managing Challenging Behaviour
 23 Strategy and segregation.
 24 What is MCBS, in short?
 25 A. It was a management strategy for the management of

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1 challenging behaviours. It sat a level below the Close
 2 Supervision Centre system, where the most dangerous
 3 within prisons are removed from normal location. MCBS
 4 operated in similar principle: there was a dedicated
 5 unit at HMP Woodhill, and other small units at different
 6 prisons within the country where they would access
 7 support, psychological one-to-ones, interventions. They
 8 tend to house much fewer prisoners, so resources were
 9 concentrated more onto those individuals.
 10 Q. Now, is this right: that Usman Khan was managed on the
 11 MCBS programme from July 2013 as a result of his conduct
 12 up to that time?
 13 A. Yes.
 14 Q. In November 2013 I think he was involved in an assault
 15 and as a result, was transferred to the Specialist
 16 Intervention Unit in Manchester. What would such a unit
 17 be?
 18 A. I visited there once. It is a small unit, I think it
 19 held less than 10 prisoners on the unit when I visited.
 20 It was an area separate from the main part of the
 21 prison, so whilst living there, he wouldn't have
 22 associated with other mainstream prisoners, and he would
 23 have accessed one-to-one work while he was on that unit.
 24 Q. In June 2014, Usman Khan was transferred to the MCBS
 25 unit at Woodhill and then briefly transferred to the

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1 prison population, the main population in June or July
 2 of 2015, then returned to the MCBS unit for the
 3 remainder of his time at Woodhill until his transfer to
 4 Whitemoor.
 5 A. Yes.
 6 Q. You are aware of those facts?
 7 A. Yes, I am.
 8 Q. Is it right that he also spent some time in true
 9 segregation units?
 10 A. I've seen that at different times, yes.
 11 Q. What do we glean about Usman Khan's conduct and
 12 behaviour from the times he spent, first of all, in MCBS
 13 units and secondly, in segregation units?
 14 A. What that says to me is that his behaviour was such that
 15 the staff in the prisons where he was working felt that
 16 his risk was too much for him to remain on what I call
 17 normal location, a normal residential wing, and would
 18 therefore need removing to access further treatments to
 19 try and stabilise his behaviours.
 20 Q. Moving on to another topic incentives and earned
 21 privileges, IEP. Is this a regime whereby a prisoner is
 22 given a classification and receives privileges such as
 23 TVs and DVDs and so on, in accordance with that
 24 classification?
 25 A. Yes. It's applied in all prisons, across the country,

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1 there are three levels to the scheme, and it reflects
 2 your current behaviour in the environments where you
 3 live and work. The wing managers tend to be the people
 4 who make judgments on that level. They'll conduct
 5 a review. One can be conducted at any time, a person or
 6 officer can request a review, a prisoner himself can
 7 request a review, and if there's enough information
 8 there that would warrant a review, then a wing manager
 9 will hold one and then assign an IEP level from that.
 10 Their IEP level then dictates what access to items
 11 they can have in cells, so those on the highest level
 12 would access a DVD player or an Xbox or a PlayStation,
 13 something similar. It also affects how much money moves
 14 from their account into what they have available to them
 15 to spend, and different things such as that.
 16 Q. Looking at Usman Khan, while he was at Whitemoor, was he
 17 reduced from enhanced to standard IEP level
 18 in February 2017 after being involved in an assault?
 19 A. I know he was reduced. I think it was to standard that
 20 time. I think one other time he did go to basic level.
 21 Q. In your statement you say that he was reduced to basic
 22 level in August 2017, before being upgraded again
 23 through the levels in early 2018?
 24 A. Yes.
 25 Q. Adjudications next, please. Is an adjudication a formal

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1 decision that a prisoner has breached prison rules,
 2 which may involve disobeying lawful orders, possessing
 3 unauthorised items, or endangering others?
 4 A. Yes, that's correct.
 5 Q. Was Khan subject to a total of 15 adjudications while he
 6 was in prisons?
 7 A. I believe that's so, yes.
 8 Q. That's certainly what you say at your paragraph 35?
 9 A. Yes.
 10 Q. And I think eight of those were found proven?
 11 A. Yes, and some not proceeded.
 12 Q. Next, please, extremism risk guidance, or ERG; what is
 13 that in brief?
 14 A. A psychological risk assessment of their risk of
 15 extremism.
 16 Q. So it's a means of assessing, in a psychological way,
 17 the risk of extremist offenders re-offending?
 18 A. Yes.
 19 Q. Does it have 22 factors, as well as a sweep-up factor?
 20 A. Yes.
 21 Q. And does each of those factors have guidelines for
 22 assessment?
 23 A. Yes, it does.
 24 Q. We can put them on screen. If we look at {DC6607/2} and
 25 if we go to the first main page of that, page 2. Sorry,

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1 over to {DC6607/4}, I think. Yes.
 2 So do we see that there's a series, the bottom of
 3 the page, please, a series of, first of all, engagement
 4 factors, such as the need to redress injustice, the need
 5 for status?
 6 A. Yes.
 7 Q. And then over the page, a series of intent factors,
 8 including over-identification with an extremist group,
 9 cause or ideology {DC6607/5}; yes?
 10 A. Yes.
 11 Q. And then a series of capability factors, so skills that
 12 might be relevant to offending, access to networks,
 13 criminal history.
 14 A. That's correct.
 15 Q. So it's a structured means of assessing extremist
 16 offenders by reference to these different factors?
 17 A. Yes, it is.
 18 Q. Who may prepare an ERG report using this tool?
 19 A. So in my prison we have leva, who is a trained
 20 psychologist. I understand that probation officers can
 21 also be trained to conduct an ERG also.
 22 Q. We'll hear, I think, that there was a report by
 23 leva Cechaviciute in April 2018 with your department
 24 having some input into that report?
 25 A. That's correct, yes.

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1 Q. I'll ask you a little bit about that later.
 2 We can take that off screen now.
 3 The jury have heard about MAPPA, Multi-Agency Public
 4 Protection Arrangements. What sorts of prisoner are
 5 subject to MAPPA arrangements in the period leading up
 6 to release?
 7 A. Those that present a risk to the public.
 8 Q. And such offenders may include terrorist offenders, of
 9 course?
 10 A. Yes.
 11 Q. Does the MAPPA process involve meetings attended by the
 12 main statutory agencies, including probation, police and
 13 so on?
 14 A. Yes.
 15 Q. And for an offender like Usman Khan, will those meetings
 16 begin while the offender is in prison before release?
 17 A. Yes, that's correct.
 18 Q. Will a form called a MAPPA F form be prepared for some
 19 of the first MAPPA meetings in relation to such
 20 an offender?
 21 A. That's the form that my analysts would use to provide
 22 intelligence to the MAPPA meeting.
 23 Q. So that's a form, I think those in this case were about
 24 10 pages long, setting out information and including
 25 intelligence through your department?

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1 A. Yes.
 2 Q. We'll look at some of the MAPPA meetings and the MAPPA F
 3 forms later .
 4 Next, Learning Together and educational programmes,
 5 please. We have heard that Learning Together is
 6 an educational programme organised by the
 7 University of Cambridge staff, in which prisoners study
 8 alongside Cambridge University students in prison.
 9 We've heard that that was introduced into Whitemoor
 10 after it had been run for a short time at HMP Grendon.
 11 Were you aware of Learning Together being introduced
 12 into Whitemoor?
 13 A. Yes, I was.
 14 Q. Were you aware that the number of courses being run by
 15 Learning Together at Whitemoor increased over the years?
 16 A. Yes. Yes.
 17 Q. Now, we have also heard that somebody wanting to go on
 18 a Learning Together course, an inmate at Whitemoor,
 19 would complete an application form, and that that would
 20 be screened by people at the prison before inmates were
 21 sent forward for an academic sift by the people from
 22 Learning Together.
 23 Who played a role in the prison screening of those
 24 forms?
 25 A. So in the same way that prisoners apply for any

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1 education or activity , the application would have gone
 2 through the education department into the activities
 3 hub. Every prisoner within our prison has a work and
 4 activity risk assessment that sets out a rating of high,
 5 medium or low for their risk in partaking activities .
 6 Each area where activities are held also has
 7 an assessment into whether that's a high, medium or low
 8 risk area. The two are then cross-referenced, so
 9 a prisoner assessed with a high risk activity assessment
 10 wouldn't be allowed to work in a -- what we've assessed
 11 as a high risk physical area for the prison. So the
 12 first sift for that would be to make sure that the
 13 people who were applying met the right activity risk
 14 level to be able to access Learning Together.
 15 Q. As an activity , how was Learning Together assessed in
 16 terms of risk?
 17 A. Much like education, and because of one, the location of
 18 where it was in the prison, so in terms of access to
 19 escape-type risks, it was very low for us. Also, the
 20 room being used had plenty of CCTV, the officer had
 21 a podium in there and has very clear sight around the
 22 room for monitoring, which further added to it being
 23 a low risk place.
 24 What they planned to do in the sessions didn't
 25 involve any tools or materials that added to the risk

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1 either , so the assessment, I understand, remained at
 2 low.
 3 Q. So Learning Together was itself a low risk activity .
 4 What was the assessment of Usman Khan's risk in the
 5 learning context?
 6 A. I believe he initially started as one of the higher
 7 risks , because he wasn't able to access certain
 8 educational things until he had been in Whitemoor
 9 a short time, so I assume he started high and ended up
 10 medium.
 11 Q. In November 2017 when he was passed for
 12 Learning Together, was he high or medium?
 13 A. He -- I think he was medium, but I couldn't swear by
 14 that.
 15 Q. So you said one of the checks that was performed in
 16 order to clear somebody to participate in
 17 a Learning Together activity, or any learning activity ,
 18 was to check the risk rating of the activity and compare
 19 it against the risk rating of the offender?
 20 A. Individual .
 21 Q. Even if Khan had been high risk in November 2017, could
 22 he have been cleared for Learning Together on the basis
 23 that it was a low risk activity ?
 24 A. If -- because of what I then did myself at the end, that
 25 is possible if there weren't being current active

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1 negative behaviours reported, yes.
 2 Q. So that's the first stage, comparing the risk rating of
 3 the activity and the risk rating of the offender. Is
 4 there then a second stage, which involves someone like
 5 you making a more generalised assessment?
 6 A. For Learning Together there was; for other activities ,
 7 we don't do that.
 8 Q. Why specifically for Learning Together?
 9 A. It was new to me, I wanted it to be successful, so
 10 I took it upon myself to carry out that sort of extra
 11 level of check because both organisations have
 12 reputations at stake and I wanted to make sure that
 13 Learning Together within our prison ran successfully and
 14 all needs were met.
 15 Q. In order to perform that exercise for someone like
 16 Usman Khan, what preparation or research would you do?
 17 A. Predominantly I would use the Mercury system, which
 18 is -- they are security files .
 19 Over time I've learnt a few shortcut searches,
 20 which -- so one of my concerns was we get conflict
 21 within prison, through gangs, et cetera, and that I saw
 22 as one of the risks of -- so prisoners work with
 23 civilian staff quite regularly and it is an everyday
 24 occurrence, and it tends to only go wrong when they
 25 can't control their emotions, and that normally comes

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1 around because of gang issues or coming across people,
 2 so I was very conscious to do a search specifically for
 3 conflict within the group. I would also -- so the other
 4 part in my role is counter-corruption, which is -- the
 5 information sits separately, so I also had access to
 6 that, because that was another concern of mine would be
 7 the continued contact between our men and the students,
 8 there could be conditioning which could lead to
 9 corrupting.

10 Q. Did you, when performing this sift, using that material,
 11 apply any formal criteria to who would or wouldn't be
 12 allowed to go forward to the programme.

13 A. So in terms of me working through a documented list of
 14 risks, no.

15 Q. Were there, in fact, any Prison Service guidelines
 16 requiring that kind of assessment of risks of
 17 individuals to go into an educational programme
 18 involving outside civilians beyond the system you've
 19 described of comparing risk of offender against risk of
 20 learning activity?

21 A. Not that I'm aware of, no.

22 Q. Now, of course, clearing prisoners to participate in
 23 Learning Together specifically would put prisoners
 24 directly alongside young undergraduates who may never
 25 have been into a prison before. Was that something you

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1 specifically took into account in your assessment?

2 A. Yes, and I was actually quite surprised the first groups
 3 weren't full of young people, like I had automatically
 4 assumed, and there were quite a few mature students
 5 within the group, so that was -- I broke the stereotype
 6 I'd built in my head, I guess. As a father, I expected
 7 a class full of 18-year-olds, and that's not what
 8 I ended up with.

9 Q. You bore in mind, did you, the risks of putting people
 10 who were potentially violent, manipulative, predatory,
 11 directly alongside potentially young students in
 12 a learning environment?

13 A. Yes.

14 Q. Now, we know, we've heard from Learning Together that
 15 prisoners who participated had to attend an induction
 16 and sign a student compact setting out requirements to
 17 abide by prison rules and giving guidance on reporting
 18 matters and the like. Were you aware of those documents
 19 when you were doing your work?

20 A. Yes, I was. I think initially I helped in the putting
 21 together of those documents.

22 Q. During the course of the academic year did you have
 23 continued contact with the Learning Together team?

24 A. Yes, I did.

25 Q. Regular?

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1 A. Fairly regular, yes.

2 Q. What experience or information did you draw about the
 3 effects of participation in the Learning Together
 4 programme on offenders?

5 A. In a short space of time I was seeing a lot of positive
 6 outcomes as a result of the Learning Together, so
 7 I didn't take part in any of the groups, but what
 8 I started to see was people actually returning back to
 9 residential units having taken part in whatever that
 10 day's session was, actually appearing genuinely happy
 11 and energised, and when you've worked in a high security
 12 prison as long as me, that's not something you see very
 13 often, so that really hit me hard, and it started having
 14 a positive effect on their behaviour back on the wings
 15 as well, and in some men you started to see a much more
 16 prosocial version of themselves. I'm not sure how it
 17 happened, but that's what I saw.

18 Q. Can we now turn to Usman Khan's time at Whitemoor. We
 19 know that he arrived at Whitemoor in mid-2016, nearly
 20 six years into his sentence, with two years to go?

21 A. Yes.

22 Q. Did you or your staff familiarise yourselves with his
 23 record of conduct up to that time?

24 A. Yes.

25 Q. I'm just going to give you some examples, and we can

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1 look at the Mercury record for these examples, if it
 2 helps, as we go, but we'll see if that's needed.

3 So, for example, in June 2012, I think we've spoken
 4 about this already, he jumped on the netting in protest,
 5 recited a poem about cutting off a kuffar's head, and
 6 then shortly afterwards, done serious damage to his cell
 7 wall and found to be in possession of a governor's home
 8 address.

9 A. Yes.

10 Q. Was that information you would have gleaned from his
 11 intelligence record?

12 A. So I would have seen that in his intelligence record,
 13 however, for the assessment of attendance in that
 14 particular session, I wouldn't have seen it as current
 15 behaviour due to the time distance.

16 Q. I'll come to the Learning Together assessment a little
 17 later. I am just, at the moment, building up a profile
 18 of him from what arrived as he first came into
 19 Whitemoor, and you first got to know him.

20 A. Yes.

21 Q. In the records also there is reference in November 2013
 22 to Khan being involved in an assault on another prisoner
 23 in which a chaplain was hit, and a search of his cell
 24 revealing a hidden razor blade?

25 A. Yes, that's correct.

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1 Q. That's another piece of intelligence you would have
2 found on your research?
3 A. Yes.
4 Q. In October 2014, there was intelligence linking him to
5 a plot to kill a civilian member of staff. Is that
6 intelligence you would have become aware of?
7 A. That (inaudible).
8 Q. In July 2015, there was intelligence that he incited
9 an attack on another prisoner as part of a wider
10 campaign of organised bullying?
11 A. Yes.
12 Q. I have picked those only because they are particularly
13 significant or egregious pieces of intelligence, but is
14 it right that on review of his MIR records, there had
15 been numerous pieces of intelligence reporting him as
16 a high-ranking terrorist prisoner involved in
17 radicalisation and intimidation?
18 A. There was a number of those, yes.
19 Q. What was your view in the round of his intelligence
20 records when he arrived? What sort of prisoner did you
21 think you were dealing with?
22 A. Obviously by nature of his offence that within the
23 prison subculture, terrorists are held in perverse
24 esteem, as are high risk category A prisoners also, so
25 he had two of those badges.

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1 What I could see from those reports was someone who
2 liked to incite others, and he read like an angry young
3 man, and when I first met him that's also what I felt.
4 Q. What were the steps, if any, that you and your
5 colleagues took to reduce the risks of holding
6 a prisoner such as Khan in the prison population?
7 A. So although he was no longer on the MCBS unit, he still
8 fell under the MCBS strategy when he first came to
9 Whitemoor, so that would mean he would have a monthly
10 case meeting on his wing, he would be given direct
11 feedback from different departments, so they would be
12 trying to manage him through that process. You would
13 also have the other processes that naturally occur
14 around others, assessments of IEP, et cetera, and the
15 way the wing interacted with him also would be a way to
16 try and motivate better behaviour.
17 Q. How regularly would you see Usman Khan during his time
18 at Whitemoor in general terms?
19 A. Two to three times a month.
20 Q. During his time at Whitemoor, Usman Khan generated
21 further intelligence of concern; is that right?
22 A. That's correct, yes.
23 Q. And again, I'm going to pick up just a few significant
24 ones to see if you were aware of them and how you
25 interpreted them and, again, we can go to the MIR on

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1 screen if it helps.
2 First of all, Khan was involved in an assault on
3 another prisoner in February 2017 as a result of which,
4 as you've said, he was reduced to basic IEP level, and
5 he then jumped on the netting before being placed in
6 segregation. Were you aware of that incident?
7 A. Yes.
8 Q. In May 2017, there was intelligence indicating that Khan
9 wanted to carry out an assault on an inmate who was
10 pretending to be a Muslim for their own ulterior
11 purposes; were you aware of that?
12 A. Yes.
13 Q. In July 2017, Khan was identified as one of the main
14 prisoners for promoting extremist views, and as being
15 involved in organised intimidation, including
16 retribution beatings. Did you become aware of those
17 various entries?
18 A. Yes.
19 Q. Now, was any particular step taken as a result of that
20 intelligence in around July/August 2017?
21 A. I think as a team we then decided to move into
22 a different area and see if the behaviours carried on
23 repeating themselves, or whether being around different
24 associates, whether the behaviour would change, so we
25 arranged what we call a disruption move.

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1 Q. Now, it was a few months after that that you came to
2 assess Usman Khan for the Learning Together programme?
3 A. Yes.
4 Q. What was your view of him, as you sat down to consider
5 those intelligence records and whether he should be
6 permitted access to the programme?
7 A. So I'm not conscious but I think I would have been
8 thinking at the time -- I would have been conscious of
9 how long Usman in particular had left, which would be
10 a lot shorter than others, and perhaps would have felt
11 that we needed to throw as much as we could at him in
12 terms of trying to reduce his risk, so I would have been
13 conscious of that.
14 I would have also, through the case management and
15 Pathfinder, I would have had updates from the wing staff
16 of how he was settling in on the wing and through my
17 role already had a current picture of some slight
18 changes, just purely by being around different people.
19 Q. So you were getting informal soundings from the wing
20 staff indicating that his behaviour was improving
21 a little?
22 A. Perhaps "improving" is wrong: was less damaging or
23 chaotic, I think is ...
24 Q. And in view of that factor, and because you wanted to do
25 as much to improve him and his mindset as possible, you

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1 thought this programme would be appropriate for him?
 2 A. There was other things as well, so if I looked at his
 3 direct use of violence, there hadn't been a catalogue of
 4 that. Encouraging others, protesting, there was
 5 obviously lots and lots of information around that. So
 6 direct physical risk to the students who were going in
 7 there, I didn't assess as high for him.
 8 Because I knew how well he had been monitored in
 9 there as well, and it would be the same for everyone,
 10 not just him, at any point if we received any IRs
 11 relating to either their behaviour in the
 12 Learning Together or outside of it that affected how --
 13 their risk of being in there, they would be removed as
 14 well, so I have the knowledge of that sort of safety net
 15 also.
 16 Q. And when you were carrying out this sift, were you aware
 17 that it was part of Learning Together's mission
 18 statement to maintain contact with their alumni,
 19 including inmate students, after they had been released?
 20 A. Initially, no, but as I worked with them more, I became
 21 aware that, yes, there were lots of people around the
 22 country maintained contact with Learning Together, and
 23 also they were assisting some people build their lives
 24 post-custody.
 25 Q. Having regard to that factor, were you concerned at all

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1 about Khan having been brought into a programme where he
 2 would have a long-term relationship with these students
 3 and academics, given that he had had a radicalising
 4 influence while he was in prison?
 5 A. I didn't draw a conclusion at all that -- so there
 6 was -- certainly in our prison there was so many people
 7 involved in Learning Together, so what that contact,
 8 I expected, for the majority to be like, would be
 9 letter-writing. Built into the compact of people
 10 partaking in Learning Together, both our prisoner
 11 students and the Cambridge students, everything would be
 12 on a first name basis, they wouldn't write in from their
 13 home addresses, it would be from the university address.
 14 So I didn't expect there to be -- I didn't have concerns
 15 about that sort of contact going forwards, and expected
 16 that all the men that did remain in contact with
 17 Learning Together, did so via the university.
 18 Q. Now, during the time, the remaining time that Khan had
 19 in Whitemoor, so after he had joined the
 20 Learning Together programme in late 2017, is it right
 21 that there were a number of further pieces of concerning
 22 intelligence about him that came through to your
 23 department?
 24 A. Yes.
 25 Q. So, again, we can show these on screen if we need to,

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1 but in January 2018, was there an entry in the Mercury
 2 record identifying Khan as emir or senior terrorist
 3 offender on C wing, that's to say the wing he had been
 4 moved to as part of the disruption move?
 5 A. Yes.
 6 Q. In June 2018, was there reporting of Khan as one of
 7 a group with links to religious bullying and the gang
 8 culture?
 9 A. Yes.
 10 Q. In July 2018, was there intelligence suggesting that
 11 Khan and other Muslim leaders wanted a person thought to
 12 be a snitch to be harmed?
 13 A. There was that intelligence, yes.
 14 Q. And on 29 October 2018, was an entry made indicating
 15 that Khan was trying to radicalise others, and that he
 16 said he would return to his old ways, interpreted as
 17 a reference to terrorism, on release?
 18 A. Yes, shortly before release.
 19 Q. And your statement tells us, is this right, that that
 20 intelligence was received from partner agencies and that
 21 your team was aware of it?
 22 A. Yes, that's correct.
 23 Q. As to the evaluation of the intelligence, is this right,
 24 without going into anything that is security-sensitive,
 25 that this was information which no one had reason to

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1 distrust?
 2 A. That's correct, had no reason to distrust that
 3 intelligence, but also we had no ability to build on it
 4 either.
 5 Q. So not specifically corroborated by further
 6 intelligence?
 7 A. Yes.
 8 Q. But no reason to distrust the intelligence you
 9 obtained --
 10 A. No.
 11 Q. -- from that reference?
 12 A. So we had made sure it formed part of his profile and
 13 then was onward-shared, as we did with other
 14 intelligence.
 15 Q. Now, those are various pieces of intelligence, but in
 16 fairness to you, more generally was there a trend in
 17 reporting about Khan during his time at Whitemoor?
 18 A. Yes, and that trend was a reduction in those sorts of
 19 reports, certainly in his last six months to a year,
 20 they tailed off in both the number and the tone as well.
 21 Q. However, were there also some pieces of intelligence and
 22 analysis suggesting that Khan might be lying low or
 23 being dishonest in order to divert attention from him
 24 and ensure he was released as hoped?
 25 A. There was a piece of intelligence in Usman's file

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1 stating that. I was aware much sooner than reading it
2 in his file that it had been an edict from a terrorist
3 group, sort of permitting Islamic extremists to start
4 using the tactic of deceptive compliance.

5 For me, working in a prison for so long, you
6 naturally apply that filter to everybody you work with.
7 You don't -- you assume that the natural starting place
8 for most people to undertake our work is progression,
9 and necessarily it doesn't come from a place of
10 sincerity, so I'm sort of used to working in that way.

11 Q. Is it right that there was reporting from before, or
12 rather, from earlier in Khan's time at Whitemoor, that
13 he had claimed to be using that tactic, "taqiyya", lying
14 for what were regarded as legitimate purposes?

15 A. There was an intelligence report stating that, yes
16 report.

17 Q. Was there also an entry in the Mercury record
18 in June 2018 by an analyst that he had generated little
19 intelligence, but that may be because of his impending
20 release?

21 A. Yes.

22 Q. What was your own assessment and opinion of Usman Khan
23 over the course of 2018 based on your dealings with him?

24 A. So whilst being aware of that intelligence picture, as
25 I said earlier, we don't focus just on that. So when

1 I coupled that picture with what the behaviours we were
2 getting reported for the people who work with him
3 day-to-day was showing a change in his personality. Not
4 huge changes, so I think within the ERG there's a change
5 model explained in there. So change, as I understand
6 it, is quite a long process, and I was seeing him making
7 some early progress on the change cycle, and that was --
8 I guess the easiest way, he was becoming more prosocial
9 with people around him, mixing with staff more, speaking
10 with prisoners outside his faith group, which reporting
11 suggested he hadn't done much of that previously.

12 So we were seeing some -- we were seeing a reduction
13 in the number and tone of intelligence, and we were also
14 seeing some change of behaviours reported by those who
15 observe him regularly. So for me he was making those
16 early changes, but I've worked in close supervision
17 centres before I worked in counter-terrorism, and that
18 process for some can take a long, long time, for others,
19 it can be much quicker, and there can be relapses along
20 the way, and it's explained in that model, and that's
21 the way I understand it, so that's what I sort of viewed
22 was those -- someone learning new behaviours.

23 Q. In your position, with huge experience in this field,
24 have you come across some offenders who gamed the
25 system, who consistently lie or misrepresent their

1 progress in order to further their own ends?

2 A. Quite regularly. So you tend to not listen to their
3 words but focus on their behaviour. So in groups and
4 interviews they will tell you how they're progressing
5 and how they're doing. Most offenders will, once they
6 start learning a little bit of insight into themselves
7 and their own drivers for their criminal behaviour, they
8 will try and convince you quite quickly that now they've
9 identified it they've also fixed it, and -- so those
10 words you hear but you pay no heed to. You focus on the
11 behaviours and see if they're able to put into play what
12 they're telling you.

13 Q. Do you also focus on the intelligence so that you don't
14 have somebody who is cleverly making Christian friends
15 and staying a little apart from extremist friends in
16 order to give the right image?

17 A. That's correct. I think the thing -- he wouldn't have
18 been -- that I remember that would have been difficult
19 out of everything to engineer was the appearance of
20 being happy, which he hadn't done much before, and
21 I think that was the -- that was one of the key things
22 that stood with me.

23 Q. Was that happiness particularly seen in the context of
24 Learning Together?

25 A. Yes.

1 Q. May we put on screen, please, {DC5668/1}. This,
2 I think, is a MAPPA F form, prepared, as you've told us,
3 by your department, or at least with input from your
4 department, for a MAPPA meeting on 27 June 2018, the
5 first of the MAPPA meetings relating to Usman Khan?

6 A. Yes.

7 Q. And if we go to {DC5668/6}, please, we can see this in
8 relation to security information with intelligence over
9 the last 12 months, so mid-2017 to mid-2018:

10 "Whilst located on A Wing blue spur, reporting
11 suggests that Brother 2 was the emir on that spur.
12 Whilst on the same spur it was reported that he was one
13 of the main prisoners for promoting extremist views. He
14 would get prisoners to go on the yard with him and would
15 preach to them. Reporting suggests that he was one of
16 the main recruiters on A wing blue spur.
17 In August 2017, it was reported that Brother 2 was part
18 of a group of prisoners who refused to lock away at the
19 end of cease association. Many prisoners looked to
20 Brother 2 for guidance on what to do. He was also
21 reported a laughing/cheering about the Barcelona terror
22 attack.

23 "In August 2017, Brother 2 was relocated to C Wing
24 red spur, where he was quickly identified as being
25 responsible for the attempted radicalisation of other

1 prisoners. He did this by talking with them and then
 2 leaving paperwork with the prisoner.
 3 "In November 2017, Brother 2 was identified as one
 4 of a group of prisoners who carried on talking
 5 throughout the 2-minute silence that was being observed
 6 for Remembrance Sunday. It was also reported in the
 7 same month that Brother 2 was part of a group of Muslims
 8 on C Wing red spur that had been trying to flex their
 9 muscles and dictate ... when non-Muslims can shower, eat,
 10 behave ..."
 11 And so on. Is this right, that was intelligence fed
 12 into the MAPPa process through dealings with your team?
 13 A. Yes.
 14 Q. Then the report goes on:
 15 "Potential for radicalisation and extremism.
 16 "Since Brother 2 was moved to c wing red spur, he
 17 seems to have crept below the CTU [counter-terrorism
 18 unit] radar. Maybe this is because he knows that with
 19 release imminent, he will be watched carefully, or
 20 whether it is because of something else we do not know.
 21 The intel reporting on Brother 2 for the last 6 months
 22 appears to fall under other threat priorities rather
 23 than extremism and radicalisation. However, this does
 24 not mean that his ideologies have changed, just that he
 25 may be behaving in a deceptively compliant manner in

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1 order to facilitate his release."
 2 Did you see that form at the time?
 3 A. I believe so, yes.
 4 Q. And this was a form that really gave the MAPPa team
 5 their first image of Usman Khan.
 6 Did you consider that that was a fair picture of
 7 security information in June 2018?
 8 A. Based on the intelligence we held, yes.
 9 Q. So whatever may have been your hopes for his
 10 improvement, your department, with an important document
 11 for which you were responsible, is expressing a fair
 12 amount of scepticism?
 13 A. Yes, it would be wrong of us to hide those risks, whilst
 14 at the same time we were part of the process encouraging
 15 him to try and reduce them.
 16 Q. Thank you very much. We can take that off screen now.
 17 Around the same time, in fact slightly before, the
 18 ERG assessment by the psychologist, Ieva, was prepared
 19 in April 2018?
 20 A. Yes.
 21 Q. And if we can put that on screen, it's {DC5322/1}.
 22 I just want to identify a couple of areas of it.
 23 {DC5322/11}, please, paragraph 5.1.10, do we see that
 24 the psychologist reports staff case notes with mixed
 25 reporting of Usman Khan's behaviour since at Whitemoor,

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1 with some polite and courteous interaction with staff,
 2 good engagement with education, and good motivation
 3 amongst positive features?
 4 A. Yes.
 5 Q. But then over to page 12, please {DC5322/12}, at 5.1.11,
 6 some challenging or disruptive behaviour noted on
 7 an occasional basis. 5.1.11; yes?
 8 A. Yes.
 9 Q. And 5.1.13, down the page, do we see that the
 10 psychologist notes suspicions from the security
 11 department about Brother 2's apparently active
 12 involvement in a prison extremist gang or group --
 13 A. Yes.
 14 Q. -- by organising or being aware of assaults and so on?
 15 Then there's reference over the course of that
 16 paragraph to a number of the pieces of intelligence.
 17 So the information coming through to the
 18 psychologist who is doing this process which you
 19 described earlier, from your department and the security
 20 department, is of a mixed picture with some improvements
 21 in behaviour, but some very worrying intelligence?
 22 A. Yes.
 23 Q. Now, we can take that off screen now. Do you recall
 24 a meeting with Usman Khan during the ERG process?
 25 A. Yes, I do.

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1 Q. We've looked already at part of the report which shows
 2 his reaction to pieces of intelligence and him generally
 3 objecting that those pieces of intelligence were wrong?
 4 A. Yes.
 5 Q. Can you remember his demeanour and attitude in the
 6 meeting when the process was discussed?
 7 A. When we discussed anything to do with radicalisation,
 8 I remember that got the biggest negative responses from
 9 him. I think almost teenager -- sulky teenager in his
 10 presentation at times, with some of the negative
 11 feedback I'd be giving him, but what -- he remained
 12 engaged with that process, so despite not liking it,
 13 actually conducted himself in a safe way during that
 14 meeting which, potentially from the things we were
 15 discussing, he held it together quite well.
 16 Q. Is one construction of his behaviour, looking back, that
 17 he was upset at being caught out, but maintaining a good
 18 face of things?
 19 A. No, so he was still discrediting what was there, he said
 20 it came -- much of the information I was quoting came
 21 from prisoners who just didn't like him because they
 22 were drug users, or they'd fallen out in other ways,
 23 that's what his energy was about, was just trying to
 24 discredit it, and I seem to remember that my counter
 25 argument to it was that it's a pattern over a period of

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1 time in different places, which is why it can't be --
 2 couldn't be discredited.
 3 Q. And that's an important point, isn't it: that as
 4 a security analyst, you may get some pieces of
 5 intelligence which are individually unreliable, but
 6 where you see a pattern from a range of sources --
 7 I won't go into the details of the sources -- that tells
 8 you something more informative?
 9 A. It does. It's a very complicated process. Sometimes
 10 the more intelligence you get can build what you think
 11 is quite a clear picture, and then some information
 12 actually completely changes what you're seeing and you
 13 realise even with a lot of intelligence it perhaps
 14 wasn't the way you first view it. It's difficult and
 15 you do -- the more information you have, the better the
 16 decisions you can make.
 17 Q. Now, there was a further MAPPA meeting, I think,
 18 in August of 2018, and a further MAPPA F form was
 19 prepared for that. If we can put that on screen,
 20 {DC6420/1} and that, I think, is the MAPPA F form for
 21 the August 2018 meeting. Again, a form giving the MAPPA
 22 participants information about the prisoner?
 23 A. Yes.
 24 Q. If we go to page 6, please.
 25 JUDGE LUCRAFT: Just before we do, Mr Hough, it's perhaps

1 a little unfortunate, the word that's been blacked out
 2 at the beginning, because it's not "Irrelevant when
 3 complete", but the word that has been blacked out has
 4 been blacked out with the word "Irrelevant".
 5 MR HOUGH: Yes. It just refers to a formal entry which is
 6 of no interest to the Inquest.
 7 JUDGE LUCRAFT: Yes, but I just thought it important to make
 8 that distinction.
 9 MR HOUGH: If we go to the lower half of the page
 10 {DC6420/6}, once again, do we see a summary of
 11 intelligence with some of the entries that I've already
 12 pointed out, the snitch entry, some concerning
 13 associations with other extremists?
 14 A. Yes.
 15 Q. In the meeting that followed, {DC6407/1}, please, these
 16 are the minutes of the meeting of 15 August 2018, there
 17 was a particular discussion I need to ask you about,
 18 you'll see it at {DC6407/6}, the lower part of the page,
 19 during the panel discussion at this meeting, it's
 20 minuted that:
 21 "Concerns [were] express[ed] around the lack of
 22 information sharing from the prison intelligence, this
 23 information is vital in [Usman Khan's] risk [assessment]
 24 and his plan when released back into the community,
 25 especially as he is engaging with known TACT [offenders]

1 in custody."
 2 Are you able to explain this entry?
 3 A. At the time I wasn't aware of that being raised. There
 4 was certainly everything we had shared with all
 5 parties, we held nothing back. We didn't have any
 6 resource issues, so it wasn't like we just couldn't keep
 7 up with work or anything like that, so I genuinely don't
 8 know why that statement was made, and I think I can only
 9 assume it was probably because of the reduction in the
 10 amount of intelligence they were seeing, perhaps they
 11 concluded that we hadn't sent everything.
 12 Q. But, as we saw, the MAPPA F form had been produced
 13 beforehand with that intelligence that we looked at?
 14 A. Yes.
 15 Q. And then moving on to the final MAPPA meeting of Khan's
 16 time in custody, December 2018, if we can look at the
 17 MAPPA F form for that, it's {DC6422/1}. This is
 18 a meeting on 5 December 2018. If we go to {DC6422/5},
 19 please, the lower part of that page, can we see here set
 20 out in the form for the benefit of the MAPPA
 21 participants, that intelligence about Khan radicalising
 22 others, and the report of him saying that he wanted to
 23 return to his old ways?
 24 A. Yes.
 25 Q. Now, it says this is low graded intelligence; as you've

1 confirmed to us, that's not because there was any reason
 2 to distrust it.
 3 A. No.
 4 Q. It's because it wasn't corroborated or supported by
 5 other intelligence?
 6 A. Yes, I'm not sure who made that statement, it's not
 7 a statement I would have used, but that's the conclusion
 8 I've drawn.
 9 Q. And I don't think we need to go to the minutes, but can
 10 you confirm that that intelligence was discussed in the
 11 MAPPA meeting that followed?
 12 A. It's in the minutes, yes.
 13 Q. We can take that off screen now.
 14 After Usman Khan's release from HMP Whitemoor, did
 15 you have any continued contact with him?
 16 A. No, not -- but I did hear through Amy and Ruth from
 17 Learning Together at different events where I would be,
 18 the occasional update via them.
 19 Q. Did you have any formal contacts with those managing him
 20 in the community?
 21 A. No, but my colleague, Jo Boulton, possibly did have.
 22 Q. We'll ask her about that in due course.
 23 We know that Usman Khan attended a Learning Together
 24 event on digital innovation at Whitemoor in June 2019.
 25 Were you involved in sifting proposed attendees for that

1 event?
 2 A. Yes, I was.
 3 Q. What did you do, in a nutshell?
 4 A. Similar to what I described previously: into their
 5 Mercury files, the number was quite low, I think around
 6 five, maybe six. These were people who actually had all
 7 taken part in Learning Together, different courses and
 8 were either acting as mentors or had bought in
 9 particularly well that they were invited.
 10 So I then carried out the similar checks I did just
 11 to make sure they weren't in a place where they would
 12 put that event at risk.
 13 Q. Were you satisfied that that was the case for
 14 Usman Khan?
 15 A. Pardon?
 16 Q. Were you satisfied that that was the case for
 17 Usman Khan, or were you only looking at inmates?
 18 A. He had been released by then, so I had no information
 19 whatsoever on Usman Khan by then.
 20 Q. What did you hear from Dr Armstrong and Dr Ludlow about
 21 his progress via these various informal updates that you
 22 had?
 23 A. A couple of times it would have been that he had made
 24 contact with them or their office, was actively trying
 25 to seek employment. I had heard how feedback from him

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1 returning to our prison as well. Not huge things, but
 2 just little updates like that.
 3 Q. Positive or negative updates?
 4 A. They tended to feel positive; that he was continuing to
 5 head in the right direction.
 6 Q. Moving on to the event at Fishmongers' Hall on
 7 29 November 2019, did you attend that event by
 8 invitation?
 9 A. Yes, I did.
 10 Q. Did you know that Usman Khan was going to attend it
 11 before you arrived?
 12 A. Yes, I did.
 13 Q. How did you know that?
 14 A. Pardon?
 15 Q. How did you know?
 16 A. I assume I was told by the Learning Together team.
 17 I don't know who exactly.
 18 Q. Would you have expected an offender in Usman Khan's
 19 position, 11 months or so after release, but bearing in
 20 mind his category and the various risk factors, to be
 21 accompanied to such an event?
 22 A. My personal — but I must say I understand nothing
 23 post-custody and the processes, so I thought he would
 24 have been. When I heard he wasn't, I just assumed that
 25 he was progressing to the point that it had been deemed

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1 not necessary.
 2 Q. Just with your experience of prisoners within your area
 3 of focus, you would have thought that a prisoner with
 4 the profile of Usman Khan, 11 months on, going to
 5 an event in London of this kind, would be accompanied?
 6 A. Yes, and I remember Amy and Ruth having a similar
 7 expectation, I think, about who would be escorting,
 8 et cetera, prior to the event.
 9 Q. What was it specifically about Usman Khan's profile and
 10 background that would have caused you to expect
 11 an escort or accompaniment to an event at this point in
 12 his time after release?
 13 A. So for me, and this is probably based on my general
 14 prison experience more than my CT prison experience, it
 15 was just the fact that we don't release many people as
 16 high risk category A prisoners, so for all people
 17 working within the prison system, that title signifies
 18 something. I'm not sure if it translated outside the
 19 prison setting.
 20 Q. So for you as a prison professional, somebody being
 21 released at category A high risk, rather than having
 22 gone down through the categories as a result of positive
 23 progress, that's unusual?
 24 A. Yes.
 25 Q. And that unusual factor would cause you to apply extra

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1 caution in dealing with things like trips and other
 2 relaxations of conditions and requirements later on?
 3 A. Yes, and in my prison experience, so you've made
 4 reference to his category A review report, and the one
 5 that, despite a local recommendation, I think you will
 6 hear from people involved in that process that they
 7 would like to see obviously the positive changes, but
 8 they would also then look for a period of consolidation
 9 after these changes before they would have reduced him,
 10 and that's my experience of working alongside other
 11 offenders: they don't lose that title easily.
 12 Q. I'm not going to ask you many questions about the events
 13 of the day, because the jury have heard about it in such
 14 great detail, but it's right, isn't it, that before the
 15 event got going, you spent some time waiting in the
 16 Banqueting Hall with Usman Khan at the same table as
 17 you?
 18 A. Yes.
 19 Q. Did you have a conversation with him over that time?
 20 A. Yes, I basically debriefed him about his time in prison,
 21 trying to learn things that would make me better at my
 22 job, if there was any feedback of things we were missing
 23 the mark on, and throughout that time, yes, he gave no
 24 indication about what his plans were for that day.
 25 Q. No, but how did he seem? What was his demeanour that

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1 day?
 2 A. Well, when I first met him, he threw his arms open and
 3 stepped in for a hug, which felt a bit weird to me, but
 4 we weren't in prison anymore and so I sort of met him
 5 halfway and sort of took one hand and then did
 6 a prison-style shoulder bump with him, so that was my
 7 first sort of clear distinction for that day and then,
 8 yes, he -- he was quite quiet initially. Because it was
 9 a Learning Together event, I tried to ask him about his
 10 creative writing and whether it -- because that appeared
 11 to bring him some pleasure in his latter days within the
 12 prison, but he didn't really engage with that style, and
 13 it wasn't until I started asking questions about his
 14 prison life that he sort of eased into the conversation
 15 and relaxed a bit more.
 16 Q. And do you remember anything that he said about his
 17 prison life and in response to your questions about how
 18 well you did your job?
 19 A. Well, not me personally, but as a service.
 20 So the thing -- there was only one thing he said
 21 during the time that made me stop, raise my eyebrows at
 22 him and asked him to clarify, and it was he talked about
 23 things he had done, and he was then talking about
 24 specifically imams, and that we needed to get people not
 25 employed by the Prison Service in and do much more

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1 around the religion because the imams hadn't been able
 2 to alter his perspective of his religion. So that's
 3 when I stopped him and gave him the sort of "What does
 4 that mean?" and he quite quickly said: but fortunately
 5 through these things and knowing violence isn't the
 6 answer I've learnt a different path, was what he was
 7 saying.
 8 Q. So even that morning he was telling you what you now
 9 know was a lie, a set of lies?
 10 A. Yes.
 11 Q. And I think when the attack began, as the jury have
 12 heard, you were outside the building with some people,
 13 Marc Conway and Michelle Molver, but that you saw
 14 Usman Khan as he came out with his knives and was
 15 pursued onto London Bridge?
 16 A. Yes.
 17 Q. We've also seen that you came onto London Bridge and saw
 18 parts of the confrontation?
 19 A. Yes.
 20 Q. I'm not going to ask you about the detail of what
 21 happened, because the jury know that, but what went
 22 through your head when you saw those terrible sights?
 23 A. I think -- so as we tried to enter the building, I think
 24 the angle of the stairs and where Marc was, I hadn't
 25 clearly seen what had gone on, which Marc had, and

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1 I think the words Marc used at the time is, "I'm not
 2 even sure this is real". We had a quick conversation,
 3 eventually went to the middle of the road, and Marc
 4 started to call the police. I think the moment I saw it
 5 was Usman Khan, my brain assumed the very worst from
 6 that point on, so even before I had seen the
 7 devastation, I think I felt it.
 8 Q. And did that cause you to reflect at all and think again
 9 of any of your dealings with him and put a different
 10 construction on any of your conversations with him?
 11 A. Oh, that's all I've done since. As a human being, it's
 12 hard not to, isn't it, and I'm sure I will keep
 13 reflecting as long as I'm doing the job I'm doing.
 14 MR HOUGH: Thank you very much. Those are all my questions.
 15 Sir, would that be a convenient time for our
 16 mid-afternoon break?
 17 JUDGE LUCRAFT: It certainly would. We'll take a break
 18 there and sit again in 15 minutes. Thank you.
 19 (In the absence of the jury)
 20 I'll rise.
 21 (3.14 pm)
 22 (A short break)
 23 (3.30 pm)
 24 (In the absence of the jury)
 25 MR HOUGH: Sir, I think it's Mr Armstrong coming next.

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1 JUDGE LUCRAFT: Mr Armstrong, just whilst we are waiting for
 2 the jury, I can imagine there may be quite a few topics
 3 that you want to cover and it may be either Mr Pitchers
 4 or Mr Rule who are going to follow you.
 5 MR ARMSTRONG: Yes, Mr Rule.
 6 JUDGE LUCRAFT: Again, I know you have been very good at
 7 doing this really, not covering the same material but
 8 seeking to elicit the parts which you wish to. I know
 9 we have got quite a few witnesses to get through in the
 10 next few days.
 11 MR ARMSTRONG: Yes.
 12 JUDGE LUCRAFT: We are not going to sit beyond 4.30 today,
 13 I know we have jurors who have got childcare issues, but
 14 we'll endeavour to get through as much as we can, but
 15 can I just, Mr Armstrong, repeat what I said the other
 16 day, that is not at the risk or the cost of either
 17 making you go at a speed which is difficult for us to
 18 follow, or indeed, at a speed where the witness wishes
 19 to give answers, but I just make that general
 20 observation.
 21 MR ARMSTRONG: Thank you. I will do my best.
 22 (In the presence of the jury)
 23 JUDGE LUCRAFT: Yes, Mr Armstrong.
 24 Questions by MR ARMSTRONG
 25 MR ARMSTRONG: Thank you.

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1 Mr Machin, my name is Nick Armstrong and I ask
2 questions on behalf of the family of Jack Merritt. Can
3 I just start, part of what I'm going to do, first of
4 all, is try and fill in some gaps, only very few of them
5 being left by Mr Hough. One of them, however, is this
6 from the custodial history. You know that he entered
7 custody aged 19, and one of the reasons why I'm pressing
8 that with a couple of witnesses is that he had spent
9 most of his adult life in custody by the time that he
10 was released?

11 A. Yes.

12 Q. And, indeed, had spent most of his adult life in high
13 security conditions and as a high risk category A
14 prisoner with all the things that we've heard described.

15 That has implications for him, and obviously has
16 an impact on you and your formation as a human being,
17 but I just want to be clear about how he ended up in
18 there.

19 Can I just show you, Mr Hough covered this slightly,
20 I just want to go back to it briefly, can we just look
21 at the NOMIS record at {DC5336/44}. So this is the
22 standard NOMIS you will be familiar with, and I think
23 the jury know this is the standard case management
24 database for prisoners, it is available to all
25 discipline staff, this is not the same as Mercury.

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1 If you -- this is the entry after he is put onto the
2 escape list, it's how he is originally identified as
3 being an escape risk, and this is 27 June 2012, do you
4 see:

5 "At approximately 13.35 on 27 June Brother 2 was
6 moved to special accommodation under restraint. After
7 he was moved it was noticed that he had damaged his cell
8 wall next to the door to such an extent that he was
9 almost through to the outer wall. It was also noticed
10 that in several areas around the cell wall he had
11 written an address that was believed to be that of
12 a member of staff."

13 Now, I think this is -- although it says Woodhill at
14 the time, that's because that is where it was when it
15 was printed, I think this was at Wakefield. He had
16 essentially been trying to burrow through the wall of
17 HMP Wakefield.

18 A. Okay.

19 Q. And that's pretty serious stuff, isn't it?

20 A. Yes.

21 Q. Which is why he ends up on the escape list.

22 Can we just pull up another document. He remains on
23 the escape list -- that is in June -- he remains on the
24 escape list for another month, until July. Can we just
25 look at {DC5547/1}. This is a transfer paperwork to

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1 Belmarsh. If you just flick through, I think it's to
2 page 9 -- I might be wrong about that {DC5547/9}.

3 No, I'm going to have to go back, can we just flick
4 back through the pages. That's about transferring from
5 Belmarsh. Back again, please. {DC5547/6}, yes, so
6 that's it:

7 "He has now been upgraded to high risk cat A so all
8 restrictions and monitoring required is being carried
9 out."

10 What that means, doesn't it, is that he is taken off
11 the escape list, which means that he's got evidence he
12 has been involved in an escape attempt and he is moved
13 to high risk category A when they think he is an escape
14 risk?

15 A. Yes.

16 Q. That is how they have done it?

17 A. Yes.

18 JUDGE LUCRAFT: And the date of that document?

19 MR ARMSTRONG: That is 11/7/12, I think you can see at the
20 bottom, sir, thank you.

21 Mr Hough has taken you through much of the
22 intelligence and I don't want to go back through it, and
23 the jury has the most recent document which covers 2017
24 and 2018. I just want to just summarise some of it. We
25 see references to him being described as number one, as

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1 the emir, and him describing himself as number one in
2 the intelligence.

3 A. Yes.

4 Q. And I'm just putting that to you, because one of the
5 things we're interested in is his status--seeking, and he
6 does that, doesn't he?

7 A. Yes.

8 Q. We see him holding court with other prisoners?

9 A. Yes.

10 Q. We see him running rackets, protection rackets, there's
11 intelligence about him doing that and there is
12 intelligence about him grooming more vulnerable
13 prisoners, Mr Hough has been to that.

14 A. Yes.

15 Q. And we see this, including grooming prisoners perhaps
16 for their use on the outside, including for drugs
17 reasons; do you remember seeing that intelligence?

18 A. Sorry, could you say that again?

19 Q. There was intelligence about using people on the outside
20 for drugs reasons?

21 A. For drugs reasons?

22 Q. Yes, there were drug users being used for...?

23 A. Yes.

24 Q. Thank you. The reason I just ask you about that is
25 because one of the things that we might see in this is

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1 this status-seeking behaviour being replaced towards the
 2 end of his sentence by Learning Together giving him
 3 another status, and he may have quite enjoyed seeing
 4 himself as being a high-profile individual, being used
 5 by the University of Cambridge, getting all of the
 6 attention that he got from them.

7 A. Yes.

8 Q. Now, there are risks associated with that, aren't there,
 9 in that he may enjoy that status until it collides with
 10 reality and he discovers that he's not going to be
 11 getting into the University of Cambridge or doing
 12 a masters degree at the University of Cambridge or being
 13 a Jack Merritt or a Saskia Jones any time soon. If you
 14 replace one status with another status and then he
 15 doesn't get it, there are serious risks associated with
 16 that?

17 A. Yes, but I'm not sure about what his expectation from
 18 that, because I don't think there was a package set out
 19 to him for him to expect that.

20 Q. We will explore that with other witnesses, but we will
 21 see him talking in general terms about wanting to do
 22 a master's degree in Cambridge and writing a book and
 23 those sorts of matters.

24 A. Okay.

25 Q. Now, one of the reasons why I want to just flag some

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1 aspects of the intelligence is, it's key, isn't it, that
 2 a lot of that behaviour, some of which is very
 3 concerning behaviour, is maintained at the same time
 4 that he is also being seen being polite to staff? There
 5 are reports about him being polite to staff and
 6 compliant with staff at various stages?

7 A. Yes, but the people we lock up don't offend every day.

8 Q. Indeed. And also at the same time as when he was doing
 9 work supposedly on understanding and improving his
 10 offending behaviour?

11 A. Yes.

12 Q. Now, I just want to give a couple of examples about
 13 that.

14 So in 2015, for example, one of the main courses
 15 that he has relied on as being a way that might have
 16 helped him move on is the Healthy Identity Intervention
 17 programme.

18 A. Yes.

19 Q. And you know about the HII?

20 A. Yes.

21 Q. I went to it with Brother 2 this morning, I'm just going
 22 to go back to it. Can we just pull up {DC5327/1} again,
 23 please, and go back to paragraph 4.1 {DC5327/3}. So
 24 this is, again, where Brother 2 — I'm just putting to
 25 you that this is not that great a report. This is where

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1 he is talking about — this is what I put to Brother 2
 2 this morning about him being someone who wanted to
 3 better himself but couldn't see any way in which he
 4 could better himself. Could we then go to
 5 paragraph 4.6.1 {DC5327/6}:

6 "[He] reflected on his self-image, reporting his
 7 view that he does not intentionally bring harm on
 8 himself or others, he seeks to do good for the community
 9 and himself."

10 Now, that may be at odds with some of the
 11 intelligence and some of what we know of Brother 2,
 12 mightn't it?

13 A. Yes.

14 Q. 4.8.1, please {DC5327/7}:

15 "Brother 2 reports his main learning from completing
 16 the intervention is discovering he is 'shy' ..."

17 That's a slightly odd bit of self-image for the
 18 flag-waving, stall-manning emir on the wing.

19 A. And that he was running stalls at 17, yes.

20 Q. Indeed. Can I go to paragraph 5.1 you have there. It's
 21 unsurprising, therefore, that the second sentence of the
 22 conclusion:

23 "However the extent to which Brother 2 has developed
 24 any additional insight into the risk factors driving his
 25 offending behaviour is questionable, given Brother 2's

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1 own admission that he feels he has not learnt anything
 2 new..."

3 Now, I'm just saying, it is a fair reading of that
 4 that there is still rather a lot of concerning stuff in
 5 there and he is not really making any progression; isn't
 6 it?

7 A. That's what those words indicate, yes.

8 Q. Now, I flag that because that's in 2015. He is, you
 9 know, people are pleased that he has done the HII, but
 10 in 2017, so another 18 months or so after this, we have
 11 all of the concerning behaviour that Mr Hough has gone
 12 through in particular, holding court, involved in
 13 assaults, lots of engagement, there is
 14 an August 2017 incident in particular.

15 This is not a man at this stage that looks like he
 16 is doing any serious work, doing any penetrating insight
 17 into his own personality type and moving on?

18 A. No.

19 Q. Thank you. He also does the Thinking Skills programme,
 20 that's completed in December 2017.

21 Now, I know that the Thinking Skills programme is
 22 a programme that prisons recommend. I think it's
 23 15 sessions of about two hours?

24 A. I don't really know that programme, no, sorry.

25 Q. I'm going to suggest to you that it too is not the most

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1 intense programme that can bring about this kind of
 2 change that we would be looking for with somebody like
 3 Brother 2. It's something that is worth doing, but it's
 4 not an intense programme that lasts for a long time?
 5 A. Again, I'm not -- I don't really understand --
 6 Q. I'm just putting it alongside things like Mr Crilly who
 7 came a few days ago and talked about being in a
 8 therapeutic programme for five years in order to turn
 9 his life around. It's very different to that?
 10 A. Yes.
 11 Q. Can I just go to a little bit of the TSP, {DC5341/9},
 12 please. The reason why I just flag this, and I'm going
 13 to do it very lightly, because Mr Hough has already been
 14 to this, is this is where he says:
 15 "Where highlighted I would like to clarify that
 16 though I felt angry, I also made clear that I would
 17 never harm anyone who did not physically harm me, this
 18 is a principle I live by ... I would not harm staff nor
 19 anyone else..."
 20 Now, that again is at odds with things like him
 21 having been in segregation for having punched
 22 a chaplain, for example?
 23 A. Yes.
 24 Q. Again, by the end of 2017, this is a man who has not
 25 seriously moved on, his entrenched, long-standing,

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1 I have put to one witness, behavioural patterns since
 2 childhood are not showing many signs of alteration here?
 3 A. All the more reason for us to keep trying.
 4 Q. I'm not going to disagree with you that -- with you,
 5 Mr Machin, I'm just going to say keep trying but put
 6 proper safeguards in place; okay?
 7 Then, just for completeness, we know that Brother 2
 8 also did Islamic guidance course, but that was five
 9 sessions immediately before release at the end of 2018
 10 with the chaplain that we've heard from?
 11 A. Yes.
 12 Q. Okay. So I'm going to suggest to you that that is why
 13 none of this is sufficient to result in the category A
 14 team or the people who do the high risk bit of the
 15 category A evaluation take him off it. He is maintained
 16 at category A, and we can look at some of the decisions,
 17 but they don't think any of this is sufficient to lower
 18 his risk to a category B, or even off the high risk
 19 category A stage, do they?
 20 A. No, as I said earlier, I think they would be looking for
 21 a longer sustained period of consolidation.
 22 Q. Yes, indeed, and that's indeed exactly the language they
 23 tend to use, and the consequence of that is that he
 24 continues to be regarded as somebody whose escape would
 25 be highly dangerous to the public and for whom escape

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1 must therefore be made impossible. That's the test.
 2 A. Correct.
 3 Q. Now, just on this, just to flag one thing, it is right
 4 that the local area panel made a recommendation for
 5 category B shortly before his release in December 2018?
 6 A. Yes.
 7 Q. We'll ask some of the individuals involved in that in
 8 a moment, but can I just bring that up, that
 9 recommendation up. That's {DC5565/2}. Then can we go
 10 to the second half of that, please, that page. Yes.
 11 So what this says is:
 12 "The LAP [six lines up from the bottom] acknowledged
 13 that there were security concerns raised during the
 14 first half of the reporting period, but ultimately felt
 15 that he should be recommended for downgrade due to only
 16 having a month remaining in custody. It was satisfied
 17 that no concerning behaviours have been seen for over
 18 12 months and that a downgrade that facilitated a period
 19 of time in a category B resettlement environment would
 20 benefit his transition to the community and enhance his
 21 chance of success."
 22 And that's on 7 November 2018.
 23 I'm just going to say two things about this:
 24 firstly, this is a slightly surprising recommendation
 25 because this would be taking him not only into

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1 category A and off high risk, but into category B., so
 2 that's a double jump; do you see?
 3 A. Yes, but I think this is shortly before his release, so
 4 I am -- I understood it that that was to negate the risk
 5 that actually within two months he would be accessing
 6 the general public without potentially accessing any
 7 resettlement work.
 8 Q. But the point is this -- you're giving the answer that
 9 I'm expecting you to give -- one usually tries, before
 10 anybody releases someone into the community, to manage
 11 them down the risk categories?
 12 A. Yes.
 13 Q. So you go A, B, C, D, and then out, is what usually
 14 happens, because you want to test whether any apparent
 15 progress is reliable progress?
 16 A. Yes, and each level stretches (overspeaking) --
 17 Q. And you do it in reducing -- you make their lives look
 18 increasingly like the community until you're confident
 19 enough to release them?
 20 A. Yes.
 21 Q. Now, the opposite happened with Brother 2, he went
 22 straight out from very high security conditions?
 23 A. Yes, there was --
 24 Q. And there are real concerns about that and you've talked
 25 about them with Mr Hough and we'll come back to them in

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1 a moment. But this is the team, this is the local area
 2 panel saying a month ahead, he's coming out anyway, we'd
 3 better try and do something, isn't it?
 4 A. Yes.
 5 Q. But it's useless, isn't it, Mr Machin? I mean, firstly,
 6 they're only a month ahead of release, so that's not
 7 going to do anything, realistically. As a risk
 8 management device, they're not going to achieve anything
 9 in a month?
 10 A. No, not in a month, no.
 11 Q. But, equally, nothing's going to happen, and nothing did
 12 in a month, because this is a recommendation that goes
 13 to the high security central Category A Review Team, the
 14 CART, isn't it, because that decision would be made
 15 centrally?
 16 A. Yes.
 17 Q. And that wasn't going to happen probably inside a month,
 18 and, indeed, didn't?
 19 A. I don't know.
 20 Q. We know there isn't a decision in time, so the idea that
 21 he was going to get moved on and spend any significant
 22 periods of time in category B and get tested was
 23 hopeless?
 24 A. Certainly in terms of the tested. So what I mean by the
 25 words "resettlement", as a high security dispersal

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1 prison, we have no links to Jobcentre Plus, things like
 2 that so --
 3 Q. Yes.
 4 A. -- or -- I think the intention was to enable to start
 5 bridging some of those links he would need ready to be
 6 in the community, not any therapeutic intervention that
 7 was going to drastically change his risks.
 8 JUDGE LUCRAFT: So, in fact, what I think I understand from
 9 what you're saying is, this was very much viewed with
 10 a view to making those contacts on immediate release
 11 into the community from a category B environment that
 12 wouldn't be there in a category A high risk environment?
 13 A. Yes, the category B prisons, there are a number that
 14 allow for those links to be established, and we are most
 15 certainly not one of those.
 16 MR ARMSTRONG: So that is, the learned coroner is absolutely
 17 right, that's the most that could be achieved by this:
 18 it's not suggesting that this was a radical alteration
 19 in his risk level, it was just to try and facilitate by
 20 increasing practical contacts?
 21 A. Yes.
 22 Q. Thank you very much. The consequence of that is, of
 23 course, as I put to another witness, is on
 24 23 December 2018, he is regarded as somebody whose
 25 freedom is highly dangerous to the public and the

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1 community. On 24 December, the following day, he's
 2 free.
 3 A. He's a member of the community.
 4 Q. That's a pretty dramatic thing and raises genuine risk
 5 management issues?
 6 A. It definitely does to me.
 7 Q. Absolutely right.
 8 As Mr Hough has been through, he went into --
 9 I mean, I -- and I don't think you and I are going to
 10 disagree about this: spending most of your adult life in
 11 the high security estate is an unusual thing to do and
 12 is likely to do something to your head, to put it
 13 informally?
 14 A. And I would add to that, that increases then when you
 15 are moved to smaller units.
 16 Q. I was absolutely going to just go there. He spent his
 17 times in things like the MCBS unit. Now those units are
 18 small, often 10 prisoners or so?
 19 A. Yes.
 20 Q. I know that, for example, in HMP Woodhill where he was,
 21 he was in something called House Unit 6C, which is right
 22 next to the Close Supervision Centre, which is HU 6A
 23 and B?
 24 A. Yes.
 25 Q. So that's the kind of environment he is in. The Close

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1 Supervision Centre is the prison within the prison,
 2 absolutely top end prisoners who kill other prisoners
 3 unit?
 4 A. Yes.
 5 Q. And that's the -- so it's very heavily regulated, things
 6 like your associations with other prisoners even within
 7 that unit are very heavily regulated, you see very few
 8 other things, it's a very, very stark environment?
 9 A. Yes.
 10 Q. And he spent long periods of time there?
 11 A. Yes.
 12 Q. Now, equally, he wasn't just in the MCBS regional
 13 scheme: he was, for a period, in the central scheme?
 14 A. Yes.
 15 Q. Because he was regarded as an even more complex case,
 16 and yet that's the kind of environment he's grown up in?
 17 A. Yes.
 18 Q. Now, I want to go on to ask you some questions about
 19 how, in these circumstances, he becomes this good news
 20 story -- as I'm going to say that he did -- for
 21 Learning Together, because there are -- and we can go to
 22 some of the references, the jury has heard about this,
 23 we have seen, for example, the video that is played
 24 in March 2019 that has Usman Khan on it. Can I just
 25 ask, by the way, have you seen that video,

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1 the March 2019?
 2 A. No.
 3 Q. But you've heard about it, I think?
 4 A. Yes, I think I was sent a copy, but the disc didn't
 5 play, so I've never seen it.
 6 Q. Once he got his Chromebook, there were photographs taken
 7 of him, he was put in leaflets, Learning Together
 8 leaflets, and so on. He was used as, Mr Pitchers put it
 9 somebody, we will come back to it no doubt with other
 10 witnesses, Mr Pitchers put it to Learning Together that
 11 he was used as a poster boy for Learning Together. He
 12 was regarded as a success story, wasn't he?
 13 A. Yes, you can put it that way.
 14 Q. I just want to understand how that comes about, given
 15 where he had come from, and just before I do that, break
 16 this down slightly, your involvement with
 17 Learning Together, I understand that Learning Together
 18 starts at Grendon, it is rolled out to Whitemoor
 19 a couple of years later, and Warren Hill at around the
 20 same time, and we know, and people in this room are very
 21 bored with me talking about this, Grendon and
 22 Warren Hill, very different prisons to Whitemoor?
 23 A. Yes.
 24 Q. Therapeutic communities, specialist progressive regimes,
 25 et cetera. Now, we are told, and I think we will be

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1 told, that Governor Styles, who is your boss in the
 2 prison, ultimately, he was the number one governor at
 3 the time, wasn't he?
 4 A. Yes.
 5 Q. He was involved in that rollout, he was involved in the
 6 process of bringing it into Whitemoor, and we will ask
 7 him about that?
 8 A. I don't know for certain, but it very likely was.
 9 Q. That was your impression?
 10 A. Yes.
 11 Q. From your point of view, where did you first hear about
 12 Learning Together? How did you get involved and at what
 13 stage?
 14 A. When Gina Butler, who was the head of learning and
 15 skills, who I think you are speaking to tomorrow,
 16 introduced me to Amy and Ruth actually within the
 17 prison.
 18 Q. I see.
 19 A. And brought them to my office, and that was when I was
 20 first told about what they wanted to do, and I think the
 21 purpose of that initial talk was what would we want from
 22 an induction process --
 23 Q. I see.
 24 A. -- and it sort of started from there.
 25 Q. That's very helpful, thank you. So it sounds like

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1 a decision to do this has been taken?
 2 A. Yes, that's what it felt like.
 3 Q. And they are beginning to roll it out but they involve
 4 you as head of security?
 5 A. I was custodial manager at the time, so I think Gina had
 6 worked with me previously, and so out of the five
 7 different custodial managers down there, felt it easiest
 8 to approach me because basically she was asking for
 9 a favour in the initial time.
 10 Q. Right, I see. And what was the favour she was asking
 11 for?
 12 A. My time.
 13 Q. To do what?
 14 A. To help piece together how we were going to run the
 15 sessions.
 16 Q. So they had already decided to run the sessions. Had
 17 they already recruited prisoners by this point?
 18 A. No.
 19 Q. They hadn't?
 20 A. No.
 21 Q. I think we are going to be told by Gina Butler that
 22 there was a stage where she and Ruth and Amy walked the
 23 wing talking to possible candidates, did you know that?
 24 A. Yes, they did.
 25 Q. Was that before or after your involvement?

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1 A. Before, and it tended, so the process I've described
 2 earlier, our natural risk level assessments, took a few
 3 names away.
 4 Q. Okay.
 5 A. So then there were less -- people that were actually
 6 able to attend the class because their risk level
 7 allowed it, they then had interactions with them to find
 8 out what their learning motivation was.
 9 Q. Yes.
 10 A. From then, they would then be left with a list of names
 11 that they think showed them the right engagement and
 12 would benefit from it, and then I would complete the
 13 final check.
 14 Q. Then you would do the security sift?
 15 A. Yes.
 16 Q. Okay, I'll come back to that in a moment.
 17 But the point is that decisions have already been
 18 taken by the time you get involved and you are
 19 essentially implementing a decision that's been taken?
 20 A. Yes. Yes.
 21 Q. Okay. We know that there's quite a lot of -- and
 22 I would be interested in this with others -- the
 23 relationships where people already know Ruth and Amy
 24 before it gets to this stage, and we know, for example,
 25 that Governor Styles and later Gina Butler were doing

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1 a master's degree with the Institute of Criminology
 2 at Cambridge. You didn't have that relationship; you
 3 weren't doing a master's degree at the
 4 University of Cambridge?
 5 A. No, I haven't, no.
 6 Q. Okay. Were you aware, as you get involved as
 7 a custodial manager at that stage, conversations taking
 8 place about security risks, in any sense at this stage,
 9 say: look, this seems to have worked and produced
 10 results at Grendon, but there are much -- and maybe
 11 those benefits would be achieved in a place like
 12 Whitemoor too, but the downside of trying to get those
 13 benefits might be that much greater because of the
 14 different demographic, the different cohort of prisoners
 15 we're dealing with here.
 16 Did you hear of a conversation about that?
 17 A. I can't recall one, but that's not to say there weren't
 18 some.
 19 Q. Yes, but if it happened, it didn't happen around you?
 20 A. Yes, not that I can recall.
 21 Q. And did you -- and at this stage I want to ask you
 22 a question about what you knew about Learning Together
 23 processes, because, you know, a number of us put some
 24 questions to the Learning Together witnesses last week
 25 about whether it was a good idea or not to be having

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1 a research methodology that validated the feelings of
 2 prisoners irrespective of the factual truth or otherwise
 3 of those feelings, and there is a process that goes on
 4 with people like Usman Khan that say: how do you feel
 5 about all of this? He then talks about all the bad
 6 things that have happened, we then later discover that
 7 quite a few of those bad things never happened.
 8 Were you aware of the research methodology of
 9 Learning Together?
 10 A. No.
 11 Q. You have not got into any of that, you've not gone away
 12 reading Prison Service Journal articles or anything like
 13 that?
 14 A. I read the Prison Service Journal, but I don't
 15 understand the research side of it, no.
 16 Q. Okay. I mean, do you know this about the way it
 17 operates: that it's run by Ruth and Amy, who are
 18 academics, so they come at this from an academic -- and
 19 Amy Ludlow said she's a lawyer -- but not from
 20 a custodial background. Did you also know that as well
 21 as involving Cambridge undergraduates, large parts of
 22 the organisation seemed to be run by young, first job
 23 out of university, postgraduates, so Jack, for example,
 24 Simon Larmour, for example, and recent graduates who are
 25 in their 20s. Did you know that at the time?

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1 A. Well, I met those people, so...
 2 Q. Did you meet them early on or later on?
 3 A. No, I met those probably second, third, fourth courses
 4 in.
 5 Q. I see.
 6 A. Initially I just remember Amy and Ruth for the first
 7 course.
 8 Q. And I just wonder whether that puts any alarm bells up
 9 for you, because I'm going to put this very gently, and
 10 I hope appropriately and respectfully, you have been in
 11 the high security estate a long time?
 12 A. Mm--hm.
 13 Q. You have seen some of the most serious prisoners that
 14 the UK has?
 15 A. Yes.
 16 Q. And you've seen them try to get one over on you?
 17 A. Yes.
 18 Q. And you know, as you have told us rather memorably
 19 today, you've got to watch what these guys do more than
 20 you listen to what they say?
 21 A. Yes.
 22 Q. But that's a lesson that you've probably learnt the hard
 23 way by being on the wing for 20 years?
 24 A. Yes.
 25 Q. Jack Merritt, Simon Larmour, may not have learned those

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1 lessons, they are in their first jobs out of university
 2 and may not have had the same experience of applying
 3 credulity and scepticism and cynicism to what they're
 4 being told?
 5 A. That's true, but they weren't in a position to make
 6 decisions about these men, so...
 7 Q. But they are later, aren't they? They are going to be
 8 dealing with these men as they go through courses, and
 9 they are going to be dealing with these men after
 10 they're released?
 11 A. Again, that wasn't clear to me at that stage then.
 12 There was no direct link for anything other than the
 13 courses we were running there at that time. Yes, I was
 14 aware there was a wider network of communication that
 15 continued for people post their course, but, again,
 16 I wasn't with an expectancy that everyone we put into
 17 those classrooms was then going to benefit from anything
 18 other than attending the sessions for that course.
 19 JUDGE LUCRAFT: Sorry, as I understood it, Mr Armstrong,
 20 your question started off about whether Mr Machin was
 21 aware of how Learning Together was run, and we've rather
 22 assumed from his answers that he was aware how it was
 23 run, but it just seemed to me, in the light of some of
 24 the answers he has given, that it may well be that in
 25 fact what his knowledge is, is he is aware of the role

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1 played by Amy and Ruth and of other postgraduates coming
2 into the university, but not necessarily how the
3 organisation was run, which may be important in terms of
4 the question you've just posed about involvement between
5 students, whether they're inmate students or university
6 students further down the line.
7 MR ARMSTRONG: Yes, that's absolutely fair, and maybe I need
8 to -- as I understand it, you begin to see the
9 involvement of the likes of Jack Merritt some time down
10 the line, so I think you said four or five courses down
11 the line?
12 A. Yes, could have been two, could have been three. It
13 definitely is not in my memories of the first ones, and
14 the initial setting up process.
15 Q. And when do you also -- so you become aware of their
16 involvement somewhere down the line. When do you become
17 aware, if you can tell us, of the role that
18 Learning Together plays beyond the prison walls?
19 A. Well, I don't know what that role is, so I'm perhaps, to
20 this day I'm not fully aware, other than just becoming
21 aware of keeping a network -- a network of contact
22 going, that was all I was really aware of.
23 Q. But you must have been aware -- I mean, I think you're
24 aware of the June 2019 event at Whitemoor?
25 A. Yes.

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1 Q. Which is an alumni -- which is Usman Khan being invited
2 back in?
3 A. Yes.
4 Q. Which must mean that he has contact with the
5 organisation after he has been released?
6 A. Yes.
7 Q. And in November 2019, of course, you're a guest at
8 an alumni event at Fishmongers' Hall?
9 A. Yes.
10 Q. So you can see that that's all mixing?
11 A. Yes, but, again --
12 Q. The nature of it you don't?
13 A. Yes, and we didn't begin this with the expectation that
14 those things were then going to follow.
15 Q. No, I see that, and we've heard the word "nascent" used
16 in terms of Learning Together wanted to do this but it
17 seems to have been a bit of a work in progress.
18 I suppose the question really is this: at any stage
19 along that journey that is travelled by all of you, do
20 you go to Amy and Ruth or Jack or anybody else: look, do
21 remember, you are dealing with serious individuals here,
22 it's not the University of Cambridge anymore, it's not
23 Grendon anymore, some of these guys are gaming you, or
24 may be gaming you, or may be emotionally volatile, much
25 more serious than the guys you are used to dealing with.

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1 Do you give them the benefit -- at some point take
2 them to one side -- of your 20 years of hard-learned
3 experience?
4 A. No.
5 Q. Do you think you should?
6 A. That's difficult to answer. Certainly because of the
7 way I receive info, much of it I wouldn't have been
8 allowed to share with them at all, certainly
9 intelligence aspects of things, but I hadn't, from my
10 position, seen anything going on where it had sort of
11 driven me internally to say: oh, they really do need to
12 be careful. From working with them in the prisons, they
13 had very good jailcraft, really.
14 Q. They had very good?
15 A. Jailcraft, an understanding of what was going on around
16 them. I don't know what Grendon's like, I know it's
17 a prison, I know its therapeutic purpose, but what it's
18 like to be there, I genuinely don't know, so I wouldn't
19 be stood there saying: remember, we're not like this, or
20 we're not like that.
21 I have a long experience, but that's at Whitemoor,
22 so my experience is based around the high security
23 prison that is Whitemoor.
24 Q. I understand. But what I'm worried about here, what
25 I'm suggesting to you, is that we are getting two worlds

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1 colliding where you have rather a lot of, as I say,
2 hard-bitten experience that they don't have, and whilst
3 they may walk the walk and talk the talk and be
4 articulate and clever and all the rest of it, they might
5 need to be told, and they might need to be told by you:
6 we have got some serious guys in here, remain vigilant.
7 A. So I guess the best way to answer that is if I'd ever
8 seen them behave in a way, I would have not stopped for
9 a second. There was nothing within the relationship
10 with Amy and Ruth that would prevent me from doing that.
11 Q. Yes.
12 A. But I never did it.
13 Q. Yes.
14 JUDGE LUCRAFT: And I think, Mr Machin, the point you have
15 made, and I think Mr Armstrong accepts, is that you're
16 seeing Learning Together, until one gets to 29 November,
17 very much in the prison context. So the event at
18 Whitemoor is an event held in a prison, you have told us
19 about. It's not as if you have been to other events
20 similar to the one at Fishmongers' Hall before that day?
21 A. I had been to one at Hull --
22 JUDGE LUCRAFT: Right.
23 A. -- which, again, was in a prison. One day in a prison,
24 one day in the university. And I had attended another
25 event in London which, again, one day in Brixton Prison,

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1 one day... so for me, it was all about bringing students
 2 into prisons. It wasn't -- the aim of the project
 3 wasn't necessarily to me, what I saw, bringing prisoners
 4 into educational establishments. So that wasn't --
 5 MR ARMSTRONG: I see.
 6 A. It was a prison-based educational experience is
 7 what I ...
 8 Q. So that stuff that I'm talking about which is policing
 9 boundaries, remaining vigilant on the outside, is just
 10 not on your radar at this stage at all?
 11 A. No.
 12 Q. You're concerned with security assessing on the high
 13 security estate and nothing beyond that?
 14 A. No.
 15 Q. All right.
 16 Can I just now go to the sift that you do. Can
 17 I just pull up Gina Butler's witness statement, please
 18 {WS5092} and paragraph 59. That is 5092. And paragraph
 19 59 is --
 20 JUDGE LUCRAFT: It might be the next page.
 21 MR ARMSTRONG: {WS5092/17}. I may have the reference wrong
 22 on this. Can we just go back a page {WS5092/15}, I hope
 23 I haven't got this wrong. So this is:
 24 "The procedure for residents to apply for Learning
 25 Together was set out in my Second Witness Statement..."

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1 Can we then go over the page {WS5092/16}. Yes.
 2 Maybe paragraph 54:
 3 "In addition to consulting with Mr Machin and the
 4 OMU, I consulted with the Chaplaincy prior to sending
 5 the list of applicants to Amy Ludlow and Ruth Armstrong.
 6 I wrote a letter to another resident who applied for
 7 Learning Together around the same time as Usman Khan
 8 but who was refused by Mr Machin. This letter shows
 9 that I consulted the Chaplain."
 10 Now, this is referring to various bodies within the
 11 prisons, it's talking about you; the OMU, which is the
 12 Offender Management Unit, those are people who are
 13 responsible for progressing and I think probably
 14 contains Jo Boulton; is that right?
 15 A. Yes.
 16 Q. And the chaplaincy. Can we now just go to GB/14 which
 17 I think is {WS5092-GB14/1}. This is the letter on
 18 another prisoner who was declined access to
 19 Learning Together. Sorry to make people jump about.
 20 This is a refusal to somebody:
 21 "I write to advise you that your application has
 22 been through an internal sift panel, comprising of
 23 representation from Activities, OMU, Chapel and
 24 Security. I regret to advise that I am unable to process
 25 your application further based upon the feedback

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1 provided by Security."
 2 Just to be clear about this, there is an education
 3 stage to this sifting process where we check whether
 4 they're motivated to do education and they're going to
 5 get any gain by it and then there is a security stage by
 6 this. Is the security stage, certainly in
 7 a counter-terrorism case, just you, as I understand it,
 8 or is it a panel?
 9 A. So the pre-assessments are completed by the general
 10 security department in terms of allocation to activity.
 11 That bit at the end would be me and possibly one of my
 12 analysts helping me, but predominantly me.
 13 Q. If we can just pull up your witness statement, that's
 14 {WS5060/16} at paragraph 47, you say this:
 15 "I was involved in the sifting of applicants for the
 16 Learning Together programme and considering whether it
 17 was safe for offenders and visitors to attend... I would
 18 sift the offenders... this was not just for TACT
 19 offenders but all offenders... I am aware that the
 20 application forms state that the sift was to be done by
 21 security... however this was a reference to me and not
 22 the Security department: as I stated above, those
 23 unfamiliar with the two departments might not
 24 distinguish the two."
 25 If I could just leave that there for the moment,

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1 that is essentially you doing the safety check?
 2 A. Yes.
 3 Q. But, as you've told Mr Hough, you didn't apply any
 4 particular criteria to that, you just take a view on
 5 their current behaviour and as to whether or not they
 6 are or going to be refractory in a classroom; is that
 7 what that is?
 8 A. The main priority, yes, that the session would run as
 9 planned, and that I wasn't letting people into that room
 10 that were going to jeopardise that in any way.
 11 Q. You say there that you would review the NOMIS and the
 12 intelligence reports. How far back would you go? How
 13 much of a pattern would you seek to establish?
 14 A. For something like this, I would say about six months,
 15 no longer than a year.
 16 Q. Right, so it is a snapshot?
 17 A. It's recent -- well, a snapshot would be just diving in
 18 for a few odd reports. A year is a quite a long time in
 19 a prison.
 20 Q. I'm putting it to you this way. I mean, you don't have
 21 on your radar at all what happens after release, but
 22 even in relation to the prison, this is looking like
 23 quite a quick, quite an informal check, no particular
 24 criteria, you look at some NOMIS entries and some IRs.
 25 A. I made my own assessment of their current behaviour.

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1 Q. We don't have any emails or documents -- I think you
 2 know this and it's in your witness statement --
 3 A. Mm--hm.
 4 Q. -- any records of you conducting that process and what
 5 you considered.
 6 A. Yes.
 7 Q. You tell us that the reason why that is is that you
 8 delete all emails after two years?
 9 A. I don't, our system -- I learnt as the process of
 10 preparing for this Inquest that no emails -- I couldn't
 11 find any emails either sent or received older than two
 12 years, unless they had been pulled out of the system and
 13 stored somewhere separately.
 14 Q. I mean that -- you didn't know it was being deleted on
 15 a two-year basis?
 16 A. No. In my time of us having IT at work, there hadn't
 17 been an announcement to that effect. We have a finite
 18 amount of space that each account can hold, and I had
 19 always assumed as long as that wasn't full, information
 20 would still be there. It's only, like I say, preparing
 21 for this Inquest, I then realised that that's not the
 22 case, and I couldn't find much after two years old.
 23 Q. And there don't seem to be any emails anywhere else,
 24 I mean, Gina Butler hasn't produced any emails that you
 25 have sent to her about this process?

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1 A. For the same reason: she's in the same prison, same IT
 2 system. From that time we just couldn't find those
 3 emails.
 4 Q. Are you able to help us with why the prison has
 5 a system, which seems an unusually strict system of
 6 deleting emails after only two years?
 7 A. I've got no idea, sorry.
 8 Q. This is just --
 9 A. I've got absolutely no idea.
 10 Q. That's just the Prison Service?
 11 A. I don't know. I don't know if it's unique to us or it's
 12 the IT structure that...
 13 Q. I think it might be.
 14 A. Yes. Not, like I say, I've only actually become aware
 15 of that preparing for this Inquest.
 16 Q. Because, I mean of course this event, this awful event,
 17 is November 2019, and the application process
 18 was November 2017, so a two-year must have been applied
 19 very rigidly for us to lose them?
 20 A. Well, the reason I know it's two years, because whilst
 21 preparing my legal team in January, when I went to refer
 22 back to stuff we discussed in January in the month
 23 of February, it wasn't there anymore, and that's when it
 24 sort of became a fine -- so I monitored my email account
 25 the next month and then realised that, again, I'd lost

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1 another month of historic info, so ...
 2 Q. The reason why I'm just pressing you on what exactly
 3 happened is, I mean, Ruth Armstrong told us on Day 9 of
 4 this Inquest that her understanding was that the
 5 applications would be gathered by the head of learning
 6 and skills, they would then be sifted by security, OMU,
 7 with relevant input from psychology and any other
 8 programmes, perhaps education, for lack of -- for
 9 conflicts, and so on. Now, that sounds like a more
 10 involved process than you're describing?
 11 A. But that -- those other people aren't me, so I'm just
 12 one element of that process, it sounds like.
 13 Q. Have you ever seen a process of sift for
 14 a Learning Together programme that involved psychology?
 15 A. Well, I haven't, but I did my work in isolation.
 16 Q. Okay. Thank you.
 17 Now, Mr Hough asked you questions about -- this is
 18 the sift process which takes place at the end of 2017.
 19 Mr Hough asked you some questions about the ERG process.
 20 Now, that's a bit of structured decision-making, and
 21 I'm asking you about that even though it's not done by
 22 you because it's a process with which you were involved
 23 and you answered some questions about Mr -- you were
 24 asked some questions by Mr Hough about that process and
 25 about Usman Khan's reaction to it?

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1 A. To the meeting I had as part of that process, yes.
 2 Q. Which was in April 2018.
 3 A. Yes.
 4 Q. Now, can I just put up a couple of entries from that.
 5 So can we just go back to the ERG document, which is
 6 {DC5322/34}, and if we can just go to paragraph 8.2.2,
 7 please. Now, the significance of this is that this is
 8 a document, isn't it, which in an area of risk
 9 assessment and decision-making that is inherently
 10 difficult. What this is designed to do is bring
 11 discipline and rigour to that process. You know that to
 12 be true, don't you, because these are tricky guys and
 13 you need to do stuff properly.
 14 A. Yes.
 15 Q. Now, 8.2.2, this is talking about the "stages to change"
 16 model postulating that individuals who modify their
 17 problem behaviours move through a series of stages.
 18 If you look there, we have pre-contemplation,
 19 contemplation, preparation, action and maintenance
 20 stages. So pre-contemplation, meaning as it sounds:
 21 I am thinking about maybe changing as a human being, as
 22 an offender?
 23 A. No. Not even thinking about changing, is the way
 24 I understand it.
 25 Q. Well, individuals in the pre-contemplation stage have no

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1 awareness of their problems and sorry, no intention to
 2 change.
 3 A. Yes.
 4 Q. Then contemplation stage: recognise their problem areas
 5 and want to overcome them, but relevant behavioural
 6 changes are not yet evident.
 7 If we then go to paragraph 8.2.4, please:
 8 "In summary, although Brother 2 may have made
 9 some..."
 10 Yes, sorry, 8.2.4:
 11 "In summary, although Brother 2 may have made some
 12 internal changes over the course of his imprisonment ...
 13 he may still struggle to apply this learning
 14 continuously and in high-risk situations and eventually
 15 he may sometimes end up behaving in a way that could be
 16 paralleling his offending ... [et cetera, et cetera] It
 17 is true that Brother 2's true internal change could be
 18 somewhere on the continuum between the pre-contemplation
 19 and preparation stages (and a change may be more
 20 significant for some risk factors ...)."
 21 So what Ms Cechaviciute is saying here, that he may
 22 not even have begun the process of alteration?
 23 A. Yes, but I don't think that goes against what I said
 24 earlier --
 25 Q. No, indeed.

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1 A. -- showing the earlier -- the early signs of change.
 2 Q. Paragraph 8.3.5, please {DC5322/37}.
 3 "Overall it appears that Brother 2's risk of
 4 extremism became exacerbated whilst in custody and
 5 through his observed behaviour, Brother 2 raised
 6 multiple concerns to staff about his ongoing risk in the
 7 community."
 8 Now, what that's about is the fact that Brother 2
 9 comes into prison having committed an offence that got
 10 him a 16-year sentence with a 5-year extended licence,
 11 and then according to this analysis, got worse in
 12 prison.
 13 A. They're certainly suggesting that. As it's a risk
 14 assessment as opposed to a definitive statement, I don't
 15 think it's wrong, I think, as described earlier, prisons
 16 for some people, it does bring them into contact with
 17 many more risky people, which in turn can increase their
 18 own risks.
 19 Q. Yes. Like Abu Hamza or Charles Bronson, or the others
 20 we've heard mentioned?
 21 A. Less so with them because they're kept separately, but
 22 more so for people in general locations where you have
 23 100 plus people on a wing.
 24 Q. Ms Cechaviciute, who wrote that, said that she toned
 25 down some of her language, she has got a witness

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1 statement, and said she toned down some of her language
 2 in the ERG, because that goes to Brother 2. She said
 3 she put other entries elsewhere. Can I just go to her
 4 witness statement, {WS5070/1}, and then at paragraph 18,
 5 please {WS5070/6}. So:
 6 "On 15th March 2018, I attended
 7 a [counter-terrorism] Case Management System meeting and
 8 updated attendees on the ERG... The log records '[Usman
 9 Khan] is due to be released in December 2018, he has
 10 been referred to MAPPA with approved premises in
 11 Stafford. [Ieva Cechaviciute] informed the committee
 12 that her report will show that Brother 2 has made little
 13 progress whilst in prison, he doesn't understand his own
 14 risk, and being in prison has made him a greater risk
 15 than before by elevating his profile, he still refuses
 16 to accept responsibility for his crime'. "
 17 That is a pretty stark conclusion of Brother 2 as
 18 of March and April 2018, isn't it?
 19 A. Yes.
 20 MR ARMSTRONG: Now, one of the things that we know, and
 21 I might need to go to this, I may not go to this,
 22 I'm very conscious of time.
 23 Sir, can I indicate, I think I'm getting there but
 24 I may need 15 minutes or so.
 25 JUDGE LUCRAFT: Well, I know that the witness is going to

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1 have to be back tomorrow, Mr Armstrong, so what I would
 2 suggest we do is let's perhaps deal with a topic and
 3 we'll break and pick up in the morning.
 4 MR ARMSTRONG: Yes, okay. Thank you very much. I'm sorry,
 5 I'm being slightly longer than I expected.
 6 The ERG, this process, this is the Extremism Risk
 7 Guidance process of structured decision-making, sits
 8 with other bits of structured decision-making and risk
 9 assessment, including the OASys?
 10 A. Yes.
 11 Q. And the OASys, as you know, is the offender system
 12 assessment process, is what it means.
 13 A. Yes.
 14 Q. Can I just -- at the moment I don't need to go to this
 15 document, but there is guidance that confirms that. In
 16 2012, can we just bring up {DC5653/36}. Then we've got
 17 to go to page 36. Yes. Now if you just look at that,
 18 one of the things that the OASys does is confirm the
 19 Prison Service's view of the likelihood or the
 20 probability of serious harm to others, and if you see
 21 the table at the bottom there, in relation to the full
 22 risk of serious harm analysis for Brother 2 in 2012, to
 23 risk to the public in the community is put at
 24 "very high".
 25 A. Yes, I see that.

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1 Q. Yes? If we now go to the same assessment process, which
 2 takes place reasonably regularly, can we go to
 3 {DC5663/54}, and you see this is from 27 December 2018,
 4 so three days after he is released, it is still
 5 recording his likelihood of serious harm to others in
 6 the community as being "very high"?

7 A. Yes.

8 Q. Now, this is a process that goes on, and it deals with
 9 a number of matters, but this is the prison system's way
 10 of assessing risk, it sits with the ERG, and that's its
 11 conclusion. If we look at {DC5663/47} of the same
 12 document, please.

13 JUDGE LUCRAFT: Mr Armstrong, the one thing we have to
 14 remember about this is the date in the top right-hand
 15 corner is the date the document was printed rather than
 16 the date it was created?

17 MR ARMSTRONG: Absolutely. Thank you. I'm grateful, sir.
 18 Yes, it's not from February 2020.

19 JUDGE LUCRAFT: No. That's probably when it was printed.

20 MR ARMSTRONG: But if we look at, is this page 47? Can I go
 21 to the second half of this page, please. These matters
 22 are defined, so just up from the bottom, "high risk of
 23 serious harm" is:
 24 "There are identifiable indicators of risk. The
 25 potential event could happen at any time and the impact

1 would be serious."
 2 So that's pretty bad. But "very high risk of
 3 serious harm" is:
 4 "There is an imminent risk of serious harm. The
 5 potential event is more likely than not to happen
 6 imminently and the impact would be serious."
 7 So at the time of his release, just like it has been
 8 for at least the last six years, Brother 2 is assessed
 9 as regarding an imminent risk of serious harm, it will
 10 be serious, it could happen at any time?

11 A. Yes.

12 Q. Now, I'm just going to go briefly to some guidance, and
 13 I'm going to go, just to illustrate this, this is
 14 {DC7447/1}. Some of this guidance, I should explain for
 15 the benefit of the jury, some of this will be blacked
 16 out, but I will talk in very general terms about
 17 a little bit about what it contains without putting it
 18 on the screen, there are reasons for that.

19 If we could just go to page 4, please, that first
 20 bit is under "Extremism Risk Guidance":
 21 "ERG was developed to support the OASys assessment
 22 as OASys on its own is insufficient in regard to
 23 assessing risk and need with this offender population."
 24 So that's the point we discussed before. The ERG
 25 and the OASys run together for these purposes?

1 A. Yes.

2 Q. Could we just go to {DC7447/7}, please. I think
 3 I'm going to need to go below that, "Were others
 4 involved?":
 5 "This is a key section. Try to establish whether
 6 group influence played a part in the offence."
 7 We know that Brother 2 offended within a group.
 8 "Was there coercion? Did they..."
 9 And then in the next paragraph:
 10 "In the area, it is important if possible to note
 11 the offender's role within the group and their
 12 relationship to the other group members/co-defendants.
 13 Is there evidence of either a leadership or follower
 14 role for the offender?"
 15 Those are the sorts of issues that we've seen within
 16 the context of the offence, but also we've seen
 17 a leadership role for Brother 2 on the wing, haven't we?

18 A. Through the intelligence, I didn't actually see him as
 19 a leader myself, so that intelligence about him being
 20 the emir, our own assessment was that it was others.

21 Q. All right.

22 A. But I do agree with the general --

23 Q. The whole cause(?).

24 A. Yes.

25 Q. Indeed. {DC7447/9}, please:

1 "Emotional state of the offender: Was the offender
 2 driven by strong feelings of anger, anxiety or
 3 frustration associated with their sense of grievance or
 4 injustice?"
 5 We've seen with Brother 2 a sense of what happened
 6 to him in childhood. Some of that may not be true, but
 7 there is evidence in his case of grievance thinking,
 8 isn't there?

9 A. Yes.

10 Q. {DC7447/11}, now, this is going to be a blacked out
 11 section. In that first blacked out section, take it
 12 from me that one of the things that that refers to in
 13 general terms is the consequence of not living up to
 14 academic expectations. That's an issue, or could be
 15 an issue, in the context of the University of Cambridge,
 16 if he doesn't get to where he wants to get.

17 A. Yes.

18 Q. Top of page -- I'll just go to top of {DC7447/12},
 19 please.

20 JUDGE LUCRAFT: Once we've done this part it may be we just
 21 take a pause.

22 MR ARMSTRONG: I -- yes. Thank you.
 23 That entry has something to do with comparison with
 24 siblings. Some people get -- extremism is linked to
 25 factors which include comparing yourself to your

1 siblings and coming off worse. Brother 2, so far as we
 2 know, is the only person who has offended within his
 3 family and may feel -- we don't know -- that he needs
 4 to -- he doesn't compare well with his brothers or
 5 others in his family.
 6 A. Mm--hm.
 7 Q. Yes. Page 14, please {DC7447/14}. This is an entry,
 8 again blacked out, there's an entry here about rigid
 9 thinking. You will know that a big part of extremism
 10 offending is about rigid thinking, seeing things in
 11 an us--and--them black--and--white sense?
 12 A. Yes.
 13 Q. Not moving from that position. If it is right, as we've
 14 seen in some of these examples, that Brother 2 never
 15 shifts far from believing that he did very little wrong,
 16 he is right, it's just the world not understanding him,
 17 that would be a sense -- that would be an example of
 18 rigid thinking?
 19 A. That would be one example, yes.
 20 Q. Thank you. And finally just {DC7447/15}, and this is
 21 now open. Unsurprisingly, there is material here about:
 22 being involved in hate--based behaviour; displaying any
 23 offence--related behaviour observed in the custodial
 24 setting; establishing links or associations; links with
 25 extremist -- this is at the bottom. Has the offender

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1 kept links with extremist associates whilst in custody,
 2 security information to suggest that they are associated
 3 with other TACT offenders, and then there are things
 4 about correspondence and there is also material below
 5 that about extremist material. All of that at one time
 6 or another turned up in the intelligence about Brother
 7 2.
 8 A. Yes.
 9 Q. And, I don't think -- being very fair, Mr Machin,
 10 I don't think you're going to push back on me in
 11 relation to any of this; all of that goes to support
 12 that the OASys rating of him being very high risk of
 13 harm and imminent risk of harm, and the ERG assessment
 14 that he may even be as low down as the pre--contemplation
 15 stage of change is consistent with the guidance and
 16 makes him a very, very concerning proposition right up
 17 until the time that he becomes free in December 2018.
 18 A. Which is why those decisions --
 19 Q. Which is why you were as concerned as you say you were
 20 about him?
 21 A. Yes.
 22 MR ARMSTRONG: Thank you very much.
 23 Sir, that is as far as I need to go today.
 24 I haven't got much more to deal with, but I've got
 25 a little .

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1 JUDGE LUCRAFT: Very good.
 2 Mr Machin, we'll pick up tomorrow. I'm conscious
 3 you have been giving evidence for quite some time, I'll
 4 just remind you, so tomorrow morning if you wish to
 5 remain standing, that's fine, but if you want to take
 6 a seat at any time, please don't feel you need to ask;
 7 you may do --
 8 A. No, thank you, it's better for my back if I stand,
 9 that's why.
 10 JUDGE LUCRAFT: Thank you.
 11 Ladies and gentlemen, we'll meet again tomorrow
 12 morning, please, for 10 o'clock. Thank you.
 13 (In the absence of the jury)
 14 I'm intrigued to see which of you is right about the
 15 pronunciation of the psychologist's name, but we'll find
 16 out.
 17 MR ARMSTRONG: I got that from one of the counsel for the
 18 Secretary of State.
 19 MR HOUGH: I'm confident that Mr Armstrong is more likely to
 20 be right.
 21 Sir, I just wanted briefly to address the timetable,
 22 and nothing I say is a comment on any advocate, it's
 23 just to set out what we have in the next two days.
 24 After Mr Machin, we have Georgina Butler, Joanne
 25 Boulton, William Styles, and Julia Nix. We have it in

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1 mind to get through those witnesses by Friday lunchtime.
 2 JUDGE LUCRAFT: Yes.
 3 MR HOUGH: Friday is a slippage day, but I understand the
 4 court can't sit beyond lunchtime that day.
 5 JUDGE LUCRAFT: I can't, I am afraid, Mr Hough. I've got to
 6 be dealing with another case at the Old Bailey on Friday
 7 afternoon, so we will rise at 1 o'clock, or thereabouts,
 8 on Friday.
 9 MR HOUGH: So we are hoping that with cooperation from
 10 everybody, and bearing in mind that with these witnesses
 11 Ms Leek needs some time as well --
 12 JUDGE LUCRAFT: Yes.
 13 MR HOUGH: -- that we can make -- we can fit those witnesses
 14 into those days without putting them off and putting
 15 further periods of the timetable under strain.
 16 I raise these matters not, as I say, as a matter of
 17 arid concern, but because keeping people in their places
 18 in the timetable is important both to the management of
 19 the Inquest and for the feelings and commitments of the
 20 various witnesses.
 21 JUDGE LUCRAFT: I'm sure, Mr Hough, everyone understands
 22 that by and large the people who are coming to give
 23 evidence are in fairly senior positions and they have
 24 many other responsibilities, and I'm sure everyone will
 25 do their very best to make sure that we stick to the

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1 timetable.
 2 So I repeat my point, which I know Mr Armstrong and
 3 Mr Pitchers have been very good about, which is not
 4 going over the same territory, either that you have gone
 5 over, unless it's to deal with a supplementary point or,
 6 indeed, going over territory that one of them has gone
 7 over already, and I know that that's been applied --
 8 MR HOUGH: We are well aware, for example, that Mr Armstrong
 9 has to put certain points to the first prison witness,
 10 which may not need to be put many times again.
 11 JUDGE LUCRAFT: No.
 12 MR HOUGH: So ultimately, if we get into difficulties, the
 13 course I may adopt is to ask Mr Moss to take time
 14 estimates from each advocate and then see if they can be
 15 used to be more precise in timetabling each witness.
 16 JUDGE LUCRAFT: Yes.
 17 MR HOUGH: Obviously we would prefer to be a little more
 18 informal, but that is the course we will take.
 19 JUDGE LUCRAFT: The other thing I think we must all remember
 20 is that we've got a jury listening to the evidence; that
 21 much as otherwise one could have very long days,
 22 I'm acutely aware that actually that can be
 23 counterproductive sometimes with the jury missing -- and
 24 the point I really made to Mr Armstrong the other day
 25 and repeated this afternoon, is that he shouldn't feel

1 that he's got to rush through significant material, but
 2 equally if it is significant, the jury need to be able
 3 to follow it.
 4 MR HOUGH: Thank you, sir.
 5 MR ARMSTRONG: I'm grateful. And I'm grateful for the
 6 flexibility as well from you both.
 7 JUDGE LUCRAFT: I'll rise.
 8 (4.37 pm)
 9 (The court adjourned until 10.00 am on
 10 Thursday, 29 April 2021)
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